

# Prevent Duty OPCC Standard Operating Model

Owner	Polly Reed, Chief Executive
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<b>Equality Analysis</b>	Low

# 1. Purpose

This document outlines the standard operating model undertaken by the Office of the Police and Crime Commissioner for Warwickshire (OPCC) to ensure that it is complying with the statutory duty under <a href="Section 26 Counter-Terrorism & Security Act 2015">Section 26 Counter-Terrorism & Security Act 2015</a> (CTSA 2015), which sets out that specified authorities, "must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism" (the 'Prevent duty').

The guidance set out in this document is based on the <u>Counter-Terrorism Strategy</u> (<u>CONTEST</u>) 2023, the statutory <u>Prevent Duty Guidance 2023</u>, the <u>Channel Guidance 2023</u>, and benchmarks set out in the <u>Home Office Prevent Duty Toolkit</u>.

CONTEST's overarching aim remains to reduce the risk to the United Kingdom and its citizens and interests overseas from terrorism, so that our people can go about their lives freely and with confidence.

The model of delivery will be reviewed annually or as soon as possible after the publication of any revised or new national guidance that relates to the Prevent duty.

# 2. 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.

The objectives of Prevent are:

- tackling the ideological causes of terrorism
- intervening early to support people susceptible to radicalisation
- enabling people who have already engaged in terrorism to disengage and rehabilitate

The categories of Specified Authorities subject to the Prevent duty are set out in <u>Schedule 6 CTSA 2023</u> and are as follows:

- 1. Local Government (including County and Borough/District Councils)
- 2. Criminal Justice (including Prisons, Young Offender Institutes, Secure Colleges, and Probation Services)
- 3. Education and Child Care (including Schools, Further Education, and Higher Education, nursery schools, and Care/Children's Homes)
- 4. Health and Social Care (including NHS Trusts and Foundation Trusts)
- 5. Police (including Police Forces, **Police and Crime Commissioners**, Police Authorities, and Mayoral Offices for Policing and Crime)

# 3. Strategic Themes

Whilst compliance with the Prevent duty will look different across each Specified Authority due to their different functions, structures and remits, there are a number of cross-cutting strategic themes, as follows:

## Leadership

- A designated person in a leadership position in each Specified Authority, who
  is responsible for overseeing Prevent delivery, including ensuring that relevant
  staff have appropriate training and induction demonstrated by:
  - ensuring staff understand the risk of radicalisation that results in support for terrorism or involvement in terrorism by making sure they can access training resources and further guidance.
  - building and promoting the capabilities to deal with radicalisation concerns, such as a formal pathway to escalate concerns and refer through to Prevent.
  - promoting the importance of Prevent and the role staff play in countering terrorism.

## **Partnership Working**

- An effective partnership as a key component of delivery
- Specified authorities working together, in particular with local Prevent leads and coordinators, the police, and local authorities; facilitated through multiagency forums, such as local, regional or national strategic Prevent boards.
- Specified authorities co-operating as far as reasonably practicable with local authority-led Channel panels in relation to adopted Prevent referrals.

## **Capabilities**

 Specified authorities developing and maintaining appropriate capabilities to have due regard to the need to prevent people from being radicalised into terrorism; including the capability to:

#### a) Understand risk

Including ensuring that all staff involved in the implementation of this duty (in particular frontline staff) receive training appropriate to their role, understand radicalisation and the signs that individuals are being drawn into terrorism, and know how to make a referral,

### b) Manage risk

Including engaging with partners to conduct a risk assessment that builds an understanding of threats and risks, helps to tailor approaches, and underpins risk management.

## c) Share information

Including the lawful sharing of personal data on a case-by-case basis, as set out through a local Information Sharing Agreement, and in compliance with the requirements of data protection legislation. For example, to ensure that a person at risk of radicalisation is given appropriate support, such as on the Channel programme.

# 4. Compliance

The following sections set out the activity that the OPCC will undertake in order to ensure our delivery of Prevent is compliant with the activities, practices and processes outlined in the eight sections of the Home Office Prevent Toolkit. This includes both the partnership element of our obligations under the duty, as well the specific guidance relating to the police sector as detailed in the Prevent duty guidance. These activities will ensure the OPCC is effectively contributing to the delivery of a proportionate and effective response to the local Prevent risks in Warwickshire.

