

**BARNSELY CLINICAL COMMISSIONING GROUP
PREVENT POLICY**

Version:	V1
Approved By:	Q&PSC
Date Approved:	25 April 2019
Name of originator/author:	S MacGillivray
Name of responsible committee/individual:	QPSC
Name of executive lead:	Chief Nurse
Date issued:	25 April 2019
Review Date:	April 2022
Target Audience:	All employees of the organisation

THIS POLICY HAS BEEN SUBJECT TO AN INITIAL EQUALITY IMPACT ASSESSMENT

Amendment Log

Version No	Type of Change	Date	Description of change
V0.2	Review and update	15.04.2019	Reviewed and revised to comply with the requirements of the Barnsley CCG Policy on Policies. Copy of Basic Prevent Awareness leaflet removed as this is updated annually. Copy of NHS England Training and Competencies Framework replaced with hyper link to updated framework. Local referral procedure included in policy. Appendix added to provide information on and links to available training. Appendix added to provide additional clarity in respect of Prevent related contract and performance management.

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1. Introduction

- 1.1 Within the Home Office of Central Government, the Office for Security and Counter Terrorism (OSCT) is responsible for providing strategic direction and governance on Contest.
- 1.2 Contest is the UK Government's strategy for counter-terrorism; as part of Contest, the aim of Prevent is to stop people becoming terrorists or supporting terrorism.
- 1.3 Contest 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.
- 1.4 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.

2. Purpose and Scope

- 2.1 This policy outlines NHS Barnsley Clinical Commissioning Group's (CCG) approach to supporting the national Prevent Strategy.
- 2.2 The CCG has a responsibility to ensure that it makes arrangements to safeguard and promote the welfare of young people and to protect adults at risk from abuse or neglect. NHS England (NHSE) has advised that Prevent be incorporated into safeguarding arrangements to ensure that Prevent awareness and other relevant training is delivered to all staff in commissioned health services that provide services to NHS patients.
- 2.3 Preventing adults at risk from becoming a terrorist or supporting terrorism is no different from other forms of safeguarding activity and so this policy should be read in conjunction with the CCG's Safeguarding People Policy and the Safeguarding Adults Safeguarding Principles for South Yorkshire
<https://www.barnsley.gov.uk/media/10469/sy-safeguarding-adults-procedures.pdf>

3. The risks of not having this policy in place

3.1 If this policy is not in place and implemented, the CCG:

- May not meet its statutory and regulatory requirements
- May undermine the CCG's Safeguarding People Policy
- May not have effective systems and processes in place to ensure that the services it commissions meet their responsibilities in respect of Prevent
- May suffer reputational harm

4. Definitions

The following terms are used in this policy and its appendices:

Terminology	Explanation
Contest	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.
Prevent Strategy	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.
Channel	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: <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	Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
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 Terrorism Act 2006.

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.
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5. Roles and Responsibilities

Role	Responsibility
Chief Officer	The Chief Officer has responsibility for the CCG in meeting the requirements of and for implementing guidance issued by HM Government contained within the Counter Terrorism and Security Act 2015.
CCG Prevent Lead (Designated Nurse Safeguarding Adults)	Implementation, monitoring and review of the Prevent strategy, delivery plan and policy documents on behalf of the CCG. Providing support and advice on Prevent concerns raised by staff. Implementing, monitoring, reviewing and ensuring access to the training provided within the CCG, ensuring it meets the required national competencies. Ensuring engagement and attendance at the Barnsley Channel Panel. Ensuring engagement and attendance at the Barnsley Silver Prevent Meeting. Ensuring engagement at regional and national Prevent Forums. Monitoring the compliance with the Prevent Strategy of commissioned service providers.
Contract and Performance Management staff.	Provide oversight and performance management regarding implementation of the Prevent Strategy within commissioned provider organisations. Further detail can be found at Appendix B.
All staff	Reporting Prevent related concerns to the Prevent lead. Keeping themselves informed and up to date about changes to Prevent policy and procedural documents. Ensuring they have undertaken Prevent training at the appropriate level for their role as detailed within the NHS England Prevent Training and Competencies Framework (2017).

6. Training

- 6.1 All staff are to be made aware of the Prevent Strategy and how this is being implemented within the CCG.

