

SAFEGUARDING AND PREVENT DUTY POLICY

FOR APPRENTICESHIP AND
VOCATIONAL TRAINING
PROGRAMMES, UK

PREPARED BY

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APPROVED BY

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VERSION CONTROL

Version	Date	Comment	Author	Review Due
1	17/04/24	Policy Created	SW	17/04/25

COMMUNICATION

The content of this policy is communicated to all colleagues and learners during their induction phase and at other times through team meetings and email communications. A copy of the policy is always available on MSTeams.

MONITORING AND REPORTING

Implementation of the policy is monitored by the Quality and Compliance Manager and reported to the Operations Director.

An overview and review of ongoing cases is discussed at monthly SLA meetings with the Apprenticeship Leadership Team. The Operations Director updates the Strategic Leadership Team during monthly SLT meetings.

POLICY REVIEW

This policy will be reviewed annually, or sooner if deemed necessary.

Signed:



Position: Operations Manager

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1. PURPOSE

The purpose of this policy is to protect people from harm that could impact an individual's growth and development, particularly young people and vulnerable adults. This policy is informed by, and adheres to, the requirements of Department for Education's "Keeping Children Safe in Education" (KCSIE) Statutory guidance (September 2023) and "Working together to safeguard children" (December 2023) and Counterterrorism and Security Act (2015).

Our duty under PREVENT to protect apprentices from radicalisation is included in this policy. This policy and procedure focus on how we recruit and train our trainers and consultants, support our apprentices and deal effectively with allegations against staff.

The Safeguarding and Prevent Policy for Vertex Company UK 1 Limited, trading as Vertex Professional Services (VPS) reflects the importance of our responsibility to safeguard and promote the welfare of all our apprentices and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying. We are committed to providing a caring, friendly, and safe environment for all our apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning and social activities in an enjoyable and safe environment and be protected from harm.

2. SCOPE

This policy applies to all staff, apprentices, visitors, contractors, volunteers, service providers or subcontractors, who all share a legal responsibility to take seriously any concerns about neglect or abuse that come to their attention and to follow procedures set out in this policy.

This policy provides support for all young people and vulnerable adults regardless of their programme, length of stay and mode of delivery.

The aims of this Policy are:

- Identify the expectations of staff in relation to safeguarding
- Ensure relevant and effective safeguarding practices are in place
- Ensure the right of every applicant and apprentice to learn within a safe environment
- Promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognise that safeguarding is everyone's responsibility
- Ensure that the fundamental rights and needs of our applicants and apprentices are observed
- Prevent abuse through the pastoral support offered to all applicants and apprentices
- Provide guidelines for staff in handling matters relating to actual or suspected child abuse
- Ensure staff act professionally
- Deter potential, unsuitable individuals from applying to VPS by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- Reject at interview stage anyone where we have doubts about suitability
- Prevent the risk of abuse by ensuring procedures and standards are in place

3. DEFINITIONS

Throughout this policy reference is made to 'children and young people'. This term is used to mean those under the age of 18. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up with circumstances consistent with the provision of safe and effective care; and keeping action to enable all children to have the best outcomes (Keeping Children Safe in Education 2023)

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Reference is made throughout to ‘adults at risk of harm’. Adults at risk of harm are defined as people aged 18 years or over who may need or receive community care services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health. March 2000). The procedure will be applied, with appropriate adaptations to all apprentices.

3.1 WHAT IS SAFEGUARDING?

Safeguarding refers to protecting people’s health, wellbeing and human rights. Enabling them to live free from abuse, harm and neglect.

VPS recognises that staff and employers have a role to play in safeguarding the welfare of young people and vulnerable adults and preventing their abuse. This policy focuses on protecting learners from abuse and neglect and is designed to provide a basic procedure which should be followed in the event of a safeguarding concern.

