Lifeworks Charity Limited

Radicalisation and Prevent Policy v2.0

May 2023

Notice to staff using a paper copy of this guidance, the Intranet holds the most recent version of this guidance. Staff must ensure they are using the most recent guidance.

Owner: Safeguarding Lead

Policy Information Chart

Title	Radicalisation and Prevent Policy V2.0
Document purpose/summary	The purpose of this policy is to provide clear guidance for all Lifeworks staff on how to identify, raise concerns and respond to radicalisation matters by implementing this procedure.
Owner	Safeguarding Lead
Policy Department	Safeguarding
Ratification date	05/23
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Consultation process	SLT
Ratified by	BOT
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Associated documentation/cross referenced policies	Safeguarding Children and Child Protection Safeguarding Adults Safeguarding Children in an Adult Setting Whistleblowing
Supersedes document	Preventing Extremism and Radicalisation v1

Executive approval is subject to the understanding that the policy Owner has followed the organisation process for policy ratification

Document Review History

Version no.	Type of Change: Major, minor, none or taken out of use	Date	Author of change	Description of change
1.0	New Document	September 22	Safeguarding Lead	Complete revision and reformatting
2.0	Major	May 2023	Safeguarding Lead	Definition of notifiable events, combining of College and Community, new top level report format

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Radicalisation and Prevent Policy   May 2023

1.0 Equality, Diversity and Inclusion

1.1 Lifeworks is committed to encouraging equality, diversity and inclusion among our workforce and eliminating unlawful discrimination. The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best. The Charity, in providing services, is also committed against unlawful discrimination of service users or the public.

2.0 Introduction

2.1 Lifeworks is committed to providing a secure environment for service users, where they feel safe and are kept safe. All staff at Lifeworks recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for service users or not. This Radicalisation and Prevent Policy is one element within our overall charity arrangements to Safeguard and Promote the Welfare of all service users. We see it as our duty to prevent people from being drawn into terrorism.

3.0 Purpose

3.1 The Purpose of this policy is to:

- Ensure that Lifeworks complies with all the relevant current legislation and other National Standards which govern this area of our work.

- Ensure the individuals in our care keep themselves and others in the wider community safe.

- Prevent the vulnerable children, young people and young adults in our care being exposed to radicalisation and extreme views

- Ensure that the welfare and safety of individuals in our care is a major consideration at all times.

- Ensure that arrangements are in place to deal with concerns which may be raised about an individual/s in our care.

4.0 Scope

4.1 This policy applies to all service users, staff and activities provided by Lifeworks.

5.0 Definitions

The following definitions will apply to this Policy:

5.1 *Radicalisation* - the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

5.2 *Extremism* - 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. Included within this definition are calls for the death of members of our armed forces, whether in mainland UK or overseas (ref. the *Counter- Terrorism and Security Act 2015*).

5.3 *Fundamental British Values* - democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Within this definition, the following additional explanations are valid:

5.3.1 *Mutual Respect and Tolerance* - to encourage respect of other people with particular regard to the protected characteristics of the *Equality Act 2010*.

5.3.2 *The Rule of Law* - a requirement for compliance to the Health and Safety laws which regulate industry as they apply to the business of running Lifeworks' services.

5.3.3 *Individual Liberty* - the extent that this exists or is limited by regulation.

5.4 *Service User* - Child, young person or adult using Lifeworks' services.

6.0 Responsibilities

6.1 Responsibilities of All Staff

Safeguarding is everyone's responsibility.

Everyone employed by or volunteering with Lifeworks is responsible for reporting anything that is or could potentially be abuse, neglect or the risk of abuse or radicalisation and are responsible for implementing these policies and procedures in association with their line managers and other relevant agencies.

6.1.1 All Staff have a responsibility to:
- Maintain an attitude of "it could happen here" in order to remain vigilant to the possibility of abuse and ensure that any and all radicalisation and extremism concerns are acted upon in the appropriate manner.
- Be clear about their own role and that of others in providing a caring and safe environment for all service users and must know how they should respond to any concerns about an individual that may arise.
- Ensure they are aware of and adhere to this policy and all related policies and procedures listed in the reader information chart of this document.
- Ensure they are familiar with and adhere to all relevant procedures involved in recognising and reporting incidents.
- Report all concerns, without judgement about their significance, to the Designated Safeguarding Lead.
- Adhere to appropriate confidentiality.
- Ensure they fulfil the mandatory prevent training and induction requirements.
- Maintain professional relationships with service users at all times. No attempt should be made to build or encourage any friendship with service users or their families outside of work. This includes telephone and personal contact and connecting via social media.
- Ensure that any and all correspondence with service users and their families is via Lifeworks systems. Staff must not give their personal contact details to service users including e-mail, home or mobile telephone numbers.

6.1.2 All staff undertake online safeguarding training as part of their induction, including training on Prevent and radicalisation and this is updated at least every 2 years. Staff in each service area attend additional safeguarding training and updates throughout the year.

6.2 Responsibilities of the Charity Safeguarding Lead

Lifeworks Charity has an overall Charity Safeguarding Lead who is a member of the SLT. The Charity Safeguarding Lead is also the key Prevent Officer of Lifeworks.

6.2 1 The Charity Safeguarding Lead has a responsibility to:
- Take ownership of all Safeguarding policies and procedures across the Charity,

reviewing and monitoring their implementation.
- Provide bi-monthly group forum to charity DSLs.
- Circulate updates relating to Safeguarding to the charity DSLs.
- Provide an annual formal report to the Board of Trustees on Safeguarding (including items stated in 6.5.4).
- Undertake an annual safeguarding audit/review alongside key staff and the Trustee Safeguarding Champion.
- Advise DSLs and staff on the Prevent strategy and their prevent duty as required, supporting them in the case of any referrals.
- Inform the CEO, Chair of the Board and the Trustee Safeguarding Champion immediately of any notifiable prevent incident and ensure an investigation takes place. A notifiable safeguarding incident in this case includes those incidents which meet criteria and are under further investigation by the LA and incidents which involved emergency services.
- Ensure that the Charity's requirements for external reporting of prevent events are fulfilled.

The Charity Safeguarding Lead undertakes Level 3 safeguarding training and additional safeguarding management training in order to fulfil their role. Training is updated at least every two years.

6.3   Responsibilities of the Designated Safeguarding Leads (DSL) and their Deputies

Each service area (Lifeworks College, Robins, Sesame and CP) has a Designated Safeguarding Lead (DSL) who has overall responsibility for adult safeguarding in the setting, including prevent and radicalisation. In the absence of the DSL, the Deputy DSL will undertake the DSL's duties.

