



## Inspiring Great British Manufacturing


### Prevent Policy

Policy owner: Quality Enhancement, Compliance and Systems Manager

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Signature: 

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## 1. ORGANISATION POSITIONING STATEMENT

MTC Training is committed to providing a secure environment for all our learners, colleagues and stakeholders.

The current threat from radicalisation, extremism and terrorism in the UK is real and severe and can involve the exploitation of vulnerable children and young adults. The UK government introduced the Prevent strategy in 2010. The Counter-Terrorism and Security Act 2015 (“the Act”) imposes a legal duty on “specified authorities”, when exercising their functions, to have due regard to the need to prevent people from being drawn into terrorism. As an independent training provider, MTC Training must comply with this duty, as well as with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners.

This policy is designed to provide a clear framework to structure and inform MTC Training’s response to safeguarding concerns for those children, young people and vulnerable adults (hereafter referred to as ‘learners’) who may be vulnerable to the messages of extremism, thereby effectively fulfilling our Prevent Duty. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process (see section 8).

In order to ensure that we fulfil our Prevent Duty, MTC Training colleagues are expected to confirm their commitment to all MTC policies, processes and procedures in writing as a condition of their employment. In addition to the guidance in this Policy, we provide training to all colleagues and learners to ensure everyone understands how to identify and report any concerns and the support that is available to help.

### 1.1 Policy Review

In order to ensure that the Policy and its associated processes remain relevant, effective and up to date, this Policy will be reviewed on an annual basis (or sooner if new legislation is published).

Our Designated Safeguarding and Prevent Lead completes annual update training, or ad hoc training as legislation is updated. This is disseminated to the Safeguarding and Prevent Deputy and Officers and our associated action plan and risk assessment for Prevent is also updated.

## 2. POLICY STATEMENT

MTC Training aims to guide learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take our role in preparing our learners for life in modern Britain extremely seriously.

We aim to encourage working towards a society:

- With a common vision and sense of belonging by all communities.
- In which the diversity of people’s backgrounds and circumstances is appreciated and valued.
- Where similar life opportunities are available to all.
- Within which strong and positive relationships exist and continue to be developed in the training centre, the workplace and the wider community.

In order to protect learners and colleagues from radicalising influences and build resilience to

extreme narratives, we raise both colleagues' and learners' awareness of our Prevent Duty by promoting it through the induction programme, internal signage, learner progress reviews and embedded in teaching and learning through British Values. Learners and colleagues also have ongoing access to online Prevent resources.

We further promote awareness through online learning and face-to-face training via regional Prevent Leads, ensuring all learners and colleagues are able to identify potential vulnerabilities and any worrying changes to behaviour, and understand how to raise and report any concerns. Learners also undertake mandatory attendance workshops on personal and cyber security delivered by subject matter experts. Colleagues complete mandatory refresher sessions annually with our Safeguarding and Prevent Team, or when legislation changes, as well government approved e-learning training courses.

Our Safeguarding and Prevent training for both learners and colleagues includes exercises and techniques for building resilience to extreme narratives, and we actively promote British Values throughout the apprenticeship programme in order to strengthen the barriers to extremism.

We also share information leaflets with employer partners and parents to inform them of the support mechanisms we have in place to address the Prevent Duty, and to help protect our learners when they are not onsite at the training centre. In addition, our Employer Guide for our employer partners contains a section on Prevent and British Values.

Our IT Team monitors digital safety and carries out filtering and monitoring of learners' internet use and agreed 'flags' that may indicate vulnerabilities or worrying changes in behaviour are reported to the DSL for escalation via our Safeguarding Process. The Annual Filtering and Monitoring Declaration, Appendix 1, is completed by the DSL and Head of IT Infrastructure and Operations to confirm that arrangements are sufficient.

Our 'Prevent Action Plan' provides more detail about our ongoing actions to reduce the local and national risks relating to our responsibilities around the Prevent Duty. We assign a RAG (Red Amber Green) rating to each risk, detailing the actions we are taking to mitigate these risks in order to protect learners and colleagues from radicalising influences. The Prevent Action Plan is updated on a 6-monthly basis, or sooner if local or national incidents occur to alter the risk landscape.