3.2 WHAT IS PREVENT?

Prevent is one part of the UK’s Contest Counter Terrorism Strategy. It includes four sections:

- **Pursue:** to stop terrorist attacks
- **Prevent:** to stop people becoming terrorists or supporting terrorism
- **Protect:** to strengthen the UK’s protection against extremism, radicalisation and terrorism
- **Prepare:** to mitigate the risk and impact of a terrorist attack on the UK

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views. At VPS, we are fully committed to safeguarding and promoting the welfare of all apprentices and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

VPS recognises that staff and employers have a role to play in safeguarding young people and vulnerable adults from radicalisation. This policy focuses on protecting learners from extremism and provides a procedure that should be followed in the event of a concern linked to Prevent.

4. VPS’ COMMITMENT

At VPS, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

The principal objectives of this policy are that: All staff will understand what radicalisation and extremism are and why we need to be vigilant. All apprentices and staff will know that VPS has policies in place to keep them safe from harm and that VPS regularly reviews its systems to ensure they are appropriate and effective.

VPS staff promote respect, tolerance, and diversity. Apprentices and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. It is recognised that apprentices or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our apprentices and staff with confidence, self-belief, respect, and tolerance as well as setting high standards and expectations for themselves.

Apprentices and staff are briefed during induction and as part of ongoing standardisation and training; about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the internet.

Inappropriate websites are banned and cannot be accessed from VPS premises. VPS staff, contractors,

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associates, and volunteers undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities, including their statutory safeguarding duties. Through various training opportunities within VPS, we ensure that our staff are fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

VPS will:

- Provide a safe environment for children, young people, and adults at risk of harm to learn in
- Identify those who are suffering, or are likely to suffer, significant harm or who are at risk of radicalisation
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures
- Refer concerns that a child, young person or adult at risk of significant harm, or might be at risk of significant harm, to the appropriate referral agents
- Work effectively with others as required by 'Working Together to Safeguard Children (2023)

VPS will approve and review policies and procedures annually:

- Ensuring systems are in place and effective in relation to the identification of children, young people and adults at risk of harm and procedures for reporting concerns are widely known
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with apprentices
- Ensuring safe recruitment of staff
- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding and PREVENT
- In developing policies and procedures, VPS will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies

5. ROLES AND RESPONSIBILITIES

5.1 VPS IS RESPONSIBLE FOR

- having appropriate arrangements in place to provide a safe and secure environment for learners
- having procedures to deal with issues concerned with suspected or reported abuse or radicalisation
- practising safe recruitment by checking the suitability of staff; including Disclosure and Barring Service checks
- working with relevant government agencies and co-operate as required
- ensuring any IT equipment provided by VPS has the appropriate filtering to prevent learners accessing harmful material
- ensuring learners and staff understand what is and what is not permissible when using IT equipment, mobile technologies and social media; and their associated risks
- having a system for assessing and rating risk of when learners may be drawn into terrorism
- including opportunities in the curriculum for our learners to develop the skills they need to recognise and stay safe from abuse, promote British Values that reflect fairness in our society as well as respect and tolerance in a diverse society

5.2 VOCATION STAFF RESPONSIBILITIES

All vocational staff must

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- report any concerns for the well-being of learners in accordance with this policy, as quickly as possible (at most, within 24 hours) if a learner is in immediate danger or at risk of harm, a referral should be made *immediately* to the Designated Safeguarding Officer
- safeguard the well-being of learners and help prevent them from being abused or radicalised
- help learners recognise their responsibilities through raising awareness, guidance, support and training
- All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Officer.

5.3 BUSINESS OPERATIONS MANAGER RESPONSIBILITIES

The Business Operations Manager – UK is responsible for:

- annual review of this policy to ensure it meets its purpose and legislative requirements
- making adjustments to this policy in consultation with senior management of VPS in the event of changes in legislation or recommended Safeguarding practices
- ensuring that all staff undertake Safeguarding and Prevent training as appropriate
- keeping up-to date with developments in child and vulnerable adult protection issues
- appointing the Designated Safeguarding Officer(s) and ensuring they receive appropriate training and support for the role

5.4 RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING OFFICER(S) – PROGRAMME & QUALITY MANAGERS

The responsibilities of the Safeguarding Officer(s) are:

- reporting cases of suspected abuse, extremism, grooming or allegations and refer to relevant organisations/government agencies
- providing advice and support to staff and learners on issues relating to protection from abuse
- recording and maintaining all complaints or concerns, even if it does not lead to a referral. Such records are to be kept confidential, stored securely in a locked place and separate from general learner records

5.5 HR RESPONSIBILITIES

Where an allegation of abuse or inappropriate behavior is made against a member of Staff, VPS Human Resources will advise and guide the line manager.

