



PREVENT POLICY AND PROCEDURE

Captiva Learning Limited

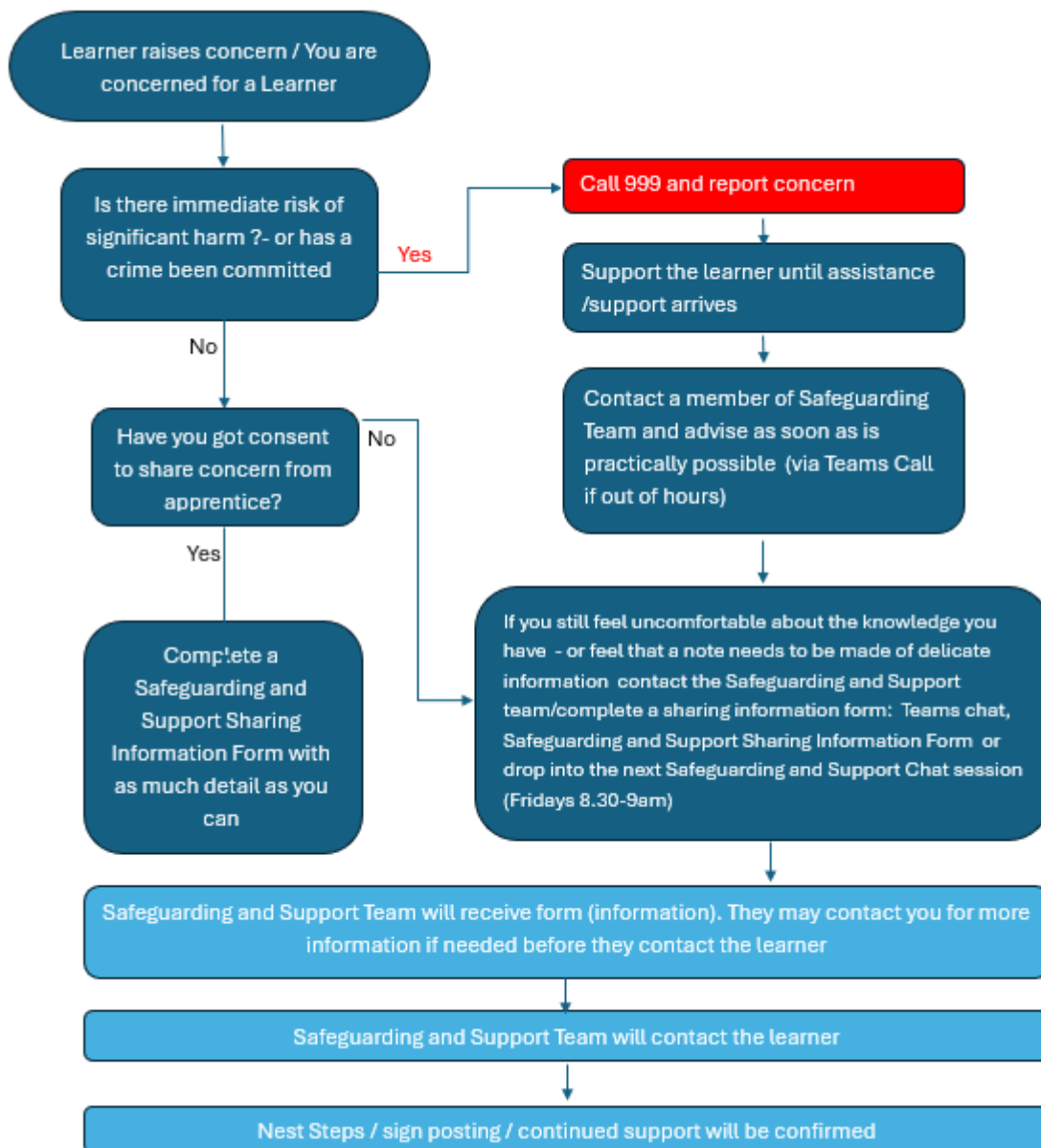
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This document will be reviewed annually unless a change of policy or regulation necessitates an interim review. The review will be led by a member of the senior leadership team, or a senior manager, and will involve external advisors or experts where 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 and Prevent Reporting Procedure



