

OP110

Prevent Policy

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Prevent

1.0 Policy Statement (Purpose / Objectives of the policy)

The Prevent Statutory Duty issued under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies (“specified authorities” listed in Schedule 6 to the Act) 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.”

This policy is applicable to all Trust staff members.

All aspects of this document regarding potential Conflicts of Interest should refer first to the [Conflicts of Interest Policy \(OP109\)](#). In adhering to this Policy, all applicable aspects of the Conflicts of Interest Policy must be considered and addressed. In the case of any inconsistency, the [Conflicts of Interest Policy \(OP109\)](#) is to be considered the primary and overriding Policy.

2.0 Definitions

CONTEST	<p>The United Kingdom’s Strategy for Countering Terrorism.</p> <p>The aim of CONTEST, the UK’s counter-terrorism strategy, is to reduce the risk from terrorism to the UK, it’s citizens and interests overseas, so that people can go about their lives freely and with confidence.</p> <p>(HM Government 2023)</p>
Prevent	<p>Prevent duty guidance: for England and Wales.</p> <p>Prevent is one of the four strands of the CONTEST strategy. The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.</p> <p>(HM Government 2023)</p>
Prevent Objectives	<p>This has three specific objectives:</p> <p>Tackle the ideological causes of terrorism. Intervene early to support people susceptible to radicalisation. Enable people who have already engaged in terrorism to disengage and rehabilitate.</p> <p>(HM Government 2023)</p>

Terrorism	<p>This is defined by the Terrorism Act 2000 as an action that endangers or causes serious violence to a person or people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of political, religious, or ideological gain.</p> <p>(Home Office 2000)</p>
Channel	<p>Channel is part of the Prevent strategy. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme 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. <p>(HM Government 2023)</p>
Counter-Terrorism and Security Act 2015	<p>The Counter-Terrorism and Security Act contains powers to help the UK respond to the threat of terrorism. It received Royal Assent on 12 February 2015. The act will:</p> <ul style="list-style-type: none"> Disrupt the ability of people to travel abroad to engage in terrorist activity and then return to the UK Enhance the ability of operational agencies to monitor and control the actions of those who pose a threat Combat the underlying ideology that feeds, supports and sanctions terrorism <p>(Home Office 2015a)</p>
Extremism	<p>This is vocal or active opposition to fundamental values including democracy, the rule of the law, individual liberty and mutual respect and tolerance of different beliefs and faiths.</p> <p>(Home Office 2015b)</p>
Radicalisation	<p>Radicalisation is the process of a person subscribing to extremist ideology. This can include legitimising support for, or use of, terrorist violence. The majority of people who commit terrorism offences do so of their own agency and dedication to an ideological cause.</p> <p>(HM Government 2023)</p>
Vulnerability	<p>Anyone can be vulnerable to radicalisation, regardless of their age, gender, ethnicity, religion, education or background. But there are some factors that can make some people more at risk of being targeted by radicalisers than others.</p> <p>(Action Counters Terrorism 2024)</p>

3.0 Accountabilities

This policy applies to all staff and volunteers employed by the Trust, and how they can be supported to develop an understanding of Prevent in order to recognise that someone may have been or is being radicalised.

3.1 The Chief Nurse:

Fulfills the role of the nominated Director/Executive Lead and is responsible for coordinating the management of safeguarding which includes Prevent.
Ensures that the Board receives sufficient assurance on the effectiveness of the service.

3.2 All Managers:

Ensure that all their staff attend the Prevent level 3 e-learning training every 3 years.

3.3 All Trust Staff:

Complete the Prevent level 3 e-learning training 3 yearly.

3.4 The Trust Prevent Lead (located in the Trust Safeguarding Team)

- Supports the implementation of the Prevent Policy across the Trust.
- Provide communication, support, and guidance to the Trust on emerging national, regional and local strategic Prevent and Channel processes.
- Manage Prevent cases alongside multi-agency partners.
- Provide a quarterly report to NHS England via the Regional Prevent Coordinator, this information is then reported to the Home Office.
- Coordinate Prevent training trust wide.
- Collate Prevent training data to provide quarterly Prevent reports to the Integrated Care Board (ICB).