6.3.1   The DSL has a responsibility to:
- Liaise with the LA, Social Services, Police and other agencies on individual cases of suspected or identified abuse.
- Ensure the Deputy Safeguarding Lead is up to date in terms of training and is fully involved and supported in decisions made.
- Act as the contact person/s within the service area.
- Be responsible for co-ordinating action within the service area on safeguarding issues
- Liaise with staff on a 'need to know' basis so that service user's rights to confidentiality are ensured
- Represent the service area at channel meetings if required
- Ensure staff and visitors within the service area are familiar with this policy and procedure
- Ensure all staff receive regular update training on radicalisation.
- Ensure the staff team is aware of how to identify and respond to risks to service users from extreme or radical views.
- Embed a contextual safeguarding approach within the service area, working to ensure that environmental and social factors that may impact upon service users' welfare and safety are understood, considered and communicated to any safeguarding partners as necessary.
- Discuss concerns and support colleagues to arrive at effective responses within the confidentiality of the Prevent and Radicalisation Policy.
- Generate timely safeguarding reports, including the top level report identifying trends.
- Refer cases to the Channel programme as required, for service users who have been identified as being vulnerable to being drawn into terrorism
- Support staff involved in reporting incidents
- Refer cases to Lifeworks HR Team where a person is dismissed or has left due to risk/harm to a student to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- Attend (as appropriate) Local Authority Designated Officer Support Network meetings.

6.3.2 DSLs undertake additional safeguarding training modules in order to fulfil their role. The Lifeworks College DSLs undertake additional Multi-agency Safeguarding and Child Protection training in order to fulfil their role.
All safeguarding leads across Lifeworks Charity receive updated training at least every two years.

6.4 **Responsibilities of the HR Department**

The HR Department is a centralised team, based at Head Office, who oversee all recruitment across the Charity.

6.4.1 The HR Team has a responsibility to:

• Ensure that an up-to-date Safer Recruitment Policy is in place and procedures within are followed.
• Ensure that Prevent is implicit throughout any recruitment process and this commitment is clear to all applicants.
• Ensure that an up to date Single Central Record of DBS checks is maintained at all times.
• Ensure that Safeguarding Policies are readily available to staff and external stakeholders.
• Manage and monitor the safeguarding training of all staff.

6.4.2 The HR Manager and HR Officer are trained in Safer Recruitment, alongside key management personnel in each service area and oversee the recruitment process of all staff members across the Charity.

6.5 **Responsibilities of the Board of Trustees**

6.5.1 Trustees should proactively safeguard and promote the welfare of their charity's service users. They must take reasonable steps to ensure that their service users or others who come into contact with their charity do not, as a result, come to harm.

This should be a key governance priority for Trustees. Trustees are responsible for safeguarding even if certain aspects of the work are delegated to staff. It is therefore essential that trustees:

• know their responsibilities
• have adequate measures in place to assess and address safeguarding risks
• have adequate safeguarding policies and procedures appropriate for the charity's particular circumstances and which reflect both the law and best practice
• make sure that these policies and procedures are effectively implemented and regularly reviewed

These steps are vital, given that charities are accountable to the public and must operate for the public benefit. Trustees should be familiar with their responsibilities and the Charity Commission guidance:

Safeguarding and protecting people for charities and trustees (last updated June 22)

6.5.2 There is a clear line of responsibility and accountability in the provision of services within Lifeworks to safeguard and protect the welfare of children, young people and adults at risk. Trustees must be confident that service users, visitors and staff know who they should contact to report any safeguarding concerns they may have. The Charity Safeguarding Lead directly

reports to the Lifeworks Board of Trustees.

6.5.3 Safeguarding is every board member's governance responsibility and in addition there is a nominated trustee safeguarding champion. All trustees are appointed in line with safer recruitment practices and undertake level 2 children and adult safeguarding as part of their trustee induction programme. The BOT safeguarding champion will in addition undertake level 3 safeguarding training.

6.5.4 Trustees have legal responsibility for the organisation's safeguarding arrangements and must be informed of any safeguarding incidents and internal investigations. The safeguarding policy will be regularly reviewed, updated and formally ratified at trustee meetings. This enables the trustees to be able to support the senior leadership and staff teams by continually evaluating the information provided and know when they need to become more involved. This includes:

- Allegations made against the most senior members of staff
- Ensuring safer recruitment practices are carried out for senior staff
- Disciplinary proceedings for the most senior members of staff
- Being notified about any complaints made in relation to safeguarding
- Investigating any whistleblowing allegations made against the most senior members of staff
- Undertaking, alongside key staff, annual internal safeguarding audits and reviews
- Agreeing the organisation's risk management framework including how safeguarding risks will be mitigated
- Ensuring full investigations are conducted in response to any serious notifiable safeguarding incident in line with Charity Commission, Ofsted and CQC regulations
- Meeting on an annual basis with the CEO and Charity Safeguarding Lead to formally review the previous 12-month number and type of incidents and accidents, investigation responses and outcomes

The overall governance of Lifeworks is critical to underpinning the foundation and development of good safeguarding practice. Trustees will need to be confident effective safeguarding systems and processes are in place and being followed at all times. Children and adult safeguarding policies should be formally reviewed annually, or updated with changes in legislation as they happen.

Safeguarding is an agenda item at every quarterly BOT meeting whereby the SLT will formally report on any incidents or accidents including notifiable prevent related incidents, investigations and outcomes. In addition, any notifiable safeguarding incident will be reported immediately by the Charity Safeguarding Lead to the Board safeguarding champion and the Chair of the Board and they will be kept fully informed.

7.0   What is the Prevent Strategy?

The Counter-Terrorism and Security Act 2015 became law in February 2015. It introduced a raft of measures, some of which are still being debated in Parliament. The terrorism threat to the UK is considerable, and the government has acted to ensure that the intelligence agencies have the

powers they need to keep us safe; it has issued statutory guidance to all relevant specified authorities.

7.1   Schedule 6 List

This list, which is regularly reviewed, includes all local authorities; anyone on the list is known as

a 'specified authority'. It also includes prison, health- and social care, education, and police personnel at an identified level, for instance, a chief officer of police. The Act creates a general duty of 'due regard' on all 'specified authorities'.

Local authorities must have due regard to local circumstances; give appropriate weight to the need to 'prevent' people being drawn into terrorism (see below), and consider all other factors relevant to how they carry out their usual functions.

7.2   The Prevent Strategy

This includes clarification of the Prevent strategy first identified in 2011, which is a part of CONTEST: the government's counter-terrorism strategy.