Safeguarding and Support Team:

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Tel: 020 8221 9089

Designated Safeguarding Lead: Rebecca (Becks) Scullion

Deputy Designated Safeguarding Leads:

Dane Carton Michelle Huntley

Aston Wood Alison McNeil

John Cobb

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. The Counter Terrorism and Security Act 2015, along with the upcoming Terrorism (Protection of Premises) Act 2025 (Martyn's Law), has further strengthened these requirements. Captiva is committed to recognising and fulfilling its responsibilities and legal duties set out in the PREVENT strategy and duty statement and preparing for compliance with Martyn's Law requirements. For further information on how this is carried out, please refer to our PREVENT Duty Procedure.

Scope and Application:

This policy applies to all individuals associated with Captiva Learning, including: all apprentices enrolled with Captiva, all staff members (permanent, temporary, agency), all volunteers and contractors, all senior managers and board members, all visitors to Captiva premises.

Captiva recognises that both apprentices and staff may be vulnerable to radicalisation and extremism. While our apprentices are adults (18+) and staff are working professionals, vulnerability is not fixed and can change due to circumstances. As self-advocating adults, both groups retain the right to make their own decisions, but this does not diminish our duty of care to identify and respond to radicalisation risks across our entire community.

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. Online radicalisation has become increasingly sophisticated, with extremist groups using AI-generated content, deepfakes, and digital manipulation to spread disinformation and recruit vulnerable individuals.

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 online conspiracy theories, and misinformation campaigns designed to undermine democratic processes or promote harmful ideologies. 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 upcoming Terrorism (Protection of Premises) Act 2025 (Martyn's Law) will require responsible persons at premises where 200 or more people may be present to implement reasonably practicable public protection procedures and measures to mitigate terrorist risks.

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 individuals vulnerable to future manipulation and exploitation. Contemporary threats include online radicalisation through social media platforms, encrypted messaging apps, and AI-generated extremist content that can be difficult to detect and counter.

Captiva is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children, apprentices and individuals 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. This process is increasingly facilitated through digital platforms, online gaming environments, and virtual reality spaces where extremist recruiters can operate anonymously. It is vital that staff can recognise 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 and the promotion of conspiracy theories, disinformation, or misinformation that undermines educational content or promotes harmful ideologies.

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.

Geographical Risk Assessment and Heat Mapping

Captiva recognises the importance of understanding the geographical distribution of our apprentice and staff populations to effectively implement PREVENT duties and counter-terrorism preparedness measures. This geographical awareness is essential for our adult education context, where learners may face location-specific risks such as county lines exploitation, regional extremist activity, or local patterns of radicalisation.

Understanding Our Learner and Staff Distribution for Targeted PREVENT Support

Heat maps are utilized to visualize the geographical distribution of our apprentices' workplaces and staff locations across the UK, providing crucial intelligence for our PREVENT and counter-terrorism strategies. By identifying areas of high learner and staff concentration, we can ensure our safeguarding resources are strategically aligned with local safeguarding partnerships, Adult Safeguarding Boards, Channel panels, and PREVENT coordinators in the regions where we have the greatest responsibility.

