



Prevent Policy and Procedure

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Pareto is committed to promoting and ensuring adherence to this policy and procedure. We will actively promote and reinforce this commitment during staff induction processes. Additionally, continuous training will be provided to our employees to ensure proper implementation of the policy and procedure.

To maintain its effectiveness and relevance, this policy and procedure will be reviewed at least once annually. The purpose of these regular reviews is to assess its suitability, identify any areas for improvement, and make necessary updates as required.

For the purposes of this policy, the terms "us", "our" and "we" refer to Pareto.

Changes to legislation

Counter-Terrorism and Security Act 2015, Section 29 is up to date with all changes known to be in force on or before 11 November 2024. There are changes that may be brought into force at a future date. Changes that have been made appear in the content and are referenced with annotations.

Scope and Purpose

This policy outlines the organisation's commitment to the Prevent Duty, ensuring that all apprentices, staff, and stakeholders are safeguarded from the risks of radicalisation and extremism. The purpose is to promote a safe, inclusive, and supportive learning environment where British Values are upheld, and any concerns related to radicalisation are identified and responded to appropriately.

Our delivery staff will continuously develop and maintain their confidence and ability in effectively embedding meaningful and relevant Prevent content into their delivery and apprenticeship review content to ensure our apprentices and their employers know how to keep themselves and their colleagues safe from any risks of becoming vulnerable to radicalisation.

This policy applies to all Pareto employees located in the United Kingdom involved in the delivery of apprenticeship programmes. Agency workers, consultants or self-employed contractors who are engaged to support any elements of these programmes, will also be required to adhere to these guidelines and procedures unless otherwise stated.

Policy Statement

Pareto Apprenticeships is committed to safeguarding all learners and staff, including protecting them from the risk of being drawn into terrorism or extremism. We recognise the importance of the Prevent Duty and our responsibility to uphold the principles outlined in the Counter-Terrorism and Security Act 2015.

This policy outlines our commitment to:



Promoting Safeguarding:

We will create and maintain a safe and secure learning environment where all individuals feel valued, respected, and protected.

We will proactively identify and address potential risks of harm, including those related to extremism.

Encouraging Critical Thinking:

We will promote critical thinking skills and encourage learners to challenge harmful or extremist ideologies.

We will equip learners with the knowledge and resources to understand and resist extremist narratives.

Fostering Tolerance and Respect:

We will foster a culture of tolerance, respect, and understanding among learners and staff. We will celebrate diversity and promote positive relationships between individuals from different backgrounds.

Raising Awareness:

We will actively raise awareness of Prevent and its importance, ensuring that all staff and learners understand their role in safeguarding against extremism.

We will provide training and resources to staff to equip them with the knowledge and skills to recognise and respond to potential safeguarding concerns.

Responding to Concerns:

We have clear procedures in place for responding to concerns about individuals who may be at risk of being drawn into extremism.

We will work closely with relevant agencies, such as the police and local authorities, to address these concerns appropriately.

Evaluating and Reviewing:

We will regularly evaluate and review our Prevent Duty policy to ensure its effectiveness and to reflect current best practice.

By implementing this policy, Pareto Apprenticeships is committed to playing its part in preventing extremism and creating a safe and inclusive learning environment for all.

This policy will be communicated to all staff, learners, and stakeholders. We encourage everyone to familiarise themselves with the policy and to report any concerns they may have.

This policy takes into consideration and includes content from, [Prevent duty guidance: for further education institutions in England and Wales \(2015\)](#) - Updated 7 May 2024





The Prevent Duty

Pareto Apprenticeships has a duty to safeguard our apprentices.

Prevent is about safeguarding our apprentices to keep them safe.

The Prevent Duty is **not** about preventing apprentices or partners from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways and be aware of radicalisation. Resources on this website to support them in adopting the Prevent Duty - <http://www.preventforfeandtraining.org.uk/>

Pareto Apprenticeships and the employers that we work with must encourage apprentices to respect other people with particular regard to the protected characteristics set out in the Equality Act 2010. These are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation.

[Section 26 of the Counter-Terrorism and Security Act 2015](#) places a duty on certain bodies, listed in Schedule 3 to the Act, to have "due regard to the need to prevent people from being drawn into terrorism". This Prevent Duty forms part of the wider governments **CONTEST** counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists.
- Pursue terrorism – disrupt and stop terror attacks.
- Protect against terrorism – strengthen UK protection.
- Prepare to deal with terrorism – mitigate the impact of attacks that can't be stopped.

