

PREVENT POLICY

Statement

The Counter-Terrorism and Security Act 2015 places an obligation on education and training providers to have due regard for the need to prevent people from being drawn into terrorism. This is known as the Prevent duty. At Pier Training, we are fully aware of our legal responsibility to fulfil this responsibility by ensuring that we have robust procedures in place. The statutory guidance [Prevent duty guidance: for higher education institutions in England and Wales](#) is used by Pier Training to ensure this policy and procedures are robust and fit for purpose.

The aim of the company's Prevent policy is to provide an environment where all can work safely. Pier Training will take every reasonable precaution to minimise risk while providing demanding, challenging, and enjoyable training and development activities, at our own premises and the premises of our employers and clients.

Pier Training will actively promote Prevent in all aspects of its work including teaching and learning sessions and resources, employer engagement sessions and staff training days. Our aim is to provide an environment where all individuals work towards achieving their full potential with a feeling of safety and achievement.

Partnership and Contacts

Pier Training is committed to working with [Regional further and higher education Prevent co-ordinators](#) as they play a key role in supporting us in the delivery of Prevent, providing support to build resilience against the dangers of radicalisation. The regional Prevent education coordinators - GOV.UK website is used by staff for training, updates, guidance and support materials, and for the DSO to make a referral.

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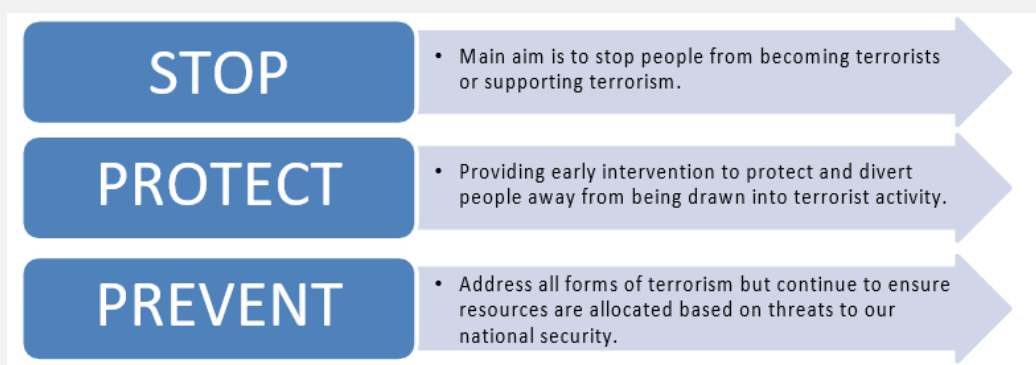
West Midlands Regional Prevent Coordinator

Contact form: [Regional Prevent Education Coordinators](#)



Radicalisation and Extremism

"Radicalisation is a process which somebody goes through in order to become involved in extremist activities or terrorism, from a starting point of having no particular strong opinions or being a moderate person through to holding some extremist views, and it can be a process that happens online or in meeting people, and their conversations and their opinions are gradually changed over time." (DfE 2017)



Protecting apprentices and employees from radicalising influences

Young people are susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting young people from this risk is part of Pier Training's safeguarding approach. The company recognises the vulnerability of people under and over the age of 18 and the need to prevent them from becoming terrorists or supporting radicalisation. The Prevent objective aims to safeguard apprentices and employees from any form of extremist activity and to challenge terrorism and terrorist activity.

'Extremism' is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (DFE-00247-2018)

Our policy is to guide all employees, apprentices, and their employers to enable them to practice effective Safeguarding and Prevent procedures for themselves and for those they are working with.

The resource [Explaining Prevent to staff and students in higher education - GOV.UK](#) is used as a guide of techniques and tools available to talk about Prevent with apprentices. For example, we issue a Bi-monthly Safeguarding Newsletter to regularly share information and updates about Prevent across our stakeholders. In addition, we use the Prevent Duty animation videos at induction and where appropriate at other times during the programme of delivery.

Throughout this policy and procedure, reference is made to apprentices and young people; this means those under the age of 18 years and those over 18 years of age who are considered to be particularly vulnerable for valid reasons such as disability or learning difficulties.

