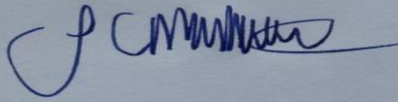


DH Associates Ltd

# Prevent Policy and Risk Assessment

Managing Director	Jueliya Mc Mahon	31 August 2021
		
Review Date	Senior Leadership Team	31 August 2022

# Prevent Policy and Risk Assessment

## 1. Background to Policy

DH Associates has a Prevent Strategy and risk assessment that has informed the development of this policy. As an independent training provider with an ESFA contract we have a statutory duty to comply with the Prevent duty and to safeguard learners. The Prevent Duty is not about discouraging learners from having political and religious views and concerns but is about supporting them to use those concerns or act on these in non-extremist ways.

## 2. Principles

DH Associates is committed to promoting and protecting the rights of learners, particularly children/ young people and vulnerable adults. The company will strive to provide a safe learning environment for any learners, particularly those who are under the age of 18 years or are identified as vulnerable adults

As part of safeguarding, Prevent and the Equality Act 2010 all staff have a duty to demonstrate and help learners develop values which underpin an awareness of social and moral responsibility in modern Britain.

The values we need to promote include democracy, rule of law, individual liberty, tolerance and mutual respect for different faiths and beliefs.

## 3. Responsibility

The Managing Director is responsible for the oversight of the company's Prevent Strategy and Policy. Managers are responsible for ensuring all staff are informed of the policy at induction and understand their responsibilities for reporting concerns.

The Operations Manager is the Designated Prevent Officer with responsibility for issues arising under this policy. This responsibility reflects the link to other policies informed by Prevent e.g., Safeguarding, Bullying & Harassment, and Health & Safety.

All managers and employees of the company, subcontractors, employers and learners are required to take shared responsibility for promoting the principles outlined above and raising awareness and concerns under this policy.

## 4. Training

All employees of DHA will receive initial training on this policy and this will be included in the induction for all newly appointed staff. All staff complete mandatory safeguarding and prevent modules within one week of joining the organisation.

The organisation has Prevent champions in place to promote within teams as part of monthly meeting agenda.

The Prevent Lead promotes weekly personal development topics to raise awareness of current values, wellbeing, safeguarding and prevent duty.

## 5. Partnership

DH Associates will work in partnership with local safeguarding boards and statutory agencies in relation to any investigation under these procedures. We will seek advice appropriately from local prevent teams.

## 6. Sharing Information

Information may need to be shared when seeking advice or support for learners under this policy. Information sharing will be assessed on a case-by-case basis and is governed by legislation, Data Protection Act and Common Law Duty of Confidentiality. When considering sharing information, the following will be taken into account.

- necessity and proportionality: information will only be shared where it is strictly necessary to the intended outcome. This will be based on a professional judgement of risk to an individual or the public
- consent will be sought, where possible, from the person concerned before sharing any information about them
- if an individual is engaged in any illegal terrorist activity this will be reported to the police

## 7. 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 or reject and/or undermine contemporary ideas and expressions of freedom of choice.

**“Extremism** is 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” (*HM Government Prevent Strategy 2011*)

## 8. Causes of Violent Extremism

Research from case studies of those who have become involved in extremism suggests the path to radicalisation is not linear or predictable. The length of time taken can vary from a few weeks to years. Evidence suggests the process can start at secondary school.

Common factors

- Contact with recruiters. Often this is through peers, older siblings or family members or acquaintances.
- Access to violent extremist material. Increasingly this is via the internet via websites or social networking
- Use of extremist narratives. Extremist narratives have the potential to influence views by inspiring new recruits, helping to embed beliefs or persuading others of the legitimacy of their cause.

## 9. Susceptibility

There is no single profile of a person likely to become involved in extremism. However, the following appear to play a part

- Search for answers to questions about identity, faith or belonging
- Driven by desire for adventure or excitement
- Desire to enhance self-esteem and promote street credibility
- Sense of grievance triggered by personal experience of racism or discrimination

## 10. Indicators

The following may indicate a person is at risk of radicalisation.