This policy is to be used alongside our Safeguarding Policy, which seeks to protect learners from maltreatment, prevent impairment of their health or development, provide effective support, and take action to help each individual learner achieve their potential.

### 3. DEFINITIONS

**"Extremism"** is vocal or active opposition to fundamental British values, which include democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. (HM Government Prevent Strategy, 2011.)

**"Radicalisation"** is the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**"Terrorism"** is defined in the Counter Terrorism Act 2008. For the purpose of this document, it is

defined as an action that:

- Endangers or causes serious violence to a person / people,
- Causes serious damage to property,
- Or seriously interferes or disrupts an electronic system.

The use or threat must be designed to influence government or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.

“**Colleague**” encompasses all MTC Training employees, part-time and full-time staff, contractors and associates. This Prevent policy applies to all colleagues.

“**Channel**” is part of the Prevent strategy and provides support to individuals at risk of being drawn into violent extremism. It draws on existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children’s and youth services and offender management services) and the local community and has three objectives:

- To identify individuals at risk of being drawn into violent extremism.
- To assess the nature and extent of that risk.
- To develop the most appropriate support for the individuals concerned.

“**County Lines**” are where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into doing this by gangs. The ‘County Line’ is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

“**Martyn’s Law**” also known as the Terrorism (Protection of Premises) Bill, aims to enhance the security and preparedness of public venues against terrorist attacks. Premises in scope include:

**Publicly accessible locations** with a capacity of 100 or more people. This includes:

- Retail and hospitality venues.
- Health, education, and childcare facilities.
- Stadiums and sports grounds.
- Hotels and theme parks.
- Places of worship, libraries, museums, and galleries.
- Academic institutions and leisure centres.
- Shopping centres and supermarkets.
- Tourist attractions and supermarkets.

**Enclosed premises** (buildings) where public access is granted by express or implied permission.

**Open-air premises** that require express permission for access, such as tickets, memberships, or invitations.

The law categorises premises into two tiers based on their capacity:

- **Enhanced Tier:** Premises with a capacity of 800 or more.
- **Standard Tier:** Premises with a capacity of 100 to 799.

These measures ensure that venues are better prepared and can respond effectively in the event of a terrorist attack and should be considered when MTC Training colleagues are planning and risk assessing any external visits for apprentices.

## 4. NATIONAL GUIDANCE AND STRATEGIES

The overall aim of the Government counter-terrorism strategy, [CONTEST](#), is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. Prevent remains one of the key pillars of CONTEST, alongside the other three 'P' work strands:

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

Prevent is a key part of the Government's strategy to stop people becoming terrorists or supporting terrorism. Early intervention is at the heart of Prevent in diverting people away from being drawn into terrorist activity.

Prevent happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation.

### 4.1 Objectives

The Prevent strategy objectives are:

- **Tackle** the ideological causes of terrorism.
- **Intervene** early to support people susceptible to radicalisation.
- **Enable** people who have already engaged in terrorism to disengage and rehabilitate.

All colleagues should have an awareness of the Prevent agenda and the various forms radicalisation takes. All colleagues should be able to recognise signs and indicators of concern and respond appropriately.

## 5. VULNERABILITY / RISK INDICATORS

We ensure that all colleagues who are in contact with children and potentially vulnerable persons, including our learners, are trained, prepared and supported to effectively implement our documented Safeguarding and Prevent Duty Policies. This ensures that they are able to identify, at an early stage, any vulnerabilities or worrying changes in behaviour that may be a cause for concern and are confident in taking the appropriate action in a timely and consistent manner.

We provide guidance and support to employers and parents or guardians to ensure that everyone involved with our learners is confident in identifying and reporting vulnerabilities or worrying changes in behaviour. The Prevent module within our learner induction programme raises learners' awareness of radicalisation and extremism making links to fundamental British Values, so that they are able to make informed decisions, recognise if others are affected, and know what action to take if they are worried someone is being radicalised.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a learner, or their family may be vulnerable or involved with extremism.

