




PREVENT POLICY AND PROCEDURE

Captiva Learning Limited

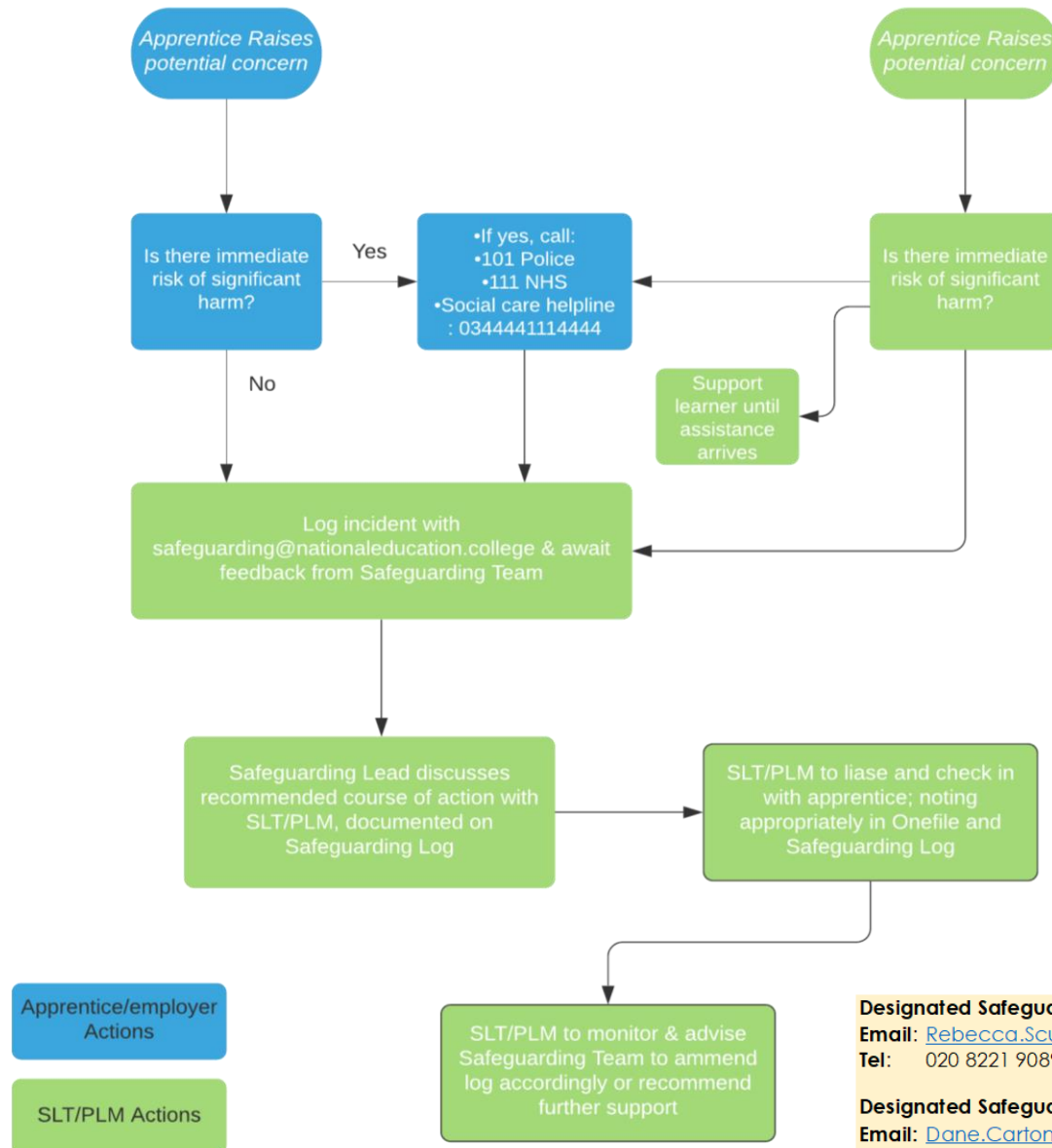
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Signed:		Jason Oster Captiva Chief Operating Officer	

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This document will be reviewed annually unless a change of policy or regulation necessitates an interim review. The review will be led by a member of the senior leadership team, or a senior manager, and will involve external advisors or experts where required. The updated document will be reviewed by the senior leadership team initially, then by the Captiva Governance Board before being authorized for publication by the Chair of the Board.

