

# **Prevent Policy 2022/23**

# **Policy Review**

This policy will be reviewed in full annually

The policy was last reviewed and agreed by the BAJ Prevent Lead on 13th Oct 2022. It is due for review in August 2023.

# **Aim of Policy**

To ensure the Academy is a safe learning environment for all learners and to stop people becoming terrorists, or becoming drawn into or supporting terrorism.

The PREVENT Strategy is a legal obligation upon all FE and HE providers.

The British Academy of Jewellery believes equality and diversity is integral to our inclusive curriculum, creative innovation, national reputation and the richness of Academy life. We are committed to providing an environment that promotes safety, positive wellbeing, equality and celebrates diversity. This contributes to sustaining an accessible and inclusive environment for all learners, staff, alumni, governors, visitors, community and commercial partners that we engage with.

The PREVENT strategy seeks to:

"...help 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."

Prevent duty guidance: for further education institutions in England and Wales

Updated 1 April 2021 (.gov website)

At BAJ this is achieved through:

### Staff

Staff are provided with resources to support accurate and relevant delivery of British Values and Prevent information

Staff receive regular updates on British values and Prevent

Safeguarding and Prevent Lead work closely together to manage any concerns raised by staff/learners and pass to appropriate authorities if necessary

All staff deliver the resources and lessons to ensure learners are kept safe

### Learners:

Learners discuss and work on key Prevent and British Values issues at appropriate points in the learner journey -, induction, online training, learner reviews and surveys, and at appropriate learning points throughout delivery of all FE schemes of work.

All learners participate in training, discussion and activities around the British Values and Prevent resources offered by BAJ

# **PREVENT** and Safeguarding



PREVENT is part of safeguarding at BAJ. The policy and procedures are well established and well understood by staff. Both are kept in a central location for quick access and reference. Reports which contain concerns raised under PREVENT are presented to the Safeguarding Team and the Senior Management Team on a weekly basis. The Prevent Lead and Safeguarding Lead are therefore

## A Co-ordinated Strategy

The British Academy of Jewellery has been working on a range of initiatives which supports the PREVENT agenda:

- Learner Voice Activities and Council
- Safer recruitment
- Employer Forums
- Learner Engagement and Enrichment
- Continuous staff development training
- Staff and learner inductions

### Links to other policies and documents

Responding to PREVENT will require reference to other relevant guidance, policies and procedures. These will include policies and procedures relating to:

- Safeguarding Children and Vulnerable Adults
- Learner Charter
- Learner Handbook
- Admissions Policy
- Attendance & Punctuality Policy
- Health and Safety Policy
- Equality and Diversity Policy
- Bullying and Harassment Policy
- ICT Users Policy
- Employee Handbook

### **Key Objectives**

This strategy has five key objectives:

- 1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
- 2. To break down segregation among different learner communities by supporting interfaith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society
- 3. To ensure the safety of learners and that the Academy is free from bullying, harassment and discrimination
- 4. To provide support and appropriate sources of advice and guidance for learners who may be at risk
- 5. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism and the process of declaring any concerns
- 6. In order to achieve these objectives, the strategy will concentrate on six areas;



### 1. Leadership, Management and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners, staff and visitors and promotes respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, commitment, integrity and innovation including equality and diversity, democratic society, learner voice and participation
- Building staff and learner understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with, local authorities, police and other agencies
- A designated senior manager to implement the PREVENT Duty Risk Action plan with effective consultation from the Local Authority and Police PREVENT leads, safeguarding consultants e.g., NSPCC, Islington Safeguarding Children Board and the Camden HE/FE PREVENT Coordinator
- Establishment of a Prevent Steering Group with representation from all physical sites of the Academy, reporting to the Prevent Lead. Members must have the authority to act, if necessary, in line with the prevent duty to keep learners safe.
- Regular reporting monthly from DSL and Prevent Lead to the Leadership Team
- · Action planning and accountability The Prevent Risk Assessment, Prevent Selfassessment and Prevent action Plan must be reviewed and updated at least annually.

