

## Prevent Policy

<b>Prevent Policy</b>	
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# 1. Introduction

- 1.1 This policy is primarily to outline how the Lincolnshire Integrated Care Board (LICB) supports, coordinates, and provides strategic assurance regarding the delivery of the statutory Prevent duty across the Integrated Care System (ICS).

The policy will also outline how the Integrated Care Board (ICB) will deliver elements of the Prevent duty, which are not statutory for the ICB itself, but demonstrate good practice and leadership by the ICB. The intention is to provide a framework to support the relevant local specified authorities to evidence that they are paying due regard to the duty.

It is the role of the ICB to have strategic oversight and coordination functions with regards to the delivery of the Prevent duty by specified authorities, service providers commissioned on Standard NHS Contracts and other local health providers or services. It is not responsible for ensuring providers that are specified authorities are paying due regard to stopping individuals from being drawn into terrorism. That responsibility lies with the individual specified authorities.

## 2. Purpose

- 2.1 Prevent Statutory Duty issued under section 29 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 guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty [Prevent duty: core standards for healthcare commissioners and providers - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/prevent-duty-core-standards-for-healthcare-commissioners-and-providers).
- 2.2 The purpose of this policy is to provide a framework for implementation of the Government PREVENT Strategy, and the required action to be taken by LICB staff in the event of any concerns about the potential risk to staff and vulnerable service users/carers/families being drawn into extremist activities.
- 2.3 This guidance will ensure that LICB staff are aware of how to safeguard and support vulnerable individuals, whether staff or service users, who they feel may be at risk of being radicalised by extremists.
- 2.4 Ensure appropriate systems are in place within the LICB for staff to raise concerns if they think this form of exploitation is taking place.
- 2.5 Promote and operate safe environments where extremists are unable to operate.

## 3. Scope

- 3.1 This policy applies to all staff working or volunteering within the LICB. The Prevent Duty is applicable to all services commissioned by the ICB. It is applicable to all ICB staff temporary or permanent including agency staff and volunteers.
- 3.2 All employees of the ICB have an individual responsibility for the protection and safeguarding of children, young people, and adults at risk of being drawn in to

extremism.

- 3.3 All managers must ensure that their staff are aware of this policy and know how to access it.
- 3.4 Managers should also ensure the implementation of the policy in accordance with their line of responsibility and accountability.

## 4. Definitions

- 4.1 The need for all specified authorities to evidence that they are paying due regard to the statutory duty placed on all specified authorities, is defined by the Counter-Terrorism & Security Act 2015 (CTSA, 2015), which mandates that all specified authorities have “due regard to the need to prevent people from being drawn into terrorism”, (Section. 26, CTSA 2015). These procedures, practices and processes are based on the CONTEST Strategy 2023, the statutory Prevent Duty Guidance 2023, the Channel Guidance 2023, and the Home Office Benchmarking Tool.

[Prevent duty guidance 2023](#)  
[Prevent duty guidance: Local authority toolkit](#)  
[Channel Duty Guidance: Protecting people susceptible to radicalisation](#)  
[Prevent duty: guidance for healthcare professionals - GOV.UK](#)

- 4.2 **What is PREVENT?** – The Office for Security and Counter Terrorism (OSCT) in the Home Office is responsible for providing strategic direction and governance on CONTEST. PREVENT is one of the 4 key principles of the CONTEST strategy, which aims to stop people becoming terrorists or supporting terrorism. CONTEST, which is primarily organised around four key principles / 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

- 4.3 The ICB is a key partner in the PREVENT principle of this strategy in line with all parts of the NHS, charitable organisations and private sector bodies which deliver health services to NHS patients. It refers to anyone (staff, patients or visitors).
- 4.4 The objectives of Prevent are:
  - tackling the ideological causes of terrorism
  - early intervention to support people susceptible to radicalisation
  - enabling people who have already engaged in terrorism to disengage and rehabilitate.

Term	Definition
Extremism	Extremism is 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. We also include in our definition of extremism calls for the death of

	members of our armed forces, whether in this country or overseas.
Radicalisation	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. The current UK definition of terrorism is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
Government PREVENT strategy	Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views. Provides practical help to prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support. Works with a wide range of institutions (including education, statutory services charities, online and health) where there are risks of radicalisation that we need to deal with.
Prevent Duty	The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. Prevent work also extends to supporting the rehabilitation and disengagement of those already involved in terrorism.
Children and Young People	“Every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier” (Article 1, Convention on the Rights of the Child, 1989).  “A child is defined as anyone who has not yet reached their 18th birthday” (Working together To Safeguard Children; HM Government 2013).
Adult at risk	“Has needs for care and support (whether or not the authority is meeting any of those needs),  b) is experiencing, or is at risk of, abuse or neglect, and  c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

