

Prevent Duty and County Lines Policy v6

INTRODUCTION TO THE PREVENT DUTY

‘Prevent’ is part of the government’s overall counter-terrorism strategy which is called CONTEST. The aim of Prevent is to reduce the threat from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific objectives:

1. Respond to the ideological challenge of terrorism and the threat we face from those who promote it
2. Prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
3. Work with sectors and institutions where there are risks of radicalisation

There is Prevent duty statutory guidance for England and Wales, issued under section 29 of the Counter-Terrorism and Security Act 2015. It places a duty on specific bodies to have ‘due regard to prevent people from being drawn into terrorism’. Any Driver Ltd has a duty as a provider of adult education.

Government expectations

- Establish or use existing mechanisms for understanding the risk 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

At Any Driver we take this duty and the governments’ expectations seriously. We adopt a risk-based approach to ensure our policy and implementation of the policy is proportionate to the risk. A localised approach is a key part of our approach; we focus on the delivery areas as part of the risk assessment and development of resources and training.

The definition of extremism and radicalisation

Extremism

Extremism can range from incitement of social, racial or religious hatred through to advocating and justifying the use of violence to achieve fundamental change in society.

Extremism is ‘vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism also includes calls for the death of members of our armed forces, whether in this country or overseas’.

Radicalisation

Radicalisation is the context of extremism and refers to the process by which people come to support violent extremism and, in some cases, join terrorist groups. It is important to note however that having radical views is not wrong or illegal. It is when radical views cross over to incitement of hatred and justification of violence that it moves into criminality. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

HM Government defines ‘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. The HM Government definition also includes calls for death of members of its armed forces, whether in this country or overseas.

All terrorist groups need to radicalise and recruit people to their cause. Some want a few select, key people with what they see as the right capabilities; others seek to be mass movements and to transition from being terrorists to insurgents capable of overthrowing legitimate governments. There is no one way of identifying an individual who is likely to be susceptible to terrorist ideology. If extremist views are held within a family unit, even very young children may be vulnerable to radicalisation and display concerning behaviour. However, many studies show that radicalisation often occurs as people search for identity, meaning and community and this is why young people may be particularly vulnerable.

Our role at Any Driver is to be aware of change in people's behaviour, observe signs that they are becoming withdrawn or outspoken about extremism ideology and using this policy to refer to the authorities if appropriate.

Vulnerability Assessment Framework

Professionals use a Vulnerability Assessment Framework to guide their decisions about whether an individual needs support to address their vulnerability to being drawn into terrorism. It sets out three dimensions:

1. Engagement
2. Intent
3. Capability

However, it should not be assumed that the characteristics described below necessarily indicate that a person is either committed to terrorism or may become a terrorist. These are things for staff and managers to consider in their assessment of risk to and from the person.

Engagement

The engagement factors are sometimes referred to as 'psychological hooks'. They include the needs, susceptibilities, motivations and contextual influences that together can map an individual's pathway into terrorism. They can include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

Intent to cause harm

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mind-set that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- Over-identification with a group or ideology
- 'Them and us' thinking
- An ability to dehumanise people they see as the enemy
- Attitudes that justify offending
- Preparedness to use harmful means to achieve an end
- Harmful objectives

Capability to cause harm

In the same way that not everyone who is engaged with terrorist ideals intends to cause harm, not all those who intend to cause harm are capable of doing so. Plots to cause widespread damage to take a high level of personal capability, resources and networking to be successful. What an individual is capable of is therefore a key consideration for those who are tasked with assessing the risk of harm to the public. Factors can include:

- Individual knowledge, skills and competencies
- Access to networks, funding or equipment
- Criminal capability

Recruitment and how messages are spread

Propaganda through social media, videos and other media outlets, interaction with young and vulnerable people in group setting such as youth groups, debating societies, protest etc. trips overseas are glamorised; young and vulnerable adults are given a sense of belonging and purpose. Fake news is a big issue and forms a key part of the strategy to recruit people to their cause.

At Any Driver we thoroughly vet any guest speakers of visiting tutors, we approve the content of any such training or presentations prior to delivery and ensure a member of staff is present. However, this is a low risk area for Any Driver because we almost ever have this type of external delivery. However, through our policy to observe our Assessor/Tutors, if there were any concerns in relation to this area it would be picked up and dealt with very quickly.

THE PREVENT DUTY TRAINING

As a provider of adult education, we have a duty to provide staff and learners with training to develop their awareness, knowledge and skills in relation to the risk of extremism and radicalisation. In doing so this prepares them to play a full and active part in society and explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. Learners learn about democracy, government and how laws are made and upheld. They are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.'

RISK ASSESSMENT

We will carry out a risk assessment based upon current provision for training, including geographical locations, types of learners and their backgrounds and opportunities to become radicalised whilst attending one of our programmes or in their outside life. Risk assessment are reviewed as a minimum

annually, however should there be a change in our provision a risk assessment will be carried out earlier.