### 2. Training

All Academy staff members receive annual Prevent training. Training is provided for new staff as part of the staff training programme and is part of the whole Academy safeguarding and child protection training plan

All learners receive training on Prevent as part of their induction. They then undertake modules which are certified, on Prevent topics.

### 2. Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Delivering effective training on British Values and Prevent to all learners
- Ensuring that regular opportunities arise where reference can be made to British Values and Prevent so that these concepts are embedded in the curriculum
- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights through various projects, events and campaigns



- Developing the learners critical thinking skills which will support them in resisting extremism
- Encouraging active citizenship/participation and learner voice
- Focussing on narrowing the attainment gap for all learners
- Identifying any vulnerabilities or worrying changes in learner behaviour and reporting it to the Designated Safeguarding Lead

### 3. Learner Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities.

This will be achieved through:

- Establishing strong and effective learner support services and processes
- Listening to what is happening in the Academy and the community through learner voice mechanisms including learner council and satisfaction surveys
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping learners and staff know how to access support in the Academy and/or through community partners
- Signposting or providing in-house welfare, pastoral and chaplaincy support that meets the demographic of our learners
- Signposting learners to external prayer facilities and ensuring good governance and management procedures are in place for activities in these facilities
- Supporting at risk learners through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all learners

### 4. Learner Engagement and Enrichment

BAJ has started to implement a learner engagement and enrichment strategy to enable learners to engage at all levels of the organisation to shape and enhance the learner experience.

Initiatives are being explored or have been introduced to strengthen the cohesion of our learners and staff including:

- Learner Voice
- Learner Council
- Learner Progress Reviews
- Learner Induction sessions
- Enrichment activities
- Learner social activities
- Raising awareness and promoting events that celebrate our diverse learner community focusing on cultures and faith as part of the Equality, Diversity and Inclusion Calendar
- Run a series of campaigns throughout the year in connection with the Learner Council and the Equality and Diversity Champions which provide opportunities to carry out PREVENT work.

### 5. Managing Risks and Responding to Events



To ensure that the Academy monitors risks and is ready to deal appropriately with issues that may arise.

This will be achieved through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the Academy
- Understanding and managing potential risks within the Academy and from external influences
- Head of Apprenticeships must ensure that all apprentices are free from radicalising influences in their workplace. This must be carried out in progress reviews and ensuring that the employer adheres to our Prevent policy.
- Introducing a new Safe Working Practice Guide which identifies the behaviours it expects form all staff
- Safer recruitment practice
- Lone working in and out of the workplace training for all relevant staff
- Robust risk assessments and reviews of visitors, lecturers, suppliers, employers and contractors
- Creating and monitoring a learner risk register and training admissions staff to be able to identify and raise concerns prior to a candidate enrolling on any of our programmes
- Supporting and encouraging staff to develop and use the skills required to challenge appropriately
- Develop learning/ expert coaches, delivery staff and class representatives who will have the knowledge, skills and confidence to lead debates about controversial issues
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the Academy
- Creating an infrastructure and embedding processes and resources that will help to respond appropriately to a threat or incident within the Academy
- Developing effective ICT security and responsible user policies
- Referrals being made to Channel (a process which supports people at risk of being drawn towards terrorism) through the Designated Safeguarding Lead (DSL) who will refer to Channel if appropriate.
- Referring immediate causes for concern, where appropriate to our local Police Forces in London and Birmingham.
- Internal training to ensure that all staff know that they must contact the DSL immediately if they have concerns about a learner, a member of staff or an employer.

### Managing Disclosures – Receive, Reassure, React and Record

Guidance for Staff if a learner comes to them to raise a PREVENT concern about either themselves or another student.

### Receive

 Do not ask questions or probe for information as this may contaminate evidence and prohibit a police investigation



- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said.
- Make a note of what has been said as soon as practicable.