3.5 Head of Safeguarding:

- Manage the Children and Adult Safeguarding Service and providing expert leadership on all aspects of the safeguarding agenda including Prevent.
- Ensure that the Trust has robust systems and processes in place for the protection and on-going support of adults and children.
- Monitoring compliance, ensuring risks to safeguarding functions and exceptions are appropriately raised in the relevant forum and to the Board where appropriate.
- Provide reports quarterly to the Quality Safety Advisory Group (QSAG).
- Represents the Trust at CONTEST board to provide assurance of meeting statutory duty.
- Represents the Trust at Prevent Delivery Group which informs Prevent delivery planning.

3.6 Children's Safeguarding Team

Represents the Trust at Channel panel monthly meetings and provides feedback to senior management as appropriate.

3.7 The Trust Safeguarding Group

The Group ensures that it receives assurances in relation to compliance with the requirements of this policy through receipt of reports including the number of Prevent referral made, compliance of regional and local strategic Prevent and Channel processes and Prevent level 3 training.

4.0 Policy Detail

- 4.1 This policy and its appendices define the process all staff must follow to ensure that the appropriate safeguarding actions are taken if concerns or disclosures are made that identify that a person is at risk of being or who is suspected of being drawn into extremism. This policy also covers Trust staff who may be vulnerable to radicalisation and extremism or have concerns about other members of staff being involved in terrorist activities.
- 4.2 Channel forms a key part of Prevent. The process adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. There is no fixed profile of a terrorist, so there is no defined threshold to determine whether an individual is at risk of being drawn into terrorism. However, signs that extremist views are being adopted can be used to assess whether the offer of early support should be made. [What are the risks of radicalisation? | ACT Early](#)
- 4.3 Any member of staff (including contracted, substantive, temporary, seconded and volunteer staff) who have a concern that someone is being radicalised, see [Appendix2](#), must discuss their concerns with their immediate line manager and contact the Safeguarding Team [Safeguarding Service \(xrwh.nhs.uk\)](#), who will advise and support through the process. If a Prevent referral to Channel is deemed appropriate see ([Appendix 1](#)).
- 4.4 Prevent referrals do not require consent to be obtained by healthcare staff from the individual/s. The Channel process is voluntary, and consent will be sought as part of the process by the Counter Terrorism Officer from Channel. Once the referral has been sent the referral must be deleted from email (including recycle bin) and personal drive.
- 4.5 If the referral relates to a member of staff, the referral MUST **not** be documented in the individual's personal file (refer to [HR09 Employee Records Personnel Files Policy](#)).
- 4.6 If there are concerns about the Prevent process or Channel response to referrals then consideration should be given to the escalation process [Make a complaint about Prevent - GOV.UK \(www.gov.uk\)](#). Support can be provided with this process

from the Children's Safeguarding team.

- 4.6 Unlike mainstream safeguarding for adults and children, there is no threshold to make a Prevent referral for an individual for whom you have concerns. There needs to be an ideological concern and a vulnerability for that individual to being drawn into terrorism, which includes violent extremism and non-violent extremism which can create an atmosphere conducive to terrorist activity. There will be cases that require a safeguarding response in conjunction with Prevent, see [CP41 Safeguarding Children Policy](#) and [CP53 Safeguarding Adult Policy](#).

5.0 Financial Risk Assessment

1	Does the implementation of this policy require any additional Capital resources	No
2	Does the implementation of this policy require additional revenue resources	No
3	Does the implementation of this policy require additional manpower	No
4	Does the implementation of this policy release any manpower costs through a change in practice	No
5	Are there additional staff training costs associated with implementing this policy which cannot be delivered through current training programmes or allocated training times for staff.	No
	Other comments	

6.0 Equality Impact Assessment

The assessment has been completed and no negative impact has been identified.