The CONTEST strategy is made up of four 'workstreams', each comprising a set of objectives:

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

This policy is intended to make staff aware of their role and responsibilities regarding the Prevent area of work, as required by the legislation.

7.3   Prevent Strategy Objectives

The Prevent strategy aims to perform the following:

- Respond to the ideological challenge of terrorism and the threat posed by those who promote it.
- Prevent people from being drawn into terrorism and ensure they are given the appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Since the 2011 Prevent strategy, the government has defined extremism as "a 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"; also included in their definition are "any calls for the death of members of the armed forces".

The Prevent strategy was explicitly changed in 2011 to counter all forms of terrorism, including non-violent extremism, that create an atmosphere conducive to terrorism or that popularise views that can then be exploited by terrorists. The changes also made clear that preventing people from becoming terrorists or supporting terrorism requires challenging extremist ideas where they are used to legitimise terrorism and are shared by terrorist groups. The strategy also means intervening to stop people moving from extremist (albeit legal) groups into terrorist-related activity.

Prevent work is intended to deal with all kinds of terrorist threats to the UK. Currently, the most significant threats are from terrorists' functions in Syria and Iraq, including Al Qa'ida associate groups, ISIS (also Daesh), and so forth; however, right-wing extremists also pose a threat to our safety and security. In fulfilling the Prevent duty, all specified authorities are expected to participate fully in work to prevent people from being drawn into terrorism. Specified authorities in

Schedule 6 of the Act are those judged to have a role in protecting vulnerable people and/or our national interest and security.

8.0 Statutory Guidance

8.1 Three themes

Three themes run through the risk-based approach to the Prevent duty (i.e., an awareness of the risk of radicalisation; see below):

8.1.1 Effective Leadership

For all specified authorities, the expectation is that those in leadership positions will

- Establish or use existing mechanisms for understanding the risks of radicalisation.
- Ensure staff understand the risk and build the capabilities to deal with it.
- Communicate and promote the importance of the duty.
- Ensure staff implement the duty effectively.

8.1.2 Working in Partnership

Prevent work depends on effective partnership. To demonstrate effective compliance with the duty, the specified authorities must demonstrate evidence of productive cooperation, in particular with local Prevent coordinators, the police and local authorities, and co-ordination through existing multi-agency forums, for example, Community Safety Partnerships regime.

8.1.3 Capabilities

Frontline staff who engage with the public should understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. They need to be aware of what we mean by the term 'extremism' and the relationship between extremism and terrorism.

Staff need to know what measures are available to stop people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it. They need to understand how to obtain support for people who may be being exploited by radicalising influences.

8.2 Risk-Based Approach

This means, as a starting point, awareness and understanding of the risk of radicalisation in their local area, institution, or body. This risk will vary greatly and can change rapidly, but no local area, institution, or body will be risk-free; the type and scale of activity that will address the risk will vary but all of the specified authorities will need to give "due regard" to it. Local authorities are expected to provide appropriate training to frontline staff, including those whom it contracts for services.

As outlined above, three themes run throughout the sector-specific guidance: leadership, working in partnership, and capabilities.

8.3 Sharing Information

In addition to those overarching themes, sharing information is paramount. To ensure the rights of individuals are fully protected, agreements must exist at a local level (usually via the local authority). When sharing information in this context, consideration of the following is important:

- Necessity and proportionality.
- Consent.
- Power to share.
- Legislative requirements e.g. Date Protection Act, common law, the duty of confidentiality.

8.4 Monitoring and Enforcement by the authorities

All specified authorities must comply with this duty; they must maintain appropriate records, show compliance with their responsibilities, and provide reports when requested.

8.4.1 Central Support and Monitoring

The Home Office (HO) oversees Prevent activity in local areas which have been identified as priorities for this programme; they will provide central monitoring for the duty. The HO shares the management of local Prevent coordinator teams with local authorities. The HO will draw together data about implementation of Prevent from local and regional Prevent co-ordinators from all specified authorities; monitor and assess the delivery of Prevent; maintain contact with relevant departments (escalating issues where appropriate); and support the Prevent Oversight Team, chaired by the Minister for Immigration and Security, which may agree on further steps to support the implementation of the duty. Where non-compliance of the duty is identified, the Board can make recommendations to the Secretary of State to use their powers of direction.

8.4.2 Inspection Regime in Individual Sectors

Central support and monitoring will be supported by existing inspection regimes in specific sectors. Not every specified authority has a suitable inspection, and in some areas, it may be necessary to create or enhance existing regimes. Specific arrangements are in place to work with the Welsh government to provide support to Welsh inspection regimes. This will mean, for instance, that for specified authorities within health- and social care the inspection regime which will support the Prevent strategy will be the CQC, NHS England, and Monitor, to name but a few.

8.5 Sector-Specific Guidance

All of the above information relates to all of the sectors identified below. In addition, each of those sectors has its sector-specific guidance. Those sectors are

- Local authorities.
- The health sectors.
- Prisons and probation.
- The police.

As providers of services to local authorities and/or the health sector, it is vital to understand Prevent and any role we may play within it via our contractual arrangements. Staff are at the frontline of contact with the local community and need to be aware of Prevent and understand their role concerning the strategy.

Prevent coordinators are located within the local police authority and accessed via the 101 number.

9.0 Channel

9.1 What is Channel?

A multi-agency early intervention process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour; works in a similar way to SABs.

9.2 Who does it work with?

Individuals of any age are at risk of being exploited by extremists or terrorist ideologies. It provides support for tackling any form of radicalisation or personal vulnerabilities.

9.3 The Channel Panel

Each panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk; they can decide whether a support package is needed.

10 What to do in the case of a concern

10.1 Identifying Risk

As part of wider safeguarding responsibilities staff are alert to:

• disclosures by children, young people and young adults of their exposure to the extremist actions, views or materials of others outside of Lifeworks, such as in their homes or community groups, especially where they have not actively sought these out;

• graffiti symbols, writing or art work promoting extremist messages or images;

• accessing extremist material online, including through social networking sites and excessive usage; parental reports of changes in behaviour, friendship or actions and requests for assistance;

• partner services, local authority services, and police reports of issues affecting young people in other settings;

• voicing opinions drawn from extremist ideologies and narratives;

• use of extremist or "hate" terms to exclude others or incite violence;

• intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture;

• attempts to impose extremist views or practices on others and

• anti-Western or Anti-British views. We closely follows the Devon County Council Safeguarding Board agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation.

10.2 Raising a Concern

If staff believe that someone vulnerable is being exploited or radicalised then the established safeguarding procedures should be used to escalate concerns: inform the service area DSL or Deputy DSL and complete an occurrence form (Appendix A). Advice can then be sought from the prevent office and we will be guided by them with regards to the next course of action.

