

PREVENT DUTY POLICY

Policy Owner: Designated Safeguarding Lead / Prevent Lead

Designated Safeguarding Lead (DSL): Jim Johnson

Applies to: Directors, managers, employees and contracted trainers

Review: Annually, or sooner following relevant legislative, guidance or organisational changes

1. Policy Statement

Johnson Training Ltd is committed to safeguarding learners from the risk of radicalisation and involvement in terrorism.

Prevent forms part of our wider safeguarding responsibilities. We will take reasonable and proportionate steps to identify and respond to concerns that an individual may be susceptible to radicalisation or at risk of becoming involved in or supporting terrorism.

Concerns will be considered objectively, proportionately and without discrimination.

2. Organisational Context

Johnson Training Ltd provides specialist training to the leisure industry, primarily for pool plant operatives, managers and employees of leisure facilities.

Our courses include regulated qualifications on the Regulated Qualifications Framework (RQF) and programmes externally endorsed by recognised awarding organisations.

All our learners are aged 18 or over. Much of our provision is delivered online or through blended learning. Face-to-face courses are normally between one and three days.

Because contact with individual learners is relatively brief, opportunities to recognise developing patterns of behaviour may be limited. Nevertheless, all staff and contracted trainers must remain alert to safeguarding and Prevent concerns.

3. Purpose

This policy aims to:

- incorporate Prevent into our safeguarding arrangements;
- ensure staff understand their responsibilities;
- provide a clear process for reporting concerns;
- ensure concerns are assessed fairly and proportionately;
- maintain appropriate referral arrangements; and
- ensure staff receive suitable Prevent awareness training.

4. Legislative Framework

This policy has regard, where applicable, to:

- the Counter-Terrorism and Security Act 2015;
- current statutory Prevent Duty Guidance;
- current Channel Duty Guidance;
- relevant Department for Education safeguarding guidance;
- the Equality Act 2010; and
- applicable UK data protection legislation.

Johnson Training Ltd will also comply with applicable safeguarding and Prevent requirements arising from funding, contractual or awarding-organisation arrangements.

5. Understanding Prevent

Prevent is part of the Government's counter-terrorism strategy. Its objectives are to:

- tackle the ideological causes of terrorism;
- intervene early to support people susceptible to radicalisation; and
- enable people who have engaged in terrorism to disengage and rehabilitate.

Prevent is fundamentally a safeguarding responsibility involving early identification and appropriate support.

6. Identifying Concerns and Chemical Access

There is no single profile of a person susceptible to radicalisation and no definitive checklist of indicators.

Staff should use professional judgement and consider the context and combination of circumstances rather than relying on individual behaviours or characteristics.

Possible concerns may include:

- expressed support for terrorist violence or terrorist organisations;
- attempts to justify terrorist violence;
- engagement with terrorist propaganda;
- attempts to influence others towards terrorist ideology or violence; or
- indications that an individual is being groomed, coerced or influenced towards terrorism.

Chemical Access and Pool Plant Training

Johnson Training Ltd recognises that its pool plant training necessarily includes legitimate instruction and discussion concerning potentially hazardous chemicals, including their properties, reactions, handling, storage, dosing and safe use.

Learners may also, through their employment, have legitimate access to pool treatment chemicals and associated plant, storage areas and equipment.

Interest in, discussion of, or legitimate occupational access to chemicals must not, by itself, be treated as a Prevent concern.

However, because some learners may have occupational access to hazardous chemicals, trainers should remain alert where **unusual or concerning enquiries or behaviour occur in combination with other relevant safeguarding or Prevent indicators.**

This could include, for example, persistent enquiries about obtaining unauthorised access to chemicals, bypassing established controls, accessing quantities or substances outside legitimate occupational requirements, or other behaviour suggesting an intention unrelated to safe pool plant operation.

Any such concern must be considered in its full context and reported to the DSL. Trainers must **not investigate the learner themselves, make accusations or attempt to determine the learner's intentions.**

Where a concern relates primarily to unsafe chemical handling, unauthorised access, storage or workplace safety rather than radicalisation, it should be dealt with through the appropriate health and safety, safeguarding, employer or site procedures.