Definitions

Radicalisation

Is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo.

Terrorism

Is an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion, ideology or social class.

Extremism

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in the above.

British Values

British values are defined as:

- Democracy





- The rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs

Our Responsibilities

Pareto have a legal responsibility under the Prevent Duty to make sure that employees, partners, volunteers and employers:

- Undertake training in the Prevent Duty
- Exemplify British values of "democracy, the rule of, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into our practice.
- Are aware of when it is appropriate to refer concerns about apprentices or colleagues to the Prevent officer.

Any emails should, in the first instance be sent to:

Safeguarding@pareto.co.uk

Any calls should, in the first instance be made to:

01625 810643

The Prevent Officer and Designated Safeguarding Lead within Pareto Apprenticeships is Dan Gagg.

dgagg@pareto.co.uk

Direct dial: **01625 415762 Ext: 3362**

Escalating an Incident or Concern

Prevent concerns and/or incidents should be reported using the incident [report form](#): <https://forms.gle/A3sU9TENnHVRsaQn9> or emailing safeguarding@pareto.co.uk and by referring to the processes detailed below.

What to do (Apprentices and Employer/Partners)

If an apprentice or employer/partner needs to raise a Prevent concern they should speak to their Skills Coach for support and guidance in raising the concern.

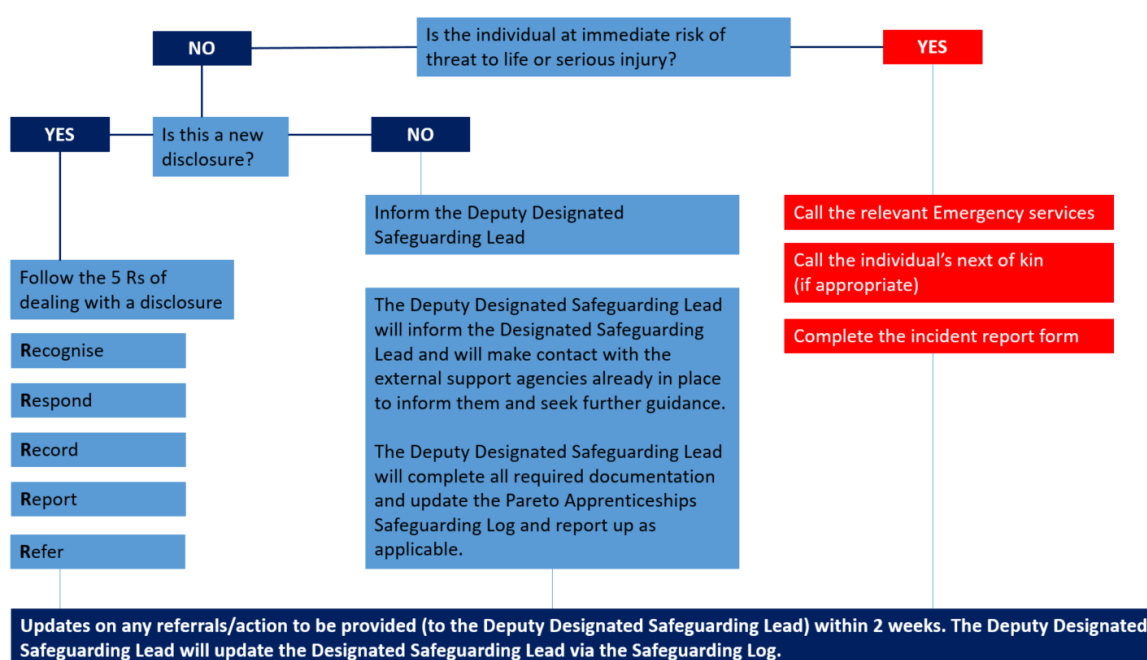
If the concern requires immediate attention they should call the Safeguarding helpline on **01625 810643** and email Safeguarding@pareto.co.uk providing as much detail as possible about the concern.

What to do (Pareto Apprenticeship Staff)

Prevent concerns and/or incidents should be reported using the incident [report form](#): <https://forms.gle/A3sU9TENnHVRsaQn9> or emailing safeguarding@pareto.co.uk and by referring to the processes detailed below.