It is important to note that anyone can make a referral to the local prevent office via 101. If someone has raised concerns with the DSL and is not satisfied that the concern has been dealt with sufficiently, it is the duty of the member of staff to call the prevent office themselves.

During any subsequent external investigation, for the individual to remain in our care, the management team will hold a focus meeting to identify risks and control measures that can be put in place to reduce that risk. They will decide if it is safe to keep the individual or whether they need to undertake a period of temporary exclusion. The safety of all the individuals in our care, our staff and the wider community is of paramount importance.

11 Approaches and Practices

11.1 We will all strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches people may experience elsewhere may make it harder for them to challenge or question these radical

influences. We ensure that all of our support and approaches will help our children, young people and adults build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills.

We develop strategies to ensure that all of our staff are equipped to recognise extremism and are skilled and confident enough to challenge it. We follow the three broad categories of:

• making a connection with service users through positive engagement and a person centered approach;

• facilitating a 'safe space" for dialogue and

• equipping people with the appropriate skills, knowledge, understanding and awareness for resilience.

Therefore this approach will be embedded within the ethos of Lifeworks so that service users know and understand what safe and acceptable behaviour is in the context of extremism and radicalisation.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using an approach that includes:
• Open discussion and debate.

• Work on anti-violence and a restorative approach to conflict resolution.

• Targeted programmes.

We also work with local partners, families and communities in our efforts to ensure Lifeworks understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our service user's experiences and horizons.

We help support people who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a service user is being directly affected by extremist materials or influences we will ensure that that person is offered mentoring. Additionally in such instances we will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

At Lifeworks we promote the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We will teach and encourage our service users to respect one another and to respect and tolerate difference, especially those of a different faith or no faith. It is indeed our most fundamental responsibility to keep our service users safe and prepare them for life in modern multi-cultural Britain and globally.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by service users or staff will always be challenged and where appropriate dealt with in line with our Code of Behaviour for staff.

11.2 Use of Partners

At Lifeworks we work with partners to enrich the experiences of our service users, however we will positively vet those partners who we engage to provide such learning opportunities or experiences for all. Such vetting is to ensure that we do not unwittingly use agencies that contradict each other with their messages or that are inconsistent with, or are in compete opposition to, our values and ethos.

We will assess the suitability and effectiveness of input from partners or individuals to ensure that:

• any messages communicated to service users are consistent with the ethos of Lifeworks and do not marginalise any communities, groups or individuals

- any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise young people through extreme or narrow views of faith, religion or culture or other ideologies;

- activities are matched to the needs of service users.

We recognise, however, that the ethos Lifeworks is to encourage children, young people and adults to understand opposing views and ideologies, appropriate to their understanding and abilities. Therefore by delivering a broad and balanced activities programme, augmented by the use of external sources where appropriate, we strive to ensure our service users recognise risk and build resilience to manage any such risk themselves where appropriate to their ability but also to help develop the critical thinking skills needed to engage in informed debate.

11.3 Whistle Blowing

Where there are concerns of extremism or radicalisation, staff or others are encouraged to make use of our internal systems to Whistleblow or raise any issue in confidence. They must inform the Manager of the service straight away (or if it relates to the Manager inform Lifeworks CEO). Please see our Whistleblowing Policy for further information.

Safeguarding Staff at Lifeworks are alert to the fact that whilst Extremism and Radicalisation is broadly a safeguarding issue there may be some instances where a young person may be at direct risk of harm or neglect. For example; this could be due to a young person displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with or staff may be aware of information about a young person's family that may equally place a young perosn at risk of harm. (These examples are for illustration and are not definitive or exhaustive). Therefore all adults working in Lifeworks (including visiting staff, volunteers, contractors) are required to report instances where they believe a student may be at risk of harm or neglect to the Designated Safeguarding Lead or Deputy.

11.4 Training

Local authorities are expected to provide appropriate training to frontline staff, including those whom it contracts for its services.

All staff, during induction, are made aware of the organisation's policies and procedures, all of which are used for training updates. All policies and procedures are reviewed and amended where necessary and staff are made aware of any changes. All staff and Trustees complete induction safeguarding training, including a section on Prevent and Redicalisation.

Further training on Safeguarding is organised for staff at regular intervals and complies with the prevailing arrangements agreed by the Local Authority and the Devon County Council Local Safeguarding Boards and will, in part, include training on extremism and radicalisation and its safeguarding implications. The Designated Safeguarding Lead attends training courses as necessary and the appropriate interagency training organised by Devon County Council Local Safeguarding Boards, or similar courses from an accredited provider. Again this will include training on extremism and radicalisation and its safeguarding implications.

11.5 Recruitment

The arrangements for recruiting all staff, permanent and volunteers, to Lifeworks follows guidance for safer recruitment best practice in education and care settings, including, but not limited to, ensuring that DBS checks are always made at the appropriate level, that references are always received and checked and that we complete and maintain a single central record of such vetting checks.

We apply safer recruitment best practice principles and sound employment practice in general and in doing so will deny opportunities for inappropriate recruitment or advancement. We are alert to the possibility that persons may seek to gain positions within our services so as to unduly influence our character and ethos. We are aware that such persons seek to limit the opportunities for our service users thereby rendering them vulnerable to extremist views and

radicalisation as a consequence. Therefore, by adhering to safer recruitment best practice techniques and by ensuring that there is an ongoing culture of vigilance within our charity and staff team we will minimise the opportunities for extremist views to prevail.

12.0 Monitoring Compliance

12.1   All reports of abuse, neglect or radicalisation will be monitored as appropriate, and evaluated and reviewed on a regular basis, at least every year by the Lifeworks Safeguarding Steering Group. This includes the Charity Safeguarding Lead, the CEO and the Trustee Safeguarding Champion. Following evaluation information being submitted to the Board, actions can be recommended to reduce potential for future occurrences. The effectiveness of the policy will also be evaluated against all case studies as part of the review. As part of this review, completed cases will be evaluated to see how they have been handled.

12.2   The HR Team manage and monitor the safeguarding training of all staff using a training matrix. This information is recorded in staff personnel files.

12.3   Supervisors ensure that the mandatory safeguarding training has been completed by new employees and that all safeguarding policies have been read and understood. Safeguarding knowledge and queries, alongside expectations of training, are discussed and recorded at supervision and as part of the appraisal process.

12.4   The DSL of each service area undertakes 'spot-check' monitoring of staff knowledge and implementation of prevent policies and procedures. Outcomes of these spot-checks are discussed during group supervision with the Charity Safeguarding Lead.