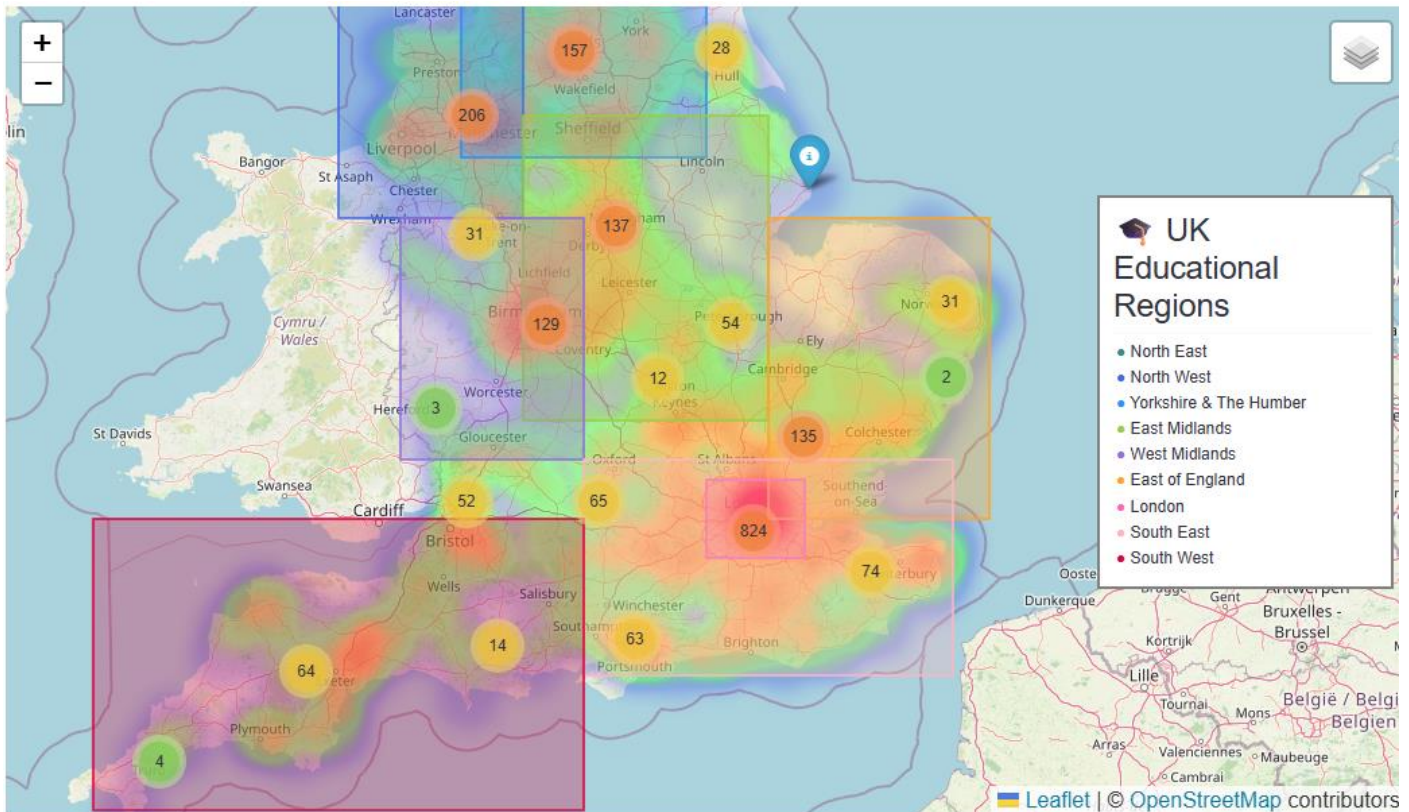
This data enables us to:

- Build stronger relationships with local authorities and PREVENT coordinators
- Understand regional PREVENT risks and emerging threat patterns
- Ensure our Designated Safeguarding Lead and team maintain current knowledge of local procedures and contact networks
- Allocate team members as regional specialists with deep local knowledge
- Respond effectively to concerns while respecting local context and expertise

Areas showing higher concentrations of learners and staff receive prioritised attention for:

- Local PREVENT training updates and awareness sessions
- Partnership engagement with Channel panels and PREVENT teams
- Resource allocation for rapid response capabilities
- Regional threat monitoring and intelligence sharing.

The heat mapping system is reviewed at least annually to reflect changes in our learner distribution, ensuring our PREVENT response remains geographically relevant and effective.