## 1. Multi-agency partnership group

The Prevent Duty places an obligation on all specified authorities to work in partnership and demonstrate evidence of productive co-operation. Local Authorities have an additional obligation to drive partnership working and ensure that there is multi-agency forum to which all specified authorities are invited to attend, so they have the opportunity to participate.

In Warwickshire, specified agencies have established a single county-level Prevent Steering Group coordinated by a dedicated Prevent Officer, who is funded by the specified agencies and employed by Warwickshire County Council. The Prevent Steering Group takes a risk-based approach to the delivery of Prevent across the partnership and representatives from each sector/organisation sitting on the board are expected to actively contribute and support the workings of the group so that it can monitor and evaluate the impact of the Prevent Duty. This group has an agreed Terms of Reference, which will be reviewed at least annually.

The Prevent Steering Group will report at least annually to Safer Warwickshire Partnership Board (SWPB), which performs the functions of the County Strategy Group as required by the Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007, and will provide executive governance/oversight of the Prevent arrangements. The chair of the group and/or Prevent Officer will routinely attend SWPB and provide reports on the situational assessment, the action plan,

referral pathway, Channel panel, training, overall compliance and the level of engagement with key partners.

The PCC provides funding towards the costs of the dedicated Prevent Officer role.

The OPCC Head of Policy and Partnerships is the Prevent Lead for the OPCC.

The OPCC Head of Policy and Partnerships is a core member of Warwickshire's Prevent Steering Group and will ensure that the PCC, Deputy PCC and OPCC staff are routinely briefed on the work of the group and any impacts on local communities.

The PCC and OPCC Chief Executive both attend SWPB.

## 2. Local risk assessment process

In order to ensure a risk-based approach is undertaken in Warwickshire by the partnership, the OPCC will contribute to an annual risk assessment process for the county, which will produce its Situational Assessment. The purpose of the Situational Assessment is to review and assess the information available to the partnership that relates to the counter terrorism context in the area, which then enables local authorities and all local partners to effectively target activity to prevent terrorism, disrupt radicalising influences, and build resilience.

The document will outline what information has been reviewed and evaluated, and then identify and justify the key priorities the partnership will aim to address with their Prevent action. The level of activities carried out by the partnership will be dependent on the respective levels of threat, risks and vulnerabilities, and the resources available to deliver the requisite activities. The risk assessment will provide the basis on which the partnership can assess if their response is proportionate and appropriate.

The risk assessment will include the following minimum elements, and will be scheduled in order that a revised Situational Assessment can be produced and agreed before the start of each financial year it will be used to assess delivery.

#### **Minimum elements for the annual Risk Assessment:**

- Presentation of Warwickshire's Counter-Terrorism Local Profile (CTLP) to the Prevent Steering Group by Counter-Terrorism Policing West Midlands (CTPWM). This will provide an assessment of the threat of radicalising influences in the county, including the ideologies, group narratives, methodology (such as venues used) and potential targets for exploitation. It will assess the risk, including that radicalisation may take place and the harm it may cause.
- An assessment by the Prevent Steering Group of the corporate risk of not meeting the Prevent duty, reflected in the annual benchmarking assurance process conducted by the Home Office.

 Provision by all local partners of any other information they possess which may affect the local Prevent context.

The OPCC will actively participate in the development of the CTLP and will take part in a countywide partnership workshop during Q4 of each financial year, in which it will assist in identifying the key priorities/risks for the partnership based on the key considerations from the elements outlined above. The assessment will consider the relative level of threat and risk relating to Prevent within Warwickshire and the resources available to deliver actions to mitigate against those risks. The aim is to ensure that the local partnership delivers a proportionate and effective response to local Prevent risks/priorities to ensure vulnerable individuals are not drawn into terrorism or supporting it.

The Situational Assessment will be reviewed at each Prevent Steering Group meeting to ensure that any changes to the local Prevent context are assessed and if necessary, the Situational Assessment and supportive Action Plan are amended to reflect any significant change. This will be recorded and minuted at the Prevent Steering Group.