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to conform with a group
- Day to day behaviour becomes centred on an extremist ideology, group or cause
- Loss of interest in friends and activities not associated with extreme ideology, group or cause
- Possession of materials or symbols associated with extremist cause
- Attempts to recruit others
- Using insulting or derogatory names for another group
- Accessing extremist material online

There may be an increase in prejudice-related incidents e.g., verbal assaults, provocative behaviour, damage to property, refusal to co-operate, condoning violence towards others.

## 11 Reporting Procedures

- All concerns or suspicions on radicalisation or extremism must be reported directly to the Prevent Lead or in their absence to the Team Manager.
- If the learner is a young person or vulnerable adult under safeguarding the parents/carers (where applicable) will be contacted and the incident discussed in detail. The aim is to identify motivating factors, including; any changes in circumstances at home, parental views of the incident and to assess whether the incident is serious enough to warrant a further referral. All records of the meeting will be kept alongside the initial referral form. If contacting the parents or carers would compromise the learner/investigation contact may be deferred.
- All concerns or suspicions will be investigated and this may involve seeking information and /or advice from employers and external partners.
- Information will be shared only where necessary and sharing will be proportionate to the level of concern.
- Records will be made at each stage of the investigation
- If deemed necessary, serious incidents involving criminal activity will be referred to the emergency services
- If the investigation establishes that the individual concerned needs support a discussion will be held with the local Prevent police/ local authority officer
- Support can be offered through Channel if the Police Channel Officer determines this is appropriate



**Prevent Risk Assessment & Action Plan – 26/04/2021 & Quarterly July 2021**

**Owner** – Kate Day, Head of Operations. Safeguarding/Prevent Lead.

**Reviewer** – Jueliya McMahon, Managing Director & Kate Day, Head of Operations. Safeguarding/Prevent Lead

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Current Terror Threat Level
<b>SUBSTANTIAL</b>
A terrorist attack on the UK mainland is likely All risk scoring will take account of the current terror threat level

Risk Scoring			
Likelihood		Severity	
Almost Certain	5	Catastrophic	5
Very Likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or Trivial	1

Risk Levels	
<b>HIGH RISK</b>	<b>12 &gt;</b>
<b>MEDIUM RISK</b>	<b>07-11</b>
<b>LOW RISK</b>	<b>6 &lt;</b>

Critical	An attack is highly likely in the near future
Severe	An attack is highly likely in the near future
Substantial	An Attack is likely
Moderate	An attack is possible, but not likely
Low	An attack is highly unlikely