Responding to suspicions of radicalisation and extremism

Captive is alert to changes in any individual's behaviour or attitude which could indicate that they need help or protection - whether they are an apprentice, staff member, contractor, or visitor. This includes monitoring for exposure to online extremist content, AI-generated disinformation, or conspiracy theories that may be impacting their wellbeing or professional conduct.

- When any member of staff has concerns that an individual may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead for investigation and action;
- When concerns arise about a staff member, the same principles apply. Professional support and intervention should be sought through appropriate channels, treating this as a safeguarding matter rather than solely a disciplinary issue;
- 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 individuals at risk;
- All staff must be aware of the risks associated with generative AI, deepfakes, and manipulated digital content that may be used for radicalisation purposes;
- Staff should be vigilant for individuals sharing or creating extremist content online, including through social media, gaming platforms, or virtual learning environments;
- Concerns about staff members will include sharing information and working with through line management and HR channels while ensuring safeguarding principles are maintained.

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;
- Where concerns relate to online activity, digital evidence will be preserved in accordance with data protection requirements and law enforcement guidance.

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 or digital literacy and critical thinking skills to help individuals identify and resist online manipulation.

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;
- Address online radicalisation risks and provide digital literacy support to help individuals critically evaluate online content.

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). Training Providers also have emerging obligations under imminent Martyn's Law to implement counter-terrorism preparedness measures and cooperate with the Security Industry Authority (SIA) as the designated regulator. 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 Needs / 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;
- Digital vulnerability: excessive time spent online, particularly in unmoderated spaces, exposure to conspiracy theories or disinformation, difficulty distinguishing between reliable and unreliable online sources;
- Financial hardship or exploitation: vulnerability to online scams, cryptocurrency fraud, or financial manipulation that may be linked to extremist funding activities;
- Social media manipulation: being targeted by sophisticated online influence operations, AI-generated content designed to radicalise, or deepfake technology used to spread extremist messaging.

However, this list is not exhaustive, nor does it mean that all individuals 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 including through online gaming, social media, or encrypted messaging platforms;
- Accessing violent extremist websites, especially those with a social networking element or AI-generated extremist content;
- Possessing or accessing violent extremist literature including digital content, podcasts, or multimedia materials;
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues including sharing or creating violent extremist content online;
- Joining or seeking to join extremist organisations including online communities, forums, or virtual groups;
- Significant changes to appearance and/or behaviour including online behaviour patterns, digital footprint changes, or altered communication styles;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis particularly where this leads to increased online activity in extremist spaces;
- Creating, sharing, or distributing AI-generated extremist content, deepfakes, or manipulated media designed to promote extremist ideologies;

- Expressing belief in conspiracy theories that promote violence or undermine democratic institutions.

Counter-Terrorism Preparedness and Martyn's Law Compliance

Captiva recognises its emerging responsibilities under the Terrorism (Protection of Premises) Act 2025 (Martyn's Law) and is committed to implementing appropriate counter-terrorism preparedness measures. At present this includes consideration and planning for:

Responsible Person Designation: Captiva will designate a responsible person who will be accountable for ensuring compliance with Martyn's Law requirements. This person will: - Ensure reasonably practicable public protection procedures are in place - Coordinate with the Security Industry Authority (SIA) as the designated regulator - Implement and maintain terrorism risk assessments - Oversee staff training on counter-terrorism preparedness.

Physical Security Measures: Where premises regularly accommodate 200 or more people, Captiva will: - Conduct regular terrorism risk assessments - Implement reasonably practicable public protection measures - Develop and maintain emergency response procedures - Ensure staff understand evacuation, invacuation, and lockdown procedures - Coordinate with emergency services using Joint Emergency Services Interoperability Principles (JESIP).

Training and Awareness: All staff will receive training on: - Counter-terrorism awareness through ACT e-Learning - Recognising hostile reconnaissance through SCaN (See Check and Notify) training - Response procedures including RUN, HIDE, TELL guidance - Digital safety including recognition of AI-generated extremist content - Identifying and reporting suspicious behaviour or items.