The Situational Assessment will be shared with the OPCC, who will consider any specific issues arising in relation to the Warwickshire area and share and promote the document within the organisation, in order that the priorities of the PCC outlined in the Police and Crime Plan are considered when assessing the delivery of the Prevent duty.

## 3. Partnership plan

Following the agreement of the Situational Assessment, the Prevent Steering Group will develop a multi-agency Prevent Partnership Plan, which will address the key priorities identified in the Situational assessment. The OPCC Prevent lead will review both the Situational Assessment and the Plan whilst it is being developed, so that they can ensure that they and the OPCC can appropriately contribute to any relevant actions for that sector/organisation. The OPCC can add actions to the plan that will address the agreed priorities.

The OPCC Prevent lead, who attends the Prevent Steering Group, will be responsible for ensuring that the action plan is appropriately shared within the OPCC. They will also be responsible for driving and monitoring activities related to any actions relevant to the OPCC and providing updates at meetings on progress against the plan. All actions will be specific to reducing the risk of radicalisation, they will be measurable, achievable, proportionate and timed.

## 4. Referral pathway

All local specified authorities in the partnership have agreed an appropriate referral pathway, which has been made available to all OPCC staff.

The OPCC will ensure that the referral pathway is understood by relevant staff, and will routinely review and assess referrals made by their organisation to ensure that they are in line with the local Prevent context.

The OPCC will review its workforce profile and ensure that staff/teams that are likely to make referrals can benefit from a higher level of Prevent training if necessary.

The Prevent Steering Group will seek appropriate assurances from the OPCC regarding the referral pathway being embedded within the organisation and that relevant staff have been identified and appropriately trained.

Referral data will be incorporated into the CTLP and will be reviewed as part of the risk-assessment. At each quarterly meeting referral data will be reviewed to assess if there needs to be action taken by the partnership/individual agencies to seek assurances that the referral pathway is effectively known by staff and/or a review of the training to programme to ensure it is still achieving the desired outcomes in terms of the level of understanding of Prevent by relevant staff.

## 5. Channel panel

As a specified authority the OPCC will be advised of the work of the Warwickshire Channel Panel, which is convened and managed by the Warwickshire County Council (WCC) and operates under an agreed Terms of Reference. Due to the nature of the OPCCs strategic role and responsibilities, it is not a member of the Channel Panel itself.

It is the responsibility of WCC to ensure that the local Channel process complies with the relevant Channel Panel Guidance produced by the Home Office, and that the Chair and Vice-Chair are both suitably experienced and skilled in safeguarding in a multi-agency environment and have received appropriate Channel training.

The Channel Panel Chair will update each Prevent Steering Group meeting with an overview of the current caseload, number of reviews completed, and any issues of concern identified by the Chair, Vice-Chair, Channel Panel or the Home Office's Channel Quality Lead. The Chair will also report to the Prevent Steering Group the outcome of the Annual Assurance Statement that the Home Office asks each area to complete annually. The OPCC will actively contribute to these processes.

## 6. Training programme

In order to identify individuals at risk of radicalisation, the OPCC will train its staff to know and recognise the signs or indicators that an individual may be vulnerable or susceptible to being drawn into terrorism or supporting it. It will also train appropriate staff so that they know how to make referral.

The OPCC will provide the Prevent Steering Group with appropriate assurances that it has a training plan for its respective workforce, which identifies what roles require Prevent training and at what level. Bespoke training is available via Warwickshire's Prevent Officer. The OPCC will also ensure that induction training for new staff also includes appropriate Prevent training available from <a href="https://www.gov.uk/guidance/prevent-duty-training">https://www.gov.uk/guidance/prevent-duty-training</a>.

The OPCC will maintain a record of the specific training different identified roles are receiving, including refresher training at appropriate intervals, and review this at least

annually to ensure it aligns with the priorities and risks identified in the Situational Assessment. This review will also take into account the referral data analysis and risk assessment review presented at each Prevent Steering Group.

The Prevent Steering Group will endeavour to ensure that the training provided by each sector/organisation provides the same outcomes and provides consistent and appropriate information and messaging regarding the Prevent duty. The consistent use of the Prevent Officer to facilitate/deliver Prevent training supports this aim.

