

### Cambridge Spark - PREVENT Policy

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Change History			
Issue	Issue Date - Version No.	List of changes or remarks	Change owner:
1	October 2018	Creation of policy	Jules Wix
2	October 2019	Annual update	Jules Wix
3	May 2020	DSL Training updates	Judit Gorog
4	March 2020	Annual update	Judit Gorog
5	July 2021	Updates to general policy. Updates to legislation. Consideration to EIF amendments and current requirements. Amendments to categories of abuse and risks. Factoring of online remote provision.	Kayte Winter
6	October 2022	Update on referral process following gov.uk update to guidance	Kate Norris
7	January 2023	Update to legislation - Protect Duty and Martyn's Law	Kate Norris

## 1. Statement of Policy

### 1.1. Introduction

Preventing Extremism and Radicalisation is one element within Cambridge Spark's overall arrangements to safeguard and promote the welfare of all learners in line with statutory duties. This policy draws upon the Government's 'Prevent' agenda and the DfE's Guidance 'Keeping Children Safe in Education 2019'. Cambridge Spark recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for students. We further recognise that if we fail to identify and challenge extremist views, in line with the PREVENT Duty, outlined within The Counter-Terrorism and Security Act 2015, then we are failing to protect our students from potential harm. As such any concerns in relation to PREVENT will be treated as an urgent safeguarding concern and Cambridge Spark commits to the following;

- All staff will be trained to a sufficient level of knowledge and embed this within their professional activities and any interactions with learners and stakeholders
- Ensuring that all learners are trained using the Education and Training Foundations Side By Side Training Programme within the first three months of their programme
- Ensure that all stakeholders are aware of the organisations' policies and processes in relation to Safeguarding and Prevent and how to report any concerns

This policy applies to all staff working for or on behalf of Cambridge Spark. It should be read in conjunction with the following policies:

- Safeguarding Policy
- Health and Safety Policy
- Equality and Diversity Policy
- Staff Code of Conduct.

The leadership team at Cambridge Spark will promote and obtain commitment to the Prevent Policy and reporting procedure through the following activities;

- Staff Induction - All Staff are required to complete the Education and Training Foundation Side-By-Side Training as a minimum
- Formal CPD and Staff Briefing Sessions - These occur on an annual basis and attendance is mandatory for all staff company wide
- Caseload Reviews and Delivery Staff 1-2-1's - carried out on a monthly basis and concerns raised via the Risk Register Process
- Business and Service Updates - through the production and sharing of up to date legislation

and any changes via monthly Newsletters, Quality Information Boards and weekly departmental meetings

- Governance Review - Quarterly Governance Board meetings, carried out to review any concerns or risks raised
- Safeguarding Working Group - carried out on a monthly basis to ensure visibility of any concerns or risks identified and ascertain any necessary interventions, DSL leads will also attend regular Regional FE and HE Prevent Coordinators Meetings and report back to the group

## **1.2. Objectives**

The aim of the Prevent Policy is to create and maintain a safe, healthy and supportive learning and working environment for our students, staff and stakeholders alike.

Our policy has four key objectives

- To safeguard our students and staff from the risk of radicalisation and empower students and staff to protect themselves from harm.
- To promote and reinforce our core values of welcoming, respect, empowerment, and courage, in so doing, promote fundamental British values.
- To ensure that staff and students are aware of their responsibilities in preventing violent extremism
- To work collaboratively with local and national organisations and authorities to ensure safety and a culture of vigilance and Cambridge Regional College.

Cambridge Spark will achieve these objectives through leadership, partnership, and by building learner resilience.

In accordance with statutory duty, Cambridge Spark will ensure:

- All staff are trained in Prevent so that they understand their responsibilities and feel confident in spotting the signs that an individual may be at risk of being radicalised.
- All learners understand the risks of extremism and how these may present in the workplace.
- The promotion of British Values through both the curriculum and as part of the organisation's culture.
- All partner organisations and employers understand their responsibilities to prevent learners from being radicalised.
- Concerns raised about learners or by learners themselves are dealt with immediately and referred to the relevant authorities as appropriate.
- Robust IT procedures which prevent learners and staff from accessing extremist platforms and websites.
- Close liaison with local and national partners including the DfE Prevent Co-Ordinator to better understand and communicate the local and national risks.
- A Prevent Risk Assessment and Action Plan is published and regularly reviewed by senior managers.