Digital Security and Online Safety: Captiva recognises the evolving nature of online threats and will: - Monitor for AI-generated content risks including deepfakes and digital manipulation - Provide education on identifying disinformation and conspiracy theories - Implement filtering and monitoring systems that account for AI-generated harmful content - Train staff to recognise online radicalisation indicators - Maintain digital evidence preservation capabilities for safeguarding investigations.

Compliance and Reporting: Captiva will: - Notify the SIA of our status as a Standard Tier premises under Martyn's Law - Maintain documentation of all public protection procedures and measures - Conduct regular reviews of counter-terrorism preparedness - Cooperate fully with SIA inspections and guidance - Report security incidents to appropriate authorities.

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. The strategy has evolved to address contemporary threats including online radicalisation, AI-generated extremist content, and the use of digital platforms for terrorist recruitment and planning

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. Contemporary risks include sophisticated online influence operations, the use of AI and deepfake technology by extremist groups, and the spread of conspiracy theories and disinformation through digital platforms. Captiva works nationally across a variety of dispersed locations, in which the Home Office-defined risks of radicalisation can vary. 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 and emerging partnerships with the Security Industry Authority under Martyn's Law requirements.

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'. Contemporary radicalisation increasingly occurs through digital means, with extremist groups using sophisticated online

recruitment techniques, AI-generated content, and psychological manipulation through social media algorithms. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation;
- Identity crisis and/or isolation including digital isolation and online echo chambers;
- Political and/or democratic disenfranchisement;
- Discrimination;
- Foreign policy and/or international crises or disputes;
- Political movements;
- Ideologies or faiths;
- Exposure to conspiracy theories and disinformation campaigns;
- Digital manipulation through AI-generated content and deepfakes;
- Social media algorithm-driven radicalisation pathways.

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. Online spaces can amplify these vulnerabilities through targeted content, algorithmic reinforcement, and exposure to extremist communities. People can become vulnerable for many reasons including:

- Low self-esteem;
- Guilt;
- Loss;
- Isolation including digital isolation and online dependency;
- Family breakdown;
- Fears;
- Lack of purpose;
- Anger;
- Peer pressure including online peer pressure and virtual community influence;
- Financial hardship that may lead to vulnerability to online exploitation;
- Cognitive challenges in distinguishing reliable from unreliable information sources.

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. This exploitation increasingly occurs through sophisticated online operations using AI-generated content, deepfakes, and targeted digital manipulation.

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. Online extremist groups also exploit digital status symbols, online gaming achievements, cryptocurrency rewards, and virtual community belonging to attract and retain followers.

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 or increased agitation when discussing online content or when digital access is restricted;
- Verbal: expression of opinions that are at odds with generally shared values including sharing conspiracy theories, expressing belief in disinformation, or using extremist terminology learned online;
- Physical: changes in appearance or routine including increased secrecy around digital devices, unusual online activity patterns, or possession of extremist digital content;
- Digital: changes in online behaviour, sharing extremist content, creating AI-generated propaganda, or showing signs of online radicalisation including changed privacy settings, new online associates, or evidence of encrypted communication use.

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

Notice: recognise any changes in behaviour or appearance similar to those outlined above, including digital behaviour changes, online activity patterns, or exposure to extremist content including AI-generated materials.

When making observations, it is critical to separate facts from assumptions, assertions, and alternatives: - Focus on what you actually know and have observed (facts) - Avoid assumptions - do not ignore facts to create your own narrative - Avoid assertions - phrases like "I believe" or "I'm sure" without factual backing - Consider alternatives - other explanations that could adequately explain the situation

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. You may both agree that more context is required which may be best established through talking to the person who is potentially at risk. In these instances, think about who is best placed to talk to them. When concerns relate to digital activity, avoid confronting the individual directly about online behaviour as this may lead to increased secrecy or encrypted communication.

Remember: The power of talking is huge. When you think about something and vocalise it to someone else, you gain clarity. Sometimes how you're internalising the threat with your own prejudices or unconscious bias will be very different to how someone else interprets it.

