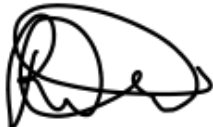




# Multi Trades Training

## Prevent Policy & Action Plan

Review Date: August 2024

<b>Approved by</b>	RK Jones	<b>Position</b>	Director
		<b>Date</b>	15 <sup>th</sup> June 2023

### Document Control

Date	Review & Revision	By
01/09/2022	Added reporting changes RecordMy	Quality Lead
26/01/2023	Added Martyns Law	Quality Lead
15/06/2023	Updated West Midland coordinator to Alamgir Sheriyar <a href="mailto:alamgir.sheriyar@education.gov.uk">alamgir.sheriyar@education.gov.uk</a>	Quality Lead

## Prevent Policy & Action Plan

### Context

This document defines the Prevent Policy for Multi Trades Training, in response to the Counter Terrorism Strategy (CONTEST) (revised 2018), the Counter Terrorism Act (2015) and the Counter Terrorism and Border Security Act 2019 and the national statutory duty to have due regard to the need to prevent people from being drawn into terrorism.

This policy is revised in January 2023 to acknowledge the changes announced by the government on 19<sup>th</sup> December 2022 and the announcement of the Protect Duty, or Martyr's Law.

The new duty will require venues to take steps to improve public safety, with measures dependent on the size of the venue and the activity taking place. The announcement that the duty will apply to premises where 'qualifying activities' take place of which education is one. The duty will follow a tiered model linked to the activity that takes place at a location and its capacity, the standard tier applying to premises where there is a maximum capacity of over 100 people.

Multi Trades Training (MTT) delivers its apprenticeship training and workshops on a small scale usually one-to-one or in small groups of six to eight participants and therefore considers itself exempt, but will exercise all aspects of this policy to protect and prevent our staff and learners from threat. For more information on the new duty please visit:

<https://www.gov.uk/government/news/martyns-law-to-ensure-stronger-protections-against-terrorism-in-public-places>

This policy also covers MTT staff who may be vulnerable to radicalisation and violent extremism or have concerns about other members of staff being involved in terrorist activities. Prevent continues to be one of the four "P" work strands of the Government's Counterterrorism

### Strategy CONTEST led by the Home Office.

- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Pursue:** to stop terrorist attacks.
- **Protect:** to strengthen our protection against a terrorist attack.
- **Prepare:** to mitigate the impact of a terrorist attack.

The CONTEST strategy was updated in 2018 following the findings from a review of all aspects of counter-terrorism and to future-proof the strategy in its response to heightened threats. In order to deliver the Prevent agenda, three national objectives were identified within the CONTEST Strategy 2011:

- **Objective 1:** respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- **Objective 2:** prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- **Objective 3:** work with sectors and institutions where there are risks of radicalisation which we need to address.

These were revised in 2018 CONTEST Strategy, which takes a risk reduction model approach to Countering Violent Extremism, to: -

- Tackle the causes of radicalisation and respond to the ideological challenge of terrorism.
- Safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support.
- Enable those who have already engaged in terrorism to disengage and rehabilitate.

### **Purpose**

The purpose of this policy is to enable MTT to demonstrate how it meets its corporate accountability in meeting the duties under the Counter Terrorism Act 2015 and how we follow national guidance and promote best practice in relation to Prevent and Channel processes.

This policy is in four parts

1. MTT Prevent Policy
2. MTT Prevent Action Plan
3. Appendix 1: Glossary
4. Appendix 2: sets out internal reporting of concerns

### **Scope**

This policy underpins the commitment of the directors of MTT in ensuring that staff and learners are respected, protected, and supported to the best of their ability.

The principles in this document will provide support, advice, and guidance to MTT in discharging its Counter Terrorism (Prevent) duties and responsibilities. It will alert staff to their Prevent Responsibilities through early identification and appropriate information sharing and referral.

The purpose of Prevent is to safeguard and support vulnerable people to stop them from becoming terrorists or supporting terrorism. Prevent works in a similar way to programmes designed to safeguard people from gangs, drug abuse, and physical and sexual abuse.

Therefore, this Policy sits alongside MTT's Safeguarding Policy. As such, all staff should read this policy, undertake mandatory training to the appropriate competence level and will be referred to in safeguarding training.