We will do this by:

- Appointing and training a Designated Safeguarding Lead (DSL) to be the single point of contact for the organisation.
- Raising awareness of Prevent at every opportunity.
- Ensuring that all staff and learners understand that Prevent is part of their wider safeguarding responsibilities
- Providing a framework for reporting and dealing with concerns and disclosures.

### 1.3. Legislative Frameworks

The legislative frameworks and guidance around the policy are:

- **Prevent Duty 2015** - places a responsibility on specified authorities to prevent children and young people from becoming radicalised.
- **Keeping Children Safe in Education 2020 (updated Jan21 due to EU Exit)** - requires all staff to read and understand their responsibilities if engaged in 'regulated' activities with young people. Sets out the responsibilities of the Designated Safeguarding Lead and provides guidance on safe recruitment of staff.
- **Working Together to Safeguard Children 2018** - reaffirms safeguarding as everyone's responsibility and the importance of sharing information between agencies.
- **Counter Terrorism Strategy (CONTEST) 2018** - details four work streams to reduce the risk to the UK and its interests overseas from terrorism; Pursue, Prevent, Protect, Prepare.
- **Protect Duty - Martyn's Law (awaiting legislative approval)** - aims to target duties and responsibilities around events and security

### 1.4. Definitions

**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; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

**Radicalisation** - The process by which a person comes to support terrorism and extremist ideology associated with terrorist groups

**British Values** - A set of values first set out in the Prevent Strategy in 2011 to support the spiritual, moral, social and cultural development of learners. The values are; Democracy, The rule of Law, Individual Liberty, Mutual Respect and Tolerance of those with different faiths and beliefs and those with no faith.

## 2. Implementation

### 2.1. Approach

Cambridge Spark leadership will continuously strive to provide an ethos which upholds the core values of shared responsibility and wellbeing for all apprentices, learners, staff, and visitors. Central to this they will seek and create opportunities to promote respect, equality and diversity, understanding, and British Values.

This will be achieved through;

- Ensuring British Values and prevent training is embedded within the apprenticeship learning journey and learners undertake the ETF Side By Side Training
- Building staff and student understanding of the issues and confidence to deal with them through mandatory staff training during employment at Cambridge Spark
- Actively working with the agencies and authorities, where necessary, including; the Police, Local Authorities, Health, Education, Probation, Youth Offending and the Regional FE and HE Prevent Coordinators

Cambridge Spark takes seriously its responsibility to ensure the safety and wellbeing of learners, staff and the wider community and as part of this will do all it can to prevent any learner from being drawn into terrorism. It welcomes the Government's intention that the Prevent Duty is implemented 'in a proportionate and risk-based way' and that it should not create large new burdens on institutions. It will therefore implement its legal responsibilities as part of our existing policies and procedures.

## **2.2. Risk Assessment and Action Plan**

As required by the Prevent Duty, Cambridge Spark will carry out assessments of the risk of its learners being drawn into terrorism. This risk assessment and associated action plan will be working documents and will be reviewed and monitored by the Designated Safeguarding Lead (DSL) and senior managers. Where any significant risk is identified, the DSL will liaise directly with the DfE Prevent Co-Ordinator and other agencies as appropriate.

Cambridge Spark will ensure that it monitors risks and is ready to deal appropriately with issues which arise through the following;

- Understanding the nature of threat from violent extremism and how this may impact directly and indirectly on the organisation
- Identifying, understanding and managing potential risks within Cambridge Spark from external influences.
- Responding appropriately to events reported via local, national or international news that may impact on learners and their communities.
- Ensuring plans are in place to minimise the potential for acts of violent or non-violent extremism within the organisation and learning environments
- Ensuring measures are in place to respond appropriately to a threat or incident within the organisation
- Continuously developing effective ICT security and responsible user policies.
- Ensuring compliance with all related policies.

## **2.3. External Speakers**

Although the nature of the Apprenticeships delivered by Cambridge Spark does not provide many opportunities for external speakers,

Cambridge Spark expects external speakers to act in accordance with the law and not to breach the lawful rights of others. We reserve the right to refuse an external speaker to speak at or attend an event, to refuse to permit an event and/or to halt an event at any time if we reasonably consider that there may be a breach of any legal obligation or policy.