7.0 Maintenance

The Trust Prevent Lead will be responsible for reviewing policy in line with legislation and professional guidance.

8.0 Communication and Training

- Prevent Level 3 eLearning training is mandatory for all RWT staff and can be accessed via My Academy and searching Prevent
- The Children's Safeguarding Team will be responsible for yearly Prevent updates to be disseminated electronically via team brief and staff bulletins to all RWT staff to ensure compliance with the updated Prevent guidance [Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](#).
- Further information on the Prevent agenda, Counter Terrorism and Channel can be found on the Safeguarding team Intranet page. [Counter Terrorism \(xrwh.nhs.uk\)](#)

9.0 Audit Process

Criterion	Lead	Monitoring method	Frequency	Committee
Prevent referrals are recorded by safeguarding children team who submit quarterly prevent returns to ICB. Prevent lead is notified of this numerical data for reporting to TSG.	Trust Prevent Lead	Prevent returns and activity data	Prevent Returns Quarterly Activity data for TSG Monthly	Trust Safeguarding Group
Compliance with Mandatory Training	Trust Prevent Lead	Education and training database	Monthly	Trust Safeguarding Group

10.0 References

- Action Counters Terrorism (ACT) 2024. Available at: [What are the risks of radicalisation? | ACT Early](#)
- HM Government (2023) Channel duty guidance: Protecting people susceptible to radicalisation. Available at: [Channel Duty Guidance: Protecting people susceptible to radicalisation \(publishing.service.gov.uk\)](#)
- HM Government (2023) CONTEST: The United Kingdom's Strategy for Countering Terrorism. Available at:- [Microsoft Word - English Standard CONTEST 2023 \(publishing.service.gov.uk\)](#)
- HM Government (2023) Prevent duty guidance: Guidance for specified authorities in England and Wales. Available at:- [Prevent duty guidance: Guidance for specified authorities in England and Wales \(publishing.service.gov.uk\)](#)
- Home Office (2000). Terrorism Act 2000 (Act of Parliament). Available at :- [Terrorism Act 2000 \(legislation.gov.uk\)](#)
- Home Office(2015a) Counter-Terrorism and Security Act. Available at : <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>
- Home Office (2015b) Counter Terrorism Strategy. Available at: <https://www.gov.uk/government/publications/counter-extremism-strategy>
- <https://www.gov.uk/government/publications/prevent-and-the-channel-process-in-the-nhs-information-sharing-and-governance>
- [NHS Prevent training and competencies framework - GOV.UK \(www.gov.uk\)](#)
- [Prevent and the Channel process in the NHS - GOV.UK \(www.gov.uk\)](#)

Part A - Document Control

Policy number and Policy version: OP110 Version 5.2	Policy Title PREVENT POLICY	Status: Final		Author: Lisa Tooth Named Nurse Safeguarding Children Director Sponsor: Chief Nurse
Version / Amendment History	Version	Date	Author	Reason
	1.0	March 2018	Trust Prevent Lead	New Policy
	2	April 2019	Trust Prevent Lead	Full review undertaken no amendments required
	3	June 2019	Trust Prevent Lead	Minor amendment to 9.1
	3.1	May 2020	Trust Prevent Lead	Updates to Appendix 1 and 2.
	4	March 2021	Named Nurse Safeguarding Children	Full review undertaken. Updated and amended
	4.1	February 2023	Named Nurse Safeguarding Children	Updates to sections 8.0 Communication and Training and 10.0 References
	4.2	October 2023	Named Nurse Safeguarding Children	Extension
	5.0	July 2024	Named Nurse Safeguarding Children	Full review
	5.1	October 2024	Named Nurse Safeguarding Children	Update to Appendix 1 – now National Prevent Referral Form
	5.2	March 2025	Named Nurse Safeguarding	Updated Appendix 1.