**Note:** The policy applies to all staff working within MTT, whether employed, contracted or on a voluntary basis.

## **The Prevent Duty**

Section 26 of the Counter-Terrorism and Security Act 2015 ('CTSA Act') places a duty on the Company, in the exercise of its functions, to have:

*“due regard to the need to prevent people from being drawn into terrorism”.*

This is known as the Section 26 of the Counter-Terrorism and Security Act 2015 ('CTSA Act') places a duty on the Company, in the exercise of its functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent Duty.

The term “due regard” as used in the CTSA Act means that the Company should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when it considers all the other factors relevant to how it carries out its usual functions and activities.

Terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them.

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. We also include in our definition of extremism, calls for the death of members of our armed forces.”*

The Prevent strategy deals with all forms of terrorism and with non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. It also made clear that preventing people becoming terrorists or supporting terrorism requires challenge to extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist- related activity.

MTT has implemented its Prevent-related responsibilities in a proportionate and risk-based way. All employees should demonstrate an awareness and understanding of the risk of radicalisation. The risk will vary greatly and can change rapidly; but no area, institution or body is risk free.

The Prevent Duty is not about preventing individuals from having political and religious views and concerns, but about supporting our adults to use those concerns or act on them in a non-extremist way.

Prevent is an important element within our safeguarding policy and processes. Prevent is focused on safeguarding adults and encourages a learning environment where issues can be raised and discussed safely, whilst ensuring that apprentices and employees are resilient to extreme narratives.

### **The Prevent strategy is driven by:**

- Ensuring British Values are promoted and are embedded within employability and skills programmes
- Maintaining IT policies that are robust and can deal effectively with potential online risks from extremist organisations, through appropriate use of firewalls and monitoring usage
- Apprentices, learners, staff and other stakeholders may become at risk of being drawn into terrorism. In particular, all employees should be aware of the glossary in Appendix 1 and the relationship between extremism and terrorism:

The Prevent duty does not and must not involve any covert activity against people or communities. The Company may however need to share personal information to ensure, for example, that a person at risk of radicalisation is given the appropriate support.

Information sharing is assessed on a case-by-case basis and is governed by legislation and the following principles:

- **Necessity and Proportionality:** Personal information should only be shared where it is strictly necessary to the intended outcome and proportionate to it. Key to determining the necessity and proportionality of sharing information will be the professional judgment of the risks to an individual or the public
- **Consent:** Wherever possible the consent of the person concerned should be obtained before sharing any information about them
- **Power to share:** The sharing of data by MTT requires the existence of a power to do so, in addition to satisfying the requirements of the General Data Protection Regulations 2018 and Human Rights Act 1998;
- **Confidentiality:** MTT should be aware of any confidentiality obligations that exist.

### **British Values**

MTT actively promotes the fundamental British values of:

- **Democracy** ; an understanding of how citizens can influence decision- making through the democratic process
- **The rule of law;** an appreciation that living under the rule of law protects individual citizens and is essential for wellbeing and safety
- **Individual liberty;** an understanding that the freedom to choose and hold other faiths and beliefs is protected in law
- **Mutual respect;** an acceptance that other people having different faiths or beliefs (or having none) should be accepted and tolerated, and should not be the cause of prejudicial or discriminatory behaviour
- **Tolerance** of those with different faiths and beliefs - an understanding of the importance of identifying and combatting discrimination.

Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Employees should not promote or tolerate views or theories as fact which are contrary to established scientific or historical evidence and explanation. The aim is to improve safeguarding and standards of spiritual, moral, social and cultural development, and to strengthen barriers to extremism.

The British Values and Prevent duty to relate to the Equality Act 2010 as we seek to:

- Eliminate unlawful discrimination, harassment or victimisation
- Advance equality of opportunity between people who share a protected characteristic, and those who do not
- Foster good relations between people who share a protected characteristic, and those who do not.

## Definitions

- **Radicalisation:** is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.
- **Terrorism:** an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion, ideology or social class.
- **Extremism:** an ideology that is far outside the mainstream attitudes of society, including, 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.

## Legal Framework

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children, young people and vulnerable adults.

We fulfil our responsibilities through the following hyperlinks:

- [Keeping Children Safe in Education 2021](#)
- [Counter Terrorism Strategy \(CONTEST\) 2018.](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Prevent Duty Guidance](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Equality Act 2010](#)

## Our Responsibilities

MTT acknowledges that members of staff are not specialists in recognising where abuse or radicalisation may occur or has already taken place. However, it expects everyone to adopt, support and promote this policy to the best of their ability.