During the course of the event at which he or she participates, no speaker shall:

- Act in breach of the criminal law;
- Incite hatred or violence or any breach of the criminal law;
- Encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism;
- Spread hatred and intolerance;
- Discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age;
- Defame any person or organisation; or
- Raise or gather funds for any external organisation or cause without express permission of Cambridge Spark

During the course of the event at which he or she participates, all speakers shall:

- Adhere to all policies implemented by Cambridge Spark
- Act lawfully and respectfully
- Promote and conduct themselves professionally and in line with British Values

## **2.4. Staff Training**

Cambridge Spark will carry out training on a regular basis for all relevant staff so that they can identify those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. The training will include guidance on how to handle appropriately and sensitively any concern that may emerge. The organisation's approach will be to support vulnerable learners in whatever circumstance they find themselves in, whilst recognising that radicalisation could be occurring.

## **2.5. Welfare and Learner Support**

Cambridge Spark will ensure that learners are fully supported throughout their course and that staff are confident to take preventative and responsive steps when working with 'at-risk' learners, partner professionals, families and communities. This will be achieved through:

- Establishing strong effective and responsive learner support services.
- Listening to what is happening in Cambridge Spark learning environments and the wider community.
- Implementing anti-bullying strategies and processes for challenging discriminatory behaviour.
- Recognising the presence of risk and lack of protective factors that may increase risk to a student and implementing early risk management strategies
- Clearly directing learners, employers and staff to means of accessing support within Cambridge Spark and or through community partners.

- Support learner with problem solving and repair of harm through accessing appropriate support including referral to external agencies
- Working collaboratively to promote support for learners across the provision including within the apprentices workplace
- Supporting 'at-risk' learners

## 2.6. Learner Engagement

Cambridge Spark undertakes to provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners. Key to this is undermining extremist ideology and supporting the learner's voice. This will be achieved through:

- Embedding British Values, equality, diversity, inclusion, wellbeing and community cohesion into curriculum design and course delivery.
- Promoting wider skills development, such as social and emotional aspects of learning, alongside technical content.
- Adapting the curriculum to recognise local and employer needs, challenge extremist narratives and promote universal rights.
- Encouraging active citizenship/participation and providing an environment where learners' voices can be heard.

## 2.7. IT Networks

Cambridge Spark will not allow their IT networks to be used in any way that supports, promotes or facilitates terrorism. Prevent is referenced in the IT policies and the organisation will keep this matter under constant review. The possible use of filters as a means of restricting access to content covered by the Prevent Duty will be included on the Prevent Action Plan and as part of the risk assessment process. Social media services such as Facebook, Twitter and WhatsApp provide new avenues for the distribution and accessing of extremist material, and the organisation takes the challenges presented by social media very seriously.

## 2.8. Communications

Cambridge Spark will not permit material supporting terrorism to be displayed or distributed at its centres or via on-line platforms and will remove any such material if it is found. Likewise, it will seek to ensure that the organisation's printed and electronic communications (including its website) do not contain or support terrorist material or material likely to encourage terrorism.

## 2.9. Reporting Concerns

### Reporting a concern

If a **member of staff** is concerned about the welfare and/or safety of a learner, they must treat it as a matter of urgency and contact the Designated Safeguarding Lead. (DSL)

The DSL will assess the situation and decide whether the matter needs to be referred to external agencies or whether the matter just needs to be recorded and monitored.

If the child or adult at risk is in immediate harm, then the relevant authorities (e.g. police) must be contacted immediately. In this situation, the member of staff must ensure that the child or vulnerable adult is accompanied and kept safe until the relevant authorities arrive.

If an **apprentice or other learner** reports unsafe practices or safeguarding issues within their working environment to a member of Cambridge Spark staff, the staff member must report the incident to Cambridge Spark's DSL. The DSL will offer guidance and signposting for the learner and will support the learner to report the matter through the employer's whistleblowing/reporting procedures or report the matter directly to the employer if more appropriate.

If a **member of staff** observes a safeguarding issue taking place within the working environment, they must:

- Take action to stop the activity immediately
- Inform the individual of your concerns
- Ask them to remove themselves from the area
- Inform Cambridge Spark's DSL.

If a **member of staff or learner** has a concern or wishes to make an allegation about a member of Cambridge Spark staff, they should contact the DSL directly, unless it is the DSL that they have concerns about in which case they should report the matter to a senior manager. All learners are informed at induction that if they have any concerns over their own personal welfare and wellbeing that they do not feel comfortable talking to their tutor about, they should contact Cambridge Spark's DSL.