Due Diligence Checks for Outside Speakers

Pier Training will meet the [Prevent Duty guidance](#) regarding external speakers. Pier Training will consider whether the views being expressed by speakers, or the views likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. '[Implementing the Prevent Duty in higher education \(HE\): chief security officers](#)'

Safeguarding is crucial to ensure a safe and appropriate learning environment; therefore Pier Training carries out the following procedures and checks prior guest speakers being invited to attend any sessions:

- A background credentials check is carried out by the DSO, including qualifications, experience, ID documents, work related documents such as work ID, and a reference from any previous speaking engagements. A suitability check will also be carried out by searching across social media sites to examine any posts within the public domain that do not align with Pier Training's
- The DSO will obtain permission from the speaker to complete a [DBS CRSC](#) check using the update service.
- All materials used by the speaker including any weblinks will be assessed by the DSO before sharing with learners
- A record of guest speakers and the checks completed is kept on file
- The DSO will interview the speaker to set out clear expectations and to provide guidelines on acceptable content to ensure they understand any learner needs and sensitivities. The DSO will check that content remains balanced and impartial and free from political or extreme views.
- Tutors are required to be present during the session to monitor interactions and intervene if necessary

Main Elements of Prevent

- Providing effective regular and up-to-date training for the awareness of all aspects of Prevent and e-safety. This will equip and empower staff and young people to keep themselves and others safe.
- The development, implementation and review of the policy and effective procedures for identifying and reporting disclosures.
- Supporting young and vulnerable people who have made a disclosure.
- Ensuring where appropriate the safe use of Information and Communications Technology (ICT).

Terms of Prevent

- Pier Training vows to implement the Government's [CONTEST strategy](#). The company aims to pursue, prevent, protect, and prepare in order to effectively respond to terrorist attacks.

- Everyone has the right to freedom of speech and the freedom to have their own beliefs and ideas which Pier Training will ensure is not compromised. However, harmful and extremist ideologies will not be tolerated, especially to the safeguarding of vulnerable people.

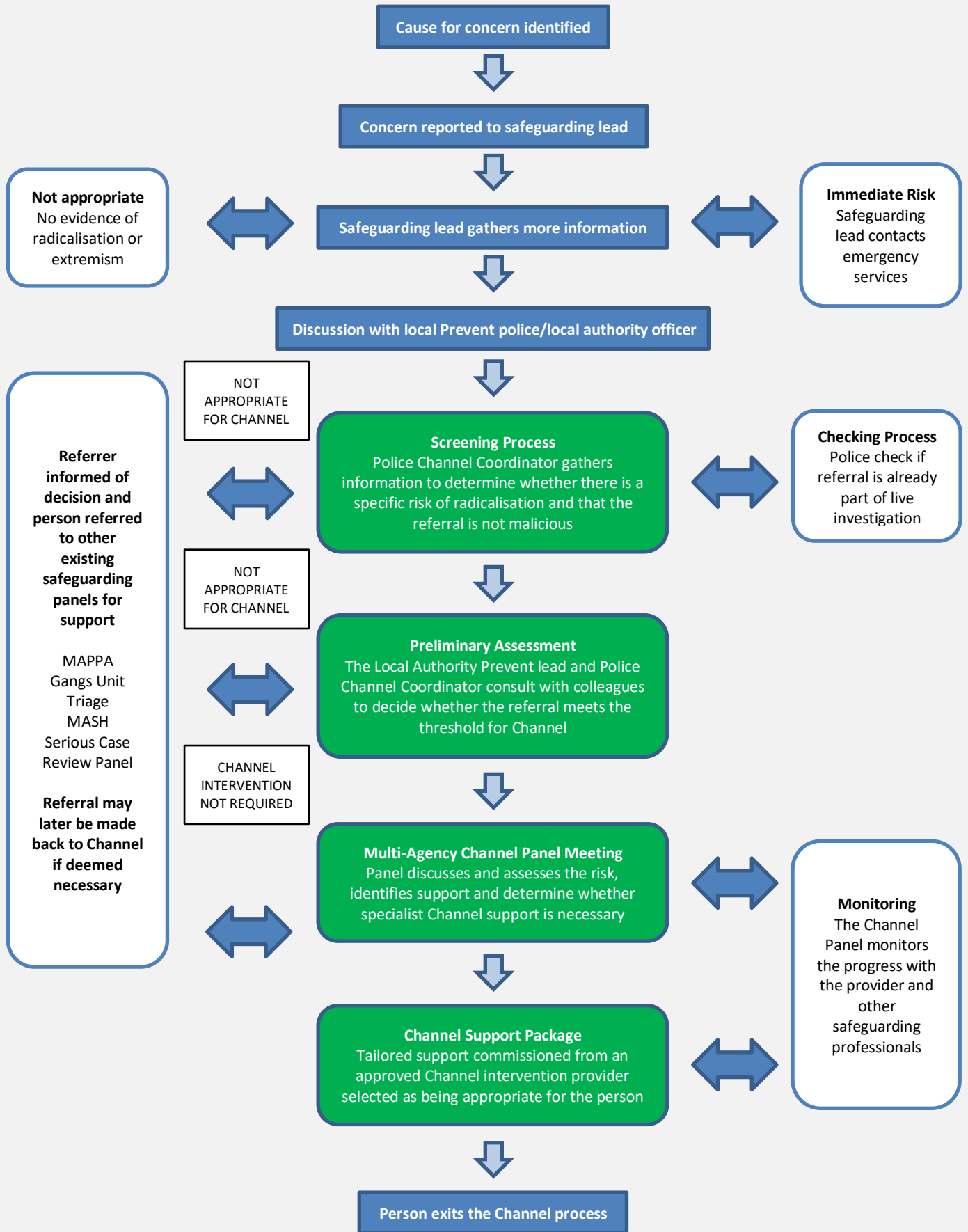
The Prevent strategy has three main objectives that Pier Training will uphold:

