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Purpose:	This policy demonstrates our commitment to supporting the UK Government's counter-terrorism strategy, CONTEST. Part of this is the Prevent strategy which seeks to identify and prevent people from being coerced and radicalised into participating in extremist criminal activities, within a local, domestic and international context. This policy further demonstrates our compliance with our legal responsibility 'to have due regard to the need to prevent people from being drawn into terrorism'.	
Audience:	Babcock employees of the training businesses, our learners and their employers, and those representing Babcock in England, Scotland and Wales.	
Scope:	This policy relates to all Babcock employees and government funded learners including those of our sub contracted apprenticeship provision based in England, Wales and Scotland and covered by laws and legislation in England & the devolved nations.	
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Cross-referenced policies:	OP197 Operating Procedure for Safeguarding Learners C197 Learner Welfare & Safeguarding Policy processes and Code of Conduct C439 Learner Health & Safety Policy C002 Equality, Diversity and Inclusion (EDI) Policy, including Recruitment – ES&T C002t Equality, Diversity and Inclusion (EDI) Policy – Training C073 Safer Recruitment_DBs Policy and Procedures C223 Disciplinary Policy and Procedure C224 Grievance Policy and Procedure ES&T Disclosure & Barring Service (DBS) HR Policy and Procedures Babcock Group (BIG) Social Media Policy BIG Whistle Blowing Policy BIG Code of Conduct Policy BIG Modern Slavery Transparency Statement BIG, Land & ES&T Health & Safety Policies BIG, Land & ES&T Security, Information Assurance and Data Protection Policies	
Further information:	This policy document effectively replaces the Embedding Prevent Duty and Fundamental British/Core Values Strategy (C1144 v2) and supports our Health & Safety, Welfare & Safeguarding, Equality, Diversity & Inclusion, Recruitment, Security & Information Assurance and corporate Health & Safety policies noted above. Refer to All together different site on Connect, Prevent resources. Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers - HM GOV (July 2018)	

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1. Position statement

This policy demonstrates our commitment to supporting the UK Government’s counter-terrorism strategy, CONTEST. Part of this is the Prevent strand, which seeks to stop people becoming radicalised or supporting terrorism, within a local, domestic and international context. It is a commitment that our partners, including learners and employers, should share.

Prevent has three specific strategic 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 that they are given appropriate advice and support.
3. Work with sectors and institutions where there are risks of radicalisation that we need to address.

All training providers are mandated through the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism. However, Babcock want to go beyond just meeting our legislative mandate, therefore, our Prevent - Duty of Care, including the promotion of British Values, is firmly embedded as part of our learning programmes and in existing Health & Safety, Welfare & Safeguarding, Equality, Diversity & Inclusion and Information Assurance & Security policies, which should be adhered to in conjunction with this policy’s context.

This policy acts to emphasise Babcock’s commitment to develop effective processes and deliver education on the Prevent agenda as we embrace and promote British Values at all times whilst we develop programmes and work with learners and their employers. It is vital that we play our part in helping to steer young people and adults at risk, in particular, away from harmful influencers and ensure our learners develop self-confidence, self-worth and the ability to think critically.

As the UK faces a range of terrorist threats, all terrorist organisations and groups, whether local, national or international, pose a threat to us and will seek to radicalise and recruit people to their cause. With many employees, learners and employer partners within Babcock Training operating daily within higher risk sectors and communities, we have a duty of care to not only identify and respond to vulnerabilities and potential risks but to address these quickly to ensure ongoing safety for everyone at all times.

Channel is a counter-terrorism programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by: identifying individuals at risk; assessing the nature and extent of that risk; developing the most appropriate support plan for the individuals concerned. The Channel referral process is not about criminalising a person but rather about intervening before a person or persons may commit an act which does criminalise them.





2. Objectives

- To embrace and demonstrate the British Values of: Democracy; The Rule of Law; Individual Liberty; and Mutual Respect and Tolerance for those with different faiths and beliefs ourselves, in all that we do.
- To provide effective and ongoing education on Equality, Diversity & Inclusion, including British Values, to ensure everyone who works and learns with Babcock is free from bullying, harassment, victimisation or discrimination.
- To provide effective and ongoing education on Health & Safety and Welfare & Safeguarding topics, including our Prevent Duty and British Values practices.
- To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
- To break down segregation and instill tolerance and mutual respect among different communities; including supporting inter-faith and inter-cultural dialogue and understanding.
- To uphold our legal responsibilities to inhibit the promotion of extremist and subjective prejudiced opinions and beliefs across all day-to-day activities. Promotion or endorsement of any organisation or persons linked to extremism is contrary to the values of Babcock and shall constitute misconduct.
- To ensure that employees, learners and employers have a good understanding of their roles and responsibilities in recognising and preventing violent extremism.
- To raise awareness and provide effective support for those who are identified as at risk.