In order to contextualise the risk, we will carry out extensive research using information from local authorities and the police.

Support for individuals at risk

'**Channel**' is the name of a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It uses a multi-agency approach to:

- Identify individuals at risk
- Assess the nature and extent of the risk
- Develop the most appropriate support plan for the individual concerned.

It provides a mechanism to make referrals if we are concerned about an individual, although the individual's engagement with the programme is entirely voluntary at all stages.

What to do if you have a concern

All safeguarding policies should have clear procedures in place for protecting children and adults at risk of radicalisation. If you have a concern about an individual, in the first instance, you should follow your normal safeguarding procedures and speak to your **Designated Safeguarding Officer – Cheryl Grass**.

In Prevent priority areas, the local authority will have a Prevent lead who can also provide support. The safeguarding lead may also contact your local police force or dial 101, the non-emergency number to talk in confidence and get support and advice.

The Department for Education has a dedicated telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly, or in non-emergency situations, they can be emailed at: counter.extremism@education.gsi.gov.uk

Guidance to the Prevent Referral Pathway

What is Prevent?

Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism. Prevent works within the noncriminal space, using early engagement to encourage and support individuals to challenge ideologies and behaviours.

What is Channel?

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremism or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.

Who does Channel work with?

Channel is designed to work with people of any age who are at risk of being exploited by extremist or terrorist ideologies.

How does Channel work?

The Channel Panel is chaired by the local authority and brings together a range of multi-agency partners to collectively assess the risk and decide whether a support package is necessary. The partnership approach ensures that those with specific knowledge and expertise around the

vulnerabilities of those at risk. In Gloucestershire, we have core channel panel members and we invite bespoke professionals known to or working with the individual in question.

How will the person be involved in this process?

A person will always be informed first if it is felt they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. The process of seeking consent is carefully managed by the Channel Panel and a decision is made at Stage One about who should seek consent and how this will be achieved.

Who can make a referral?

Anyone can make a referral – Please see the attached referral pathway.

What happens with the referral?

Every agency should have a Single Point of Contact (SPOC) and concerns should be discussed with them in the first instance. Prevent officers are available for advice. If it is agreed a referral is required, this will first be screened by The Prevent officers in Special Branch who will make a decision as to whether this will be considered by the Channel Panel.

Raising a Concern

If you believe that someone vulnerable is being exploited or radicalised, please use the established safeguarding or duty of care procedures within your organisation to escalate the concerns to the appropriate leads. Please follow the attached process map to make a referral for a person who is under the age of 18.

COUNTY LINES

Whilst County Lines is very different from the Prevent Duty, the actions we need to take are similar and both things focus on vulnerable individuals being 'groomed' and 'recruited' into established groups that cause harm and put the individual at a serious risk.

Exploitation of Young & Vulnerable People:

- **Grooming & recruitment** – vulnerable children targeted, befriended, given money, feels like a family, they belong, they have the things they always wanted & then they are exploited
- **Property** – Cuckooing is when a vulnerable person has their property taken over by drug dealers & mules from outside of the county
- **Drugs** – the primary target is buying cheap in major cities such as London, using vulnerable children & young people to cross several county lines to deal
- **Weapons** – more recently the movements of weapons have become another commodity
- **Violence** – the children & young adults can't escape it, they are threatened, they experience violence & they often go on to be perpetrators of violence
- **Sex** – whilst sexual exploitation is a risk, authorities report that those involved in County Lines are at no greater risk than other vulnerable children & young adults
- **Gangs** – once recruited these vulnerable children are gang members, it's highly likely they will remain in the gang, move up the ranks & become institutionalised gang members & possibly leaders of the future
- **Crime** – most fall into a life of crime, starting with small convictions & sentences, progressing to serious crime & serving time in jail – it's almost impossible for them to break the cycle

County Lines is becoming one of the biggest and most challenging issues for local authorities and the police to deal with. As the title suggests it involves moving people across counties to carry out one or more of the things listed above. Whilst it is more common for teenagers and young adults to become victims of this, vulnerable adults are also at risk.

As an adult education provider Any Driver doesn't have a legal obligation to have a County Line policy or provide staff and learners with training. However, Any Driver believe that they have a responsibility to share their knowledge and experience with their staff and learners and in so doing raise awareness, knowledge and skills in the local community and support the authorities to tackle these crimes.

STAFF AND LEARNER TRAINING

- All new staff will need to undertake the ETF Prevent Duty training & assessment as a minimum; certificates must be retained on file by the **Designated Safeguarding Officer – Cheryl Grass**
- All staff will undertake an annual update using the revised ETF course materials as a minimum, records must be maintained by the **Designated Safeguarding Officer – Cheryl Grass** along with the updated certificates
- Any Driver Ltd will provide staff with other update training, including access to local and relevant case studies
- Any Driver Ltd will provide training for assessor to enable them to deliver high quality Prevent and County Lines training to their learners
- Staff will keep a record of their CPD affecting Prevent and County Lines issues (refer to ADP009 CPD Policy)

ACCOUNTABILITY

Overall accountability sits with **Neil Evans** the Managing Director and **Designated Safeguarding Lead**. However, the **Designated Safeguarding Officer is Cheryl Grass** and she has accountability for implementation, maintaining records, staff training and policy review. All staff have a responsibility to abide by the policy and provide the best training and education to the learners.