- Ensuring that the prevent strategy is widely understood and that effective procedures are put into place for all employees. This includes early engagement to encourage the young and vulnerable to combat and challenge all forms of terrorism.
- To take any threats of terrorism or terrorist activity seriously and carry out further investigation.
- When needs arise, to work with institutions and sectors to combat issues of radicalisation. e.g., The Channel Programme.

The Channel Programme

- Pier Training recognises the importance of Channel - a programme that is an important figure in the challenging of radicalisation in younger and more vulnerable people.
- Channel works for the welfare of the young and vulnerable and helps in providing them support. It provides a platform for fair and lawful action by assessing individual circumstances and conditions.
- Employees, as part of Pier Training, will work alongside this multi-agency and co-operate fully with them as and when there is a serious threat of radicalisation.
- Channel is made up of specific board members from the local authority who are responsible for ensuring a panel is in place for prevent and safeguarding issues.
- The police of that local authority area are included as part of the Channel and would be informed of any critical or important information.

Procedure for Channel



Responsibility

The senior management team and Directors are accountable for the execution of this policy throughout the organisation. The Designated Safeguarding Officer (DSO), Marie Woodward and the Deputy Safeguarding Officer, Angela Atkinson are responsible for providing the senior management team with information pertaining to Safeguarding and Prevent and such notifications will be addressed where required, under the Safeguarding and Prevent agenda item of all senior management team meetings.

The DSO shall ensure active compliance with this policy by all staff, apprentices, stakeholders, freelance trainers and linked employers. All staff will actively endeavour to implement this policy.

Designated Safeguarding Officer (DSO)

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Prevent Duty Self-Assessment

The [Prevent duty self-assessment tool](#) is completed annually by the designated safeguarding officer (DSO) to evaluate the impact and effectiveness of meeting the requirements of the Prevent duty and the Education Inspection Framework.

This assessment involves gathering evidence against 9 distinct areas, each with specific requirements to identify what is working well and what requires development. This involves consulting with learners, employers, and employees.

The self-assessment process is split into 3 steps:

Step 1 Evaluation	The self-assessment spreadsheet is used to appraise each question within the sections. Based upon our evidence, a rating level (1 to 4) of red, amber, green and blue (RAGB) will be used to identify the level at which we are meeting the requirements of each question (See fig 1 below).
Step 2 Action Planning	The evidence and actions identified in each section are used to identify future development needs that will address any shortcomings in areas evaluated as red or amber and which will build on and extend good practices identified in green areas. Any identified actions will be transferred to our Quality Improvement Plan (QIP) as part of the reporting arrangements and action planning for improvement.
Step 3 Summary	The final stage involves the DSO populating all the data to produce a single status measure that applies to each section. This provides 'at a glance' evaluation of Safeguarding and Prevent at Pier Training.