Recording Form for Safeguarding Incident at College or Community

Staff, volunteers and regular visitors are required to complete section A and give it or email it to the DSL or Deputy DSL if they have a safeguarding concern about a person in our service area.

| SECTION A: To be completed by person who is reporting the concern	
Information Required	**Enter Information Here**
Name of person completing the form	
Your Signature	
Job role	
Date of occurrence	
Time of occurrence	
Full name of person involved	
Date of birth	
Gender	
Witness if any	
Incident Details *Please include where you were when the person made a disclosure, what you saw, who else was there, what did the person say or do and what you said.* *Ensure that if there is an injury this is recorded (size and shape) and a body map is completed* *[Make it clear if you have a raised a concern about a similar issue previously]*	

Incident Details contd.	

| SECTION B: To be completed by DSL	
Time form received by DSL	
Nature of concern/disclosure	
Parents/Carers Informed [yes/no, date and time]	
Referral made to police [yes/no, date and time]	
Referral Made to Other Agency [yes/no, date and time, name of organisation]	
Feedback given to service user [yes/no, date and time]	
Feedback given to pastoral team/key worker [yes/no, date and time]	
Feedback given to person who recorded disclosure [yes/no, date and time]	
Full Name of DSL	
Signature of DSL	
Date of Signature	

Body Chart

Male
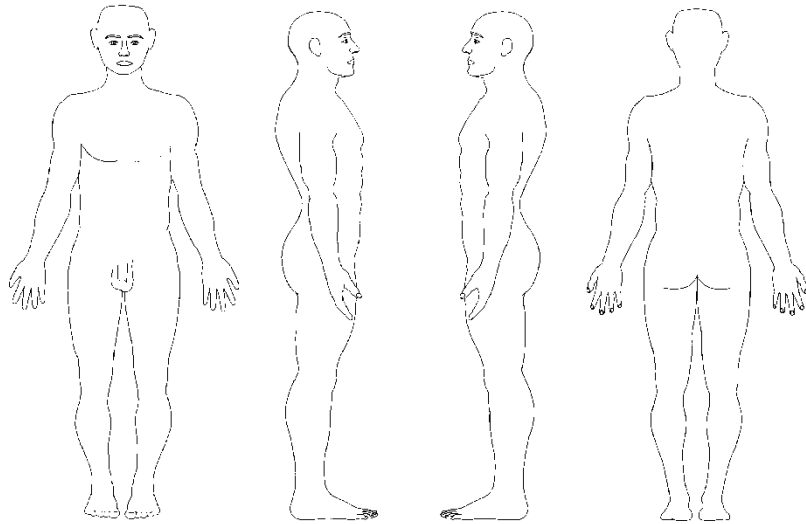
Female
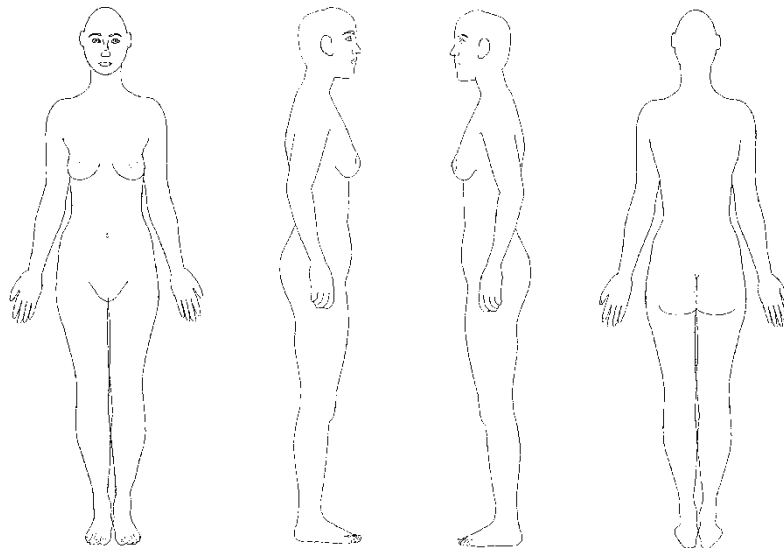
Describe any injury that was sustained during the occurrence or any unexplained or unwitnessed injury being reported, including what type of injury, where it is, how big it is, what first aid measures were needed, if medical intervention was needed. Also, mark the location and proportion of the injury on the body chart.

Appendix A2: Robins Recording Form for a Safeguarding Incident

Name of person completing the form	
Designation	
Date of occurrence	
Time of occurrence	
Name of person involved	
Male/female	
Status i.e. service user/staff/visitor/public/contractor	
Age	
Witness name if any	

Specification of occurrence type

INCIDENT (violence/abuse/physical attack on staff/absconding/ missing person/hospitalisation damage to property/major utility failure etc.)	ACCIDENT (fall or other injury/car accident/any accidental or unintentional injury etc)	INJURY FROM KNOWN RISK ASSESSED BEHAVIOUR (self-harm if risk assessed)	INJURY OF UNKNOWN ORIGIN (child comes into service with bruises/cuts/scrapes/grazes etc.)	NEAR MISS (potential to cause harm)

Nature of occurrence: tick the most appropriate box

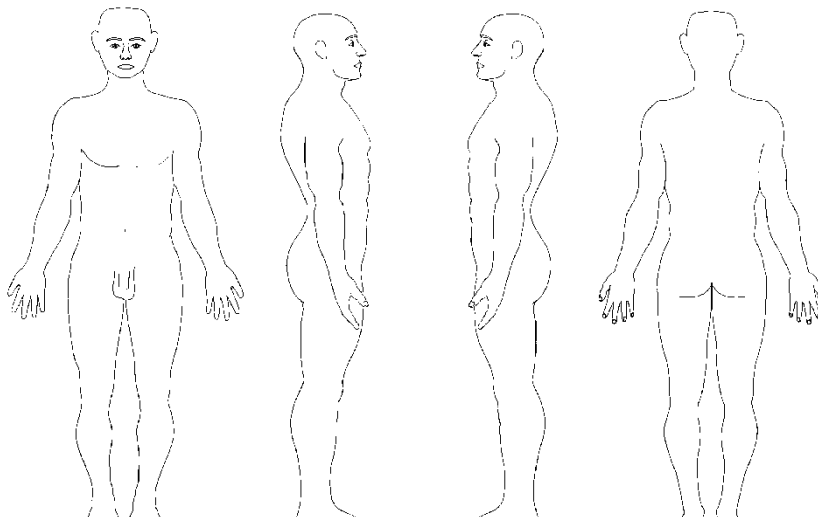| Fatality		Major Injury		Dangerous Occurrence		Abusive Incident		Minor Injury		Utility failure	
Damage to Property		Risk to Self or Others		Missing Person		Service User Allegation		Assault		Altercation	

