

Preventing People Becoming Involved in or Supporting Terrorism PREVENT UHL Policy

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REVIEW DATES AND DETAILS OF CHANGES MADE DURING THE REVIEW

Version 2-reflects the Prevent Statutory Duty in the Counter-Terrorism and Security Act 2015 and current NHS Standard Contract.

- February 2024 – Policy reviewed and the following changes made at the request of the Policy and Guideline Committee rewording on Page 5. Added CQC regulation to section 10, Review and update of Appendix 2

KEY WORDS

Prevent, Terrorism, Counter-terrorism, Radicalisation, Radicalise, Extremism, CONTEST, Vulnerability,

SUMMARY

The Prevent policy, describes organisational responsibilities, around the Prevent agenda in line with the Prevent Statutory Duty issued for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people being drawn into terrorism and in line with NHS England Standard Contract requirements; by identifying vulnerable individuals who are at risk of being radicalised into violent extremism and ensuring that staff refer into the local Channel project. Channel provides a multi-agency response to vulnerable people, to de-radicalise and protect the individual.

(refer to section 6 for staff members)

Caring at its best

Staff have a responsibility to help the Trust fulfil its obligation by identifying and supporting adults and children who may be prone to exploitation or influence from violent extremism. Staff can do this by following the Prevent process:

- respond to the ideological challenge of terrorism and the threat from those who promote it;
- prevent individuals from being drawn into terrorism and ensure that they are given appropriate advice and support;

Staff member becomes aware of patient/client (adult or child) or member of public who may be at risk of being radicalised (by others) or self-radicalised into extremist activities.

1. Contact Prevent Lead -on **0116 2585770** or alert via: UHLPrevent@uhl-tr.nhs.uk
2. An incident report will be created on the secure UHL Safeguarding Data Base by UHL's Prevent Lead.
3. Complete UHL Safeguarding Adult / Child referral form

In the event of Prevent Lead being on leave Contact:
Leicestershire Police Prevent Engagement Team at: Prevent.Team@leicestershire.pnn.police.uk or Dial **101** and ask to speak to the Prevent Team.

Prevent Lead to share with the LLR's Police Prevent Engagement Team for the multi-agency 'Prevent Case Management' process, which assess risk factors and identifies/provides support for people at risk of radicalisation.
Options outlined below

If urgent action is required to manage risk factors UHL's Prevent Lead to contact the relevant Police Team.

Confirm and Challenge Meeting

To be arranged by UHL Prevent Lead as soon as practicable.

Meeting to include:

- The Multi-disciplinary team involved.
- Discussion to include identifying level of risk and immediate risk management and intervention required to address this.

Referral into Channel

Prevent.Team@leicestershire.pnn.police.uk
or
Contact UHL's Prevent Lead on:
07921545511 or
UHLPrevent@uhl-tr.nhs.uk

No further
Multi-agency
action required

Update clinical risk assessment and care plan to ensure appropriate support is in place.

If you know of a threat to national security, or you want to report suspicious activity you can call the police counter-terrorism hotline on 0800 789 321.

1 INTRODUCTION

- 1.1 University Hospitals of Leicester NHS Trust (UHL) is committed to ensuring vulnerable individuals are safeguarded from being radicalised into violent extremism and supporting or becoming terrorists themselves as part of the Home Office counter-terrorism strategy *Prevent* one of the 'four P's' of the counter terrorism strategy CONTEST:

The strategy is primarily organised around four key principles. Work streams contribute to four programmes, each with a specific objective:

- Pursue-to stop terrorist attacks
- Prevent-to stop people becoming terrorists or supporting terrorism
- Protect-to strengthen our protection against a terrorist attack
- Prepare-to mitigate the impact of a terrorist attack

- 1.2 Due to a number of high profile cases associated with the NHS, there is a clear need for the Trust to identify and protect vulnerable people. This will help reduce the risk from terrorism and violent extremism so that all the people of Leicester, Leicestershire and Rutland can go about their business freely and with confidence. However, this is not about spotting potential terrorists but identifying where vulnerabilities exist and where support may be needed.
- 1.3 The Prevent objectives focus on support, trust and confidence, both in ourselves and in those around us. The Police play a crucial role in pursuing those involved in terrorist activity; whilst the health sector must show due regard and work towards helping prevent people from becoming radicalised and/or vulnerable to violent extremism.
- 1.4 This document describes UHL's contribution as part of the multi-agency Prevent agenda and referral into local safeguarding processes which reviews any risks posed by individuals who are identified as being vulnerable to the influence of extreme terrorist groups and could pose a risk to the wider public safety and themselves.