Share: speak to one of the named Designated Safeguarding Officers to report your concerns. Remember to trust your instinct. When reporting digital concerns, preserve any evidence in accordance with data protection requirements and avoid sharing potentially extremist content with colleagues who do not have a safeguarding role.

Remember: This is about supporting someone who is at risk - treat it as you would any other safeguarding concern. If you thought someone was at risk of domestic violence, you wouldn't hesitate to act. It's exactly the same principle.

Guidance

PREVENT Advice Line and Referral Information

If you are worried that someone is being radicalised into terrorism and do not know who the DSL or equivalent is in your setting, call the national police Prevent advice line on 0800 011 3764 to get advice or share your concern. Alternatively, contact your local authority for help.

If you have a speech or hearing impairment, a police non-emergency number is available as a telephone service on 18001 101.

For making formal referrals, use the National Prevent Referral Form available at: [National Prevent Referral Form](#)

Contact your local authority or police for an editable version of the referral form.

Reporting Procedures:

For Apprentices:

- If you are concerned about another apprentice, please check with your mentor in the first instance and together share with the Designated Safeguarding Officer or a member of the Safeguarding and Support Team;
- If you are concerned about a member of staff, or person representing Captiva, please check and share with the Designated Safeguarding Officer a member of the Safeguarding and Support Team.

For Staff Members:

- If you are concerned about an apprentice, please check and share with the Designated Safeguarding Lead a member of the Safeguarding and Support Team;
- If you are concerned about another staff member, 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 Head of People and Culture and Designated Safeguarding Lead);
- If you are concerned about a contractor, volunteer, or person external to Captiva, please check and share with your line manager or Designated Safeguarding Lead;
- If you have concerns about your own vulnerability to radicalisation influences, please speak confidentially with the Designated Safeguarding Lead or Head of People and Culture.

For Managers:

- Managers have additional responsibility to monitor for signs of radicalisation among their team members while maintaining dignity and respect;
- Any concerns should be discussed with the Designated Safeguarding Lead before taking management action;
- Consider whether support services, reasonable adjustments, or professional development might address underlying vulnerabilities;
- If you have concerns about online extremist activity, digital manipulation, or AI-generated extremist content, report these immediately to the Designated Safeguarding Lead while preserving any digital evidence;
- If you identify immediate security threats or suspicious behaviour that may indicate terrorist planning, contact emergency services immediately on 999 and then inform the Designated Safeguarding Lead.

Key Principles for Information Sharing:

In most cases, Prevent referrals are made by the Designated Safeguarding Lead of the organisation where the concern was first raised. While any individual can share concerns about radicalisation,

the formal referral process is typically managed by the DSL or their equivalent, who has the appropriate training, knowledge of local procedures, and understanding of legal requirements to ensure the referral is handled appropriately and effectively.

This approach ensures:

- Consistency in referral quality and completeness;
- Appropriate assessment of proportionality and necessity;
- Compliance with local referral pathways and procedures;
- Professional evaluation of the information before formal submission;
- Coordination with other safeguarding concerns and support services.

Before making any referral, consider:

- The information you intend to pass on - Who you intend to pass the information to;
- The desired outcome from passing on the information - The legal basis from which this information is to be passed.

When making a Prevent referral, follow these principles:

- Information sharing needs to be necessary, proportionate and lawful - Pass on only what is required with those who need it;
- Follow your organisation's process before making a referral to the police;
- All referrals should be shared with the police for assessment.

What Information to Include in a Prevent Referral

When completing the National Prevent Referral Form, include as much detail as possible:

Personal Information:

- Your full details (name, department, job role, contact details, date of referral);
- Details of the person at risk (full name, date of birth, address, contact details, relationship to you);
- How often you see them and in what capacity.

Explanation of Concerns:

- Summarise your concern;
- provide overview and wider context;
- How/why the person first came to your notice;
- Ideology or belief of concern;
- Your specific concerns and relevant details.