#### Reassure

- Reassure the learner, but only so far as is honest and reliable. For example, don't
  make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will
  be alright now'.
- Do reassure and alleviate guilt, if the learner refers to it. For example, you could say:
- You have been brave to tell me.
- I am glad you came to me.
- I am sorry this has happened.
- This was not your fault.
- We are going to do something together to get help.
- Do not promise to keep it a secret as your professional responsibilities require you to report the matter.

#### React

- React to the learner only as far as is necessary for you to establish whether or not you need to
- Do not criticise the alleged perpetrator;
- Do not ask the learner to repeat it all for another member of staff. Explain what you
  have to do next and who you have to talk to. Reassure the pupil that it will be a DSL
  and no one else. Try to see the matter through yourself and keep in contact with the
  pupil. Ensure that if an interview undertaken by the Police is to follow, that the pupil
  has a support person present if the pupil wishes it (possibly yourself).

#### Record

- Make some very brief notes at the time on any paper which comes to hand, and write them up as soon as possible.
- Do not destroy your original notes in case they are required by a court.
- Record statements and observable things, rather than your 'interpretations' or 'assumptions'.

### Recording

Concerns about students should be recorded on the individual/personal chronological form and put in a personal folder and on the BAJ central 'at risk' log sheet., which will detail the concerns about a student, discussion with the appropriate Designated Person or in their



absence, another appropriate member of the safeguarding team and parents or carers where appropriate and any agreed actions and outcomes.

Records should be signed and dated and kept in chronological order. Group actions minuted in child protection conferences/strategy meetings must be implemented.

Recording is a tool of professional accountability and is central to safeguarding and protecting students. It is not always possible to know whether a small or vague concern held today may increase as the days or weeks pass and later form the substance of a child or vulnerable adult protection referral. For this reason, it is vital that concerns are recorded accurately so that they can be monitored and emerging patterns noticed. All records will be kept in a secure storage facility that only the DSL and deputy DSL's will have access to. Private learner information concerning PREVENT issues will not be kept on our IT systems. We will however keep a password protected central log on our system to keep account of learners who have had a PREVENT issue. No detailed account of the issue will be kept on this log and only the Designated Safeguarding Lead and the Deputy Safeguarding Leads will have access to the password and central log.

### Appendix 1

### **Supporting Vulnerable Students**

Vulnerable Children and Adult Definitions

Within the context of this policy, a child is defined as anyone under the age of 18. Vulnerable children include those:

- With a social worker including children who have a Child Protection Plan and those who are looked after by the Local Authority
- Assessed as being in need, or otherwise meet the definition in section 17 of the Children's Act 1989
- With additional needs, special educational needs and or disabilities (SEND), emotional and behavioural difficulties and mental health difficulties and may have an Education Health and Care Plan (EHCP)
- Assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who could therefore benefit from continued attendance. This might include those who are:
- o On the edge of receiving support from children's social care services
- o Privately fostered (under the age of 16 (under 18 if has a disability) and adopted children
- o At risk of becoming 'not in employment, education or training' NEET



- o Living in temporary accommodation
- o Young carers
- o Have family members in prison
- o Showing signs of abuse and neglect
- o Living with: domestic abuse, substance misuse, poverty, homelessness, adult mental health
- o Showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime Groups
- o Misusing drugs or alcohol
- o At risk of modern slavery, trafficking or exploitation
- o At risk of radicalisation or exploitation
- o Frequently going missing from care or from home
- o Unaccompanied Asylum Seeking Children (UASC)

Vulnerable adults (defined by Section 59, Safeguarding Vulnerable Groups Act 2006) are at the age of 18 or over to whom one of the following applies:

- Has a reduced capacity to give consent to a disclosure of abuse allegations or suspicion
- Has additional needs, SEND, emotional and behavioural difficulties and mental health difficulties and may have EHCP up to the age of 25
- Detained in custody or under the supervision of the probation services
- Leaving care services, seeking asylum or refuge
- In need of community care services because of mental or other disability, age or illness and who is or may be unable to take care of him/herself, or unable to protect him/herself against significant harm or exploitation. This may include:
- o Receiving personal care, or nursing, or support to live independently in their own home or a care home
- o Receiving any health or social services support

Students (children and adults) with SEND can face specific challenges including:

• Being more prone to peer group isolation or bullying (including prejudice-based bullying)



- Difficulties with communication making disclosures and investigations difficult.
- Assumptions that behaviour, mood or injury interpreted as relating to their SEND rather than any abuse.

