Prevent policy

KBM Training & Recruitment Limited (KBM) has a number of key obligations laid out in law. We recognise the need to challenge extremist ideas which risk drawing people into terrorism, and work in close cooperation to ensure that all learners, apprentices and other stakeholders are protected and remain safe. KBM has an obligation to comply with the Government's Prevent Duty. To ensure compliance with this policy, KBM has appointed Waqas Yaqoob, DSL as a **Prevent Lead Waqas Yaqoob.** KBM's policy will be consistent with the full Prevent Strategy outlined here: https://www.gov.uk/government/publications/prevent-duty-guidance

- Prevent Lead: Waqas Yaqoob waqas.yaqoob@kbmgroup.co.uk
- Prevent Offer: Jacinth Thomas
  The full CONTEST strategy outlined by the Government can be found here
  https://www.gov.uk/government/publications/counter-terrorism-strategy-contest
- KBM will follow relevant laws and regulations of England and Wales and the UK Government policy. This Prevent policy is according to following legislations:
- Education and Training (Welfare of Children) Act 2021 – in force since 29 April 2021, this Act imposes safeguarding duties on education and training providers, including apprenticeships and T-Level providers, to promote the welfare of children.
- Terrorism Act 2000 – defines terrorism offences, including acts or threats involving serious violence, damage to property, endangering life, or disrupting electronic systems. KBM also considers guidance from the Terrorism (Protection of Premises) Act 2025 (Martyn's Law) for the protection of premises and learners.
- Data Protection Act 2018 – regulates how personal information is used by organisations, businesses, and the government, in line with UK GDPR. KBM also observes updates from the Data (Use and Access) Act 2025 to ensure compliance with the latest data protection requirements.
  Apprenticeships, Skills, Children and Learning Act 2009 – covers a wide range of measures for apprenticeships, learning, skills, and educational provision.

Prevent Definitions

Terrorism – An act of terror or violence based on a political objective. This may relate to the politics of nationalism, ethnicity, religion, ideology or social class

Extremism – An ideology that is far outside the mainstream attitudes of society. This may include vocal or active opposition to fundamental British values (as detailed above). This also includes calls for the death of members of the British armed forces.

Radicalisation – This is the process by which an individual or group adopt increasingly extreme political, social or religious ideals and aspirations that reject or undermine the status quo.

Please use the following links for more information:
https://www.gov.uk/government/publications/prevent-duty-guidance
https://www.gov.uk/government/news/action-counters-terrorism
https://act.campaign.gov.uk/

Prevent policy

1. Introduction

This policy relates to all staff, learners, clients, customers, visitors, supply chain, vetting/selection of employers, placements and all other stakeholders.

Prevent is part of the Government's Counter-Terrorism Strategy known as CONTEST.

The aim of CONTEST is to reduce the risk of terrorism in the UK and its interests overseas, and to allow people to go about their lives freely and with confidence. This strategy covers all forms of terrorism.

The CONTEST Strategy is based on four key elements:

- Pursue: To disrupt and stop terrorist attacks
- Prevent: To stop people becoming terrorists or support terrorism
- Protect: To strengthen our protection against a terrorist attack
- Prepare: To mitigate the impact of a terrorist attack that can't be stopped

The Prevent Strategy has three key objectives:

- Prevent people from being drawn into terrorism and ensure that they are given the appropriate advice and support;
- Response to the ideological challenge of terrorism and the threat that we face from those who promote it;
- Work with sectors and institutions where there are risks of radicalisations that need to be addressed

2. Prevent

The Counter Terrorism and Security Act 2015 places a duty on the following to have 'due regard to the need to prevent people from being drawn into terrorism':

- Local government
- Criminal justice
- Education
- Child Care
- Health and Social Care
- Police

Under this legislation education establishments such as KBM need to have an understanding and awareness of what Prevent is, how to recognise signs of radicalisation, how to report and what will happen to individuals.