The policy is supported by our commitment to training staff during regular, internal meetings, accessibility of policy and support documents, and a company-wide promotion of safeguarding and Prevent awareness.

The lead role for safeguarding incorporates the lead responsibilities for Prevent and this is undertaken by the DSL. The responsibilities include:

- Providing strategic leadership for Prevent.
- Ensuring the MTT's statutory Prevent functions are met.
- Ensuring that all staff have access to training, support and reporting information.

When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL.

## Linked Policies

- Safeguarding
- Health & Safety
- Safe & Acceptable Use of IT Policy
- British Values Policy

## **Recognising Risks and Vulnerabilities of Radicalisation**

It is not the responsibility of MTT to decide whether or not abuse or radicalisation has taken place. We train our staff to implement the contents of this policy in their interactions with learners and we are all aware of the responsibility to act when there is any cause for concern.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

The risk of radicalisation is the product of several factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. The risk may be combined with other vulnerabilities or may be the only risk identified.

Safeguarding and prevent indicators for concern can include but are not limited to:

- Withdrawal from family and friends, or changing circle of friends
- Hostility towards others
- Talking as if from a script
- Being unwilling to discuss their views
- Increased levels of anger
- Being secretive, particularly around what they are doing on the internet
- Using extremist terms to exclude people or incite violence
- Expressing the values of extremist or terrorist organisations (including political or religious based grievances)
- Supporting violence and terrorism towards other cultures, nationalities, or religions
- Writing or creating artwork or graffiti that promotes extremist values
- Talking about being a 'martyr'
- Possession of extremist literature or other material, or trying to access extremist websites
- Possession of any material about weapons, explosives, or military training

## **How the Policy is implemented**

We will value, respect and listen to all apprentices, learners and staff.

**Staff training:** All new staff have to complete the Prevent training as part of their induction programme and then complete refresher training every year. This is recorded as CPDs and is included in the appraisal and performance management process.

## **Reporting**

Where staff are concerned about a learner's risk, reporting via the platform 'Recordmy' will alert the safeguarding team who will agree actions and interventions. In extreme cases, where a referral is made directly to an external organisation, the actions will be recorded in Recordmy.

**Learner awareness:** Delivery staff talk about safeguarding and prevent issues when meeting with apprentices for learning delivery and progress reviews.

**Actions:** Any influences of extremism leading to radicalisation will be reported to the Safeguarding Officer or appropriate public authorities.

With specific reference to Prevent, staff will:

- Respond to indications of ideological challenge of terrorism and the threat faced by those who promote it
- Report concerns to enable people from being drawn into terrorism and get appropriate advice and support from relevant specialists
- Identify sectors and institutions where there are risks of radicalisation that need to be addressed.
- Be aware of the Prevent Duty Guidelines in England and Wales; March 2015.
- Be aware of and implement data protection guidance.

**Successful application of this Policy depends on:**

- a) Responsibility; everyone must play their part in safeguarding and Prevent
- b) Coordination and proportionality; action should be appropriate to the situation
- c) Empowerment; understanding the action that should be taken and how to take it
- d) Prevention; take action before harm occurs
- e) Protection; be aware of risk and reporting arrangements
- f) Accountability; ensure roles and lines of accountability are clear
- g) Procedures; accessibility and familiarity with procedures and policies
- h) Training; induction and regular training for all staff.

**Online Monitoring**

MTT cannot monitor student engagement with its systems, as all apprentices and learners use their own, personal or the employer provider IT equipment to carry out the learning required of their specific qualification or standard.

As MTT is committed to online safety for our learners, we actively promote the 'Safe & Acceptable Use of IT Policy' for learners, and this is discussed at delivery and review. As we are unable to access the personal computers or servers to monitor the IT usage by the apprentices, we aim to educate all learners and staff to identify inappropriate or sensitive content and to know how to report anything suspicious.

**Monitoring and Oversight**

The Designated Safeguarding Lead or Deputy with support from senior managers, will review and agree support or intervention required on a case-by-case basis, and review lessons learned.

All is in the strictest confidence, and where appropriate, anonymised for the purpose of discussion.

Lessons learned are shared with the wider team as part of our commitment to continuous improvement. Anonymised data and areas requiring further detailed guidance are shared with senior managers and the Governance Board for monitoring, guidance, and review of the effectiveness of the Policy. For welfare issues, the Learner Governors are not included in this process.