Identifying Vulnerable Children and Adults

Across the Group students at risk are identified through a variety of ways:

- Application and enrolment screening
- School liaison and references
- EHCP consultations and review process
- Induction process
- Student finance application screening
- Additional Learning Support screening
- Disciplinary referrals
- Academic and support staff reporting and monitoring
- Welfare and mentoring staff reporting and monitoring
- Attendance/absence monitoring
- Regular 'At Risk meetings'
- Self-referral

Supporting Vulnerable Children and Adults

Support arrangements for vulnerable students is underpinned by:

- Strong links with external partners as well as local and national agencies to ensure a multidisciplinary approach to support students.
- Consistent implementation of student codes of conduct and behavioural policies ensures that students know what behaviour is unacceptable.
- Continuing support and activities of additional learning, student engagement, welfare, mental health and wellbeing and external signposting whether onsite or remote in the case of alternative arrangements due to COVID.
- Development of a responsive and knowledgeable staff trained to respond appropriately in safeguarding situations.



- Effective absence reporting and attendance monitoring.
- Encouraging students to feedback on how 'safe' they feel via student voice opportunities and the personal development programme.
- Embedding throughout the student journey opportunities to raise awareness and educate about safe and responsible practices.
- Regular 'At Risk meetings' held where key members of the Student Services team collaboratively coordinate action and support for priority cases.
- Collecting two emergency contact details at the point of enrolment.
- A comprehensive Fitness to Study Policy which gives a framework to support students and a Bullying and Harassment Policy to respond to allegations
- Commitment to provide alternative working and support arrangements in response to COVID including telephone welfare checks, virtual hosted Electronic Personal Education Plan (EPEP) and EHCP reviews, remote support for e-learning/google classrooms, risk assessments and care plans.

### Working in Partnership

The Groups Safeguarding Team will assist the Local Authority, Police and Clinical Commissioning Groups to exercise their statutory functions contributing to multi-agency working including:

- Attending case conferences, Core Group meetings/Children in Need meetings in liaison with key agencies.
- Gathering information from all relevant sources to contribute to an assessment and coordinating the implementation for any aspects of the Child Protection Plan/Child in Need Plan.
- Notifying Children's Services when there is an unexplained absence or exclusion for a child who is the subject of a Child Protection Plan, a child/student/vulnerable adult is missing from education.
- Following the mandatory duty to inform the local authority of any 'Private Fostering' arrangements.
- Vigilantly monitoring the welfare of children living in domestic abuse households, offering support and contributing to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.
- Working in partnership with Police and Camden Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home.



- Proactive engagement and representation with safeguarding boards, committees for groups such as Hate Crime, Missing and Criminal and Sexual Exploitation and those related to mental health.
- Working with Channel, a voluntary, confidential support programme that focuses on providing support at an early stage to those who are vulnerable to being drawn into terrorism.

### Early Help

Early Help means providing support as soon as a problem emerges. The Early Help Assessment (EHA) is a single assessment that is created with the family. It should reflect

their views, wishes and feelings and what they want to change. It is shared when appropriate (and where there is consent) with other professionals who are working in a coordinated way to support the family. EHA's are completed by any professional or partner agency that comes into direct contact with families, and who has identified more than one unmet need that would benefit from a multi-agency support approach. In the first instance, staff should discuss early help requirements with a member of the Safeguarding Team. Staff may be required to share information to support other agencies and professionals in an Early Help Assessment.

### Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views
- Contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. For those at-risk reports can be made to The Anti-Phishing Working Group at https://apwg.org/

Guidance is available to staff around safe teaching and learning when working remotely. The Group has online safety and acceptable use policies for staff and students which should be



considered in line with this policy. Filters and monitoring are in place to limit access to inappropriate site.