As a training provider KBM has a responsibility to ensure that:

- Training is provided to all parties on their Prevent Duty
- Leaders and Managers ensure that adequate training and resources are in place to meet obligations
- Staff know when it is appropriate to refer concerns about learners or other members of staff to the DSL.
- We also have a responsibility to exemplify Fundamental British Values of:
    - Democracy
    - The Rule of Law
    - Individual Liberty
    - Mutual Respect
- KBM have a duty to help learners build resilience to the potential threats of radicalisation, challenging extremism and raising awareness of and demonstrating fundamental British values.
- There are dedicated resources to help staff upskill and by extension aid learner's comprehension of a number of key Prevent and Safeguarding areas.

3. Children and adults at risk of radicalisation

Children and adults at risk of radicalisation may:

- Have low self-esteem
- Be confused about their faith, sense of belonging, or identity
- Be victims of bullying or discrimination
- Feel isolated or lonely
- Be experiencing stress or depression
- Be going through a transitional period in their life
- Be angry at other people or the government
- Feel angry about how they are treated or seen by society

It is very difficult to know at what stage certain views can become dangerous, or if a child or adult is being exploited and manipulated into becoming a part of an extremist group. Signs aren't always obvious, but indicators that a child or young person is being radicalised may include:

- Withdrawal from family and friends, or changing circle of friends

- Hostility towards others
- Talking as if from a script
- Being unwilling to discuss their views
- Increased levels of anger
- Being secretive, particularly around what they are doing on the internet
- Using extremist terms to exclude people or incite violence
- Expressing the values of extremist or terrorist organisations (including political or religious based grievances)
- Supporting violence and terrorism towards other cultures, nationalities, or religions
- Writing or creating artwork that promotes extremist values
- Talking about being a 'martyr'
- Possession of extremist literature or other material, or trying to access extremist websites
- Possession of any material about weapons, explosives, or military training

These signs don't necessarily mean that a child or adult is being radicalised. Sometimes this can be normal teenage behaviour, or an indicator that something else is going on.

4. Leadership and Governance

As part of their Prevent Duty obligations, the leaders and managers actively engaged in ensuring that the organisation and its staff fulfil their Prevent duties. KBM has a nominated **Waqas Yaqoob, Senior Manager (Operations)** who is actively engaged with external parties to maintain knowledge, understanding and provide support to the wider business to implement training and monitor our effectiveness in meeting the requirements.

As Prevent forms part of the safeguarding agenda, this is reviewed by the Safeguarding Working Group (SWG) each time we meet.

All leaders and managers are responsible for ensuring that Prevent and fundamental British values are embedded in all programmes, our IT policies and approach, our learning platforms and policies such as Safeguarding.

The Board complete online learning packages to ensure they remain up to date and can effectively lead the organisation and on the Prevent agenda.

5. Staff Training

As indicated in the Safeguarding Policy, all staff receive mandatory safeguarding and Prevent training as part of their induction. This includes a full days training where participants attend the

Workshop to Raise Awareness of Prevent. All new delivery staff must complete within three week below online sessions as part of their induction:

- Safeguarding and Safer Recruitment
- Channel – General Awareness training
- PREVENT
- Advancing Equality and Diversity
- Awareness of Forced Marriage
- Female Genital Mutilation – Recognising and Preventing FGM
- SEND: Sources of Support (Centre staff)
- Supporting Dyslexic Learners in Different Contexts (Centre staff)
- Safeguarding and Safer Recruitment

The training that colleagues receive is constantly reviewed for relevance and suitability to help prepare staff in their delivery roles.

The SWG communicate key updates on safeguarding and Prevent themes on a periodic basis. Updates such as handouts on FGM, Prevent and online safety have previously been issued. Safeguarding and Prevent are standard agenda items on Board and Management meetings.

6. Learner Training and Safety

Learners (and employers where applicable) are informed about Safeguarding and Prevent as part of their induction to their programme.

Learners are given access to online training packages (via student portal/Education Management System) on the following to complete as part of their programme:

- Prevent
- British Values
- Safeguarding

Prevent themes are naturally embedded in learner programmes and are discussed during visits and progress reviews.