**Review**

This policy will be monitored annually to review its effectiveness and will be updated in accordance with necessary changes/guidelines and in consultation with DfE HE/FE Prevent Coordinator and to ensure it continues to meet our needs and those of our Regulators i.e., Awarding Organisations (NOCN Cskills Awards), ESFA (Education & Skills Funding Agency) and external stakeholders.



## **Contact Information**

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E: [info@mttraining.co.uk](mailto:info@mttraining.co.uk)

## Prevent Action Plan

1. If a member of staff has concerns that a member of the public or another member of staff as either possibly being vulnerable to extremism or radicalisation; or has been or is in the process of being radicalised, then the Prevent Lead must be contacted, following discussion with your line manager, to ensure appropriate support is provided to that person.
2. If the Prevent Lead or deputy is not available, please download and complete the online form from your local police force (internet search police– prevent reporting) and email the referral to the nominated email address and copy in the MTT Prevent Lead in.

This process can be summarised as **Notice, Check, Share**

- **Notice:** A recognisable change
  - **Check:** Check your concern with your designated safeguarding lead, other family member, friend, employer, tutor, assessor to see if they share your concerns and if other information comes to light. Discuss your concerns i.e., what was said, who said what, and their general demeanour and behaviour
  - If an immediate concern, call 999 and report
  - **Share:** if no immediate risk, speak to the MTT Prevent lead or the local Police Prevent team
3. Children, adults at risk or adults with children identified as being vulnerable to radicalisation should be referred to the relevant Local Authority safeguarding team for triage. (Follow the MTT Safeguarding policies for details on how to contact the local authority)
  4. Staff members who think they may have cause for concern, or are unsure are unsure of the severity of the Prevent case, would seek advice from our own MTT Prevent Coordinator, Craig Barwick email [craig.barwick@mttraining.co.uk](mailto:craig.barwick@mttraining.co.uk) Telephone contact number 07437 114 514, or Rob Jones, email [rob.jones@mttraining.co.uk](mailto:rob.jones@mttraining.co.uk) Telephone contact number 07733 171 338. Raise non-urgent concerns in the platform 'Recordmy' as well as record external referrals.
  5. If an urgent response is required in the event of the Prevent lead's absence, please email the above address. The guiding principle should always be to report concerns through normal procedures so that an informed judgement can be made within the context of all available information.
  6. If the Recordmy case log reported a Prevent concern, we would contact the relevant local FE/HE Prevent Coordinator for the geographical location of the apprentice:
    - **South East:** Alamgir Sheriyar email: [Alamgir.sheriyar@education.gov.uk](mailto:Alamgir.sheriyar@education.gov.uk) Telephone: 07468 714 372
    - **South West:** Cheri Fayers, email: [Cheri.fayers@education.gov.uk](mailto:Cheri.fayers@education.gov.uk) Telephone: 07392 135 873
    - **London:** Jennie Fisher [Jennie.fisher@education.gov.uk](mailto:Jennie.fisher@education.gov.uk) Telephone: 07880 469 588
    - **Eastern England:** Contact: Dave Layton-Scott email: [david.layton-scott@education.gov.uk](mailto:david.layton-scott@education.gov.uk) Telephone: 07384 452 155
    - **East Midlands:** Sam Slack email [sam.slack@education.gov.uk](mailto:sam.slack@education.gov.uk) Telephone 07384 452 156

- **West Midlands.** Alamgir Sheriyar [alamgir.sheriyar@education.gov.uk](mailto:alamgir.sheriyar@education.gov.uk) Telephone: 07785 654 148
- **North East & Yorkshire:** Chris Sybenga [Chris.sybenga@education.gov.uk](mailto:Chris.sybenga@education.gov.uk) Telephone: 07384 456 640
- **North West:** Nigel Lund [Nigel.LUND@education.gov.uk](mailto:Nigel.LUND@education.gov.uk) Telephone: 07384 452 146
- **Head of the FE and HE regional delivery networks (Prevent and Counter-Extremism)**  
Contact: Chris Rowell, email: [chris.rowell@education.gov.uk](mailto:chris.rowell@education.gov.uk) Telephone: 07384 872 518

(Source: Government website: <https://www.gov.uk/guidance/regional-further-education-fe-and-higher-education-he-prevent-coordinators>)

7. Information on reporting possible online terrorist activity can be obtained from the Home Office website [Reporting online Terrorism](#)
8. Once a referral has been made via the Police referral mechanism, a multi-agency channel panel will determine if it meets the threshold for it to be submitted to a formal multi-agency process. For more information and access to the form please go to your local Police force's web page.
9. A Prevent referral should be made when a person who has either expressed a desire to travel to conflict zones, or expressed an association to individuals known or thought to have travelled to conflict zones or have themselves travelled to conflict zones. If a referral is required, please inform the Prevent lead who will contact the HR team so appropriate support can be provided.