2 POLICY AIMS

This policy outlines two processes to follow if concerns or disclosures are made to ensure that appropriate safeguarding actions are taken where concerns are identified that a person is at risk of being or who it is suspected is being radicalised or drawn into violent extremism.

Process 1 for patients and visitors

Process 2 for staff

3 POLICY SCOPE

This policy is applicable to all Trust staff members who are involved in care of UHL patients.

This policy also covers Trust staff who may be vulnerable to radicalisation and violent extremism or have concerns about other members of staff being involved in terrorist activities.

4 DEFINITIONS

Definitions that apply to this Policy

Terrorism	Actions of individuals or groups who seek to bring about social or political change through actions intended to cause serious harm, loss of life or raise attention through fear and/or damage to property to cause loss of life, disruption or raise attention by fear and/or damage to property.
CONTEST Strategy	Sits under the home office and is a national strategy or long-term plan of action designed to reduce the risk of terrorism, by stopping people becoming terrorists, preventing terrorist attacks, strengthening the UK's resilience to terrorism and facilitating emergency preparedness procedures in the event of attack.
Counter-Terrorism and Security Bill 2015	Make provision in relation to terrorism; to make provision about retention of communications data, about information, authority to carry and security in relation to air, sea and rail transport and about reviews by the Special Immigration Appeals Commission against refusals to issue certificates of naturalisation; and for connected purposes.
Prevent Strategy	Challenging terrorist ideologies, supporting those who are vulnerable to these ideologies and working with institutions where radicalisation may occur (including the internet and social media).

Channel	<p>Multi-agency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners (such as education and health sectors, social services, children’s and youth services and offender management services, the police and the local community to:</p> <ul style="list-style-type: none"> • identify individuals at risk of being drawn into terrorism; • assess the nature and extent of that risk; and • develop the most appropriate support plan for the individual concerned. <p>Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert away from the risk they face before illegality occurs.</p>
Prevent Case Management (PCM)	Prevent Case Management includes co-ordination of multi-agency Prevent activity at a local and regional level and linkages to national oversight of Prevent activity and includes information sharing, referral mechanisms and risk management processes.
Prevent Statutory Duty	Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.
Stakeholder	An individual or organisation with an interest in Prevent; police, health agencies, local authority safeguarding teams, CCG commissioners.
Radicalisation	Refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
Extremism	Prevent strategy defines as 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.
Non-violent extremism	Extremism as defined above, which is not accompanied by violence.
Having due regard	Authorities should place appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.
Prevent Competencies Framework	Developed to provide clarity on level of training required for healthcare workers. Supports NHS providers to meet contractual obligations in relation to Safeguarding as set out in NHS standard Contract.
Interventions	Projects intended to divert people being drawn into terrorist activity. Includes mentoring, counselling, theological support, civic engagement, developing support networks or providing mainstream services.
Prevention	Reducing or eliminating risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions.

Safeguarding	Process of protecting vulnerable people, whether from crime, other forms of abuse or (in context of this policy document) from being drawn into terrorist related activity.
Vulnerability	The condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, word describes factors and characteristics associated with being susceptible to radicalisation.
Due Regard	Having due regard for advancing equality involves: <ul style="list-style-type: none"> • Removing or minimising disadvantages suffered by people due to their protected characteristics. • Taking steps to meet the needs of people from protected groups where these are different from the needs of other people. • Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
WRAP	Workshop to Raise Awareness of Prevent (WRAP)

5 ROLES AND RESPONSIBILITIES

The Executive Lead for this policy is the Chief Nurse. University Hospitals of Leicester NHS Trust Board has a statutory duty and contractual obligation to operate and discharge the organisation in line with the Prevent Statutory Duty which comes under the Counter-Terrorism Act 2015 and NHS Standard Contract.

5.1 **CMG Clinical Directors and Corporate Directors** are responsible for:

Ensuring the Prevent strategy is implemented across the CMG and Corporate Directorates. This will support compliance with Care Quality Commission Registration Regulations for Safeguarding (Regulation 13).