These practices should be replicated in any subcontracted provision also.

All centres devices are monitored to highlight any safeguarding or Prevent concerns, in terms of searches or content. Welfare cards are currently in development and will be provided to all learners on induction.

7. External Partners and Stakeholders

All employers are made aware of their responsibilities relating to Prevent. This is communicated by those colleagues who initially engage with employers and Trainer Assessors. For Apprenticeship

provision, employers are given access to delivery models where Prevent and Safeguarding is naturally embedded throughout the learner's programme of learning.

8. How and where to report a concern or something suspicious

If a learner has concerns about themselves, or you have concerns about a learner and the possibility that they are at risk of being radicalised, you should follow the same practice for referring safeguarding concerns. Further details below.

Please note: If you feel that a learner, yourself or any other party are in imminent danger you must report this to the police (and the DSL).

Once the SWG have been informed, they will make a decision as to whether the issue needs to be escalated to the local police Prevent Officer. The DSL involved will then support the Channel process as required by the Channel panel.

Please note: Referral to the Channel process is not a criminal intervention.

If you have any concerns about an individual, you have identified a change in behaviour, their emotions, ideologies or beliefs have developed into more extreme views, please report this to your DSO or the DSL as soon as possible.

It should be noted that a learner who displays one or more of the vulnerability indicators may not necessarily be at risk of radicalisation. Equally, it may and therefore must be raised. In all instances, if you have any concerns, you must report it to your DSO or the DSL.

In all cases, the process for referral to a Prevent Coordinator involves risk assessing the learners' level of engagement, intent and capability. The DSO / DSL will consult with the local Prevent Coordinator where necessary, particularly where additional guidance and support is needed before processing a referral.

For learners/apprentices on funding programmes, including, AEB, Study, Apprenticeship and Traineeship programmes, you're appointed

- Prevent Lead Waqas Yaqoob 020 8992 4506.
- Prevent Officer, Jacinth Thomas 020 8992 4506.

Alternatively, you can contact one of the following if your concern is more urgent:

National Anti-Terrorism Hotline: 0800 789 321 or Police: 101

Or send your concerns via the following link: https://www.gov.uk/report-terrorism

9. The Prevent Process

Once a referral has been made a multi-agency meeting, known as a Channel Panel, is held to discuss the concerns that have been raised about the individual and the current situation faced.

The Channel process aims to identify early interventions to protect and divert people away from the risk that they may face if they are being drawn into terrorism or a terrorist related activity.

This process considers what vulnerabilities have been identified by those responsible for actual and potential radicalisation and how they may be drawn into terrorism.

This is an overt process with active involvement of the individual and their families (where applicable) where support 'packages' are developed to help the individual become deradicalised.

The Channel Panel group could identify a specialist or mentor to provide them with a better understanding and awareness of a particular viewpoint.

To make a Prevent Channel Referral, please complete a Notice of Concern form and report:

- Prevent Lead Waqas Yaqoob | email: waqas.yaqoob@kbmgroup.co.uk or
- Prevent Officer, Jacinth Thomas | info@kbmgroup.co.uk

Alternatively, please call one of the contacts above on 020 8992 4506.

10. National Threat Level

Threat levels are designed to give a broad indication of the likelihood of a terrorist attack. The national definitions for each threat level are provided below. The current UK threat level for international terrorism is: Substantial https://www.mi5.gov.uk/threat-levels

There are five levels of threat:

1. low – an attack is highly unlikely
2. moderate – an attack is possible but not likely
3. substantial – an attack is likely
4. severe – an attack is highly likely
5. critical – an attack is highly likely in the near future

The level is set by the Joint Terrorism Analysis Centre and the Security Service (MI5).

As a nation we continue to prioritise according to the threat posed our national security.

There has been an increase in the number of far-right inspired terror attacks, lone acts of terror as opposed to mass organised terror activities. As a result, the government strategy now reflects these concerns and highlights ways in which to identify risk in these circumstances.