✓ RECOGNISE	→	The signs and indicators of abuse, neglect and radicalisation.
✓ RESPOND	→	To what you see (concern) or to what is said (report or disclosure). Listen deeply and ask factual questions
✓ RECORD	→	What you have seen or been told. Focus on the facts and use the words of the disclosure.
✓ REPORT	→	To a Designated or Deputy Designated Safeguarding Lead without Delay.
✓ REFER	→	To an appropriate organisation – (in almost all cases this is the responsibility of the Designated Safeguarding Lead)



You can contact the Prevent Officer / the Designated Safeguarding Lead, or your line manager for immediate support and guidance.

There are also various guidance materials and resources available on your local Police authority website.

Staff Training

All Pareto staff are trained on the Channel process and how the duty engages with requirements of their role, via internal face to face/Online CPD and distance/remote e-learning.

Identifying risk at an early stage allows early intervention, and is crucial to the Prevent duty and Channel process being successful. Identifying changes in behaviour of apprentices and employees and ensuring staff are trained and confident in being able to effectively deal with any issues raised forms a key aspect of our continuous professional development for Prevent.

All legislative documents, policies, training materials, and additional resources to extend knowledge, challenge extremism and ideas to support promotion of British Values are available on the staff shared-drive.

Pareto Apprenticeships will develop the Prevent duty knowledge of delivery and non-delivery staff so that it is relevant and contextualised specific to the Digital, Business, Administration, Finance and Law sector subject area and standards within this area that we deliver. These include (but are not limited to) Digital, Sales, Leadership and Management, and Business Administration. We will ensure that continuous learning and development that is focused specifically on keeping apprentices safe and preventing them from the risk of radicalisation is a core element of our Prevent professional development.

We pride ourselves on over twenty five years of success in the Sales Training Sector and we will ensure this success is transferred to the development of our staff through our internal CPD programme and through identifying appropriate and high quality externally delivered learning and development opportunities. By delivering thorough, robust and consistent continuous professional development, we will ensure our staff are committed to promoting the policy and the importance of Prevent duty awareness with our apprenticeships and are committed to preventing the risk of radicalisation to them. Our staff training will enable our delivery staff to ensure that resources and learning objectives are directed effectively and responsively to our apprentices and their employers building resilience to extreme narratives. Our Regional Prevent Offices will maintain links with their allocated Regional Prevent Duty Officer and cascade the local Prevent duty priorities for their specified area and use this information to support the co-creation of meaningful and relevant learning content and resources. Access to credible and reliable resources on the Fellowship of Inspection Nominees resource page will be utilised to support the consistency and quality of our delivery.

Employer Risk Assessment

We complete a Prevent Risk Assessment form where we believe there may be a risk of non-compliance by the employer. This form must be completed as soon as possible to ensure they have the knowledge, policies and procedures that are appropriate for the Prevent Duty.

Where a risk of non-compliance is identified, the Action Plan must be completed and sent the form must be sent to the Pareto Prevent Officer (Deputy Designated Safeguarding Lead) via the safeguarding inbox: safeguarding@pareto.co.uk

Referral Pathways

If an apprentice has concerns about themselves, or you have concerns about an apprentice being at risk of radicalisation, you should refer to the Safeguarding Team (the Prevent Officer is part of the Safeguarding Team) by completing the [Safeguarding and Prevent online reporting form](#).

<https://forms.gle/A3sU9TENnHVRsaQn9>

Any emails should, in the first instance be sent to: Safeguarding@pareto.co.uk

Any calls should, in the first instance be made to: **01625 810643**

The Prevent Officer and Designated Safeguarding Lead within Pareto Apprenticeships is Dan Gagg.

dgagg@pareto.co.uk **Direct dial: 01625 415762 Ext: 3362**

Once the Designated Safeguarding team has been informed they will make a decision on whether the issue needs to be escalated to the local Police Prevent Officer. The designated safeguarding team/staff member that is involved with the referral will then support the Channel process as seen fit by the local Channel panel. It should be noted that referral to the channel process is not a criminal intervention.

Safeguarding Staff Members as a Result of Referral

While it is unlikely that the referrer would then be targeted. If someone received a threat or police felt someone was under threat without them knowing, there are risk assessment, warning and safeguarding processes that local police departments will apply as a matter of routine. The outcome might involve an investigation and arrests being made etc. such as markers on people's mobile phone numbers or addresses, warnings to parties involved, or other measures.