### 5.1 Vulnerability

- **Identity crisis:** Distance from cultural / religious heritage and uncomfortable with their place in

the society around them.

- **Personal crisis:** Family tensions, a sense of isolation, adolescence, low self-esteem, disassociating from existing friendship group and becoming involved with a new and different group of friends, searching for answers to questions about identity, faith and belonging.
- **Circumstances:** Migration, local community tensions, events affecting country or religion, alienation from UK values, having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet ambitions:** Perceptions of injustice, feeling of failure, rejection of civic life.
- **Criminality:** Experiences of imprisonment, poor resettlement / reintegration, previous involvement with criminal groups.

## 5.2 Access to extremist influences

- Reason to believe that the learner associates with those known to be involved in extremism.
- Possession or distribution of extremist literature / other media likely to incite racial / religious hatred or acts of violence.
- Use of closed network groups via electronic media for the purpose of extremist activity.

## 5.3 Experiences, behaviours and influences

- Experience of peer, social, family or faith group rejection.
- International events in areas of conflict and civil unrest had a personal impact on the learner. person resulting in a noticeable change in behaviour.
- Verbal or written support of terrorist attacks.
- First-hand experience of racial or religious hate crime.
- Extended periods of travel to international locations known to be associated with extremism.
- Evidence of fraudulent identity / use of documents to support this.
- Experience of disadvantage, discrimination or social exclusion.
- History of criminal activity.
- Pending decision on their immigration / national status.

## 5.4 Other critical risk factors

More critical risk factors include:

- Being in contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites, especially those with a social networking element.
- Possessing extremist literature.
- Justifying the use of violence to solve societal issues.
- Significant changes to appearance / behaviour.

## 5.5 Radicalising influences

- Online space, less regulated platforms and gaming platforms, where extreme content is easily accessible.
- Family or peers sharing extremist material or ideologies in person or online.
- Finding inspiration in infamous activists, political or religious figures, who become negative influencers and role models.
- Global events, government policies or local grievances resulting in dissatisfaction, which inspires anti-government sentiment and a gateway to crisis narratives.

## 5.6 Threats

MTC Training delivers training within a number of Local Authorities and will maintain relationships and communication with regional Prevent Coordinators. Information, unless classified, will be disseminated by the Safeguarding Team and Apprenticeship Programme Management Team to colleagues via CPD sessions and quarterly newsletters/updates.

Learners will receive training and awareness sessions during their induction with links to British Values. This will be revisited through progress reviews and embedded in teaching and learning where relevant.

## 6. EXTERNAL SPEAKERS

In the interest of safeguarding our learners, we must ensure external speakers and the material they will be presenting does not promote extremism, incite radicalisation or be offensive in any way when delivering the programme or additional learning to our learners.

All external speakers must complete the External Speaker Authorisation Form (APP-008-F1 V1) and supply presentation material to the Deputy Director – Delivery or Quality Manager to vet and approve the event.

The main practical points to be considered are:

- Notice period – usually 14 days to allow for further enquiries and appeal if required.
- Ownership of the event.
- What is the event title and who is speaking (including all names they may be known by)? What is going to be publicised? What is the event about and what does it seek to achieve? There is evidence of events being given titles that do not accurately reflect the nature of what will take place. Such actions will often be an indication that an event may be controversial, and more detailed investigation and consideration required.
- Will the event be in English language. If not, will translation be available? How and where will the event be publicised, and will this also be in English?
- Is the event likely to have an impact on the reputation of MTC Training?
- Is there any known or likely impact on the safety of learners, colleagues or wider community attending the event?

The authorisation of each event or referral for further enquiries and any subsequent conditions imposed will be clearly recorded and retained centrally.

In addition, our Designated Safeguarding Lead (DSL) is responsible for ensuring learners, colleagues and visitors have the correct security checks (DBS register), and for collating and interrogating the data to analyse and inform any necessary changes.

## 7. REFERRAL AND INTERVENTION PROCESS

Any identified concerns as the result of observed behaviour or reports of conversations that suggest that a young person supports terrorism and / or extremism raised by a learner or a colleague must be reported to the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead (DDSL) immediately, and no later than by the end of the working day. The concern will be reported and managed following the process described below and illustrated in Section 10.