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
1.	Online Safety	<p>A) Extremist organisations are able to share extremist materials &amp; views online to radicalise students and encourage them to commit acts of violence or incite others to do so.</p> <p>B) Are Learners (and staff) are able to access unlawful &amp;/or radicalising material which promotes proscribed terrorist groups?</p> <p>C) The CTLP (Counter Terrorism Local Profile) &amp; police risk briefings identify that virtually all cases of radicalisation referred for support have an identified element of online/internet facilitation evidencing the significant risk posed to students, staff &amp; the organisation.</p>	<p>4 x 5 =20</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. The organisation's IT Acceptable Use policy contains specific reference to the Prevent Duty as required by CTSA 2015 (Counter Terrorism Security Act 2015).</li> <li>2. Learners are provided with online safety advice as part of initial induction. This includes providing them with a copy of the organisation's IT Acceptable Use policy &amp; highlighting where support is available if required.</li> <li>3. Filtering &amp; monitoring of learners use of the internet is carried out by IT Team &amp; agreed "flags" are reported to Safeguarding/Prevent Lead.</li> <li>4. Learners are all to complete the ETF Side By Side Online Safety module within 1 month of commencement of programme. Trainers to document follow up face-to-face discussion afterwards.</li> <li>5. Communication to ensure Online Safety to be included within learner progress reviews update quarterly after programme start.</li> </ol>	<p>3 x 5 =15</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. Online Safety to feature prominently as a theme during learners programme for follow up by Trainers at designated time.</li> <li>2. Head of IT to agree with SMT a protocol for reporting "flags" to Safeguarding/Prevent Lead identifying urgent &amp; non-urgent issues.</li> </ol>	
2.	Partnership	<p>A) Does the organisation have effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others?</p> <p>B) The result is that the organisation is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.</p>	<p>4 x 4 =16</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. The Prevent Lead for DH Associates is the Safeguarding Lead Kate Day who is responsible for oversight of the Prevent Action Plan &amp; update to SMT.</li> <li>2. The Prevent Lead knows how to contact the DFE Regional Coordinators.</li> </ol>	<p>4 x 4 = 16</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. The Prevent Lead to develop links across region partnership relationships with DfE Regional Prevent Coordinators, Local Authority, Police Prevent Team and others.</li> <li>2. The Prevent Lead to access CTLP (Counter Terrorism Local Profile) through DFE Regional Coordinators/Police Prevent Team to inform risk assessment and to brief appropriate staff and understand local, national and international risks.</li> <li>3. The Prevent Lead to review risk assessment and update quarterly which will be informed by the CTLP or Police/Local Authority &amp; partnerships briefings/engagement and any changes to current terror threat level.</li> </ol>	
3.	Leadership	<p>A) Do leaders within the organisation at a senior level understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation if the Duty is not managed or enabled effectively?</p> <p>B) Does the organisation place sufficient priority to Prevent Action plans to mitigate risks and meet the requirements of the Duty?</p>	<p>3 x 4 =12</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. Introduction to Prevent Training</li> <li>2. Ongoing Policy &amp; Strategy Training</li> <li>3. Strategy and policy is monitored and updated by Managing Director &amp; Head of Operations</li> </ol>	<p>3x4= 12</p> <p><b>High</b></p>	<ol style="list-style-type: none"> <li>1. Quarterly review between Managing Director &amp; Head of Operations. Further review in SLT &amp; Governance panel. Dates scheduled 2021/2022.</li> </ol>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> <li>4. Risk assessment and action plan will be updated quarterly by Prevent Lead with clear review dates &amp; accountability.</li> <li>5. Safeguarding &amp; Prevent Champions will support with implementation of action plan.</li> <li>6. Staff at all levels are expected to promote British Values in their own behaviour and standards.</li> <li>7. Communicate and promote the importance of the Prevent Duty and ensure that staff implement the duty effectively.</li> <li>8. Ensure that all staff understand the risk and build the capabilities to support staff.</li> <li>9. Action plan will be accessible to all. Stored on Sharepoint – Quality &amp; Curriculum – Prevent Duty.</li> </ul>			
4.	National Terrorism Risk Level	<p>A) Does the organisation have access to terrorism &amp; extremism risk information in each in order to understand the level of risk from either nationally or locally &amp; is therefore able to carry out an effective risk action or put in place mitigating actions?</p> <p>B) Does the organisation know how to respond effectively to changing risk level (either in response to national or local events) to ensure that the risk assessment/action plan remains effective?</p>	<p>4 x 5 = 20</p> <p><b>HIGH</b></p>	<ul style="list-style-type: none"> <li>1. The Managing Director has been briefed on the way in which the risk from terrorism is assessed &amp; the current risk level via the DfE Regional, Prevent Coordinator &amp; also through local Police Prevent team.</li> <li>2. The organisation has a process/policy in place that ensures that the Prevent risk assessment/action plan is reviewed at suitable intervals, a process which is facilitated by briefing &amp; support from the DfE Regional Prevent Coordinator.</li> </ul>	<p>3 x 5 = 15</p> <p><b>High</b></p>	<ul style="list-style-type: none"> <li>1. The Police CTLP or other suitable in-person briefing or document is shared with the organisation/summarised &amp; shared.</li> <li>2. The Prevent Lead will attend Prevent Network meetings to receive briefings &amp; discussion with sector colleagues.</li> </ul>	
5.	Staff training and awareness	<p>A) Are all staff aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and are aware how to refer concerns?</p> <p>B) Are leaders and staff able to challenge extremist narratives or exemplify British Values throughout the organisation?</p> <p>C) Are staff clear on how to deal with or refer concerns resulting in individuals being supported?</p> <p>D) Do all staff complete mandated Prevent (&amp;/or safeguarding) training?</p>	<p>5 x 5 = 25</p> <p><b>High</b></p>	<ul style="list-style-type: none"> <li>1. The organisations Code of conduct is followed by all staff. Where this is breached appropriate action is taken.</li> <li>2. The organisation provides appropriate CPD awareness training on radicalisation and extremism. Ad hoc &amp; annual (mandatory)</li> <li>3. All staff have sufficient training to recognise vulnerability, how to identify and report concerns. (Safeguarding referral)</li> <li>4. The prevent lead carries out quarterly meetings with Curriculum Leads to support with natural embedding into curriculum.</li> <li>5. The organisation has prevent Champions in place to promote within teams as part of monthly meeting agenda.</li> </ul>	<p>2 x 2 = 4</p> <p><b>Medium</b></p>	<ul style="list-style-type: none"> <li>1. The Prevent Lead to test impact of training.</li> </ul>	