- 6.2 All staff will have access to training as described in the NHS England Prevent Training and Competencies Framework (2017). This can be found at <https://www.england.nhs.uk/publication/prevent-training-and-competencies-framework/>
- 6.3 All Prevent training will be linked to adult and child safeguarding training. Appendix A summarises training that is currently available in addition to the annually updated Barnsley CCG Prevent awareness leaflet.

7. Procedure

- 7.1 If a member of staff has concerns that a member of the public, or another member of staff, has been or is in the process of being radicalised, then the CCG Prevent lead must be contacted.
The CCG Prevent Lead will discuss concerns, give advice accordingly and support staff in making a referral following local pathways. The Barnsley Prevent and Channel Referral Guidance can be found at: <https://www.barnsley.gov.uk/services/children-families-and-education/safeguarding-families-in-barnsley/safeguarding-adults-in-barnsley/for-professionals-and-volunteers/>
- 7.2 If the Prevent Lead is unavailable, advice can be taken from the Local Authority Cohesion and Prevent Officer, telephone: 01226 787 733 or 07753 430 369.
- 7.3 As with any other safeguarding concern, if a staff member suspects imminent or actual harm to an individual or individuals they must report their concern as a matter of urgency by dialling 999 or the Anti-terrorist hotline on 0800 789 321. A Text-phone facility for people who are deaf or who have hearing difficulties is available on 0800 0324 539.

8. Monitoring the compliance and effectiveness of this policy

- 8.1 The CCG Prevent Lead will ensure that a process is in place to monitor the compliance and effectiveness of this policy. This will include a review of Prevent referrals undertaken in collaboration with the Local Authority Cohesion and Prevent Officer and monitoring of compliance with training requirements.

9. References

- 9.1 Counter - terrorism Strategy (CONTEST). 2018. Home Office.
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

Prevent Strategy. 2011. Home Office.
<https://www.gov.uk/government/publications/prevent-strategy-2011>

Channel Guidance. 2015. Home Office.
<https://www.gov.uk/government/publications/channel-guidance>

Counter – terrorism and Border Security Act. 2019

<https://services.parliament.uk/bills/2017-19/counterterrorismdbordersecurity.html>

Prevent Duty Guidance. 2016. Home Office.

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

Prevent Training and Competencies Framework. 2017. NHS England.

<https://www.england.nhs.uk/publication/prevent-training-and-competencies-framework/>

10. Review of this policy

- 10.1 This policy will be reviewed 3 years from the date of approval or sooner if there is a requirement to meet legal, statutory or good practice standards.

Summary of Training Available as at April 2019.

Level 1 and 2 Training:

E-Learning (e-learning for healthcare) Preventing Radicalisation Level 1 and 2: <https://portal.e-lfh.org.uk/Component/Details/459770>

E-Learning Basic Prevent Training: <https://www.elearning.prevent.homeoffice.gov.uk/>

Police Channel Panel awareness: http://course.ncalt.com/Channel_General_Awareness/01/index.html

All of these links and further published documentation for Prevent can be found at <https://www.england.nhs.uk/ourwork/safeguarding/our-work/prevent/>

Level 3 Training:

Face to Face Workshop to Raise Awareness of Prevent: Led by organisational Prevent trainers (currently Barnsley CCG have an agreement by which CCG staff attend this training delivered by Barnsley Hospital NHS Foundation Trust).

E-Learning (e-learning for healthcare) Preventing Radicalisation Level 3: <https://portal.e-lfh.org.uk/Component/Details/511790>

E-Learning Mental Health Prevent Training: <https://www.elearning.prevent.homeoffice.gov.uk/mentalhealth>

To access the e-LFH packages

Preventing Radicalisation Level 3 session and e-Assessment is now live on the e-LfH Hub within the Statutory and Mandatory Programme. The actual sessions are on the e-LfH Hub - <https://portal.e-lfh.org.uk/Component/Details/511790> - you will need to login/register to access them.

The AICC links are below and are for organisations to load onto their systems .

https://portal.e-lfh.org.uk/AICC/InitialiseRelay?CONTENT_URL=/AICC_Content/SMC17_01_019

https://portal.e-lfh.org.uk/AICC/InitialiseRelay?CONTENT_URL=/AICC_Content/SMC17_02_019

Contract and Performance Management in Relation to Prevent.

As commissioners of services NHS Trust and Foundation Trusts named in the PREVENT duty and contract holders of a number of health organisations utilising the NHS Standard Contract, the CCG has a responsibility to provide oversight and performance management regarding implementation of the PREVENT duty within provide organisations.