3. 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** – an act of terror/ violence based on a political objective, whether that means the politics of nationalism, ethnicity, religion, ideology or social class.
- **Extremism** – an ideology that is far outside the mainstream attitudes of society, including 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. This also includes calls for the death of members of the British armed forces.



4. Responsibilities

4.1 Senior management and strategic leadership

Babcock recognises that leaders have a crucial role to play in embedding and ensuring compliance with our Prevent Duty and the promotion of British Values. As outlined in our 'being babcock' guiding principles, Babcock already expects the highest standards of professional conduct and attitude across all that we do.

Senior management responsibilities for the delivery of this policy include:

- Communicating this policy to employees.
- Sharing this policy and those related to it, with our partners, learners and employers.
- Promoting and demonstrating commitment to the Prevent Duty; including embedding fundamental British Values on a daily basis, across all levels of the organisation, both internally and externally.
- Maintaining a team of Designated Persons for Safeguarding and ensuring their training, education and ongoing awareness of current risks and measures is appropriate.
- Ensuring appropriate resources and technologies are available to develop skills, training materials and platforms.
- Providing mandatory training on Security, Equality, Diversity & Inclusion, Health & Safety and Welfare & Safeguarding policies and procedures, including our Prevent Duty and Promotion of British Values, at employee induction and subsequently supported by ongoing training and awareness activities, in turn giving operational employees the tools, confidence and competence to support learners during their programme.
- Ensuring training records are up-to-date and available to audit.
- Appointing a Single Point of Contact and deputy to co-ordinate Prevent activities, internally and externally.
- Building deepening engagement with local, regional and national communities across all sectors.
- Ensuring recruitment and selection processes are compliant, including enhanced DBS checks being conducted, as appropriate to the role.
- Ensuring the curriculum includes the necessary content and resources to develop apprentices' knowledge and promote the principles of CONTEST and Prevent.
- Equipping employees and learners with the knowledge and skills they need to stay safe from harm and to know to whom they should turn for help.



- Educating employees and learners about the risk of the internet and social networking providing easy access and communication of inflammatory material, sophisticated propaganda, along with the potential for cyber bullying and grooming.
- Educating employers on providing their apprentices with clear policies that prohibits the use of sharing of illegal materials and/or the endorsement of extremist speakers. Any evidence of sharing of illegal materials or the endorsement of extremist speakers will be seen as a disciplinary and possibly criminal offence.

To ensure Babcock and its employees are confident to take preventative and responsive steps working with partner professionals, families and communities, we will:

- Establish strong and effective support services through signposting to external organisations including police/Channel Coordinator(s), if appropriate.
- Listen to what is happening locally, nationally and internally that could impact of the safety and wellbeing of everyone at Babcock and those on programme with us.
- Implement anti-bullying strategies and challenging discriminatory behaviour.

4.2 Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead takes lead responsibility for safeguarding (including online safety). The DSL ensures:

- Babcock have welfare & safeguarding policy and process which are fit for purpose with all legislative requirements upheld.
- Safeguarding activity is recorded and shared with senior leaders.
- Provides robust challenge to safeguarding reporting and the activities of the SPOC.
- Ensures appropriately trained staff are in place to manage safeguarding process and all staff have access to information, advice and guidance (IAG) / training and on-going CPD on matters relating to safeguarding learners.

Deputies are trained to the same standard as the Designated Safeguarding Lead. The activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding remains with the Designated Safeguarding Lead, this lead responsibility is not delegated.