5.2 **Prevent Lead Role**

- University of Hospitals of Leicester NHS Trust Prevent Lead is required to provide quarterly reporting to NHS England
- Monitor awareness amongst staff, through monitoring training compliance
- Act as the point of contact for Prevent enquiries between the Trust and Leicestershire Police Prevent Engagement team
- Prevent Lead to report directly to UHL's Safeguarding Assurance Committee (SAC).

5.3 **Managers and Team leaders** will be responsible for:

- Ensuring that the Prevent policy and procedures are followed and understood as appropriate to each staff member's role and function. This information must be given to all new staff on induction along with an explanation of referral process for individuals considered vulnerable to radicalisation.
- Support staff identified in NHS England Prevent Training and Competencies Framework to attend training.

5.4 **All Staff:**

All staff (including bank/seconded staff/volunteers) have an individual duty of responsibility to ensure that they:

- Identify people who could be considered "at risk" of radicalisation
- Be aware of the support which is available and be confident in referring people into Prevent Case Management/Channel processes and providing them with appropriate clinical support;
- Incident Reporting

Refer to Prevent flowchart in the At a Glance Flow Chart before the introduction section of this policy

6 POLICY STATEMENTS, STANDARDS*, PROCESSES*, PROCEDURES* AND ASSOCIATED DOCUMENTS

All specified authorities including University Hospitals of Leicester NHS Trust must comply with this duty and will be expected to maintain appropriate records to show compliance with their responsibilities and provide reports when requested.

61 Information Sharing

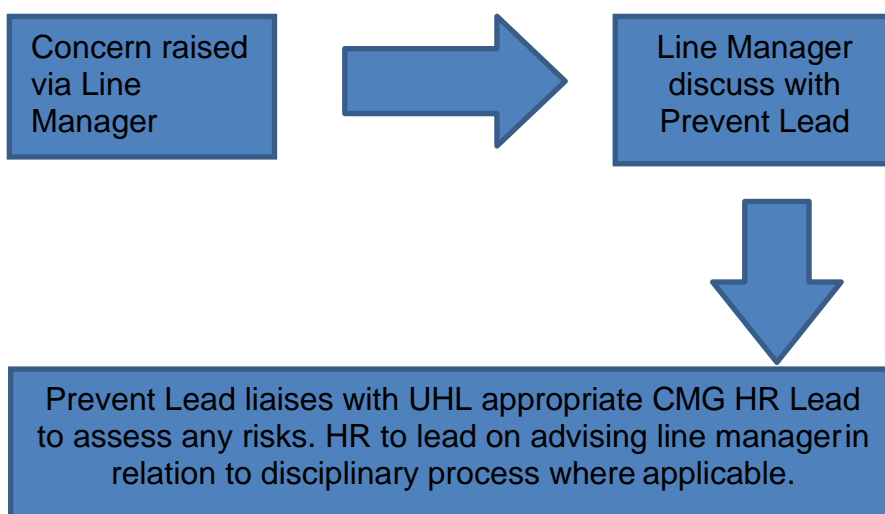
The Data Protection Act, which establishes a framework of rights and duties, which are designed to safeguard personal data, are always adhered to and provides a framework that balances the legitimate needs of UHL to collect and use personal data against the right individuals to respect for the privacy of their personal details. Any information that is shared is for lawful purposes and the data is always relevant, accurate, and necessary and kept up to date. Appropriate technical and organisational measures are also taken against unauthorised or unlawful processing of personal data.

62 Staff

Where any Trust employee expresses views, brings material into the organisation, uses or directs patients to extremist websites or acts in other ways to promote terrorism, the Trust will look to use non-safeguarding processes in order to address the concerns e.g. disciplinary action.

Where a staff member has a concern about a colleague, this should be raised with their line manager. The line manager will discuss the concerns with the Trust's Prevent Manager in the first instance.

The Prevent Lead will liaise with the UHL appropriate CMG HR Lead in order to assess and manage any Prevent related safeguarding risks and, where appropriate, the Police Prevent Lead. The Human Resources Advisor will lead on advising the line manager in relation to the disciplinary process should this be appropriate.



7 EDUCATION AND TRAINING REQUIREMENTS

Training Statement

Please refer to Appendix 1

All staff are required to attend PREVENT awareness training. Awareness training is incorporated into Levels 1 and 2 Safeguarding Training

For staff having direct patient contact, are required to complete the Home Office Approved Workshop to Raise Awareness of PREVENT which can be access via HELM

Staff should attend training every 3 years

The committee responsible for monitoring the training is the UHL Safeguarding Assurance Committee (SAC).