			Children	National Prevent Referral Form & Hyperlink in Appendix 2 updated.
Intended Recipients: All staff employed by The Royal Wolverhampton Trust.				
Consultation Group / Role Titles and Date: Trust Safeguarding Group Chief Nurse Medical Director Deborah Smith- Prevent and Cohesion Co Ordinator Counter Terrorism Local Briefing West Midlands Counter Terrorism Unit				
Name and date of Trust level group where reviewed			Trust Policy Group – July 2024 Trust Policy Group Virtual Approval – October 2024 – V5.1 Virtual Approval – Trust Policy Group – Version- 5.2 – March 2025	
Name and date of final approval committee			Trust Management Committee – July 2024	
Date of Policy issue			March 2025	
Review Date and Frequency (standard review frequency is 3 yearly unless otherwise indicated)			This will be reviewed in line with Home Office guidance when required. July 2027	
Training and Dissemination: All RWT staff will be required to undertake training. Training is available as an eLearning package via the kite site. Training compliance is reported on a monthly basis via the Trust Safeguarding Group				
To be read in conjunction with: CP53 Safeguarding Adults CP41 Safeguarding Children				
Initial Equality Impact Assessment (all policies):			Completed Yes	
Impact assessment (as required):			Completed No	
Monitoring arrangements and Committee			Trust Safeguarding Group (TSG)	
Document summary/key issues covered. The purpose of this policy is to provide a framework for the implementation of the Government’s National Prevent Strategy. The purpose of the National Prevent Strategy is to prevent individuals from becoming radicalised and supporting terrorism. Ensure all staff are aware of the safeguarding processes to support vulnerable individuals at risk of being radicalised. Ensure a Trust wide training and awareness programme is in place to comply with National standards.				
Key words for intranet searching purposes			Prevent Safeguarding Service	

	Counter Terrorism
<p>High Risk Policy?</p> <p>Definition:</p> <ul style="list-style-type: none"> • Contains information in the public domain that may present additional risk to the public e.g. contains detailed images of means of strangulation. • References to individually identifiable cases. • References to commercially sensitive or confidential systems. <p>If a policy is considered to be high risk it will be the responsibility of the author and director sponsor to ensure it is redacted to the requestee.</p>	No

National Prevent referral form

This form is designed to help articulate a concern under Prevent – where you are worried a person is susceptible to radicalisation. Complete as much of the form as you are able; doing so will ensure that the person gets the help they need to keep them and others safe.

If you are a member of public sector staff, and would like to check your concern, you should contact your organisation's Designated Safeguarding Lead (DSL) or equivalent. If you are a member of the public and are concerned about someone, you should call the Act Early Support Line on 0800 011 3764, in confidence to share your concerns with a specially trained officer or you can call the Anti-Terrorism Hotline on 0800 789 321. More information on what to do if you have a concern is available under 'Get help for radicalisation concerns' on GOV.UK.

If you are deaf, hard of hearing or have a speech impairment, a police non-emergency number is available as a text phone service on 18001 101. Remember, in an emergency dial 999.

Once you have completed this form it is essential that you submit it to the police directly, or your DSL or equivalent will do this on your behalf. Where possible you will receive a response on your referral, but this is not always possible due to data-protection considerations and other sensitivities.

Where possible, do not leave any gaps, as the police may have to contact you to gather more information which will delay the process. If you cannot answer a question, explain why in the text box provided.

1 Details of person being referred

Complete where information is known and applicable.

This information will not be used to assess whether a referral should be adopted. Any personal data provided may support Equality Act obligations. Please only provide personal data if this information is already known from an official source or was provided by the person in question.

Surname

First name(s)

Date of birth
or approximate age

Gender

Ethnicity

Nationality

Immigration or asylum status

First language

Religion

Current address

Phone number

Email address

Social media identifiers
for example, usernames
and platforms

Parent or guardian contact details

Any other details that may be relevant to the concern

2

Describe your concerns relevant to Prevent

How/why did the person first come to your notice?