12. Prevent duty risk assessment template

We use the Education and Training Foundation (ETF) Prevent duty risk assessment template. ETF has developed this template with the help of DfE funded FE and HE Prevent duty coordinators. FE

and training sector is widely using this template. We have provided the template as **Annex-1** to this policy.

Agreed/signed by: Salman Khan

Position: CEO/Director

Annex-1 Prevent Risk Assessment template

Risk Scoring

Likelihood		Severity	
Almost Certain	5	Catastrophic	5
Very Likely	4	Major	4
Likely	3	Moderate	3
Unlikely	2	Minor	2
Improbable	1	None or Trivial	1

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Further Action Needed	RAG rating
1	Online Safety	A) Extremist organisations are able to radicalise students online and encourage them to commit acts of violence or incite others to commit acts of violence as 'lone actors'. B) Learners/apprentices (and staff) are able to access unlawful radicalising material which promotes proscribed terrorist groups.	20 High				
2	Partnership	The organisation does not establish effective partnerships with organisations such as the Local Authority, Police Prevent Team, DfE Regional Coordinator and others. The result is that the organisation is not fully appraised of national and local risks and does not have access to developing good practice advice or supportive peer networks.	20 High				
3	Leadership	Leaders within the organisation do not understand the requirements of the Prevent Statutory Duty or the risks faced by the organisation and the Duty is not managed or enabled at a sufficiently senior level. The result is that the organisation does not attach sufficient priority to Prevent Action plans (or does not have one) and therefore action to mitigate risks and meet the requirements of the Duty are not effective.	12 High				

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Further Action Needed	RAG rating
4	Staff training and awareness	A) Staff are not aware of the factors that make people vulnerable to radicalisation and terrorism and are unable to recognise the signs of vulnerability and therefore are unable or unwilling to refer concerns. B) Leaders and staff feel unable or unwilling to challenge extremist narratives or exemplify British Values throughout the organisation. C) Staff are unclear on how to deal with or refer concerns resulting in individuals not being supported and potentially radicalisation remaining unchecked.	12 High				
5	Speakers and events	A) Extremist organisations are given a platform to radicalise young people because the organisation has ineffective processes in the place for vetting speakers and events. B) Inappropriate or extremist materials are shared with learners/apprentices (face to face or via weblinks) because insufficient checks are made of external speakers and materials that they promote or share.	9 Medium				
6	Welfare & Pastoral Care	The organisation does not provide effective welfare and pastoral support which results in learners/apprentices (and staff) being unsupported and the risk of vulnerabilities being exploited.	9 Medium			•	
7	Prayer & Faith Facilities	A) Requirements of learners/apprentices (or staff) requiring faith support or the use of facilities are not met by the organisation resulting in individuals seeking external support of unknown suitability. B) Facilities (either prayer rooms or quiet space type	12 medium				

No	Risk Title	Summary	Gross Score	Existing Controls	Residual Score	Further Action Needed	RAG rating
		facilities) provided are not effectively managed or supervised and become ungoverned spaces where radicalising, inappropriate or dangerous activities can take place.					
8	Work based learners/apprentices	A) The organisation does not have robust processes in place to protect work based students from the risks of radicalisation or views and practices contrary to British Values. B) Employers within work based settings are unaware of issues relating to Prevent the Statutory Duty and how to report concerns.	9 Medium				
9	Promoting British Values	A) The college does not have a culture and ethos where British Values are celebrated, which leads to a culture of disrespect and intolerance and where tensions are allowed to flourish. B) Staff and learners/apprentices do not understand BV (or feel confident about) and extremist views and narratives are allowed to flourish unchallenged.	9 Medium				
10	Campus Security	A) The organisation does not have sufficient security of it's premises and learners/apprentices are targeted by individuals or groups seeking to share their extremist views or endanger their personal safety. B) Charities are allowed on campus without effective checks or charitable collections are inadvertently diverted to inappropriate or unlawful causes. C) On site dangerous or hazardous substances are not kept secure and are allowed into the possession of individuals or groups seeking to use them unlawfully.	8 Medium				