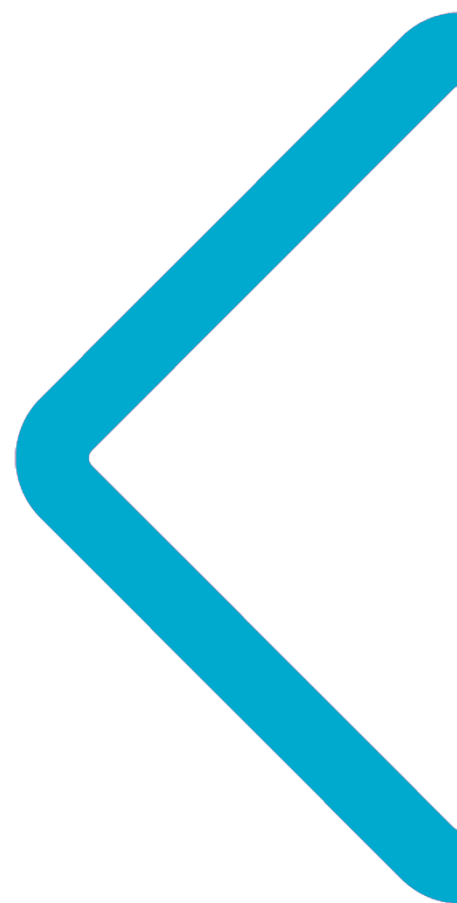


ICB Prevent Policy

April 2024



Version Control

Version Number	Author(s)	Date	Purpose/Change
1.0	Sarah Martin		New ICB policy

Document Owner: Sarah Martin, Head of Safeguarding	Approval date:	02.05.2024	First published:	08.05.2024
	Approved by:	ICB Executive Committee		
	Next review date:	May 2026		

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1. Introduction

This policy aims to make clear the duties of NHS Cheshire and Merseyside Integrated Care Board ('NHS Cheshire and Merseyside') employers in relation to its statutory duties to deliver the Prevent duty.

Prevent is part of the Governments national counter terrorism strategy which is called CONTEST, and this has four national work strands:

PURSUE: to stop terrorist attacks

PROTECT: to strengthen our protection against terrorist attack

PREPARE: to mitigate its impact

PREVENT: to stop people becoming terrorists or supporting terrorism

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. It is part of a wider non-criminalising early response to raising concerns and helping people. To deliver the Prevent agenda, three national objectives have been identified:

- **Objective 1:** respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- **Objective 2:** prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- **Objective 3:** work with sectors and institutions where there are risks of radicalisation which we need to address.

This policy refers only to the Prevent element of CONTEST which is the phase that operates in the pre-criminal space. All other elements are the responsibility of the Police and Security Services.

The national Prevent Strategy (2011) addresses all forms of terrorism including extreme right-wing factions but continues to reprioritise according to the threat posed to our national security.

2. Aims and Objectives

The aim and objective of this document is to provide all employees and those appointed by NHS Cheshire and Merseyside with guidance about Prevent, forming part of the Government's anti-terrorism strategy, CONTEST. The reasons for this are to:

- understanding how Prevent links into the wider Government anti-terrorism strategy, CONTEST.
- why Prevent is important within the NHS.
- key roles and responsibilities, including how the NHS Cheshire and Merseyside works with other key agencies across Cheshire and Merseyside in respect to the Prevent agenda.
- training.
- understanding exploitation – the process of exploitation and factors that may increase an individual's vulnerability to exploitation.
- how to raise a concern.

Preventing someone from becoming a terrorist or supporting terrorism is no different from safeguarding vulnerable individuals from other forms of exploitation or abuse. Therefore, this policy stands alongside the NHS Cheshire and Merseyside Safeguarding Children, Adults at Risk and Children in Care Policy.

The radicalisation of vulnerable individuals can be undertaken from any extremist group. These forms of terrorism include (but not limited to):

- Far Right extremists e.g., English Defence League
- Al-Qaida influenced groups.
- Environmental extremists
- Animal Rights extremists.

The key focus for Prevent in healthcare is to make sure staff have the skills and knowledge to identify when a member of the public or a colleague is displaying signs that they may have been or are in the process of being drawn into terrorist-based activity. It is essential that healthcare workers are aware of the steps that need to be taken to address the concerns raised and to help protect the individual(s) involved.