The overall findings are shared with the senior management team and any actions are documented within the Prevent action plan and QIP.

Assessment levels grid

RAG rating	Level	Definition
Red	4 - inadequate	There is no policy or practice in place and/or requirements of the duty and EIF are not being addressed
Amber	3 - basic	There is policy or fundamental aspects of practice in place, but they are not detailed in scope/scale, or embedded in routine practice and are insufficient to address complex or challenging environments or incidents
Green	2- business as usual	Required policy and practice are effectively embedded and staff and students are included in their development. Policies are detailed, applied across the organisation in all relevant areas of business and are supported by robust and transparent management and governance processes.
Blue	1- advanced	There is sound and effective implementation and understanding of how policy and practice work together to implement all relevant requirements of the duty and EIF to safeguard students. There is ongoing reflection of best practice, testing of impact and effectiveness and knowledge is shared across the institution and with appropriate networks and partners.

Fig 1. GOV.UK (2023)

Commitment and Promotion of this policy

The DSO is committed to ensuring that ongoing information and guidance on Safeguarding and Prevent is provided to all stakeholders. This is promoted through the Pier Training Safeguarding Newsletter, news feed alerts on the employee SharePoint site, Bud e-Portfolio news alerts and via social media posts, including active engagement in annual safeguarding awareness events.

Our policies are all readily available to all stakeholders via our website. Moreover, it is holistically interwoven throughout our daily practice via social media awareness posts, the teaching sessions and materials which are developed and used by tutors.

Staff Training and Implementing the Policy

The DSO is responsible for managing and monitoring Safeguarding and Prevent training for all employees. A record of employee training is kept on file. It is a requirement that the DSO ensures all staff receive Prevent training to equip them with the knowledge and skills to safeguard apprentices. All employees must complete Prevent training at least every two years

and attend refresher training at least annually. The DSO provides effective regular and up-to-date training during standardisation meetings for the awareness of all aspects of Safeguarding including Prevent.

The internal quality assurance team undertake regular observations of teaching and learning (OTLs). The teaching and implementation of Prevent form part of the observational requirements; and if tutors are observed not implementing this, then this is addressed as an OTL action until resolved.

Prior to enrolment, apprentices are invited to attend an information session to learn about an apprenticeship. During this session, Safeguarding and Prevent are introduced, including who an apprentice can contact if they have a safeguarding concern.

During enrolment, apprentices are taught about safeguarding and they are required to complete an induction workbook which includes the Safeguarding and Prevent policy. This is followed up by the apprentice's allocated tutor during a knowledge check session to ensure the apprentice understands the information, and the tutor will answer any questions to further promote the content of this policy.

Safeguarding and Prevent continue to be promoted throughout an apprentice's journey through teaching and learning sessions as well as bimonthly reviews. Tutors refer to the website [Further Education - Educate Against Hate](#) as a source of educational material which supports them to develop and embed practical teaching ideas into their programme of delivery which

Building resilience to radicalisation

At Pier Training, we help employees and apprentices to build resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence, be influenced, and participate in decision-making.

The tutors use real stories from the media to teach apprentices about democracy, political and social issues, how to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. This is an effective way of illustrating how to resist external pressures, including knowing when, where and how to get help.

Young people are often searching for answers to questions about identity, faith and belonging, and we have a duty to support them. Tutors work hard with apprentices to encourage personal resilience and a positive sense of identity. Using real examples and asking apprentices to deconstruct emotionally challenging situations and proposing solutions using the ABC approach often helps to foster this:

- A – an Activating event, Action or Adversity
- B – a Belief which either motivated the activating event or was formed as a result of the activating event
- C – Consequence

Apprentices are encouraged to reflect on thoughts and beliefs following an activating event (such as a terrorist attack or exposure to extreme narratives) and examine real evidence as well as identify assumptions or faulty thinking. This supports critical thinking and encourages tolerance and understanding.