4.3 Single Point of Contact (SPOC)

Single Point of Contact	Mary Mamik
Deputy SPOC	Mark Ritchie



The SPOC is responsible for the day to day implementation of safeguarding (including Prevent) policy and process. The SPOC and / or their Deputy will:

- Manage the day-to-day implementation of Babcock safeguarding policy and process.
- Keep all welfare & safeguarding policy and process documents up to date and in line with national best practice bench marks and legislation.
- Be the key conduit for external information on matters relating to safeguarding to be highlighted and implemented within Babcock.
- Create and deliver timely training to Designated Persons and the wider business where required.
- Ensure teams maintain accurate safeguarding logs (with due regard to the sensitive nature of such logs) including the production of analysis and reports from the stored information.
- Ensure a register for DBS checks is in place and accurate CPD and training logs for all DSL / SPOC & DPs are maintained (this is a joint responsibility in line with HR protocols).
- Complete an annual Prevent risk register assessment and manage any subsequent improvement plan.
- Refer cases of suspected abuse to the relevant 'three Safeguarding Partners' as required and act as a point of contact with the three Safeguarding Partners.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Support staff who make referrals.
- Manage ongoing enquiries under section 47 of the Children Act 1989 and police / Ofsted / CQC investigations.
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety).
- Act as a source of support, advice and expertise for all staff.



4.4 Local managers/appointed Designated Person (DP) for Safeguarding

Local managers/appointed DP responsibilities for the delivery of this policy include:

- Offering learner-facing staff, and their line managers, guidance on procedure and how to support a learner with an equality, welfare or safeguarding issue; taking the lead for suggesting or agreeing the correct signposting of medium or high risk issues.
- Utilising and promoting the use of the IAG support sites list and customer Employee Assistance Programmes, as applicable.
- Knowing/networking with local authority safeguarding agencies such as Safeguarding Partners.
- Consulting with the SPOC on any proposed external referrals or those relating to an internal HR issue, or potential HR issue.
- Informing Babcock's Single Point of Contact (or Deputy) immediately for any Prevent-type concerns or potential concerns.
- Ensuring CPOMS record contains the initial detail and IAG/support given, consent status and risk evaluation; the DP would then manage the recording of any further IAG/signposting and issue notes; following up all open issues until a recorded outcome is known including confirmation date of closure; providing a reflection including areas for improvement and indicate if the issue would make a good, redacted, case study for CPD activity.
- Regularly attending the DP Networking Calls; sharing updates with the team thereafter.
- Informing the Diversity & Safeguarding Committee of national and local projects/initiatives.
- Making good use of the resources found within the [All together different](#) site, rolling out planned awareness training or arranging bite size learning activities.
- Promoting the completion of the EDI and Safeguarding Training Survey to capture up to date training activity.

4.5 Learner-facing employees

Learner-facing employee responsibilities for the delivery of this policy include:

- Raising employers' awareness of Prevent requirements and the need to safeguard their learners and protect them from harm or discrimination.
- Raising learners' awareness of Prevent and British Values and recording what module has been completed during induction and what topic/subject has been discussed during a learning session (an exception being if a safeguarding concern has been raised as these are recorded separately).



- Understanding their own responsibilities in identifying, managing and reporting possible cases of abuse or discrimination, of any nature, including identifying those persons that may be at risk of exploitation through the process of radicalisation.
- Listening to the learner. However, where extreme viewpoints are brought to our attention, Babcock has a responsibility to take steps, as are reasonably practicable, to make sure initiators are offered a balanced presentation of opposing views.
- Being fully aware of the Designated Persons for Safeguarding who can be contacted for advice and support.
- Follow processes and procedures in relation to any concerns raised by a parent or stakeholder, involving the Single Point of Contact for Prevent concerns throughout.

4.6 Any employee

All employees hold a responsibility for the delivery of this policy, to include:

- Being empowered to ensure own levels of training, knowledge of policies and procedures to follow and understanding of Security, Equality & Safeguarding, including Prevent and British Values, is appropriate and current.
- Making good use of the resources available for learning and ensuring own training records are up-to-date and available to audit.
- Ensuring all records are kept confidential and only shared with the relevant agency or another individual on a need to know basis, even if there is no need to make an immediate referral.

If anyone believes someone is in immediate or imminent danger of harming themselves or others:

- **Call 999:** make urgent referrals by calling the emergency services if someone is in imminent danger of harming themselves or others or if urgent medical help is required.
- **Call 101:** to talk to your local police officer, get crime prevention advice, or report a crime that does not need an emergency response.
- **Call 111:** to get medical help fast but it's not a 999 emergency. You think you/someone needs to go to A&E or need another NHS urgent care service or you don't know who to call or you don't have a GP to call.
- For urgent terrorism, extremist or hate crime concerns, do not hesitate, contact 999 or follow government approved reporting and guidance below:
- **UK: report hate crime** to <https://www.gov.uk/report-hate-crime>.
- **UK: report extremist online content** to: <https://www.gov.uk/terrorism-national-emergency/reporting-suspected-terrorism>.