What was the cause of the occurrence**?**

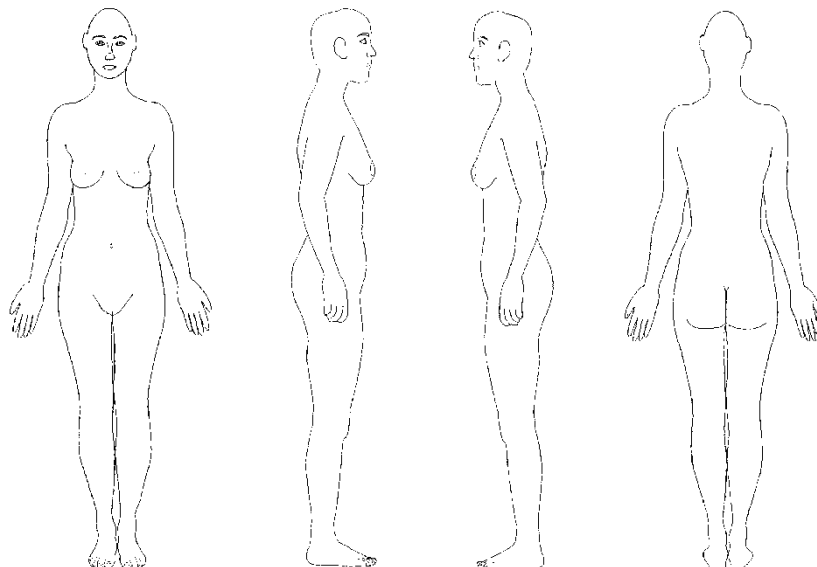| Industrial disease		Road Traffic Accident		Physically assaulted by a person		Injured whilst handling, lifting, or carrying.		Illness	
Injury by an Animal		Struck by a moving vehicle		Theft		Infectious disease		Absconding	
Medication error		Self injury		Verbal Abuse		Behavior related		Drowning or asphyxiation	
Disclosure		Other please Specify:		Slip trip or fall from height/same level		Fire/flood/gas leak/explosion		Fall witnessed or unwitnessed	

What happened? Please describe the events that took place in as much detail as possible including how staff were alerted / response times / witnesses / injuries / what was said by those present / how did the occurrence happen?

Body Chart

Male

Female

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Describe any injury that was sustained during the occurrence, including what type of injury, where it is,

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how big it is, what first aid measures were needed, if medical intervention was needed. Also, mark the

location and proportion of the injury on the body chart.

Also use the body chart for any unexplained or unwitnessed injury

Body Chart Completed by: **Date & Time:**

If there are any untoward or unexplained injuries or any cause for concern, then the GP, 111 or 999 must be contacted immediately. If the child/young person refuses to be examined by the visiting GP or paramedic then the refusal must be witnessed and recorded below

Which service did you contact?
Which professional attended?
If DR / paramedic visited did the child/young person consent to an examination?
Name of witness to refusal:
Did the child/young person consent to being supported during the examination?
Name of person supporting the child/young person during examination

What action did staff take during the incident and after the incident?

How was the incident managed and what did staff do to ensure all parties were safe?

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PRN Medication

Was any prn medication required or used?
If yes ensure mar chart is completed correctly including the description of why the medication was administered (attach copy)   Copy attached?

Did anyone else witness the occurrence (add name and designation)

Witnesses:	Designation:

Observations by person in charge of shift. What could be done to prevent this from happening again?

Who have you informed?

Next of kin yes / no	Person informed	Time
Manager yes / no	Person informed	Time

On call manager yes / no	Person informed	Time

Is it a safeguarding matter? If so do you need to take any further action?

Do you need to call the police or complete a safeguarding referral (MASH/LADO)

Is a REG 40 required?

Child/young person's debrief: What is the child/young person's thoughts on what happened? How do they feel about it? Is there anything they would like to say? Is there anyone they would like to speak to? What do they want to happen?

Name of person completing the form:

Signature:

Name of shift leader: …………………………………………………………

Signature: …………………………………….

For manager to complete:

Any further action required? Do you need one or more statutory notifications? Does an HSE form need

To be completed? Is the occurrence reportable under RIDDOR? Do support plans risk assessments

need completing or updating? Is a full debrief required? Does there need to be any further investigation? Any occupational health

Involvement required?

Signature of manager: _____   date: _____

Appendix A3: Sesame Recording Form for a Safeguarding Incident

Name of person completing the form	
Designation	
Date of occurrence	
Time of occurrence	
Name of person involved	
Male/female	
Status i.e. service user/staff/visitor/public/contractor	
Age	
Witness name if any	

Specification of occurrence type

INCIDENT (violence/abuse/physical attack on staff/absconding/ missing person/hospitalisation damage to property/major utility failure etc.)	ACCIDENT (fall or other injury/car accident/any accidental or unintentional injury etc)	INJURY FROM KNOWN RISK ASSESSED BEHAVIOUR (self-harm if risk assessed)	INJURY OF UNKNOWN ORIGIN (child comes into service with bruises/cuts/scrapes/grazes etc.)	NEAR MISS (potential to cause harm)

Nature of occurrence: tick the most appropriate box

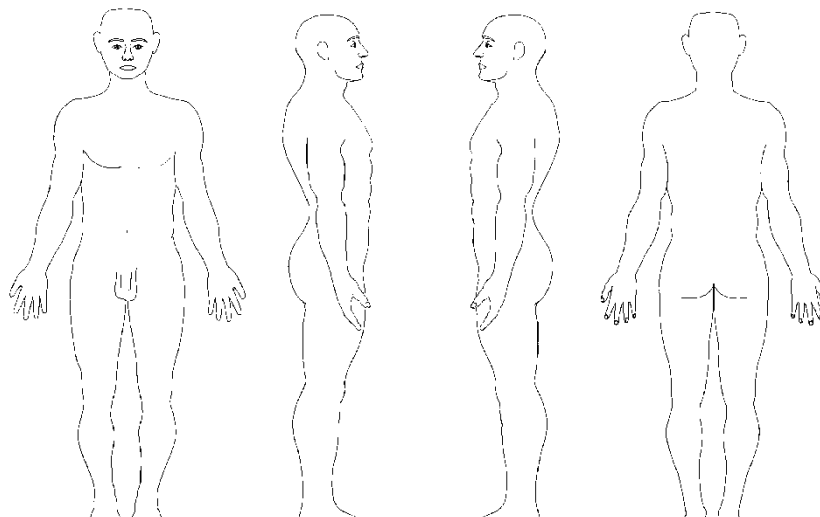| Fatality		Major Injury		Dangerous Occurrence		Abusive Incident		Minor Injury		Utility failure	
Damage to Property		Risk to Self or Others		Missing Person		Service User Allegation		Assault		Altercation	

What was the cause of the occurrence?