Safeguarding Reporting Procedure



Captive staff are trained in, and have a clear understanding of, good safeguarding practices as well as what factors may make apprentices vulnerable to a range of safeguarding concerns. Staff and apprentices are encouraged to raise any questions or concerns, and we make it safe to do this by providing a range of mechanisms for voicing the concerns.

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The PREVENT Duty

In 2011, the government published the PREVENT strategy which raised awareness of the specific need to safeguard children, young people and families from extremism and radicalisation. Captiva is committed to recognising and fulfilling its responsibilities and legal duties set out in the PREVENT strategy and duty statement. For further information on how this is carried out, please refer to our PREVENT Duty Procedure.

Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Prevent is about safeguarding our apprentices to keep them both safe and within the law. The PREVENT duty is not about preventing apprentices from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways.

Radicalisation and extremism: the holding of extreme political or religious views, e.g. animal welfare rights, environmentalists, EDL/white supremacy groups, anti-gay groups, Islam/Christian ideology. The Counter Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("The PREVENT duty").

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Captiva is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the company's safeguarding duty.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Apprentices may become susceptible to radicalisation through a range of social, personal and environmental factors; it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff can recognize those vulnerabilities.

Extremism is defined by the government in the PREVENT Strategy as: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. Captiva also includes in its definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

This Policy must be read alongside Captiva's Safeguarding Policy. Captiva will conduct an annual PREVENT risk assessment, reviewed by the Designated Safeguarding Lead and submitted to the Governance Board.

Responding to suspicions of radicalisation and extremism

Captiva is alert to changes in any apprentice's behaviour or attitude which could indicate that they need help or protection.

- When any member of staff has concerns that an apprentice may be at risk of radicalisation or involvement in terrorism, they should speak with the on-duty Designated Safeguarding Lead or Officer for investigation and action.
- Disclosure records are held by the staff team and stored on a secure server.
- Staff take care not to influence the outcome either through the way they speak to or question children/vulnerable apprentices.

Captiva will continue to welcome the apprentice whilst investigations are being made. The apprentice may choose to withdraw from learning activities whilst investigations take place. Captiva will follow the procedures as set by the local safeguarding board in relation to the delivery of services and designated roles and tasks in supporting the apprentice, family, and employer subsequent to any investigation.

- All suspicions and investigations are kept confidential and shared only with those who need to know.
- Any information is shared under the guidance of the Regional PREVENT Coordinator HE/FE.

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.

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and providers to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Training Providers have a legal duty to cooperate with the Channel programme in the carrying out of its functions, and with the police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015). Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE. Please also refer to our Prevent Policy.

Recognition of vulnerability factors can include:

- Identity crisis: the apprentice is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal crisis: the apprentice may be experiencing family tensions, a sense of isolation, and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends. They may be searching for answers to questions about identity, faith and belonging.
- Personal circumstances: migration, local community tensions, and events affecting the personal experience of racism or discrimination or aspects of government policy.
- Unmet aspirations: the apprentice may have perceptions of injustice, a feeling of failure.
- Rejection of civic life.
- Experiences of criminality which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- Special Educational Need/Additional Learning Needs: apprentices may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people or apprentices experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

PREVENT Procedure

Detecting and preventing radicalisation and extremism

This procedure forms part of Captiva's Safeguarding and PREVENT Policy. The PREVENT Procedure is communicated to all our staff, employers and apprentices to support them to identify anyone who they think may be at risk of radicalisation and extremism, and to help them to take the appropriate action.

Background

PREVENT is part of the Home Office and the police counter-terrorism strategy CONTEST and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity.

Context

People of any age, but in particular young people in the UK, are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. Learning providers and others who engage with young people, should be aware of these risks and be familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism. Captiva works nationally across a variety of dispersed locations, in which the Home Office-defined risks of radicalisation vary considerably. Captiva therefore has a support network in place for staff and apprentices that includes a central point of access. This is provided by effective communication with the Regional PREVENT Coordinator HE/FE, and ongoing links with other regional leads.