Designated Safeguarding Officer

Sian Adams – Head of HR EMEA

Tel: +44 (0) 7843 805781

Email: SAdams@goV2X.eu

Deputy Designated Safeguarding Officer

Roger Adams – Operations Manager UK Vocational Programmes

Tel: +44 (0) 7885 201092

Email: rogeradams@gov2x.eu

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6. RESPONDING TO DISCLOSURE:

Abused children, young adults and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with. By listening and taking seriously what the child, young person or vulnerable adult is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

6.1 ACTIONS TO BE TAKEN BY THE PERSON BEING DISCLOSED TO:

- Listen carefully and stay calm – you need to listen without making assumptions or judgements.
- Do not interview a child, young adult or vulnerable adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth.
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible. Explain to them that you will have to share your concerns with the Designated Safeguarding Officer who has the authority to act.
- Find out what the child or adult at risk of harm would like to happen, but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else). For apprentices under the age of 18; wishes regarding action to be taken will be noted, where possible. However, the learner will be made aware that this will not affect the final decision to make a referral.
- Record in writing on the Safeguarding Incident Report Form all the details that you are aware of and what was said using the child, young adult or vulnerable adults' own words immediately.
- Do not investigate concerns or allegations yourself, but report them immediately to a Designated Safeguarding Officer.

Confidentiality Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young adults and vulnerable adults. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- A Designated Child/Adult Safeguarding Officer
- The parents or carers of the person who is alleged to have been abused
- Police/Social Care Services
- Senior Management where appropriate
- The person making the allegation
- The alleged abuser (and parents or carers if the abuser is a child or young person)

6.2 CONCERNS ABOUT INDIVIDUALS WHO ARE NOT APPRENTICES WITH VPS

For young people who are not apprentices with VPS, the referral must go back to the head of the organisation to which they are attached. The contact can be made directly or via the Safeguarding Lead if they are on site. Where there is no organisational contact available, the referral will be made direct to Children's Services. If there is a concern about a workplace this should be recorded on the Safeguarding Incident Report Form and reported immediately to a Designated Safeguarding Officer.

Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, consultants, and trainers whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm

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- Possibly committed a criminal offence against, or related to a child, young person or adult at risk of harm
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm

7. RECRUITMENT AND SELECTION

VPS aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. VPS are committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults. All members of staff, consultants and trainers working in settings with children, young people or vulnerable adults, present on site, must have a current DBS (within 3 years) and submit a copy to the Designated Safeguarding Officer. All members of staff, consultants and trainers working in settings with children, young adults or vulnerable adults, present on site, must have completed PREVENT and safeguarding in the last year. This will be checked as part of occupational competency.

The Safeguarding Children and Safer Recruitment in Education guidance which came into force on 1st January 2011, recommends that in addition to the various staff records which are kept as part of normal business, VPS will keep and maintain a single central record of recruitment and vetting checks. VPS will apply principals of Safer Recruitment to staff working with children, young adults and adults at risk of harm as part of their apprenticeships. It will be the employer/ workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. VPS will not undertake DBS checks for apprentices. All staff who participate in the recruitment process are required to undergo recruitment and selection process training.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of VPS. VPS reserve the right to take up references for all members of staff, consultants, or trainers. All members of staff, consultants and trainers working in settings with children, young people, or vulnerable adults, present on site, must have two references.

8. PREVENT

VPS strongly believes in and adheres to the government's prevent strategy laid out in the 2015 Counter Terrorism and Security Act and the duty it places on training providers. This is as per paragraph 114 of the Counter-terrorism strategy (CONTEST) 2018.