Identifying changes in behaviour

In working closely with employees, apprentices and young people, we recognise that we may observe the possible signs and symptoms of extremism, terrorism, and radicalisation.

We therefore:

- Establish and maintain environments where employees and apprentices can feel safe and secure; and encourage apprentices to talk and actively listen to their peers.
- Ensure employees, apprentices and young people know that there are adults whom they can approach if they are worried and feel the need to talk.

Recognise changes in behaviour such as:

- Outward appearance
- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups

Online behaviour:

- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

Concerning factors or vulnerabilities that could make a person susceptible to radicalisation or manipulation into terrorist activity, for e.g., it has been noted that acceptance of extremism and extremist activity is at a higher number in younger people and those of lower-income socioeconomic backgrounds.

Factors like the one above should be recognised as significant vulnerabilities that can be exploited in the name of terrorism and terrorist activities. Further factors can also be the reason for radicalisation. Staff are encouraged to read up on them more and to voice any concerns at an early stage.

Procedure for dealing with a Prevent disclosure and reporting concerns

If a staff member receives a disclosure or has a concern, they will explain clearly to the individual about what to expect next and how information could be shared with those that

need to know. At this stage, they would seek permission to share this information, unless doing so would put the individual or others at increased risk of significant harm.

Information sharing will be based on the following: is it ... *"necessary, proportionate, relevant, adequate, accurate, timely and secure"*? (HM Government: Information sharing. July 2018).

Reassure:

- Try to have a discussion with the individual if it is safe and lawful to do so.
- Listen to what they are saying. Ensure you do not antagonise them or the situation.
- Try to challenge their ideologies and question their validity, without belittling or disregarding the individual.
- Make them aware of alternative viewpoints.
- Remind them of the Fundamental British Values and why maintaining an orderly society is important for the safety of themselves and others around them.

React:

- Do not criticise or make comments on the individual.
- Make them aware, in terms that they understand, the actions 'you' will take and who 'you' will contact.
- Contact Pier Training's Designated Safeguarding Officer
- Immediately make the person's wishes known.

Record:

- Write things down at the time and make the person aware of your intentions.
- Make note of actual words used by the person word for word.
- Keep original notes.
- Transfer your notes to the cause of concern/safeguarding log form.
- Ensure all documents are completed and given to the designated officer.
- Involve parents or guardians of an individual if appropriate, especially with those under the age of 18.

Designated Safeguarding Officer

Our designated Safeguarding Officers are responsible for:

- Overseeing the referral of any case of suspected disclosure of terrorism, extremism or safeguarding.
- Providing advice and support to staff on safeguarding and prevent issues.
- Maintenance of records on Prevent, safeguarding referrals, complaints or concerns raised.
- Liaising and advising employers that recruit apprentices to ensure appropriate safeguards are put in place.
- Ensuring that staff receive training on Prevent and are aware of the company's policies and procedures.
- Ensuring appropriate and continuous professional development training and awareness for all staff.
- Liaising with the Director responsible for addressing Prevent and safeguarding issues that arise and ensuring all decisions are shared.
- Implementation and review of the policy and procedures to ensure they remain effective and legally compliant.