## 7. Reducing permissive environments

Prevent seeks to tackle the ideological causes of terrorism by limiting exposure to radicalising narratives. This can be achieved by creating an environment where radicalising ideologies are challenged and are not permitted to flourish.

## **Disrupting permissive environments**

The Prevent Steering Group will review and assess the risk of such permissive environments being present with its communities as part of the annual risk assessment process and at each quarterly meeting via CTLP updates and briefings from the Home Office Prevent Advisor (HOPA) or CTPWM.

If issues are identified as part of these processes it will be the responsibility of the Prevent Steering Group to assess the risks and agree what action will be taken, including how those actions will be driven and delivered and by when. Where appropriate the OPCC will actively assist in supporting any required activity.

If any such issues are identified and require disruptive actions, then the HOPA will be informed and contact made with the Home Office Disruptions Team, so they can offer good practice or support in identifying appropriate and lawful actions that could be considered.

#### **Venue Hire**

The OPCC has a responsibility to ensure that any venues owned or leased by the PCC, and which can be hired by the public (including at no cost), have a suitable policy in place that ensures appropriate due diligence checks are undertaken to minimise the likelihood of radicalising influencers or groups being able to hire such premises. Where such venues are offered for hire there will be a robust booking system in place, with staff who manage the system being trained to know what to do should they have suspicions regarding any potential bookings.

#### **IT Policies**

The use of the internet is recognised as one of the greatest concerns facing Prevent, and the Prevent Steering Group encourages all partners or their representatives to ensure that at least annually they ensure that their IT firewalls and filters on their IT systems have been reviewed and are using the appropriate phrases and words as provided by the Counter Terrorism Internet Referral Unit. The OPCC utilises IT services, infrastructure and equipment provided by Warwickshire Police, and will

ensure that appropriate assurances are received from them in this regard and will record the evidence of this taking place. Details of this will be included by the OPCC in its annual assurance statement/report to the Prevent Board.

## **Contractors, Commissioning and Grant Awards**

The OPCC carries out suitable due diligence checks as part of its established processes to appoint contractors and commissioned services, and to award grants. As part of this the OPCC ensures that public funding is not used to commission individuals or organisations that are engaged in extremism or promoting extremist ideologies.

## 8. Communications and engagement

Any OPCC communications and engagement regarding Prevent will be delivered in a way that is both targeted towards, and proportionate to, the assessment of the local radicalisation risk. In addition, communications and engagement will focus on the most significant threats within Warwickshire (including ideology) and reducing operational barriers to effective local delivery.

The OPCC will make information on Prevent available to the public, including links to the <u>'Safe in Warwickshire' website</u> as well as local leaflets.

## **Engagement**

The Prevent duty directs that all specified authorities, including the OPCC, should engage with their communities to encourage an open and transparent dialogue on the Prevent duty. The current approach agreed by the Prevent Steering Group, based on the level of risk and threat in Warwickshire, is that a 'communications and engagement plan' is incorporated into the Situational Assessment and reviewed at each quarterly meeting. If it is assessed that the local risk requires a bespoke standalone communication and/or engagement plan, then these will be developed by the partnership.

As part of the risk assessment process the OPCC will review what relevant mainstream engagement activities it has planned and consider if Prevent should be included. This will be considered as part of any annual planning process and repeated quarterly prior to next meeting of the Prevent Steering Group. Any relevant engagement activities will be recorded on the Group's 'communications and engagement plan' and tracked at the Prevent Steering Group meeting.

#### **Communications**

When delivering any communications activity regarding safeguarding or exploitation-based criminality the OPCC will consider whether it is appropriate to include Prevent messaging. Records of any such Prevent related activity will be maintained and recorded at the Prevent Steering Group.

The OPCC will update its staff on key local issues and priorities regarding Prevent at least once a year, including sharing the priorities identified in the Situational

Assessment and other relevant updates. Evidence of such communication will be included in the annual assurance report submitted to the Prevent Steering Group.

## Risk based approach

As part of the risk assessment at each meeting the Chair of the Prevent Steering Group will consider if it is appropriate, due the change in the local Prevent context, if any bespoke communications or engagement activities need to be delivered as a means of mitigating against the impact of the emerging issue or standalone plans developed. The OPCC will actively assist in this where appropriate. The minutes will record any such decisions.