Procedure

Captiva has developed internal support mechanisms for both staff, employers and apprentices for safeguarding, and these will also apply for the PREVENT procedure. Outlined below is a summary of who staff, employers and apprentices should contact regarding any concerns. Captiva has developed links with external agencies who can provide support in this area. If, once internal processes are completed, and it is considered that additional external support or referral is required, then this may be arranged by the Safeguarding Team. External support will normally involve an individual being asked to voluntarily receive tailored support from relevant external individuals or organisations.

Definition of radicalisation

The Institute of Strategic Dialogue defines radicalisation as 'the process through which an individual changes from passivity or activism, to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence'. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crisis and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination

- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies or faiths

Who are we safeguarding?

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fears
- Lack of purpose
- Anger
- Peer pressure

Captiva is not suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice, be that on a personal or more far-reaching scale. An individual's vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target, but they use a sense of 'duty' (belonging to a specific group), 'status' (need for reputation), and 'spiritual rewards' (test of faith), as a way of drawing them in.

This raises the question of what those signs of radicalisation will look like; they will look a lot like other troubling behaviour:

- Emotional: anger, mood swings, a new-found arrogance.
- Verbal: expression of opinions that are at odds with generally shared values.
- Physical: changes in appearance or routine.

What to do if you believe someone to be at risk of radicalisation

Captiva has adopted the approach of 'Notice, Check, Share' where there are concerns that an individual may be vulnerable:

Notice: recognise any changes in behaviour or appearance similar to those outlined above.

Check: speak with someone you trust like a tutor/manager or Safeguarding Team and see what they recommend but trust your instinct if you are still concerned. It might on occasions be useful to speak to the person concerned who may be willing to provide useful context and detail to assist understanding.

Share: speak to one of the named Designated Safeguarding Officers to report your concerns. Remember to trust your instinct.

Guidance

- If you are an apprentice and you are concerned about another apprentice, please check with your tutor in the first instance and together share with the Designated Safeguarding Officer or Lead.
- If you are an apprentice and you are concerned about a member of staff, or a person representing Captiva, please check and share with the Designated Safeguarding Officer or Lead.
- If you are a member of staff and concerned about an apprentice, please check and share with the Designated Safeguarding Officer or Lead.
- If you are a member of staff and you are concerned about another member of staff, please check with your line manager and share with the Designated Safeguarding Lead (where the concern is your line manager then check and share with the HR Designated Safeguarding Officer)
- If you are a member of staff and you are concerned about a person external to Captiva, please check and share with a manager.

Responsibility for contacting PREVENT support:

The following people are responsible for making the decision to contact the police PREVENT Team or the Regional PREVENT Coordinator HE/FE if serious concerns are raised about any apprentice, employer, a member of staff or a person external to Captiva:

Designated Safeguarding Lead: Rebecca Scullion

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Designated Safeguarding Officer: Dane Carton

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Designated Safeguarding Officer: John Cobb

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Designated Safeguarding Officer: Alison McNeil

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Designated Safeguarding Officer: Aston Wood

Email: Aston.Wood@captivalearning.com

Tel: 0208 221 9089

Designated Safeguarding Officer: Michelle Huntley

Email: Michelle.Huntley@captivalearning.com

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No one person will usually make this decision. The Safeguarding Lead (or Officer in their absence) must make any decision for referral. This would be in the first instance through our Designated Safeguarding Lead, Rebecca Scullion. Advice would be sought, and appropriate action would be taken.

PREVENT is designed to make reporting easier and more straightforward. Captiva will do everything it can to ensure that support and guidance are available to staff, employers, apprentices and all connected with the company. If you have any proposals for additional support or advice that you think may help, please share these with a manager or the Executive Leadership Team.

All staff, apprentices and employers will be trained annually on PREVENT. Attendance will be logged and monitored for audit purposes.

Please note: as outlined in [Keeping Children Safe in Education 2023](#), any individual has the right to refer to their local Safeguarding Children Board if they have concerns about an individual. Similarly, any individual may report any behaviour that raises a concern that they are at risk of radicalisation, to the police. However, anyone wishing to report a matter related to an apprentice, member of staff or other person connected with Captiva, should please inform a Senior Manager and the Designated Safeguarding Lead and seek their support before taking any action. Captiva understands that providing a healthy and safe environment for staff, apprentices and visitors is the responsibility of all and the company is committed to constantly reviewing and improving our management systems to statutory duties are met and the health and safety needs of all our stakeholders are met.