Vulnerabilities & Indicators of Radicalisation

Vulnerabilities	Indicators
Peer pressure	Withdrawn
Unsettled family life	Change in engagement levels
Need to belong/ fit in	Using extremist language, passionate about extremist views
Accessing extremist material	Preaching
Isolation and social exclusion	Change in appearance – dress / body art
Being bullied	Change in behaviour within work and learning environment
Media influence	Change in social circles
Seeking purpose of focus for life	
Seeking revenge	
Seeking acceptance / social standing	

External Speakers and Events

In order to comply with the applicable Prevent duty guidance, Pareto Apprenticeships have policies and procedures in place for the management of events held on our premises. The policies apply to all staff, learners and visitors and clearly set out what is required for any event to proceed.

Pareto balances its legal duties in terms of both ensuring freedom of speech and also protecting student and staff welfare.

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

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

Pareto Apprenticeships have in place a system for assessing and rating risks associated with any planned events, which provides evidence to suggest whether an event should proceed, be cancelled or whether action is required to mitigate any risk. There is also a mechanism in place for assessing the risks associated with any events which are Pareto Apprenticeship- affiliated, funded or branded but which take place off Pareto premises and for taking swift and appropriate action.

Taking into consideration the recently introduced '[Martyn's Law](#)', Pareto Apprenticeships staff that are involved in the physical security of the offices and training venues have an awareness of the Prevent duty. Where appropriate and legal to do so, an institution should also have procedures in place for the sharing of information about speakers with other institutions and partners.

Pareto Apprenticeships realise that the risk of radicalisation in institutions does not just come from external speakers. Radicalised learners can also act as a focal point for further radicalisation through personal contact with fellow learners and through their social media activity. Where radicalisation happens off Pareto Apprenticeships offices and training venues, the learner concerned may well share their issues with other learners. Changes in behaviour and outlook may be visible to Pareto Apprenticeship staff.

Partnership

In complying with the applicable Prevent duty guidance, Pareto Apprenticeships carry out active engagement from governors, boards, principals, managers and leaders with other partners including police and BIS regional higher and further education Prevent coordinators. Pareto Apprenticeships seek to engage and consult learners on their plans for implementing the duty.

Risk Assessment

In line with government guidance; Pareto Apprenticeships carry out a risk assessment which assesses where and how learners or staff may be at risk of being drawn into terrorism.

The risk assessment looks at equity and diversity, and the safety and welfare of learners and staff. We expect the risk assessment to address the physical management of the Pareto offices and training environments, including policies and procedures for events held by staff, learners or visitors, and relationships with external bodies who may use premises, or work in partnership with Pareto.

Pareto Apprenticeships has clear and visible policies and procedures for managing whistleblowing and complaints. If an individual feels that their complaint has not been taken seriously by Pareto Apprenticeships, they can raise it with the DfE as per the guidance within the policy..

Pareto Apprenticeships has no subcontracted delivery of courses with other providers. Should we enter into a subcontracted provision, we will implement robust procedures to ensure that the sub-contractor is aware of the Prevent duty and the sub-contractor is not inadvertently funding extremist organisations.

The Prevent Risk Assessment is reviewed at least every two months at the Safeguarding Board meeting and updated when a need is identified.

Action Plan

Pareto Apprenticeships has a Prevent action plan that sets out the actions we will take to mitigate the risks. This is updated and monitored monthly by the Designated Safeguarding Lead and Apprenticeship Senior Leadership Team and Board.

Monitoring IT Usage

Pareto Apprenticeships utilise a number of technologies as a defence in depth approach to monitor and secure I.T. usage, including but not limited to:

- ZScaler Web filtering, filtering of web content based on categorisation and risk, includes filtering of traffic from non browser applications and logs of activity.
- Data Loss Prevention and monitoring via Google Workspace Enterprise.
- Anti-virus and behavioural analytics via CrowdStrike Falcon.

The full list of categories are available in the link below and are designed to protect against malicious content in all its forms.

<https://help.zscaler.com/zia/about-url-categories>

Pareto Apprenticeships has increased its expectations and responsibilities regarding the filtering and monitoring systems for IT. This is in response to the published standards for filtering and monitoring, which can be found here.

We ensure there are processes in place to:

Identify and assign roles and responsibilities to manage filtering and monitoring systems

- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

Useful links:

[Counter-terrorism and Security Act 2015](#)

[Equality Act 2010 and guidance on its implementation](#)

[Guidance to the Prevent Duty](#)

[Regional Prevent Coordinators](#)

[Prevent Duty Guidance](#)

This process will be reviewed annually (or when relevant changes to the provision requires an immediate update).