3. Definitions

Definitions of terms used in this policy are given below:

CONTEST	<p>Contest is the United Kingdom’s counter terrorism strategy. The aim of Contest is to reduce the risk to the UK and its interests overseas from terrorism, so that people can go about their lives freely and with confidence.</p>
Prevent Strategy	<p>The Prevent Strategy is part of the Government’s counter-terrorism strategy CONTEST and aims to stop people becoming terrorists or supporting terrorism. Prevent focuses on all forms of terrorism and operates in a pre-criminal space, providing support and re-direction to vulnerable individuals at risk of being groomed into terrorist activity before any crimes are committed.</p>
Channel	<p>Channel is a program which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The program uses a multi-agency approach to protect vulnerable people by:</p> <ul style="list-style-type: none"> • Identifying individuals at risk. • Assessing the nature and extent of that risk • Developing the most appropriate support plan for the individuals concerned.
Radicalisation	<p>Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.</p> <p>The risk of Radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.</p> <p>Vulnerable individuals who may be susceptible to Radicalisation can be patients and/or staff. Vulnerable adults can be drawn into violence, or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a person at risk of being drawn into criminal activity and has the potential to cause significant harm.</p> <p>Children and young people are vulnerable to exposure to, or involvement with, groups or individuals who advocate violence as a means to a political or ideological end. They can be exposed to the messages of extremist groups by many means. These can include exposure through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.</p> <p>Safeguarding children and young people from Radicalisation is no different from safeguarding them from other forms of harm.</p> <p>Where a concern is identified relating to a child, the child safeguarding process must also be followed.</p>

Terrorism	Terrorism is an action or threat designed to influence the government or intimidate the public. Its purpose is to advance a political, religious or ideological cause. The current UK definition of terrorism is given in the Counter Terrorism and Border Security Act (2019).
Extremism	The vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences, there is no obvious profile of a person likely to become involved in terrorist-related activity, or single indicator of when a person might move to support extremism.
Exploitation	<p>Vulnerability to Radicalisation can occur to any individual who due to their circumstances, experiences or state of mind become susceptible to a terrorist ideology. Some factors that can make people vulnerable to Radicalisation include bereavement, rejection, isolation, substance abuse, identity crisis/crisis of faith, mental health issues, participation in criminal other criminal activity and low self-esteem. Some external factors can be peer pressure, unemployment levels, media and group identity.</p> <p>Terrorists use a variety of methods to influence and exploit others. These include face to face contact, internet use, social networking or other media. Radicalisation is a process whereby the terrorists use normal social processes to manipulate and influence others into their ideology.</p> <p>The internet often plays a big part in the dissemination of extremist material and propaganda. Health care organisations should be aware of employees making frequent visits to websites showing images such as armed conflict around the world and providing access to extremist material.</p>

4. Roles and Responsibilities

The policy applies to all staff working within NHS Cheshire and Merseyside whether employed, contracted or on a voluntary basis.

Chief Executive

The Chief Executive of NHS Cheshire and Merseyside is the Accountable Officer with the responsibility for ensuring that NHS Cheshire and Merseyside implements this policy.

Executive Director of Nursing & Care

Executive Director of Nursing and Care for NHS Cheshire and Merseyside has accountability for the Prevent agenda and that a designated Prevent lead has been identified at place, who's responsibility is to ensure NHS Cheshire and Merseyside staff have Prevent training in accordance with the "NHS Prevent Training and Competences Framework" Department of Health and Social Care 2022.

The NHS Cheshire and Merseyside Prevent leads at place can be contacted via:

Place	Generic Safeguarding E-mail Addresses
ICB Central team	Eleri Lloyd-Burns, Associate Director Nursing and Care (Safeguarding) Eleri.Lloyd-Burns@cheshireandmerseyside.nhs.uk Sarah Martin, Head of Safeguarding, sarah.martin@cheshireandmerseyside.nhs.uk
Cheshire East	cheshire.eastsafeguardingadmin@cheshireandmerseyside.nhs.uk
Cheshire West	cheshire.westsafeguardingadmin@cheshireandmerseyside.nhs.uk
Halton	handw.safeguarding@cheshireandmerseyside.nhs.uk
Warrington	handw.safeguarding@cheshireandmerseyside.nhs.uk
Sefton	sefton.safeguarding@cheshireandmerseyside.nhs.uk
Wirral	wirral.safeguarding@cheshireandmerseyside.nhs.uk
Liverpool	Liverpool.safeguardingservice@cheshireandmerseyside.nhs.uk
St Helens	sthelens.safeguarding@cheshireandmerseyside.nhs.uk
Knowsley	knowsley.desnurses@cheshireandmerseyside.nhs.uk

ICB staff

All NHS Cheshire and Merseyside staff including temporary and agency staff are responsible for adhering to and complying with the requirements of the policies, procedures, guidelines, and protocols contained within and applicable to their area of operation.