- **Scotland: report extremism and terrorism online to:**
<http://www.directscot.org/article/reporting-extremism-and-terrorism-online>.
- Complete the Diary of Issues process on CPOMS retrospectively and inform the central point of contact as soon as possible.

5. Key contacts for Prevent

The role of the Single Point of Contact (SPOC) is to gather detail to be able to consult with the external Channel Coordinator, local to the region, and would follow the government’s Channel Programme processes regarding intervention, if necessary.

Single Point of Contact (SPOC) / Designated Person for Safeguarding, Prevent concerns Mary Mamik – email secure mailbox	Learners can email our secure mailbox: Training.LearnerWelfare@babcockinternational.com
Deputy SPOC / Designated Person for Safeguarding, Prevent concerns Mark Ritchie – email secure mailbox	Intranet list of all Designated Persons for Safeguarding within Babcock: https://connect.babcockinternational.com/sites/sandl/atd/Pages/Designated-Persons-for-Safeguarding.aspx

6. Safe recruitment and selection of employees

Babcock will ensure safeguarding considerations are incorporated into every stage of the recruitment process. Refer to our Safer Recruitment Policy (C073) which covers this in more detail.

Individual’s criminal convictions are checked on appointment, as appropriate to the job role, via Enhanced DBS disclosure, with additional supervision and monitoring in place until confirmation of DBS check is confirmed soon after appointment.

7. Training of employees

As a minimum, all levels of employees within the Training businesses, from directors and senior managers to learner-facing employees, have mandatory training at induction and benefit from having regular updates on Security, Equality, Health & Safety, Welfare & Safeguarding including Prevent & British Values.

Managers and Designated Persons for Safeguarding are additionally trained on the Channel Programme and how the duty engages with requirements of their role. Training includes:

- Mandatory induction modules and refresher training for employees, available via SuccessFactors, with supporting materials shared via our All together different site on Connect. Feedback on each learning experience and resource is sought and analysed for its effectiveness, both from a personal development perspective and how the individual has or will make use of their knowledge with colleagues, learners and employers.
- Following the Operating Procedure for Safeguarding Learners (OP197), including an understanding of the 5Rs: Recognise, Respond, Report, Record, Refer and when/how to risk assess the case.



- Understanding vulnerabilities and recognising indicators of radicalisation techniques is included in internal training with further support and reference documentation provided (C1164 & C1165). This supports an early intervention, and forms a crucial element to the Prevent Duty and Channel Programme being successful.

8. Training of learners

Learning platforms include an area containing easy access to policies and training resources, such as: Side by Side emodules on radicalisation and extremism, staying safe online, trust and British values, plus a wide range of topical bulletins are shared on subjects and issues which extend knowledge and build community spirit and belonging. These are developed and introduced to the learner during induction, then regularly communicated throughout the learner's programme via our Hot Topics! information sheets.

All curriculums promote knowledge, skills and understanding across a wide range of topics, building resilience to radicalisation and criminalisation, whilst supporting and balancing every learner's right to freedom of expression.

Success will be achieved through:

- Encouraging active citizenship and learner voice.
- Educating and encouraging all to be involved in becoming good citizens by playing a full and active role in wider engagement in society.
- Embedding equality, diversity and inclusion, wellbeing and community cohesion throughout the curriculum, through a range of teaching, learning and assessment activities.
- Promoting wider skill development such as social and emotional aspects of learning.
- Providing teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro-social values.
- Managing and risk assessing any external content or speakers to support learning while ensuring that the input supports Babcock goals and values.

9. Possible indicators or signs of radicalisation

A number of indicators may be presented which can provide an early indication of the potential for radicalisation. These include:

- The individual's views become increasingly extreme regarding another section of society or government policy.
- They are observed downloading, viewing or sharing extremist propaganda from the web. If a person is sharing extremist material this can be classed as a criminal act.
- They become withdrawn and focused on one ideology.
- The individual becomes increasingly intolerant of more moderate views.



- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.
- The individual expresses a desire/intent to take part in or support extremist activity.