Where there is an identified / potential risk that a learner may be involved in supporting or following extremism, further investigation by the police will be requested, prior to other assessments and interventions. The DSL is responsible for contacting either the relevant Prevent Coordinator, dependant on the location, for further advice and guidance.

## 8. DESIGNATED SAFEGUARDING LEAD (DSL)

The DSL and DDSL has responsibility for investigating and supporting learners in line with MTC Training's Safeguarding Policy.

It should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the Channel process). As part of the referral process, the DSL or DDSL will therefore also raise an electronic referral to the Channel process.

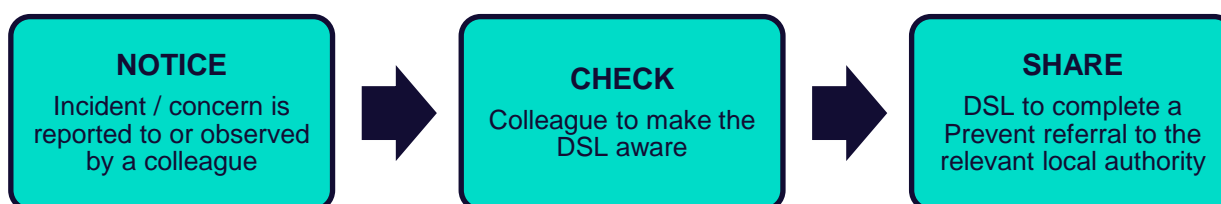
Duties will also include:

- Inducting colleagues on their role in complying with the Prevent Duty in order to prevent vulnerable people from being radicalised and / or drawn into terrorism or extremism.
- Ensuring that staff have read and understood this policy.
- Organising training for staff on Prevent issues.
- Referring incidents or alleged incidents / concerns to the police and / or social services.
- Establish protocols with the local safeguarding children board where necessary.

## 9. Channel Referral Process

Some identified concerns may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. The police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual suspected to be at risk of radicalisation. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the learner.

## 10. MAKING A REFERRAL TO PREVENT



### Notes:

- The relevant site security team and emergency services must be informed immediately if there is an immediate risk to the safety of people or damage to property
- The DSL will liaise with internal and external support mechanisms for anyone involved or effected by an incident.
- Referrals will be completed by following the relevant local authority online guidance
- [Prevent referrals – Coventry City Council](#)
- [Safeguarding vulnerable people from extremism | Oxfordshire County Council](#)
- [Liverpool Family Information & SEND Directory | PREVENT - Are you concerned about someone who is at risk of radicalisation?](#)
- [Making a referral to Prevent - GOV.UK \(www.gov.uk\)](#)

### Details to include in the Prevent referral (via local authority online forms)

- How or why your organisation came to be concerned.
- What happened if there was a specific event.
- The indicators that something is wrong.
- Any sympathetic interest in hate crimes, extremism or terrorism - including any extremist ideology, group or cause, support for 'school shooters' or public massacres, or murders of public figures.
- 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 educational 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 you've had with the learner, parent or carer (if under 18).
- The parental or carer support (if known and under 18).
- Why the referral is relevant to Prevent, for example, is there a presence or possible presence, of any terrorist or terrorism-linked ideology.
- What you're worried about, what may happen if the learner's needs are not met and how this will affect them.

## A1 APPENDIX 1: CONTACT DETAILS

### Designated Safeguarding Lead

- Dave Lee
- Email [safeguarding@the-mtc.org](mailto:safeguarding@the-mtc.org) or Safeguarding hotline number: 02476701635

### Deputy Designated Safeguarding Lead

- James Wagstaff
- Email [safeguarding@the-mtc.org](mailto:safeguarding@the-mtc.org) or Safeguarding hotline number: 02476701635