All staff have a duty to safeguard children, young people, and adults at risk by recognising abuse and neglect and referring onwards as required (Working Together 2023; Care Act 2014).

All staff are to ensure they complete the Prevent mandatory training in accordance with the Intercollegiate requirements which is role dependent.

To know who to contact within NHS Cheshire and Merseyside if they have any concerns about service users or members of staff in relation to radicalisation by extremists.

Designated Nurses/Professionals

The Designated nurses/professionals aligned to the 9 places and central teams of NHS Cheshire and Merseyside for Prevent are responsible for ensuring that all NHS Cheshire and Merseyside staff have an awareness of the Prevent agenda and receive training appropriate to their role. The Designated Adult and/or Children professional at a place represents NHS Cheshire and Merseyside at their relevant place based strategic multi-agency meetings and will work closely with Prevent leads in other organisations to ensure that appropriate processes and policies are in place and that there is a robust and effective training plan in place for key staff.

They will also ensure the Channel coordinator has the appropriate Place based administrator contacts to gain GP contacts for cases relating to Channel Panel. In addition, they will act as a conduit to the Channel coordinator if information is not provided by health providers/Trusts or GP practices to the Channel panel (Section 5).

Allocated Designates and Deputy Designates as Cheshire and Merseyside Prevent leads will commit to attendance at the NHS England Regional Prevent Group. Their role will be to ensure oversight and sharing of new guidance and legislation, identify any challenges in the system and seek solutions, and ensure escalation of risks across Cheshire and Merseyside.

Organisational Accountability

Integrated Care Boards are not specifically captured in either the Prevent or the Channel Duty however they have responsibilities as result of their role within the health system.

1. Contract and Performance Management

The NHS Standard Contract requires all NHS funded providers to demonstrate that they comply with the requirements of the Prevent Duty. This includes ensuring that there is a named Prevent lead and that there is access to quality training for staff in their organisation; Integrated Care Boards have a responsibility to provide oversight and performance management regarding implementation and compliance of the Prevent duty within provider organisations.

NHS Trusts Prevent performance is monitored by NHS England by a quarterly submission via the NHS England Prevent Dashboard.

As Statutory partners of Safeguarding Adult Boards and Safeguarding Children Partnerships, Integrated Care Boards are among the organisations that need to provide oversight to the implementation of the duty in the system. As partners to Channel panels, Integrated Care Boards can [facilitate information sharing](#) to ensure all relevant health partners are both providing relevant input into panel and that panel is sharing information to assist partners manage and support patients.

Integrated Care Boards as the commissioners of health services for their local population are also well placed to provide advice to panel members regarding the health partners that should be brought into discussions and the health services that are available that may be appropriate to an individual's support package. There is no statutory requirement for Integrated Care Boards to engage with partners in local Prevent forums, to feed into Counter Terrorism Local Profiles and to work with health partners regarding Prevent. However, to have governance and oversight regarding provider performance, NHS engagement in Channel Panel and local risks and strategies it is strongly recommended that we engage in these local partnerships in line with local policy requirements.

As part of the NHS Oversight Framework, Integrated Care Boards are required to ensure they are demonstrating they are a well led organisation, including meeting statutory requirements placed upon them and that they are meeting NHS performance requirements, including safeguarding standards. NHS England will seek assurance from Integrated Care Boards regarding how they undertake these duties and fulfil their requirements.

2. Governance Oversight

Integrated Care Boards will need to ensure they have in place robust governance systems that provide both internal and wider system assurance that the statutory duties are being implemented and organisations are meeting their requirements to safeguard individuals at risk or radicalisation.

Prevent assurance will be provided from each ICB at Place safeguarding team to the ICB Safeguarding Oversight Group via the quarterly ICB Place safeguarding assurance reports and if needed issues or concerns will be escalated to the ICB System Oversight Board

Individual Accountability

Concern that an individual may be vulnerable to radicalisation does not mean that you think they are a terrorist, it means that you are concerned they are prone to being exploited by others and so the concern is a safeguarding concern. In the event of being concerned, the individual member of staff should raise the issue with their line manager and the safeguarding team for your area. Your line manager and ICB Place Safeguarding team will support you in deciding if a Prevent referral should be made.

Channel, alongside other supportive processes, provides a clear framework in which to respond to safeguarding concerns for those adults and young people who may be particularly susceptible to terrorist ideology and thereby at risk of becoming involved in terrorism. Intervention must include the individual's consent.