No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				<ul style="list-style-type: none"> <li>6. All staff should feel comfortable challenging extremist ideas that are used by terrorist</li> <li>7. All staff to complete mandatory Safeguarding/Prevent is built into new start/induction for all staff. Meeting between Prevent Lead &amp; new starter. All new starts to complete ETF online modules within one week of joining the organisation.</li> </ul>			
6.	Welfare & Pastoral Care	<p>A) Does the organisation provide effective welfare and pastoral support which results in learners (and staff) being supported?</p> <p>B) Is welfare &amp; learner support adequately signposted and needs identified either early enough or often enough to allow learners to access welfare/learner support?</p>	<p>3 x 3 = 9</p> <p><b>Medium</b></p>	<ul style="list-style-type: none"> <li>1. The organisation embed British Vales into curriculum.</li> <li>2. The organisation provide a safe, nurturing and engaging learning environment.</li> <li>3. The organisation provide dedicated support pre, during and post Apprenticeship programme.</li> <li>4. The organisation provide positive preparation for personal and professional life by encouraging a sense of responsibility and independence.</li> <li>5. The organisation encourage trusting and respectful relationships.</li> <li>6. The Prevent Lead is a Mental Health Champion and has signed GMLPN Mental Health Charter.</li> <li>7. The organisation encourage an environment where learners appreciate different religious backgrounds, cultures and traditions.</li> <li>8. The organisation provide a wellbeing programme focuses on physical, emotional, healthy and well balanced life.</li> <li>9. Trainer and Managers carry out welfare checks as part of each session.</li> <li>10. The organisation provide out of hours personal support.</li> <li>11. The Prevent Lead to undertake Mental Health First Aid course</li> </ul>	<p>2 x 2 = 4</p> <p><b>Medium</b></p>	<ul style="list-style-type: none"> <li>1. The Prevent Lead to create themed calendar that focuses on key events throughout the year for example Ramadan.</li> <li>2. Operational &amp; Business Development team to work with employers within work based settings are aware of issues relating to Prevent the Statutory Duty and how to report concerns.</li> </ul>	

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Prevent Action Plan – what/when/who/how	Progress
				12. The Prevent Lead to promote "what's in the news today" twice weekly to raise awareness of current affairs, British Values, Wellbeing, Safeguarding, Prevent Duty.			
7.	Promoting British Values	<p>A) Does the organisation have a culture and ethos where British Values are celebrated and a culture of disrespect and intolerance where extremist views &amp; ideas are not allowed to flourish?</p> <p>B) Do Staff and learners understand British Values (and feel confident about them) and extremist views and narratives aren't allowed to flourish and are challenged?</p> <p>C) Is British Values embedded into the curriculum &amp; are seen by learners (&amp; staff) as important?</p>	<p>3 x 4 = 12</p> <p><b>High</b></p>	<p>1. The organisation encourage an environment where learners appreciate different religious backgrounds, cultures and traditions.</p> <p>2. The organisation embed British Vales into curriculum.</p> <p>3. The organisation have Prevent Champions in place to promote within teams as part of monthly meeting agenda.</p> <p>4. Prevent Lead to promote "what's in the news today" twice weekly to raise awareness of current affairs, British Values, Wellbeing, Safeguarding, Prevent Duty.</p>	<p>3x3=9</p> <p><b>Medium</b></p>	<p>1. All staff should feel comfortable challenging extremist ideas that are used by terrorist groups.</p> <p>2. Prevent Lead to create themed calendar that focuses on key events throughout the year for example Ramadan.</p>	