## 2.10 Dealing with a disclosure

If a learner directly approaches any member of the Cambridge Spark staff to report a safeguarding issue, they should:

- Listen without making judgements.
- Stay calm.
- Only ask open questions to seek clarification and not to probe or investigate.
- If possible, make a written record of what was said, ideally using their words, then sign and date the record.
- Inform Cambridge Spark's DSL as soon as possible and pass on the written record as it may be required at a later date as evidence.
- Not discuss the situation with others.
- Not give an opinion or offer advice.
- Not promise confidentiality - explain that you will need to talk to the DSL.
- Not investigate the issue yourself as it must be escalated.

The DSL will make a decision on further action to be taken and will, where possible, keep the member of staff informed as to the action that has been taken.

The organisation is aware of the Channel process and of the opportunities for informal and formal sharing of information with relevant authorities. It will use these when necessary and appropriate to do so in the interests of preventing people from being drawn into terrorism.



Information sharing will only take place with external authorities when this is consistent with the provisions of the Data Protection Act.

### 3. Making an Internal/External Referral

#### 3.1 Detail required

When reporting your proposed Prevent referral to the internal DSL it is important to provide as much of the below as possible. This enables the DSL to provide the same level of detail to the external bodies:

- how/why you became concerned
- what happened (if a specific event)
- the indicators that something is wrong
- any sympathetic interest in hate crimes, extremism or terrorism
- any worrying use of mobile phone, internet or social media and how you found this out
- any contact with groups or individuals that cause you concern, including who and how often, and why you're concerned
- any expression of wanting to cause physical harm, or threats of violence, including who to, when and what was said or expressed
- any additional need, disability or special education need, including what they are and if they're known or suspected
- any other safeguarding concerns about the family, peer group or environment
- any discussions that have been had with the individual (and parent/carer if under 18)
- what you're worried about, what may happen if their needs are not met and how this will affect them

#### 3.2 Under 18s

If this is related to an **under 18** then the DSL should tell them that they're going to inform their parent/carer and gain consent, unless doing so is going to place the individual at more risk of harm. When speaking to the parent/carer the DSL must advise that making a referral does not mean they're accusing anyone of a crime.

#### 3.3 Worries about making a referral

Safeguarding against extremism or radicalisation is no different to other types of safeguarding harm. A Prevent referral is not an accusation of criminality and will not affect anyone's education or career prospects.

DSLs must exercise their professional judgement about whether a referral is appropriate in the same way they do all other safeguarding risks.

#### 3.4 How is a referral assessed?

Acknowledgement should be received within one working day of the referral, and if not then DSL should contact the agency they made the referral to. Counter Terrorism Policing may assess the referral and they will carry out open investigation checks which should take 5 working days. Should it be deemed a Counter-Terrorism related vulnerability then it will be referred to **Channel**

#### 3.5 Channel

This a multi-agency panel who gather further information from partners and meet to consider the referral, agree the level of vulnerability and what kind of support may be required. Channel panels work with local partners to develop individualised support packages for those deemed to be at risk of extremism or radicalisation.

Channel is a voluntary process therefore the support can be turned down. At all stages it is the responsibility of CSpark to review their support, curriculum, careers guidance and IAG alongside the relevant employer to identify strategies which may prevent this risk from becoming a reality.

Further detail can be found here: <https://www.gov.uk/guidance/making-a-referral-to-prevent>

#### 4. Roles & Responsibilities

**Senior leaders and managers** will be responsible for ensuring that this policy is implemented and that they receive regular updates on Prevent related matters.

As part of the wider safeguarding responsibilities, **The Designated Safeguarding Lead (DSL)** will be the single point of contact for all Prevent related matters.

**All members of staff** should be aware of the organisation's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the staff who are concerned about a learner who might be at risk of being drawn into terrorism should report this to the DSL. Concerns about members of staff who might be at risk of being drawn into terrorism should be reported to the Designated Safeguarding Lead

#### Review of this Policy


This policy will be reviewed annually unless triggers such as changes to internal processes, national policy or legislation dictates a review out of sequence.

#### Senior Manager Sign-off

Name: Raoul-Gabriel Urma

Title: CEO

Signature:

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Date January 2023