What is the person's ideology or belief of concern if known? For example, extreme right-wing terrorism (ERWT), Islamist terrorism, left wing, anarchist and single-issue terrorism (LASIT)

What specific concerns do you have? Such as, have they had contact with extremist groups or people that worry you, discussed travel plans to a conflict zone, threatened anyone with violence, shown interest in hate crimes, extremists, or terrorism, or used their mobile phone, internet or social media in a way that worries you.

Describe any other concerns you may have.

3 Relevant or concerning behaviours you have noticed

Select the concerning behaviours you have noticed (if applicable).

Absenteeism	Abusive behaviour
Anti-social behaviour	Becoming socially isolated
Change in appearance	Closed to challenge
Confrontational	Concerning use of the internet
Expression of extremist views	Fixated on a topic or group
Interest in conspiracy narratives	Interest in extremist groups/causes
Interest in weapons	Legitimising use of violence
Quick to anger/use of violence	Seeking to recruit
Self-harm	Substance misuse
Sudden abandonment of interests	Support for gender-based violence
'Them and us' language	Use of inflammatory language
Use of symbolism linked to extremism	Other

Provide more detail on all the behaviours selected above or describe a behaviour not listed. If you require further space, attach additional sheets to the form.

4

Additional factors

Select any which apply to the person if applicable.

Access to weapons	Adolescence or period of transition
Adverse childhood experiences	Disability
Domestic abuse	Extremist material
Family breakdown	Family dispute
Financial problems	Gang or group membership
History of violence	Homelessness
Illness	Learning disability
Links to criminality	Loss or bereavement
Mental health	Neurodiversity
Physical/emotional abuse	Sexual abuse
So called honour-based violence	Socially excluded
Thoughts of suicide/self-harm	Trauma from conflict
Unemployment	Victim of abuse
Victim of crime	Victim of hate crime
Other	

Provide more detail on all the factors selected above or describe a factor not listed. If you are not sure which behaviour categories are relevant, provide any details you can. If you require further space, attach additional sheets to the form.

5

Your details

Surname

First name(s)

Organisation

Address of organisation

Role or job title

Phone number

Email address

Relationship to the person

6

Details of the person who first identified the concern (if different from above)

Surname

First name(s)

Organisation

Role or job title

Phone number

Email address

Relationship to the person

7

Details of the person you have shared the concern with

Provide the details of the person you have shared the concern with if known for example, your Designated Safeguarding Lead or equivalent, or Prevent police

Surname

First name(s)

Organisation

Role or job title

Relationship to the person

Phone number

Email address

8

Relevant dates

Date concern was first identified

Date of referral to Prevent

9

Safeguarding considerations

Does the person have any stated or diagnosed disabilities, neurodiversity needs, or mental health issues?

Yes

No

If yes, provide further details of the diagnosis.

Have you discussed this person with your organisation's Designated Safeguarding Lead or equivalent (if applicable)?

Yes

No

What was the result of this discussion?

Does the person know you are sharing this concern?

Yes

No

If yes, describe the response

Have you taken any direct action with the person since this concern was identified?

Yes

No

If yes, describe the action and result

10

Employment/education details of the person of concern

Current occupation and employer:

Previous occupation(s) and employer(s):

Current school/college/university:

Previous school/college/university:

Not currently in education or employed:

11 If there is anything you have not been able to add to the form, but feel is relevant, please provide details or a contact number below

Thank you for taking the time to make this referral.

You should now submit this form to

or your Designated Safeguarding Lead or equivalent will do this for you.