## 5. Roles and Responsibilities

5.1 The roles and functions of the LICB are indicated below. Please note that The CTSA 2015 directs that all NHS Trusts and Foundation Trusts are designated as **specified authorities** and have a statutory responsibility in relation to the Prevent Duty

### 5.2 LICB Chief Nurse

The role will, on behalf of the ICB board, have oversight of this policy and to be responsible for the governance of this policy, to coordinate the resolution of any relevant issues regarding the statutory delivery of Prevent by relevant NHS Trusts, Foundation Trusts and the contractual delivery of Prevent by any health providers commissioned by the ICB delivered under the Standard NHS Contract. This role will be the strategic lead for Prevent for the ICB and is responsible for providing assurance at board level and will ensure that all governance reporting processes are adhered to.

### 5.3 Operational Prevent Lead

The DRAFT NHS Safeguarding Prevent Duty Protocol for Integrated Care Boards, (NHS England April 2024) states that all ICB organisations will have an Operational Prevent Lead responsible for delivery of the Prevent agenda including:

- A clear understanding of their leadership role within the organisation and to any locally managed contracts as needed.
- Work with their wider healthcare partners across their partnership geography to support the development of a community of practice for Prevent, supporting key partners to come together to develop shared understanding of roles and responsibilities, accountability, skills development, threat management, risk and issues oversight.
- Attending and contributing to their respective Prevent Partnership Board at the Community Safety Partnership Level.
- Attending and contributing to their respective CONTEST boards.
- Responsive to Channel requests and Channel panels, and work with multi-agency partners to respond to threats, risks and issues as required. They will ensure there are effective mechanisms in place for sharing/storing and managing information.
- Identify a clear line of accountability to their ICB Board to enable notification of high-risk issues and escalation of concerns the Prevent Steering Group to support the Prevent delivery plan with system partners including the Local Authority Prevent Leads and Home Office Regional Advisors.

### 5.4 All ICB Staff

5.4.1 The duties contained within this policy apply to contracted, substantive, temporary, seconded and volunteer staff. All members of staff have a duty and a personal responsibility to share concerns of a safeguarding nature in relation to children and adults. All members of staff have responsibility for raising any concerns relating to PREVENT standards and reporting these through the PREVENT governance reporting.

5.4.2 To seek advice and support from the LICB safeguarding team via [licb.safeguarding1@nhs.net](mailto:licb.safeguarding1@nhs.net) of any related incident reported and submission of a referral for all cases identified if agreed by the ICB operational lead.

5.4.3 Notify Human Resources of any staff related incident and follow advice given by them. Ensure full confidentiality and sensitivity is maintained during the reporting, investigation and management of any Prevent related incidents in line with the Standards of Business Conduct Policy.

5.4.4 Seek advice and support from their line manager (in the first instance) of any on-going support /training required following any incident reported.

5.4.5 Document actions taken using the appropriate safeguarding process.

5.4.6 Contribute to discussions following any live event or complex incident to support positive review and reflect cases in order for any lessons to be learnt and/or improvements to be made.

## 6. Body of Policy

6.1 The ICB will provide the coordination role in terms of the health-related specified authorities within the ICS and all service providers contracted on the Standard NHS Contract. The ICB support the delivery of Prevent within the ICS by:

### 6.2 Understanding Risk

The ICB and NHS health providers will attend the annual local Counter Terrorism Local Profile (CTLP) briefing to understand the local Counter Terrorist (CT) threat and risk and will monitor the local threat and risk perspective by receiving the updated local CT threat/risk delivered by the local CT policing at each partnership meeting.

The ICB will ensure the ICB Executive Prevent lead is briefed, as well as appropriate representatives from local health specified authorities.

6.2.1 The ICB will support the local partnerships in producing a local Situational Risk assessment that identifies and agrees the local Prevent priorities on an annual basis based on the partnership's risk assessment.

6.2.2 Following the production of the Situational Assessment the ICB Operational Lead will assess, based on the local threat/risk, if any additional engagement is required with local health providers/services that are not specified authorities to encourage and support them to take proportionate and appropriate actions that will support mitigating against the local CT threat/risk in terms of the Prevent strategy.

6.2.3 The ICB will ensure that at least one of their safeguarding team is appropriately security vetted to receive relevant sensitive material from CTLP or other local partners.

### 6.3 Prevent Steering Group

The ICB will represent the ICB and ICS organisations at the local Prevent Steering Group that has representation from all local Prevent multi-agency partners that develop the Prevent delivery plan.

The ICB will provide to the group, at least annually, appropriate information to assure the local partnership how health related specified authorities are paying due regard to the duty. The ICB Operational Lead will provide such assurance to the ICB Exec Prevent lead and leadership team.