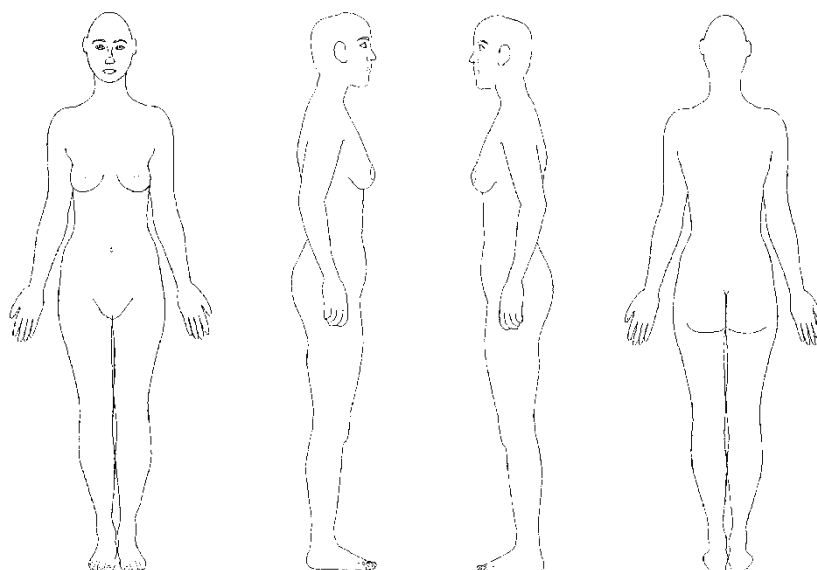| Industrial disease		Road Traffic Accident		Physically assaulted by a person		Injured whilst handling, lifting, or carrying.		Illness	
Injury by an Animal		Struck by a moving vehicle		Theft		Infectious disease		Absconding	
Medication error		Self injury		Verbal Abuse		Behavior related		Drowning or asphyxiation	
Disclosure		Other please Specify:		Slip trip or fall from height/same level		Fire/flood/gas leak/explosion		Fall witnessed or unwitnessed	

What happened? Please describe the events that took place in as much detail as possible including how staff were alerted / response times / witnesses / injuries / what was said by those present / how did the occurrence happen?

Body Chart

Male

Female

Describe any injury that was sustained during the occurrence, including what type of injury, where it is,

how big it is, what first aid measures were needed, if medical intervention was needed. Also, mark the

location and proportion of the injury on the body chart.

Also use the body chart for any unexplained or unwitnessed injury

Body Chart Completed by: **Date & Time:**

If there are any untoward or unexplained injuries or any cause for concern, then the GP, 111 or 999 must be contacted immediately. If the person refuses to be examined by the visiting GP or paramedic then the refusal must be witnessed and recorded below

Which service did you contact?
Which professional attended?
If DR / paramedic visited did the child/young person consent to an examination?
Name of witness to refusal:
Did the child/young person consent to being supported during the examination?
Name of person supporting the child/young person during examination

What action did staff take during the incident and after the incident?

How was the incident managed and what did staff do to ensure all parties were safe?

PRN Medication

Was any prn medication required or used?
If yes ensure mar chart is completed correctly including the description of why the medication was administered (attach copy)   Copy attached?

Did anyone else witness the occurrence (add name and designation)

Witnesses:	Designation:

Observations by person in charge of shift. What could be done to prevent this from happening again?

Who have you informed?

Next of kin yes / no	Person informed	Time
Manager yes / no	Person informed	Time
On call manager yes / no	Person informed	Time

Is it a safeguarding matter? If so do you need to take any further action?

Do you need to call the police or complete a safeguarding referral?

Resident's debrief: What is the Individual's thoughts on what happened? How do they feel about it? Is there anything they would like to say? Is there anyone they would like to speak to? What do they want to happen?

Name of person completing the form:

Signature:

Name of shift leader: …………………………………………………………

Signature: ……………………………………….

For manager to complete:

Any further action required? Do you need one or more statutory notifications? Does an HSE form need

To be completed? Is the occurrence reportable under RIDDOR? Do support plans risk assessments

need completing or updating? Is a full debrief required? Does there need to be any further investigation? Any occupational health

Involvement required?

Signature of manager: _____   date: _____

This sector specific guidance for further education institutions in England and Wales subject to the Prevent duty is additional to, and is to be read alongside, the general guidance contained in the Revised Prevent Duty Guidance issued on 16th July 2015.

Further education

1. Section 26(1) of the Counter-Terrorism and Security Act 2015 ("the Act") imposes a duty on "specified authorities", when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. There is an important role for further education institutions, including sixth form colleges and independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

Further education specified authorities

2. The further education institutions specified in Schedule 6 to the Act fall into the following categories:

- further education institutions on the Skills Funding Agency (SFA) register of training organisations (ROTO), including sub- contractors which receive more than £100,000 of SFA funding via lead providers. This includes approximately 950 further education colleges and independent providers – such as private companies and third sector organisations that are eligible to receive public funding from the SFA to deliver education and training and the 93 Sixth Form Colleges and other organisations funded by the Education Funding Agency to deliver post 16 education and training;
- further education institutions in Wales funded by the Welsh Government; and
- private further education institutions who are not in receipt of public funding who may be on the UK Register of Learning Providers and have similar characteristics to those on the register. We define these as institutions that have at least 250 students who are undertaking courses in preparation for examinations which either receive public funding or are regulated by the Office of Qualifications and Examinations Regulation or the Welsh Government.

3. Most institutions already understand their Prevent-related responsibilities, especially in the context of ensuring the welfare of learners, staff and visitors, and there are numerous examples of good practice in these areas. As with higher education, compliance with this duty will reflect existing best practice and should not add significant new burdens on institutions. It is to be implemented in a proportionate and risk-based way.

4. To comply with the duty we would expect further education institutions to be delivering in the following ways.

External speakers and events

5. In order to comply with the duty all further education institutions should have policies and procedures in place for the management of events held on their premises. The policies should apply to all staff, students and visitors and clearly set out what is required for any event to proceed.

6. Every institution clearly needs to balance its legal duties in terms of both ensuring freedom of speech and also protecting student and staff welfare.