All apprentices engaging with VPS in any way will undertake an induction session which is to include but not exclusively; health and safety in the workplace, awareness of safeguarding and British values and prevent. It is our aim to set core values that are for all stakeholders. We view British values of paramount importance, underpinning what it is to be a citizen in a modern & diverse Great Britain. As well as actively promoting these values to our apprentices, we embed our strategy across the full apprentice journey, staff promote it through their delivery and embed safeguarding naturally with apprentices.

8.1 THE PREVENT STRATEGY WILL SPECIFICALLY:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate

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advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address.

Channel - Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologies. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities. Each Channel Panel is chaired by a Local Authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support. Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances. A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel. Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services. This policy relates to all Staff and Apprentices and Stakeholders.

The VPS Designated officer in relation to Prevent is:

Sian Adams

Contact: +44 (0) 7843 805781

Email : SAdams@gov2x.eu

9. CONFIDENTIALITY

It is important for all staff to follow the statement of confidentiality outlined below:

Information that is given to us will be treated confidentially. Information will only be passed to third parties with the consent of the individual concerned. If there are concerns about the child's safety, wellbeing or legal requirements, the information may be shared with professionals in the local authority/policy or health agencies, after approval from the VPS Contracts Department.

Therefore, Staff must not promise confidentiality.

10. MONITORING

The number of Safeguarding cases will be reviewed by the Operations Manager UK Vocational Programmes on an annual basis.

All Safeguarding and Prevent concerns are recorded on the Safeguarding register. The designated Safeguarding Officer(s) review all Safeguarding and Prevent concerns on a monthly basis as a minimum. However, when active concerns are of immediate nature, the designated Safeguarding Officer will maintain regular, sometimes daily, at a minimum weekly, contact with the learner and/or trainer/Apprentice Employment Coach.

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11. RELATED POLICIES AND DOCUMENTS

This policy should be read in conjunction with the following policies:

- Policy No: VPS-POL2: Equality, Diversity and Inclusion Policy - Apprenticeship Programmes
- Policy No: VPS-POL10: Health, Safety and Welfare Policy
- Policy No: VPS-POL3: Anti Bullying and Harassment

12. APPENDICIES

APPENDIX 1: FURHTER INFORMATION

1. Criminal Justice and Courts Act 2015
<https://www.legislation.gov.uk/ukpga/2015/2/contents/enacted>
2. HH Department for Education
<https://www.gov.uk/government/organisations/department-for-education>
3. Serious Crime Act 2015
<https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted>
4. Safeguarding Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
5. Protection of Freedom Act 2012
<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>
6. Counter Terrorism and Security Act 2015
<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>
7. Counter Terrorism Strategy (CONTEST) 2018
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>
8. Working Together to Safeguard Children 2023
[Working together to safeguard children 2023: statutory guidance](#)

APPENDIX 2: SAFEGUARDING COUNCILS LIST

Milton Keynes Council
 Tel: 01908 252835
 Website: <https://www.milton-keynes.gov.uk/adult-social-care/safeguarding-adults-and-children/worried-about-adult>
 Email: safeguardingadults@milton-keynes.gov.uk

APPENDIX 3: PREVENT POLICE LIST

Milton Keynes Council
 Tel: 01865 555618
 Website: <https://www.milton-keynes.gov.uk/adult-social-care/safeguarding-adults-and-children/prevent>
 Email: PreventGateway@thamesvalley.police.uk

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APPENDIX 4: SAFEGUARDING INCIDENT REPORT FORM

Employee logging issue:
Name of Apprentice:
Date Raised:
Date Closed:
Outcome:

Details of Safeguarding and Wellbeing Issue Please provide details of what has happened to cause concern. Please include information such as when this occurred, who was involved and what concerns you have about the situation

Have you told anybody else? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes" please provide details

Please email this form to:

swaller@gov2x.eu

Complete as fully as possible but do not delay reporting for lack of information.

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APPENDIX 5: PROCEDURE FOR PREVENT ESCALATION (COURTESY OF NOTTINGHAMSHIRE POLICE PREVENT TEAM)