6.4 The ICB's Prevent Workstream arrangements will ensure that all health providers are routinely updated of local threat and risk, aware of the Prevent Partnership Plan, especially any actions which require the contribution of local health providers and assure them that they have the opportunity to raise any relevant issues regarding Prevent delivery or local information via the ICB Operational Lead at these meetings.

### 6.5 Referral Pathway

The ICB will promote the local Prevent referral pathway with health providers within the ICS and encourage providers to have the pathway within relevant local policies or guidance and on appropriate websites for staff to access.

6.5.1 All ICB staff should follow the following principles:

If you have concerns about any of your friends, neighbours or relatives, you can tell the Police by clicking 'Make a referral' below to complete their quick and simple online form: [Prevent | Lincolnshire Police](#)

You can also call the national police Prevent advice line [0800 011 3764](tel:0800 011 3764), in confidence, to share your concerns with their specially trained officers or contact them on: [ctp-em-prevent-referral@lincs.police.uk](mailto:ctp-em-prevent-referral@lincs.police.uk)

If it's an emergency, please call [999](tel:999).

If you see online material promoting terrorism or extremism, you can [report it online](#).

## **6.6 Channel Panel**

The ICB Operational Lead will support the Channel Chair for the Channel Panel held within the ICB area to ensure appropriate representation from relevant local health organisations attends each Channel Panel.

The ICB Operational Lead will support the Channel Chair to obtain relevant support and information from providers within the ICB. The ICB will support the Channel Chair and local providers to ensure that any personal data shared is done so in compliance with relevant data protection legislation.

The ICB Operational Lead will support the Channel Chair in resolving any issues regarding attendance by health representative/professionals at Channel or information/support provided to Channel.

## **6.7 Engagement and Communications**

The ICB Operational Lead will support the local Prevent Steering Group in delivering their engagement and communication strategy for Prevent.

Utilising the Prevent Steering Group arrangements the ICB will encourage all providers/services to update their staff, at least annually (ideally after the latest Situational Assessment has been produced), on the current local threat and risk.

The ICB will encourage all local health specified authorities and other relevant local health providers/services to provide assurances via the Prevent Steering Group arrangements that they reviewed any relevant website or policies that the information within them relating to Prevent is current and up to date.

Using the same arrangements, the ICB and all local providers should routinely review any relevant planned communication or engagement activities to assess if Prevent could be incorporated.

## **6.8 Strategic Assurance**

The ICB will provide relevant reports and information that provides appropriate assurances at a strategic level that the local health specified authorities and other relevant local providers/services are paying due regard to ensuring that individuals are not being drawn into terrorism. These reports will be shared at the Operational Quality Assurance Group and the ICB Executive Lead.

The ICB will seek to gain appropriate assurances from local health specified authorities and other local health providers/services that they have, at least annually, provide an assurance report to their respective exec team with regards to their compliance with the Prevent duty.

The Safeguarding Performance Framework (Safeguarding Dashboard) is an ICB contractual requirement for NHS Providers. The Prevent Indicators will be analysed, and exceptions reported via the ICB's internal governance processes. Local contracts should include quality checks, to ensure provider staff are appropriately trained and are considering Prevent alongside other safeguarding considerations.

Assurances should also be sought that if any issues for development have been identified that an appropriate action plan is in place and is being monitored by the relevant provider Prevent Lead.

If the ICB is not assured that a health specified authority is paying due regard to the Prevent duty it will support the Prevent lead within that Trust to address the areas in which it is felt the Trust is not paying due regard. The ICB Operational Lead should, if necessary, seek the support of NHSE, the local Prevent Partnership Group, local CT police and/or the local Home Office Prevent Advisor to ensure that the Trust is paying due regard to the duty at the earliest opportunity.

The ICB Operational Lead will ensure that the regional Safeguarding Team for NHSE are provided with appropriate assurances regarding the delivery of Prevent within the ICS.

The ICB Operational Lead will ensure that Prevent is appropriately referenced or incorporated into other relevant policies, guidance or practices within its own organisation.

They will encourage all local health specified authorities and other relevant local health providers/services to ensure that Prevent is appropriately referenced or incorporated into other relevant policies, guidance or practices within its own organisation. The ICB should seek, at least annually, assurances from relevant provider/service leads that all such policies, guidelines and practices have been reviewed to ensure any references to Prevent are still current and relevant.

## **6.9 Information Sharing**

The ICB Operational Lead will support provider leads to promote that Data sharing is an explicit professional standard requirement to protect people from exploitation and violence, and it is a statutory requirement when it relates to children. Also, they will promote good practice in adherence to Data Protection Legislation, whilst acknowledging the need to share patient level data to safeguard patients where both necessary and proportionate to do so as enabled by the legislation

The ICB will identify how specific Prevent concerns with the ICB will be documented/recorded/stored.