Key considerations for monitoring provider performance include:

- Are organisations meeting the training requirements as laid out in the Prevent Training and Competencies Framework
- Do providers have policies and procedures in place?
- Are providers identifying PREVENT concerns and making CHANNEL referrals?
- Are providers engaging with CHANNEL Panel when relevant?

This is achieved by Prevent Lead ensuring:

- Quarterly submission of prevent returns to NHS England and CCG by their provider trusts.
- Monitoring of training compliance and ensuring is linked to adult and child safeguarding training and competencies.
- Monitoring attendance at Prevent boards and Channel panels.
- CCG prevent lead reporting quarterly to committees and to Governing Body within the annual report and escalating any issues by exception.

Equality Impact Assessment (template)

Title of policy or service:	Barnsley clinical commissioning group Prevent Policy	
Name and role of officer/s completing the assessment:	S MacGillivray – Head of Quality and Patient Safety	
Date of assessment:	15 th April 2019	
Type of EIA completed:	Initial EIA ‘Screening’ ✓ or ‘Full’ EIA process	<i>(select one option) Initial</i>

1. Outline	
Give a brief summary of your policy or service	This policy sets out clear standards and requirements for NHS Barnsley Clinical Commissioning Group in relation to the Statutory PREVENT Duty. It describes roles and responsibilities and provides guidance on local referral routes.
What Outcomes do you want to achieve	The organisation meets governance and standards required relating to the Governments Counter – terrorism Strategy (CONTEST).
Give details of evidence, data or research used to inform the analysis of impact	The policy is based on national and local policies, acts of parliament and guidance.

Give details of all consultation and engagement activities used to inform the analysis of impact	Nil
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Identifying impact:

- **Positive Impact:** will actively promote the standards and values of the CCG.
- **Neutral Impact:** where there are no notable consequences for any group;
- **Negative Impact:** negative or adverse impact: causes or fails to mitigate unacceptable behaviour. If such an impact is identified, the EIA should ensure, that as far as possible, it is eliminated, minimised or counter balanced by other measures. This may result in a 'full' EIA process.

2. Gathering of Information					
This is the core of the analysis; what information do you have that might <i>impact on protected groups, with consideration of the General Equality Duty.</i>					
(Please complete each area)	What key impact have you identified?			For impact identified (either positive or negative) give details below:	
	Positive Impact	Neutral impact	Negative impact	How does this impact and what action, if any, do you need to take to address these issues?	What difference will this make?
Human Rights	<input type="checkbox"/>	✓	<input type="checkbox"/>		
Age	<input type="checkbox"/>	✓	<input type="checkbox"/>		
Carers	<input type="checkbox"/>	✓	<input type="checkbox"/>		
Disability	<input type="checkbox"/>	✓	<input type="checkbox"/>		
Sex	<input type="checkbox"/>	✓	<input type="checkbox"/>		
Race	<input type="checkbox"/>	✓	<input type="checkbox"/>		

Religion or belief	Yes	✓	<input type="checkbox"/>		
Sexual orientation	Yes	✓	<input type="checkbox"/>		
Gender reassignment	Yes	✓	<input type="checkbox"/>		
Pregnancy and maternity	Yes	✓	<input type="checkbox"/>		
Marriage and civil partnership (only eliminating discrimination)	Yes	✓	<input type="checkbox"/>		
Other relevant groups	Yes	✓	<input type="checkbox"/>		
HR Policies only: Part or Fixed term staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		


IMPORTANT NOTE: If any of the above results in 'negative' impact, a 'full' EIA which covers a more in depth analysis on areas/groups impacted must be considered and may need to be carried out.

Having detailed the actions you need to take please transfer them to the action plan below.

3. Action plan				
Issues/impact identified	Actions required	How will you measure impact/progress	Timescale	Officer responsible

4. Monitoring, Review and Publication				
When will the proposal be reviewed and by whom?	Lead / Reviewing Officer:	Designated Nurse Safeguarding Adults / CCG Prevent Lead.	Date of next Review:	15.04.2022

Once completed, this form **must** be emailed to the Equality Lead barnsleyccg.equality@nhs.net for sign off:

<p>Equality Lead signature:</p> <p>Date: 30.04.2019</p>	
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