As with any other safeguarding concern, if a staff member suspects imminent or actual harm to an individual or individuals, they must report their concerns as a matter of urgency by dialing 999 or the anti-terrorist hotline on 0800 789 321. A text phone facility for people who are deaf or have hearing difficulties is available on 0800 0324 539.

Escalating concerns in relation to an employee

Although there are very few instances of healthcare staff radicalising others or being drawn into extremist acts, it is still a risk that NHS Cheshire and Merseyside needs to be aware of and have processes within which to manage any concerns. Where an employee expresses views, brings materials into the organisation, uses or directs patients to extremist websites or acts in other ways to promote terrorism, the organisation will look to use human resources processes in order

to address the concerns (see managing allegations against staff policy). All staff will be supported through this process by their line manager, the relevant HR and the relevant safeguarding team.

If you have concerns about a child or an adult being radicalised you can tell Cheshire Police or Merseyside Police about them by completing a quick and simple online form on the [Cheshire Police Prevent Referral Page](#) or [Merseyside Police Prevent Referral Page](#).

5. Channel Panel

The Counter Terrorism and Border Security Act (2019) places a duty on specified authorities to 'have due regard, in the exercise of its functions, to prevent people from being drawn into terrorism' through the Channel process.

The Channel process is designed to provide support at an early stage to vulnerable individuals identified to be at risk of radicalisation and to work through interventions to stop them from becoming terrorists. It operates in the pre-criminal space before any criminal activity has taken place.

Channel panel is a multi-agency programme which identifies and supports at risk individuals, and which delivers this strategic aim of Prevent.

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:

- 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.

Channel is about safeguarding children and adults from being drawn into committing terrorist-related activity. Its focus is early intervention, to protect and divert away from the risk they face before illegality occurs.

Having identified an individual at risk, the Channel panel will assess the nature and extent of the risk, and subsequently develop the most appropriate support plan for the individual concerned.

NHS Cheshire and Merseyside does not have a direct role in Channel panel, this process is supported by health providers/NHS Acute/Community and Mental Health Trusts and GP practices who provide on request by the Channel coordinator relevant information about at-risk individuals known to them.

In circumstances where information about at-risk individuals is not provided by the health provider/NHS Trust or GP practice, the Channel coordinator will escalate to the placed based Designated Professional/Nurse or Named GP for Safeguarding. Who will then liaise with the health provider/Trust or GP practice on behalf of the coordinator, to ensure relevant information is shared.

6. Martyn's Law

Martyn's Law is named in tribute to Martyn Hett, who was tragically killed alongside 21 others in the Manchester Arena terrorist attack in 2017, and is also known as the Terrorism (Protection of Premises) Bill. The new law aims to

- keep people safe, will scale up preparedness for, and protection from, terrorist attacks.
- Martyn's Law will ensure better protection against the continued and evolving threat that the UK faces from terrorism.
- support, guidance and training will help embed best practice and drive-up standards across the UK.

7. NHS Cheshire and Merseyside Premises

To ensure that NHS Cheshire and Merseyside is compliant with statutory duties, amongst others, NHS Cheshire and Merseyside is required to ensure that its premises are not used by organisations or groups to disseminate extremist views or ideologies.

NHS Cheshire and Merseyside will not permit its accommodation to be let:

- a. for political rallies or demonstrations
- b. for purposes which are illegal i.e., be they forbidden by law or unauthorised by official or accepted rules.
- c. for functions attended by people whose presence may cause civil unrest or division within the community
- d. to an organisation or individual which has been banned by law.

NHS Cheshire and Merseyside also reserves the right to cancel any booking where it considers:

1. that such events may be contrary to the interest of the general public or contrary to any law or act of Parliament. Any bookings will also be subject to consideration from the police to ensure the safety of the community and staff is assessed against the request for a venue booking.
2. the users of the premises may do something that may cause or pose a risk of loss, damage or significant expense to NHS Cheshire and Merseyside or harm the reputation of NHS Cheshire and Merseyside.

NHS Cheshire and Merseyside will ensure that the application of any part of this process does not discriminate directly or indirectly against anyone on the grounds of race, disability, sex, gender reassignment, sexual orientation, religion or belief, age, marriage or civil partnership.

Staff who are responsible for arranging the hiring/booking of any NHS Cheshire and Merseyside premises/rooms should complete the Prevent mandatory training module available via Electronic Staff Records.

Staff should ensure that there is appropriate consideration of inadvertently supporting extremism when engaging outside speakers for ICB events.