8 PROCESS FOR MONITORING COMPLIANCE

Policy Monitoring Section

Element to be monitored	Lead	Tool	Frequency	Reporting arrangements
Prevent Training	Prevent Lead Safeguarding Assurance Committee (SAC)	Training and Evaluation Records/E UHL records Safeguarding Assurance Committee	Monthly	Safeguarding Assurance Committee, review of training records
NHS England Prevent Quarterly Activity Returns/Standard Contract monitoring	Prevent Lead	Prevent template sent to Regional NHS England Prevent Coordinator and CCG's	Quarterly	Organisational Prevent activity reports to Regional NHS England Prevent Coordinator and LLR CCG's

9 EQUALITY IMPACT ASSESSMENT

The Trust recognises the diversity of the local community it serves. Our aim, therefore, is to provide a safe environment, free from discrimination and treat all individuals fairly, with dignity and appropriately according to their needs,

Due Regard

UHL's commitment to equality means that this policy has been screened in relation to paying due regard to the Public Sector Equality Duty as set out in the Equality Act 2010 to eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations.

10 SUPPORTING REFERENCES, EVIDENCE BASE AND RELATED POLICIES

Assurance

- CQC Regulation
- Quarterly reporting to NHS England
- SAF-Safeguarding Adults Assurance Framework.

- Staff completing Prevent WRAP Training.
- **Department of Health - Building Partnerships, Staying Safe – The health sector contribution to HM Government’s Prevent strategy: guidance for healthcare workers (2011) -**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215253/dh_131912.pdf and
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215251/dh_131934.pdf
- **HM Government - Prevent strategy (2023) –**

<https://www.gov.uk/government/publications/prevent-duty-guidance>

11 PROCESS FOR VERSION CONTROL, DOCUMENT ARCHIVING AND REVIEW

11.1 Once this policy has been approved by the UHL P&G Committee, Trust Administration will allocate the appropriate Trust Reference number for version control purposes.

12.3 This Policy will be reviewed every three years and it is the responsibility of Prevent Lead to commence this process in a timely manner to ensure a revised version is approved by the review date.

Appendix 1 Training (Staff Prevent Training Competencies)

1. Basic Prevent Awareness Training:

Basic Prevent Awareness training should be repeated on a 3 yearly cycle to ensure that individuals are up to date with current procedures and approaches.

The training compliance target for Basic Prevent Awareness training should be in line the current national requirements for safeguarding training at 75%.

Staff requiring Level 1 Safeguarding training- All staff employed by the Trust.

Staff requiring Level 2 Safeguarding training-All non-clinical and clinical staff who have any contact with adults, children and young people and/or parents/carers including: administrators for looked after children and safeguarding teams, health care students, clinical laboratory staff, phlebotomists, pharmacists, dentists and dental care practitioners, audiologists, optometrists, contact lens and dispensing opticians, adult physicians, surgeons, anaesthetists, radiologists, allied health care professionals and all other adult orientated secondary care health care professionals including technicians and GP receptionists.

2. Prevent WRAP Training (Workshops to Raise Awareness of Prevent):

All clinical staff working with adults, children and young people and/or their parents/carers.

Appendix 2 Due Regard Equality Analysis

Initial Screening Template

Introduction

University of Hospitals of Leicester NHS Trust has a legal requirement under the Equality Act 2010 to have “due regard” to eliminate discrimination. It is necessary to analyse the consequences of a policy, strategy, function, service or project (referred to as activity) on equality groups in respect of service users, patients and staff.

The analysis has to consider people’s ‘protected characteristics’ age, disability, gender reassignment, marriage / civil partnership, pregnancy and maternity, race, religion / belief, sex, sexual orientation. We also include other vulnerable groups who may not be protected under the Equality Act but their needs should be considered.

There are several tangible benefits in conducting equality analysis prior to making policy decisions, including:

- Higher quality decisions as a result of more complete management information
- Reduced cost as a result of not having to revisit policy that is not fit for purpose
- Enhanced reputation as an organisation that is seen to understand and respond positively to diversity

Most importantly, through equality analysis we are able to take into account the needs of our different equality groups of staff and patients. Changes being proposed through policy, strategy, transformational programmes or other methods need to be analysed from an equality perspective and the results considered before decisions are made. Where negative impacts are identified, ways to mitigate or minimise them must be put in place.