### External Agencies

<b>West Midlands</b>	<p><b>West Midlands Police Prevent team:</b> Call 101 (select West Midlands Police Constabulary) <a href="mailto:CTU_GATEWAY@west-midlands.pnn.police.uk">CTU_GATEWAY@west-midlands.pnn.police.uk</a></p> <p><b>Multi-Agency Safeguarding Hub (MASH)</b> <a href="mailto:mash@coventry.gov.uk">mash@coventry.gov.uk</a></p>
<b>Oxfordshire/Thames Valley</b>	<p><b>Multi-Agency Safeguarding Hub (MASH)</b> Call 0345 050 7666</p> <p><b>ACT Early Support</b> Call 0900 011 3764</p> <p><b>Oxfordshire Safeguarding Children Board</b> <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a></p> <p><b>Thames Valley Police Prevent team:</b> Call 101 (select Thames Valley Police) <a href="mailto:Preventreferrals@thamesvalley.pnn.police.uk">Preventreferrals@thamesvalley.pnn.police.uk</a> <a href="mailto:Amanda.Kerman@thamesvalley.pnn.police.uk">Amanda.Kerman@thamesvalley.pnn.police.uk</a> or 07974 113498</p>
<b>MTC Liverpool</b>	<p><b>Liverpool Prevent Team</b> Call 0151 233 0343 <a href="mailto:prevent@liverpool.gov.uk">prevent@liverpool.gov.uk</a></p> <p><b>Merseyside Police Prevent team:</b> Call 0151 777 8506 or 0151 777 4878</p>
<b>National</b>	<p><b>Reporting suspicious internet sites, chat rooms or other web-based forums</b> <a href="http://www.gov.uk/report-terrorism">www.gov.uk/report-terrorism</a></p> <p><b>Police Prevent advice line</b> 0800 011 3764</p> <p><b>Anti-Terrorist hotline</b> 0800 789 321</p>

**A2 APPENDIX 2: ANNUAL FILTERING AND MONITORING DECLARATION FORM**

**Annual Filtering and Monitoring Declaration**

This declaration is to confirm that MTC Training meets the digital and technical standards for schools and colleges as published on 23 March 2022, updated 20 May 2024.

The declaration is completed annually in August for each academic year unless a specific safeguarding risk has been identified, any changes to related working practices or any new technology has been introduced.

<b>Section 1: Summary of provision</b>

<b>Section 2: Summary of risk assessment and mitigation</b>

<b>Section 3: Technical filtering details</b>	
a. Name of filtering provider	
b. Is a member of Internet Watch Foundation (IWF)	Choose an item.
c. Signed up to Counter-Terrorism Internet Referral Unit list (CITRU)	Choose an item.
d. Is blocking access to illegal content including child sexual abuse material (CSAM)	Choose an item.

<b>Section 4: Technical confirmation</b>	
a. Filters all internet feeds, including any backup connections	Choose an item.
b. Is age and ability appropriate for the users, and be suitable for educational settings	Choose an item.
c. Handles multilingual web content, images, common misspellings and abbreviations	Choose an item.
d. Identifies technologies and techniques that allow users to get around the filtering such as VPNs and proxy services and block them	Choose an item.
e. Provides alerts when any web content has been blocked	Choose an item.
f. Provides filtering on mobile or app technologies	Choose an item.

<b>Section 5: Technical monitoring</b>	
a. We physically monitor screens of users where possible	Choose an item.
b. We supervise on a console with device management software	Choose an item.
c. We monitor network using log files of internet traffic and web access	Choose an item.
d. We monitor individual devices through software or third-party services	Choose an item.

<b>Section 6: Comments</b>
Refer to appendix for a screenshot of the firewall category blocking.

<b>Section 7: Confirmation</b>	
<b>MTC IT</b>	
Name: Click or tap here to enter text.	
Role: Head of IT Infrastructure & Operations	
Date: Click or tap to enter a date.	
<b>MTC Training</b>	
Name: Click or tap here to enter text.	
Role: Quality Enhancement, Compliance and Systems Manager/Designated Safeguarding Lead	
Date: Click or tap to enter a date.	
<b>SLT</b>	
Name: Click or tap here to enter text.	
Role: Click or tap here to enter text.	
Date: Click or tap to enter a date.	