7. Encouragement of terrorism and inviting support for a proscribed terrorist organisation are both criminal offences. Institutions should not provide a platform for these offences to be committed.

8. Furthermore, when deciding whether or not to host a particular speaker, institutions should consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event should not be allowed to proceed except where institutions are entirely convinced that such risk can be fully mitigated without cancellation of the event. This includes ensuring that, where any event is being allowed to proceed, speakers with extremist views that could draw people into terrorism are challenged with opposing views as part of that same event, rather than in a separate forum. Where institutions are in any doubt that the risk cannot be fully mitigated they should exercise caution and not allow the event to proceed.

9. We would expect institutions to put in place a system for assessing and rating risks associated with any planned events, which provides evidence to suggest whether an event should proceed, be cancelled or whether action is required to mitigate any risk. There should also be a mechanism in place for assessing the risks associated with any events which are college- affiliated, funded or branded but which take place off their premises and for taking swift and appropriate action as outlined in paragraph 8.

10. Institutions should also demonstrate that staff involved in the physical security of the estate have an awareness of the Prevent duty. Where appropriate and legal to do so, an institution should also have procedures in place for the sharing of information about speakers with other institutions and partners.

11. But it is important to realise that the risk of radicalisation in institutions does not just come from external speakers. Radicalised students can also act as a focal point for further radicalisation through personal contact with fellow students and through their social media activity. Where radicalisation happens off campus, the student concerned may well share his or her issues with other students. Changes in behaviour and outlook may be visible to staff. Much of this guidance therefore addresses the need for institutions in receipt of public funding to self- assess and identify the level of risk, ensure all staff have access to training, and that there is welfare support for students and effective IT policies in place which ensure that these signs can be recognised and responded to appropriately.

Partnership

12. In complying with this duty we would expect active engagement from governors, boards, principals, managers and leaders with other partners including police and BIS regional higher and further education Prevent co-ordinators (details of BIS Prevent co-ordinators can be found on the Safer Campus Communities website. We would expect institutions to seek to engage and consult students on their plans for implementing the duty.

13/. Where the size of an institution warrants, management and co-ordination arrangements should be implemented to share information across the relevant curriculum areas within an institution, with a single point of contact for operational delivery of Prevent-related activity.

Risk assessment

14. Each institution should carry out a risk assessment which assesses where and how students or staff may be at risk of being drawn into terrorism. These policies and procedures will help an institution

satisfy itself and government that it is able to identify and support these individuals.

15. We would expect the risk assessment to look at institutional policies regarding the campus and student welfare, including equality and diversity, and the safety and welfare of students and staff. We expect the risk assessment to address the physical management of the institution's estate, including policies and procedures for events held by staff, students or visitors, and relationships with external bodies and community groups who may use premises, or work in partnership with the institution.

16. Institutions must have clear and visible policies and procedures for managing whistleblowing and complaints. In England, if an individual feels that their complaint has not been taken seriously by the college or provider they can raise it with the SFA (for Further Education and Private Providers) or EFA (for sixth form colleges or private providers funded by it).

17. Where an institution has sub-contracted the delivery of courses to other providers, we expect robust procedures to be in place to ensure that the sub-contractor is aware of the Prevent duty and the sub-contractor is not inadvertently funding extremist organisations.

18. In Wales the Safer Working Practice Guidance and assessment process should also be adhered to.

Action plan

19. Any institution that identifies a risk should notify the relevant BIS Prevent co-ordinator and others as necessary (such as the SFA, EFA Welsh Government and the police) and develop a Prevent action plan to set out the actions they will take to mitigate the risks.

Staff training

20. We would expect institutions to demonstrate that it undertakes appropriate training and development for principals, governors, leaders and staff. This will enable teachers and others supporting delivery of the curriculum to use opportunities in learning to educate and challenge. It will also allow leaders and teachers to exemplify fundamental British values in their management, teaching and through general behaviours in institutions, including through opportunities in the further education curriculum. We expect institutions to encourage students to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010.

21. We would expect appropriate members of staff to have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorist activity. We define extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance for those with 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." Such staff should have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response. This will include an understanding of when to make referrals to the Channel programme and where to get additional advice and support.

22. At a corporate level we would expect the institution to have robust procedures both internally and externally for sharing information about vulnerable individuals. This should include information sharing agreements where possible.

23. As the independent body responsible for standards and quality improvement for further education, the Education and Training Foundation will work with the sector to ensure that appropriate training is available. This will include and draw from training provided through the network of Prevent co-

ordinators.

Welfare and pastoral care/chaplaincy support

24. All institutions have a clear role to play in the welfare of their students and we would expect there to be sufficient pastoral care and support available for all students.

25. As part of this, we would expect the institution to have clear and widely available policies for the use of prayer rooms and other faith-related facilities. These policies should outline structures in place for managing prayer and faith facilities (for example an oversight committee) and mechanisms for managing any issues arising from the use of the facilities.

IT policies

26. We would expect institutions to have policies relating to the use of their IT equipment. Whilst all institutions will have policies around general usage, covering what is and is not permissible, we would expect that all policies and procedures will contain specific reference to the duty. Many educational institutions already use filtering as a means of restricting access to harmful content, and should consider the use of filters as part of their overall strategy to prevent people from being drawn into terrorism.

27. Institutions must have clear policies in place for students and staff using IT equipment to research terrorism and counter terrorism in the course of their learning.

28. The Joint Information Systems Committee (JISC) can provide specialist advice and support to the FE sector in England to help providers ensure students are safe online and appropriate safeguards are in place. JISC also has a Computer Security Incident Response Team who can provide assistance in the event of an online incident occurring.

Monitoring and enforcement

29. Ofsted inspects publicly funded further education and skills providers in England under the Common Inspection Framework. This inspection is risk-based and the frequency with which providers are inspected depends on this risk. Safeguarding is inspected as part of leadership and management judgement. In Wales the inspection regime is operated by Estyn.

30. Where Ofsted finds a publicly-funded further education institution or independent training provider inadequate, intervention action would be taken. In the case of independent providers this is likely to result in their contract being terminated by the Skills Funding Agency. In the case of further education institutions and local authority providers, this would result in the Further Education or Sixth Form College Commissioner making an immediate assessment. This could lead to governance and leadership change, restructuring or even dissolution under the Secretary of State's reserve powers. Under the Further and Higher Education Act 1992 Act, and following intervention action, it would also be possible for the Secretary of State to issue a direction as the ultimate sanction.

31. For those institutions that are not publicly funded, the Secretary of State will have a power to nominate a body to monitor compliance with the duty and undertake risk-based assessments.