When booking a room for an outside speaker, the following questions will assist staff in determining whether a booking is considered controversial or there is any risk associated with the booking:

1. establish what the venue will be used for and what type of event the customer is wishing to hold.
2. is the name given linked to any community group or organisation?
3. request a copy of the program details and names of any speakers.
4. request all contact details (address, mobile, home and business contact number).
5. if the customer is not a local resident, establish why they are holding an event in this area.
6. ask the customer if they have used any other venues in the country, if so, contact the previous venue(s) to establish what the event was.

If you are concerned with the answers provided by the customer, speak to your manager. If the manager deems it appropriate, they will cross reference the booking details provided with the web links and contacts below, or ask you to do so (in the order listed):

1. inform your Place Lead for Corporate Affairs/Governance or the ICB Associate Director of Corporate Affairs and Governance / Company Secretary
2. check the [government list of proscribed organisations](#) (provides a list of all known terrorist groups within UK and Ireland).
3. contact your place based or central Integrated Care Board safeguarding team for further advice.

8. Education and Training

NHS Cheshire and Merseyside must ensure that all staff receives the appropriate level of training on Prevent as per “NHS Prevent Training and Competences Framework” Department of Health and Social Care 2022. All staff should complete 3 yearly Prevent basic awareness training on ESR.

NHS Cheshire and Merseyside staff who are required to undertake level 3 safeguarding training should also complete the [HEE E-Learning for Health Preventing Radicalisation Level 3 training](#) every 3 years and inform the Integrated Care Board Electronic Staff Record team this has been completed.

All staff are to be made aware of this policy and other related policies and to know who to contact within the Integrated Care Board if they have any concerns about member of the public or members of staff in relation to radicalisation by extremists.

9. Equality and Diversity

NHS Cheshire and Merseyside comply with the Equality and Diversity Act (2010) and Public Sector Equality Duty (2011) and as such recognise that some individuals with protected characteristics in the Integrated Care Board may need additional support to understand and interpret this, Policy. The Integrated Care Board Safeguarding Place teams will respond to any direct or indirect request for support in interpreting this policy, which includes clarification and translation.

10. References

- Counter-terrorism Strategy (CONTEST) 2023 Home Office [Counter-terrorism strategy \(CONTEST\) 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/counter-terrorism-strategy-2023)
- CHANNEL guidance (October 2023) <https://www.gov.uk/government/publications/channel-guidance>
- Counter Terrorism and Border Security Act 2019. <http://www.legislation.gov.uk/ukpga/2019/3/contents/enacted/data.htm>
- Martyn's Law [Martyn's Law to ensure stronger protections against terrorism in public places - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/martyns-law)
- PREVENT duty guidance for England and Wales (2023) [Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance)
- PREVENT Strategy. www.gov.uk/government/publications/prevent-strategy-2011
- PREVENT Training and Competencies Framework (September 2022) [NHS Prevent training and competencies framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-training-and-competencies-framework)

11. Associated Documentation

The following locally developed NHS Cheshire and Merseyside ~~Integrated Care Board~~ policies and guidance are relevant:

- Safeguarding Children, Adults at Risk and Children in Care Policy
- Mental Capacity Act (2005) Policy.

This policy must be read in conjunction with the 9 Local Safeguarding Children Partnerships and Safeguarding Adults Boards Multiagency Policies and Procedures. Cheshire and Merseyside Safeguarding Children Partnerships and Safeguarding Adults Boards Multi-Agency Policies and Procedures links can be accessed at:

Place	Safeguarding Adults Board	Safeguarding Children Partnership
Cheshire East	Cheshire East Safeguarding Adults Board	Cheshire East Safeguarding Children's Partnership (CESCP)
Cheshire West and Chester	Cheshire West and Chester Safeguarding Adults Board	Cheshire West Safeguarding Children Partnership
Halton	Halton Safeguarding Adult Board	Halton Children & Young People Safeguarding Partnership
Liverpool	Liverpool Safeguarding Adults Board (LSAB)	Liverpool Safeguarding Children Partnership (LSCP)
Knowsley	Knowsley Safeguarding Adults Board	Knowsley Safeguarding Children Partnership
Sefton	Sefton Safeguarding Adults Board	Sefton Local Safeguarding Children Partnership
St Helens	St. Helens Safeguarding Adult Board	St. Helens Safeguarding Childrens Partnership
Warrington	Warrington Safeguarding Partnerships - Adults Board	Warrington Safeguarding Partnerships - Childrens Partnership
Wirral	Wirral Safeguarding Adults Partnership Board	Wirral Safeguarding Children Partnership