7. Responsibilities

The Designated Safeguarding Lead and Prevent Lead is:

Jim Johnson

The DSL is responsible for receiving and assessing concerns, maintaining appropriate records, obtaining external advice where necessary, making referrals and ensuring Prevent arrangements and staff training remain effective.

All relevant staff and contracted trainers must:

- understand this policy;
- undertake appropriate Prevent/safeguarding training;
- remain alert to concerns;
- report concerns promptly to the DSL;
- make factual and accurate records; and
- maintain appropriate confidentiality.

Staff should not investigate concerns themselves.

8. Online Safety

As much of our provision is delivered online, Johnson Training Ltd will take reasonable and proportionate measures to ensure that learning systems and resources under our control are not used to promote terrorism or expose learners to inappropriate terrorist material.

Any concern arising during online learning must be reported in the same way as a concern arising during face-to-face delivery.

9. Reporting a Prevent Concern

Johnson Training Ltd follows the principle of:

NOTICE – CHECK – SHARE

Notice: A member of staff identifies behaviour, information or circumstances which may indicate a safeguarding concern.

Check: The member of staff considers the context and discusses the concern with the DSL. Staff must not conduct their own investigation.

Share: The concern is reported promptly to the DSL with a factual record of what was seen, heard or disclosed.

The DSL will assess the information and decide whether to:

- record and monitor the concern;
- seek further safeguarding or Prevent advice;
- take another appropriate safeguarding action; or
- make an external Prevent referral.

Where a Prevent referral is appropriate, the DSL will follow the current official referral procedure. Relevant authorities will determine whether further assessment or Channel support is appropriate.

Where there is an **immediate danger to life or a serious and imminent threat**, call **999** and inform the DSL as soon as practicable.

10. Channel

Channel is a multi-agency safeguarding programme providing voluntary support to people assessed as susceptible to radicalisation.

Johnson Training Ltd will cooperate appropriately with authorised agencies where necessary and will share information only where this is lawful, necessary and proportionate.

Johnson Training Ltd does not determine whether an individual should enter Channel.

11. Equality and Freedom of Expression

Prevent procedures will be applied fairly and without unlawful discrimination.

A person's religion, race, nationality, political opinion, cultural background or other protected characteristic must not, by itself, be treated as evidence of a Prevent concern.

Learners are entitled to hold and express lawful views, including views that others may consider controversial. Prevent concerns must be based on genuine safeguarding concerns relating to radicalisation towards terrorism.

12. Information Sharing and Record Keeping

Prevent concerns will be handled sensitively and confidentially.

Relevant information will only be shared where there is a legitimate safeguarding or legal reason and will be limited to what is necessary and proportionate.

Johnson Training Ltd will maintain appropriate records of:

- Prevent and safeguarding training;
- reported concerns and actions taken;
- referrals where applicable;
- relevant risk assessments; and
- policy reviews and quality-assurance actions.

Records will be securely stored and managed in accordance with applicable data protection requirements.

13. Training and Quality Assurance

Relevant managers, employees and contracted trainers will receive appropriate Prevent awareness and safeguarding training during induction and periodically thereafter.

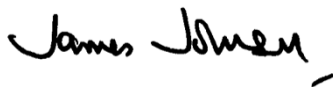
Johnson Training Ltd will monitor its Prevent arrangements through proportionate quality-assurance activities, including staff training records, safeguarding concerns, referral procedures, online safety arrangements and relevant feedback from awarding organisations or external quality assurers.

14. Review

This policy will be reviewed **at least annually** and sooner where required following:

- changes to legislation or statutory guidance;
- changes to our provision or learner profile;
- a safeguarding or Prevent incident;
- changes to referral arrangements; or
- recommendations arising from internal or external quality assurance.

Any significant changes will be communicated to relevant staff and contracted trainers.

Name:	James Johnson
Position:	Managing Director
Date: 11 09 2025	Signature: 

Review date	Reviewed by:	Comments	Version
26 Nov 2025	MJ/JJ	JTL context further developed. Added further content regarding the definition of Prevent in relation to terrorism	V2
01/09/2026	MJ	Rewritten the policy	V3
The next policy review date is 01 Sept 2027			