## Appendix 1 - Glossary

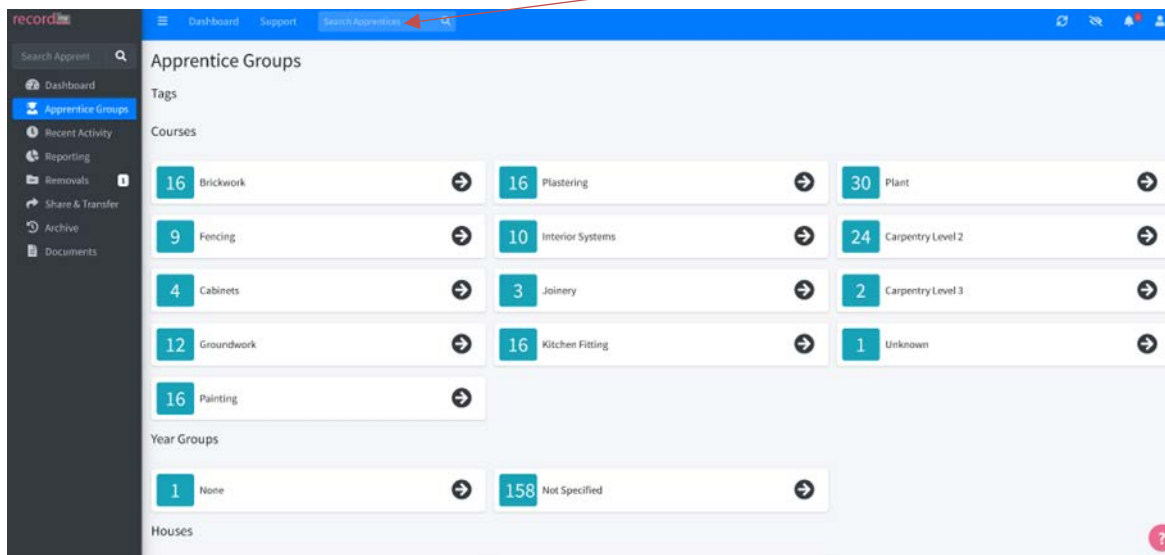
Term	Meaning
Having due regard	We should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when we consider all the other factors relevant to how we carry out our functions.
Extremism	defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.
Interventions	are projects intended to divert people who are drawn into terrorist activity. Interventions can include mentoring, counselling, theological support, encouraging civic engagement, developing support networks (family and peer structures) or providing mainstream services (education, employment, health, finance or housing).
Non-violent extremism	is extremism, as defined above, which is not accompanied by violence
Prevention	reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
Radicalisation	the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
Safeguarding	the process of protecting vulnerable people, whether from crime, other forms of abuse or (in this context) from being drawn into terrorist-related activity.
Terrorism	defined by the Terrorism Act 2000, an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Terrorist -related offences	those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.
Vulnerability	describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent the word describes factors and characteristics associated with being susceptible to radicalisation.