Concerning Behaviours (where observed):

- Absenteeism, abusive behaviour, antisocial behaviour;
- Becoming socially isolated, change in appearance;
- Closed to challenge, confrontational behaviour;
- Concerning use of the internet, expression of extremist views;
- Fixated on a topic or group, interested in conspiracy narratives - Interested in extremist groups/causes, interest in weapons;
- Legitimising use of violence, quick to anger/use of violence;

- Seeking to recruit, self-harm, substance misuse;
- Sudden abandonment of interests, support for gender-based violence;
- 'Them and us' language, use of inflammatory language;
- Use of symbolism linked to extremism.

Additional Factors (where relevant):

- Access to weapons, adverse childhood experience, disability;
- Domestic abuse, extremist material, family breakdown;
- Financial problems, gang/group membership, history of violence;
- Homelessness, illness, learning disability, links to criminality;
- Loss or bereavement, mental health, neurodiversity;
- Physical/emotional/sexual abuse, socially excluded;
- Thoughts of suicide/self-harm, trauma from conflict;
- Unemployment, victim of abuse/crime/hate crime.

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

Email: Rebecca.Scullion@captivalearning.com

Tel: 020 8221 9089

Designated Safeguarding Officer: Dane Carton

Email: Dane.Carton@captivalearning.com

Tel: 0208 221 9089

Designated Safeguarding Officer: John Cobb

Email: John.Cobb@captivalearning.com

Tel: 0208 221 9089

Designated Safeguarding Officer: Alison McNeil

Email: Alison.McNeil@captivalearning.com

Tel: 0208 221 9089

Designated Safeguarding Officer: Aston Wood

Email: Aston.Wood@captivalearning.com

Tel: 0208 221 9089

Designated Safeguarding Officer: Michelle Huntley

Email: Michelle.Huntley@captivalearning.com

Tel: 0208 221 9089

No one person will usually make this decision. The Designated Safeguarding Lead Safeguarding Lead (or member of the Safeguarding and Support team 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. Where concerns relate to immediate terrorist threats or Martyn's Law compliance issues, the designated responsible person will be informed immediately and emergency services contacted where appropriate.

Understanding the Referral Process:

A Prevent referral is a process of communicating a concern about a person who may be at risk of radicalisation. This may be shared directly as a Prevent referral with the police or a Designated Safeguarding Lead may do this on your behalf.

After a referral is made:

1. All referrals are shared with police for initial assessment and gateway evaluation.
2. Police conduct checks to see if the person is part of any live cases or investigations.
3. The referral undergoes assessment to decide the appropriate level of support.
4. You may be invited to attend a multi-agency meeting (Channel in England/Wales, or Prevent Multi-Agency Panel in Scotland).
5. Where appropriate, voluntary support packages are offered to the individual.

Feedback and Transparency:

You should receive feedback on the outcome of your referral.

If you don't receive feedback, contact the Channel lead within your local authority

There is no harm in contacting the Channel panel chair or coordinator for updates

Some cases may involve operational sensitivities that limit detailed feedback

Be transparent with individuals and families where safe to do so - explain you're seeking professional support

Remember: You don't have to hold the risk yourself. There are professionals whose job it is to assess and manage these concerns. Your role is to notice, check, and share - not to make final assessments about risk levels.

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 and counter-terrorism preparedness including Martyn's Law requirements. Training will include recognition of AI-generated extremist content, digital manipulation techniques, conspiracy theories, and online radicalisation indicators. Training will emphasize that PREVENT referrals are safeguarding concerns about supporting vulnerable people, not criminal investigations.

Annual Review and Compliance

This policy will be reviewed annually to ensure compliance with:

- Current PREVENT Duty Guidance
- Keeping Children Safe in Education (KCSIE) 2025
- Martyn's Law requirements once implemented
- Online Safety Act 2023 obligations
- Emerging digital safeguarding guidance

Reviews will include assessment of new and emerging threats, technological developments affecting radicalisation methods, and updates to counter-terrorism legislation.

Please note: as outlined in Keeping Children Safe in Education 2025, 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.