Before starting if you are unfamiliar with an Equality Analysis contact the UHL Equality Service for guidance or visit the Due Regard section on the UHL Equality INsite pages.

Below is the Due Regard Screening Template which aims to assess the likelihood of a negative impact on an equality group/s. For example, a policy change in financial management systems may be considered major but has no negative impact.

The initial screening form needs to be completed to decide if a full Due Regard (Equality Analysis) * should be undertaken. An overview of the various options available are highlighted in a Due Regard fact sheet which includes top tips and a flow chart which can be accessed which can be accessed via the UHL Equality Service INsite pages.

*A full Due Regard (Equality Analysis) makes sure that any negative impacts have been considered and ways to minimize the impact are specified

Policy Training Requirements

The purpose of this template is to provide assurance that any training implications have been considered

Training topic:	Prevent Basic Awareness/Prevent WRAP 3
Type of training:	x Mandatory (must be on mandatory training register)-Levels 1 & 2 x Role specific-Levels 3 (Clinical Facing)
CMGs(s) to which the training is applicable:	x CHUGGS (Cancer, Haematology, Urology, Gastroenterology & General Surgery) x Estates and Facilities x CSI (Clinical Support & Imaging) including the Alliance x Emergency & Specialist Medicine x ITAPS (Clinical Care, Theatres, Anaesthesia, Pain & Sleep) x Musculoskeletal & Specialist Surgery x Renal, Respiratory & Cardiovascular x Women's & Children's x Corporate Directorates
Staff groups who require training:	Refer to staff groups highlighted in NHS England Prevent Training Competencies Framework on UHL INsite Prevent Page: http://insite.xuhl-tr.nhs.uk/homepage/clinical/safeguarding-adults/prevent---key-advice-and-information
Update requirement:	N/A
Who is responsible for delivery of this training?	Prevent Lead
Have resources been identified?	Yes
Has a training plan been agreed?	Yes
Where will completion of this training be recorded?	<input checked="" type="checkbox"/> Trust Learning Management System/E UHL Records. X Other (please specify) Records collated and kept by Prevent Lead
How is this training going to be monitored?	Via Trust Learning Management System/Workforce Planning Information and Systems Manager and Prevent Lead.

Prevent Statutory Duty 2015

Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015. Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies including the health sector in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

Link below to UHL’s Prevent INsite page explains scope of the new duty and list of specified authorities within it-reference page 19 for the health sector.

<http://insite.xuhl-tr.nhs.uk/homepage/clinical/safeguarding-adults/prevent---key-advice-and-information>

and ‘Building Partnerships, Staying Safe’, published by the Department of Health which includes:

[Department of Health-Building Partnerships & Staying Safe Prevent Strategy: guidance for healthcare organisations](#)

[Department of Health-Building Partnerships & Staying Safe Prevent Strategy: guidance for healthcare workers](#)

These documents give guidance around the health sector contribution to HM Government’s Prevent strategy and covers both organisations and healthcare workers and how the objectives of Prevent are relevant to the Prevent Strategy.

- Ensuring that comprehensive arrangements are in place regarding adherence to this Prevent policy and how policies and procedures are managed within their own Department or Service in line with the guidelines in this policy.
- Ensuring that team managers and other management staff are given clear instructions about Prevent policy arrangements so that they in turn can instruct staff under their direction.

East Midlands Safeguarding Prevent Incident Referral Form

For staff concerns refer to guidance contained in UHL Prevent Policy

Information will be kept secure and confidential and will only be disclosed to those parties who have a legal and legitimate need to know.

<p>Please complete the below details and email this form to: Emsou-sb-leics@leicestershire.pnn.police.uk UHLPrevent@uhl-tr.nhs.uk</p>	<p>This will be dealt with by individual Police Force Prevent Teams.</p>
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Please complete to the best of your knowledge. Leave blank if unknown.

Your details:

Surname		D.O.B	
Forenames		Relationship to individual	
Contact no.			
email			
Professional role (if applicable)			
Address			

Individuals details and summary of concerns:

Please include as much detail as possible.

Surname		D.O.B	
Forenames		Gender	
Contact no.			
email			
Social Media Username			
Ethnicity		Nationality	

Address		Place of Birth	
Languages Spoken		English spoken?	
School or Educational Establishment			
Occupation			
Occupation Address			
Has anyone been consulted about this referral (safeguarding agency etc.)?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
If yes please give details			
Additional Info			

Summary of Concerns

Framed around Engagement, Intent and Capability