## Appendix 2

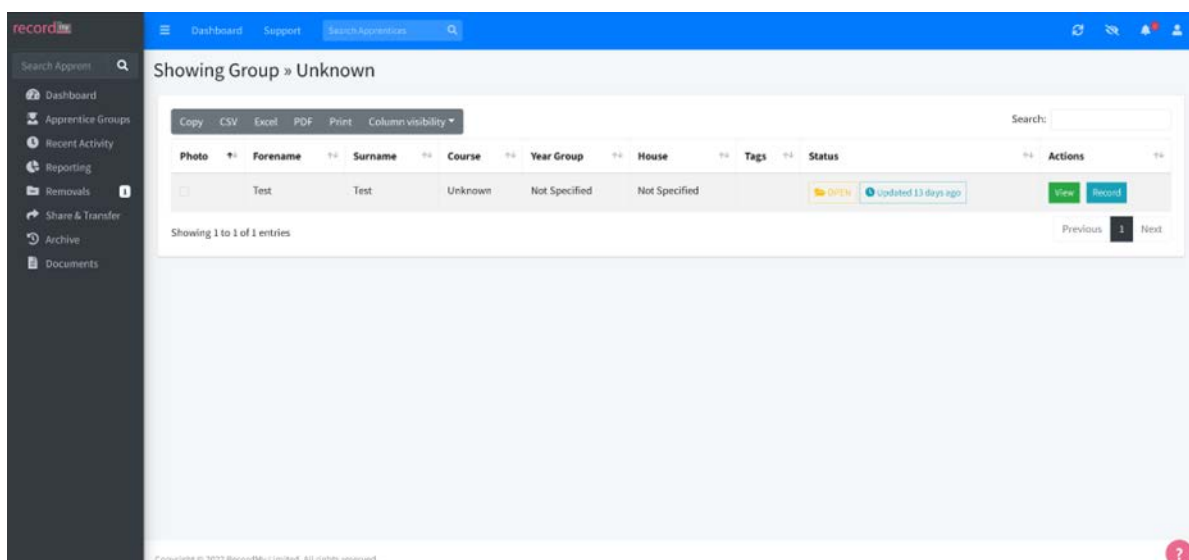
### Reporting

MTT uses the Safeguarding platform RecordMy. All tutors and Skills Coaches have access and can raise a concern or report.

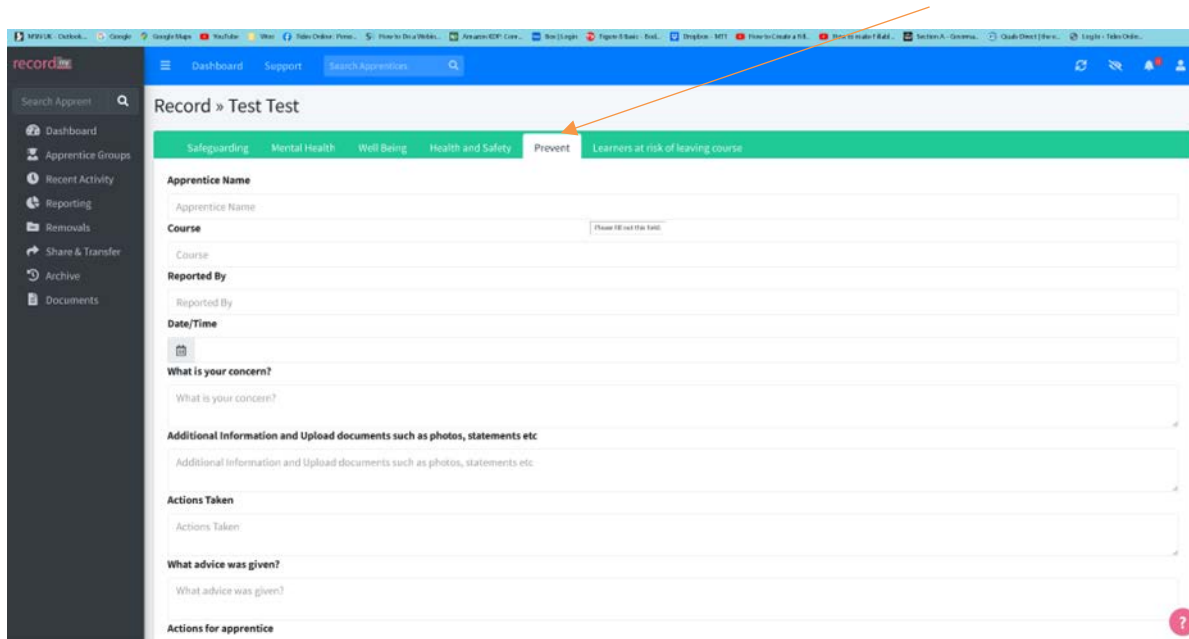
To make a report select the learner by cohort, or by searching here.



Once the learner is selected you will see this screen and then select RECORD



Once open, select the appropriate form from the selection along the top.



Then just complete the prepopulated form, add any files necessary via the 'Add Files' tab.



Save and report by hitting the 'RECORD' button and upon submission, the Safeguarding Support team will be notified.