Whilst the presence of these indicators does not mean an individual will, or has become radicalised, these early warning markers must be acted upon. Should a Babcock employee identify any of these traits with a learner, employer or colleague, contact the SPOC in the first instance. The SPOC will apply the necessary processes and procedures Quality Management System policies.

10. Managing risks and responding to events

Potential/actual terrorist threats within the Babcock community may include:

- Extreme right wing views that are being distributed both face-to-face and via social media.
- Increased risk of recruitment and grooming of young people and adults at risk to extreme radical and terrorist groups.
- Distribution of online and marketing information linked to domestic and/or international issues.
- Breaches to internal/external site and security procedures.
- Cyber-terrorism/internet terrorism; including acts of deliberate or large-scale disruption of computer networks, especially of personal computers attached to the internet, by the means of tools such as computer viruses.

To ensure that Babcock monitors risks and is ready to deal appropriately with issues which arise; we will do this by:

- Babcock will not host or allow its premises or equipment to be used by extreme groups and will seek to prevent the distribution of extreme literature through our systems. Our Safeguarding_Site and Sub Contracted Providers Assessment (C1111) is in place to identify and address potential and current threat levels at all training sites where our learners learn and/or reside. This assessment is reviewed at least annually or if changes to risk management occur.
- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on everybody within Babcock and those on programme with us.
- Understanding and managing potential risks within Babcock and from external influences.
- Responding appropriately to events in local, national or international news that may impact on employees and learner communities.



- Ensuring measures are in place to minimise the potential for acts of violent extremism within all Babcock sites and that business continuity arrangements are in place and known.
- Ensuring plans are in place to respond appropriately to a threat or incident.
- Supporting employers to develop effective processes to embed responsible user policies in relation to ICT.
- Ensuring Babcock's legal responsibility to forbid the promotion of partisan/discriminatory political views in the teaching, learning and assessment of any subject. We must take such steps as are reasonably practicable to secure that where political issues are brought to the attention of learners, they are offered a balanced presentation of opposing views. Promotion of any organisations linked to violent extremism is contrary to the values of Babcock shall constitute misconduct.
- Understanding and managing potential risks from external influences, a robust checking process for all proposed, and previously unknown, external speakers/guests visiting Babcock sites to talk to learners is in place. The Safeguarding_ External Speakers_ Guests Checklists and Consent Form (C1112) is completed in these instances and records kept and maintained locally.

A dedicated online IAG resource is available to all Babcock Emergency Services & Training employees within the All Together Different and Health and Safety sites of our intranet, Connect. Both sites contain entry points into our dedicated page on Terrorism, Extremism or Hate Crimes "Prevent" content. This includes access to all our internal resources, plus current terrorist Threat Levels, Home Office contacts, Government strategies, CitizenAid app link, videos such as "Run, Hide, Tell" and external resources such as preventtragedies.co.uk/, and further learning opportunities available for staff via ncalt.com/Channel_General_Awareness, elearning.prevent.homeoffice.gov.uk and etflearners.org.uk Side by Side, specifically designed for learners.

11. Supporting employees

We also recognise that employees who have become involved with a person or persons may find the situation stressful and upsetting. Babcock will support such employees by providing an opportunity to talk through their anxieties with their line manager, Designated Person for Safeguarding or their HR consultant, or they can seek further support as appropriate through the [CiC Employee Assistance Programme](#).

12. Allegations against employees

The Managing Investigations guidance notes (C1251) aim to provide a framework to assist Designated Persons for Safeguarding (DP), within the training-related businesses, to carry out any safeguarding investigation which involves allegations made against an employee of Babcock. Accurate records in the form of 'hearing notes' (C1252) will be maintained and shared appropriately. The Company's HR Disciplinary and Grievance procedures for managing allegations against employees must also be strictly adhered to.



13. Abuse/harm directed towards employees

While it is unlikely that an employee would be victimised for making a referral, if a threat has been made or police believe someone was under threat without them knowing, there are safeguarding measures that the police will apply to keep people safe from harm.

Babcock will not tolerate abuse, harm or violent views directed towards an employee. Any instance should be reported to HR immediately and records kept following the Diary of Issues process.

14. Monitoring this policy

Babcock monitors compliance with the policy to assess its overall effect and allow improvements and corrective action to be taken where appropriate. The monitoring process includes data collection, periodic audits and a review of the policy, to ensure practical application, continued relevance, and future requirements. The operational management team is responsible for the monitoring and review process.