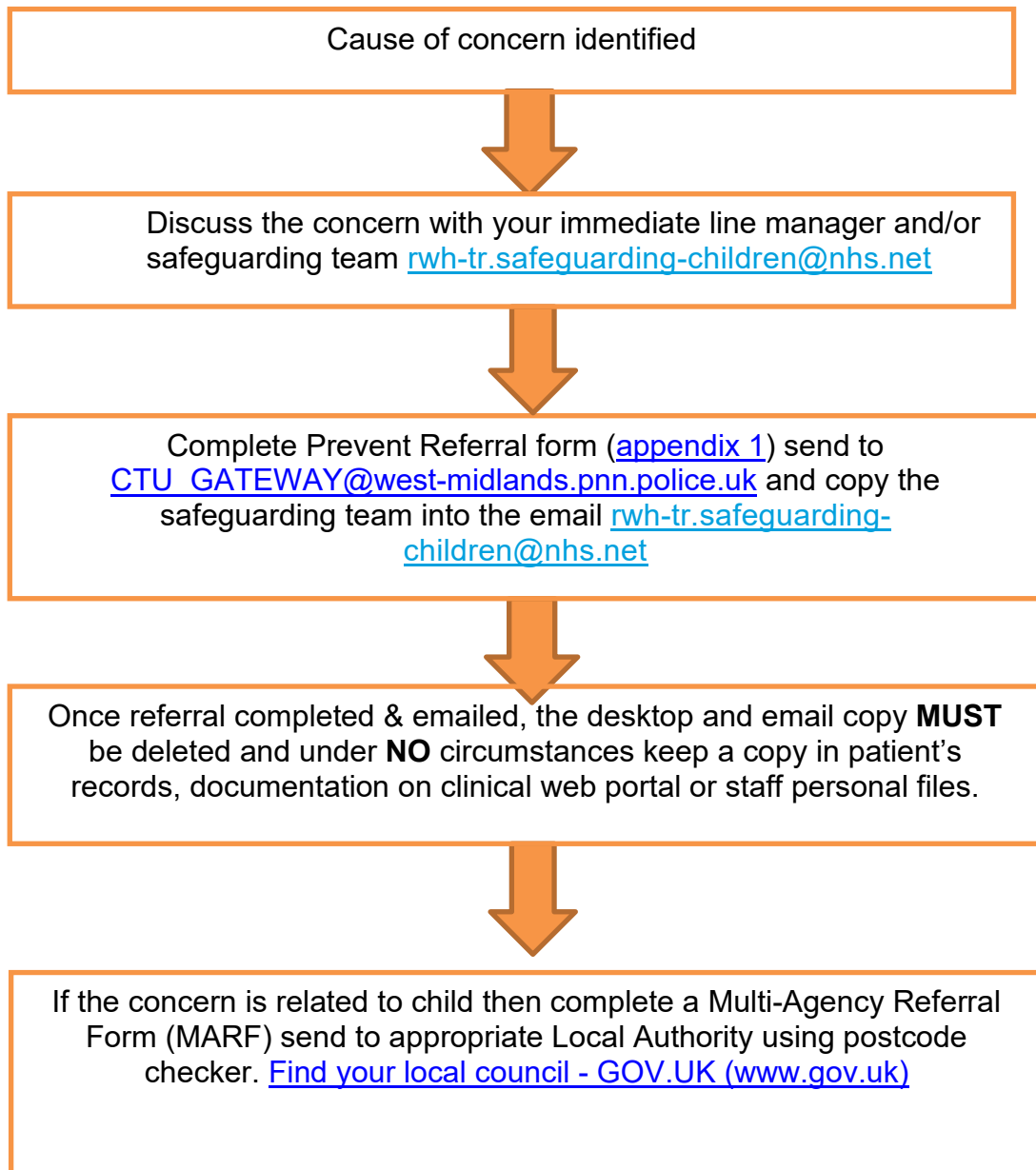
Information you provide is valuable and will always be assessed. If there is no Prevent concern but other safeguarding issues are present, this information will be sent out to the relevant team or agency to provide the correct support for the person concerned.

The Home Office and Counter-Terrorism Policing regularly conduct research in order to continuously improve the delivery of Prevent, and may contact you to invite you to participate in such research.

Tick this box if you **do not** wish to be contacted for research-related purposes.

Appendix 2

Referral for Channel



If your concern is of an urgent nature then please contact 999