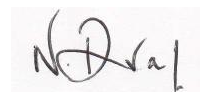
LINKED POLICIES

- ADP003 Safeguarding Policy
- ADP005 Equality, Diversity and Inclusion Policy
- ADP007 Health and Safety Policy
- ADP009 CPD Policy

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	Prevent Policy	2	2019	D Gardiner MBE	January 2020
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Policy Approved by: Neil Evans

Signature:



APPENDIX 1 PREVENT DUTY RISK ASSESSMENT

1. Introduction

Any Driver Ltd is a training provider delivering a range of Advanced Learner Loans in the Beauty sector to learners aged 19 and over. The training centres are in Nottingham, Leicester, Doncaster and Chester. Learners are committed to their studies and ongoing development, many return for further courses, attendance, achievement and positive destinations are high. Any Driver Ltd is a small business with a clear organisation structure and defined roles and responsibilities. We recognise our responsibility in relation to The Prevent Duty as part of the FE sector and have produced the following risk assessment and action plan in good faith using all available and relevant information.

2. Risk Assessment and Action Plan

Produced: September 2023 – updated January 2024.

Risk Area	Risk	Level (RAG)	Current Activity	Action Plan	Person Responsible
Leadership & Governance	Policy	Low	V6 updated Jan24.	Will share with centres and staff by end of Feb24. Review as a minimum annually.	Neil Evans (DSL)
	Risk Assessment & Action Plan	Medium	New Plan September 2023, reviewed January 2024.	Review effectiveness of risk assessment and action plan September 2024.	Neil Evans (DSL)
	Staff training & refresher/updates	Medium	All staff have had training on the Prevent Duty.	Ensure annual update training is completed.	Cheryl Grass
Centre Locations	Localised risk profile for centres - Nottingham	Medium	Nottingham is a large city with high number of students. However, our centre is out of town and our learners are adults, so we've assessed the risk as medium.	Monitor local updates to ensure centre staff are kept up to date with changing risk levels. Use the links below for local guidance and referrals. How can the Prevent team help me? Nottinghamshire Police	Centre Manager

				Prevent Duty - Nottingham City Council	
Localised risk profile for centres - Leicester	Medium	Leicester is multi-cultural city, the City Council and Police recognises that they may be at higher risk of a Prevent incident that some of their neighbouring cities and towns. However, our centre is out of town and our learners are adults, so we've assessed the risk as medium but will keep this under review.	Monitor local updates to ensure centre staff are kept up to date with changing risk levels. Use the links below for local guidance and referrals.	Prevent Leicestershire Police (leics.police.uk) Prevent Duty (leicester.gov.uk)	Centre Manager
Localised risk profile for centres - Doncaster	Low	Doncaster is very much focussed on safeguarding of children, with almost no mention of the Prevent Duty. We've used this local intelligence to assess it as low risk.	Monitor local updates to ensure centre staff are kept up to date with changing risk levels. Use the links below for local guidance and referrals.	Radicalisation and Violent Extremism (proceduresonline.com)	Centre Manager
Localised risk profile for centres - Chester	Low	<p>Chester is a university city, as well as a tourist attraction. This means the city has high levels of people living, studying and visiting, that are not local.</p> <p>Over 90% of the population is White and more than 75% are Christians. Chester is a relatively affluent area. Local news and publications demonstrate the city as</p>	Monitor local updates to ensure centre staff are kept up to date with changing risk levels. Use the links below for local guidance and referrals.	Prevent Cheshire Constabulary Layout 1 (farndon.cheshire.sch.uk)	Centre Manager

			having minimal activity of interest to the authorities.		
	National risk level	Medium	The national terrorism threat level is Substantial (an attack is likely). We reduced or risk rating from high to medium. We don't believe our centres are at any particular risk.	Link to the above action. Staff to be vigilant and observant. Staff to use the recent attach as examples for learner training.	Centre Managers
Learner Profiling	Typical learners on-programme	Low	All learners are on loans, nearly all females, all are adults, some have been on previous courses with us.	Staff to alert to changes in personal circumstances, attendance, appearance and attitude to learning. Be vigilant and observant – think 'it could happen here', report concerns to a senior manager immediately.	Tutors Centre Managers Cheryl Grass Neil Evans
Staying Safe On-line	Grooming and bribery	Medium	Covered in training with learners.	Staff to be vigilant and observant, listen to conversations. If appropriate suggest a local referral and report any concerns to a senior manager.	Cheryl Grass Centre Managers Tutors
	Radicalisation and extremism	Medium			
	Terrorism	Low			
	County Lines	Low			
	Fraud	Medium			

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