The ICB Operational Lead will ensure that appropriate local information protocols and Data Sharing Agreements are in place, and they will support provider leads to ensure that they know how to get advice and support on confidentiality, information sharing and data protection legislation relevant to the Prevent duty.

The NHS has produced guidance that provides help to healthcare staff that are involved in information sharing and information governance for the purposes of safeguarding people from radicalisation. The General Medical Council (GMC) has also produced advice on Confidentiality in handling patient information, which is another tool the ICB Lead can encourage provider leads to access, if they have concerns regarding data sharing.

[Prevent and the Channel process in the NHS: information sharing and governance](#)

## [GMC- Confidentiality-good-practice-in-handling-patient-information](#)

The ICB will support CT Police in addressing any concerns they may have regarding information sharing regarding individuals referred into Prevent as being potentially susceptible to radicalisation.

## 7. Communication, Monitoring and Review

This policy will be reviewed every three years. It will be the responsibility of the ICB Safeguarding Governance Group to:

- 6.1 Identify a suitable reviewer.
- 6.2 Ensure that the review is conducted.
- 6.3 Ensure that required changes are made.

Changes may be required due to legislation, national or local guidance, findings of Safeguarding Adult Reviews, recommendations of audits or from other sources.

## 8. Staff Training

- 8.1 The ICB Operational Lead will monitor and assess the training data submitted by local NHS Trusts and Foundation trusts to ensure local health specified authorities have proportionate and appropriate training plans based on a robust training needs analysis, which complies with the current intercollegiate guidance. This plan should be proportionate and appropriate for the local threat/risk. They will also monitor the level of training using the same data returns.

The ICB Operational Lead will seek similar assurances from appropriate local providers/services within the ICB area regarding their training plan and training levels.

The ICB Operational Lead will provide, at least annually, relevant information to the partnership to group to provide assurance of the training levels within the ICB. They will provide such assurances to the Exec Prevent lead for the ICB.

The ICB Operational Lead will encourage local providers to engage in local or more focused Prevent training, if it is felt that such additional training is required in terms of the local threat/risk.

The ICB will support ICS providers/services that are not specified authorities in accessing any additional Prevent training that is not provided by the NHS.

- 8.2 The ICB will have a Prevent training plan that reflects the current intercollegiate guidance to ensure relevant staff are appropriately trained regarding the Prevent duty.

The ICB Operational Lead will, at least annually, update ICB staff regarding the current local CT threat/risks with regards to Prevent.

## 9. Equality and Diversity Statement

- 9.1 In applying this policy and procedure, managers, employees, workers and their representatives will have regard to the Equality Act 2010 – public sector duty for the principles and requirements of the Lincolnshire ICB Equality and Diversity Strategy. The organisation is committed to equality, diversity and human rights; accordingly, the implementation of this policy and its impact will be monitored across all equality protected characteristic strands and reported regularly to the appropriate Lincolnshire ICB Board.
- 9.2 Managers will not discriminate in the application of this policy and procedure in respect of age, disability, race, ethnic or national origin, gender, religion, beliefs, sexual orientation, marital/partnership status, social and employment status, gender identification, language, trade union membership or mental health status.

## 10. Interaction with other Policies

- 10.1 Safeguarding Adults Policy  
 Safeguarding Childrens Policy  
 Mental Capacity Act Policy  
 Equality, Diversity and Inclusion Policy  
 ICB Corporate 001 – Standards of Business Conduct Policy

## 11. References

The updated [Prevent duty: guidance for healthcare professionals - GOV.UK \(www.gov.uk\)](http://www.gov.uk), including new information on Prevent duty training within the NHS

The new [Prevent duty: core standards for healthcare commissioners and providers - GOV.UK \(www.gov.uk\)](http://www.gov.uk), which provides practical information to support commissioners and providers of NHS healthcare in their work to protect people who are vulnerable and/or susceptible to radicalisation.

Existing guidance on [Prevent and the Channel process in the NHS: information sharing and governance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Existing guidance on [NHS Prevent training and competencies framework - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Counter Terrorism and Security Act 2015 specifically schedule 6 [Counter-Terrorism and Security Act 2015](http://www.gov.uk)

## 12. Glossary

ICB	Integrated Care Board
LICB	Lincolnshire Integrated Care Board
ICS	Integrated Care Systems
CTSA	County Terrorism and Security Act
CT	Counter Terrorist
CTLP	Counter Terrorism Local Profile
TACT	Terrorism Act
LSAB	Lincolnshire Safeguarding Adults Board

LSCP	Lincolnshire Safeguarding Children Partnership Board
SGM	Safeguarding Governance Meeting
GMC	General Medical Council

## Appendix A

Equality Impact Assessment and Quality Impact Assessment



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