The OPCC will consider using the Home Office's Prevent Toolkit in relation to communications and engagement activity, will record the use of the toolkit, and will feedback on its use to the Home Office Prevent Advisor as necessary.

# 5. Monitoring and Assurance

In addition to the statutory requirements of the Prevent duty placed upon the PCC by Section 26 Counter-Terrorism & Security Act 2015 (CTSA 2015), the <u>Strategic Policing Requirement</u> (SPR) makes clear that the PCC must demonstrate that they have contributed to the government's counter-terrorism strategy (CONTEST).

Monitoring and assurance of Prevent duty compliance will be supported by the OPCC's existing governance and assurance processes.

The OPCC will maintain appropriate records to show compliance with the duty and to ensure consistency and proportionate delivery. This will include keeping track of any Prevent training undertaken by staff, as well as the recording of Prevent referrals to ensure they are proportionate and appropriate. Record keeping by the OPCC will comply with relevant data protection legislation.

The OPCC will submit an annual assurance statement/report to the Prevent Steering Group.

#### **Annual Review**

This SOP will be reviewed annually in line with the risk assessment process undertaken by the Prevent Steering Group, to ensure the procedures, practices and approach used by the OPCC are still relevant and appropriate in line with any significant changes to any relevant national, regional or local strategies, policies or guidance. This review will be recorded and minuted at the Prevent Steering Group.

This SOP can also be adapted outside of the annual review process if there are relevant changes to any national, regional or local strategies, policies or guidance.

Any review of this document will take into account the most recent Home Office assessment of the Warwickshire Prevent Compliance with the Prevent Duty.

# 6. Holding the Police to Account

Unlike other specified authorities, the PCC for Warwickshire has a unique role in holding to account another specified authority – Warwickshire Police. More specifically, the <u>Policing Protocol Order 2023</u> details the PCC's legal responsibilities to:

- Scrutinise, support and challenge the overall performance of Warwickshire Police, including against priorities agreed within the Police and Crime Plan.
- Hold the Chief Constable of Warwickshire Police to account for the performance of the force's officers and staff
- Maintain an efficient and effective police force for Warwickshire.
- Hold the Chief Constable of Warwickshire Police to account for the exercise of the functions of the office of Chief Constable and the functions of the persons under the direction and control of them as Chief Constable.

Warwickshire Police are uniquely placed to tackle terrorism and therefore play an essential role in most aspects of Prevent work. They hold information which can help assess the risk of radicalisation and disrupt people engaged in radicalising others. The police also work alongside community organisations, as well as other specified authorities.

Recognising the parallels between radicalisation and other forms of harm, Prevent should be embedded into all aspects of policing including patrol, neighbourhood and safeguarding functions. In fulfilment of the Prevent duty, consideration should be given to the use of all suitable police resources, not just those specifically designed as Prevent.

In addition, the SPR makes clear that the Chief Constable must demonstrate that they have contributed to the government's counter-terrorism strategy (CONTEST). This includes Prevent, where the requirements include maintaining Prevent capabilities such as the ability to gather and assess Prevent referrals. The SPR also requires Chief Constables to develop local partnerships to deliver projects to protect people from radicalisation and support opportunities to develop community challenges to extremists who use narratives which could encourage people into participating in or supporting terrorism.

The PCC's legal responsibilities under the Policing Protocol Order 2023 (as set out above) include consideration by the PCC of the level of compliance by the Chief Constable and Warwickshire Police with the requirements of the Prevent duty. The mechanisms through which the PCC undertakes these responsibilities is set out in the OPCC policy document 'Holding to Account 2024'.

The Home Secretary can direct the PCC to take specific action to address a specific failure in relation to compliance by Warwickshire Police with the requirements of the Prevent duty, and can also instruct HM Inspectorate of Constabulary and Fire & Rescue Services (the statutory body for inspecting the police) to carry out thematic inspections or to inspect a particular force.

# 5. Revision Record

Date of change	Nature of revision
24 July 2024	Draft document v.0.1
19 August 2024	Final draft v.0.1
9 October 2024	v.1.0 authorised by CEx