- Ensure any Prevent concerns are referred immediately as per fig 2

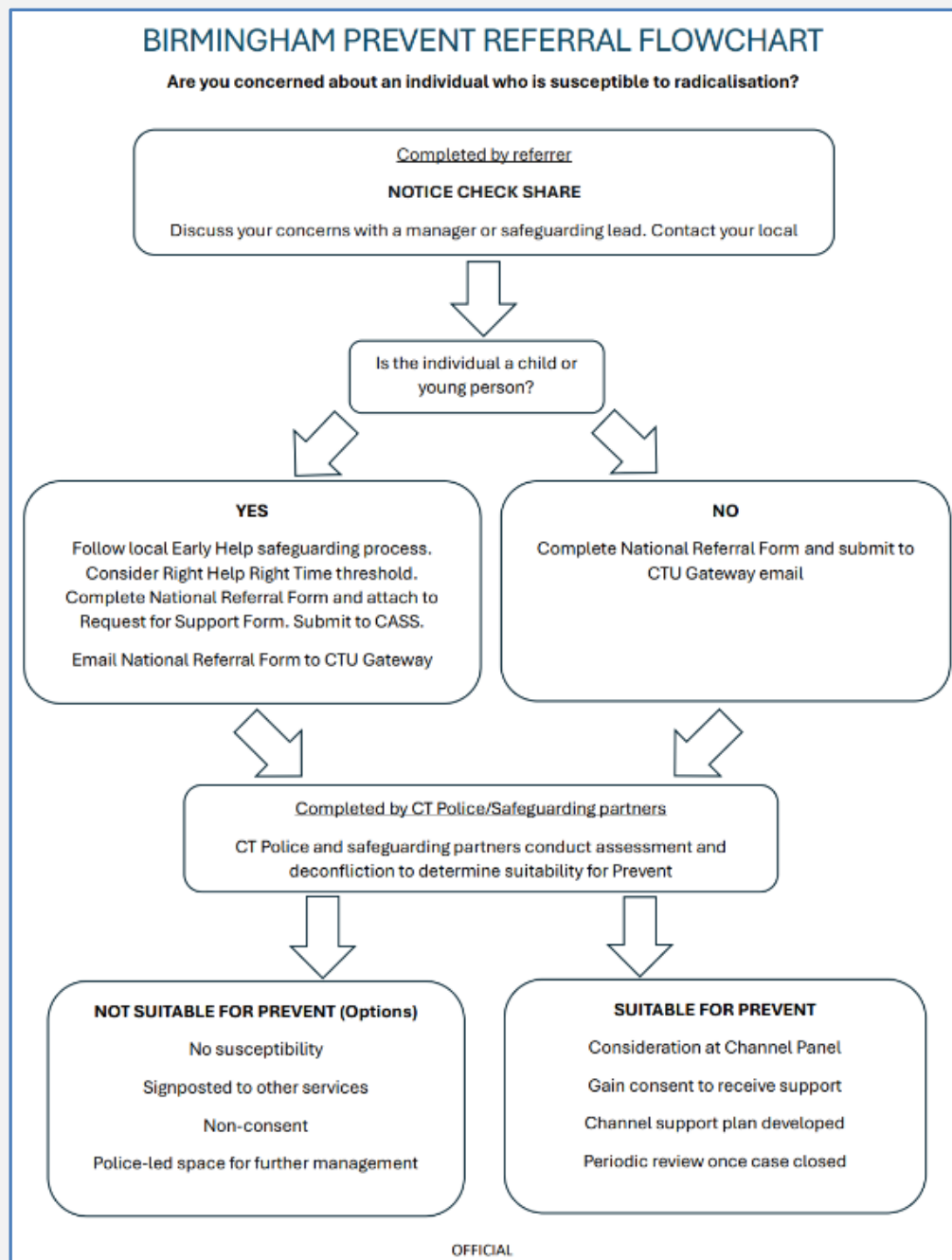


Fig2

Resources for Guidance, Training and Further Reading

[Further Education - Educate Against Hate](#)

[Understanding and identifying radicalisation risk in your education setting - GOV.UK](#)

[Regional Prevent Education Coordinators](#)

[The Prevent Duty and ICT in higher education \(HE\): guidance on effective policies to manage risk](#)

[Prevent and the Channel process in the NHS: information sharing and governance](#)

[The leadership challenge: the Prevent Duty for governing bodies and senior leaders in higher education \(HE\)](#)

[An introduction to the Prevent Duty in higher education \(HE\) training materials](#)

[The Prevent duty of care and the wellbeing of staff and students in higher education \(HE\)](#)

POLICY REVIEW

How will this policy be reviewed?

The DSO is responsible for the implementation and review of the Prevent policy and procedures. This review is completed annually or when considered necessary to ensure they remain effective and legally compliant. The date of review is also recorded within the footer of the document and includes the date of the next required review. This enables the DSO to easily track when the last review was completed ensuring the policy is relevant and up to date.

Following a review by the DSO, it is shared with the Quality Assurance Manager and Directors (SMT). The senior management team (SMT) read the policy, make any suggestions for amendments and then it is finally approved by the Managing Director.

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