



Prevent Duty (Counter-terrorism) Policy

Policy Statement

This policy has been approved by and applies to CareTech Group and its direct and indirect subsidiaries and references to "CareTech" shall be construed as referring to all such companies.

This policy is written in line with the UK Government's statutory guidance issued under the Counter-Terrorism and Security Act 2015 and national and local strategies, including for safeguarding. It should be used with reference to the policy, Safeguarding Adults and Safeguarding Children.

CareTech is committed to the UK Government's policy to reduce the risk of terrorist attacks (known as CONTEST). The overall aim of the counter-terrorism strategy is to reduce the risk from terrorism to the UK, its citizens and interest overseas, so that people can go about their lives freely and with confidence. Prevent remains one of the key pillars of CONTEST, alongside the other three 'P' work strands:

1. Prevent: to stop people becoming terrorists or supporting terrorism
2. Pursue: to stop terrorist attacks
3. Protect: to strengthen our protection against a terror attack
4. Prepare: to mitigate the impact of a terrorist attack

CareTech will support the Government's objectives, as stated in its *Prevent duty Guidance (2023): Prevent duty guidance: England and Wales (2023) - GOV.UK*. This statutory guidance from the Home Office, issued under Section 29 of the CTSA 2015 came into force on 31 December 2023.

CareTech thus aims to put Prevent in practice through the following.

- *Challenging* violent extremist ideology and support for it.
- *Disrupting* those who promote violent extremism and, in the places, where they may be active.
- *Supporting* individuals who are being targeted and recruited to the cause of violent extremism.
- *Increasing the resilience* of the services as a whole to withstanding radicalisation and extremism particularly where the risks are relatively high.
- *Addressing* the political, religious, social, cultural and economic grievances that are being exploited through the extremist ideology and behaviour.

Scope

This Policy applies to all colleagues employed by CareTech including temporary, agency, volunteers, partners, and sub-contractors. All have a legal responsibility to take any concerns seriously about radicalisation and abuse that come to their attention and to follow the procedures set out in this policy. This Policy provides support for all young people and vulnerable adults regardless of their length of stay and mode of service delivery.

Background

CareTech understands “terrorism” and “terrorists” to refer to the definitions found in the Counter-Terrorism and Security Act 2015.

As in the health care sector generally, it is the Prevent element with which a care service is mainly concerned in line with its other safeguarding responsibilities and duty of care.

Accordingly, CareTech understands the Prevent element of the wider strategy requires it to identify and respond to any of the people who use its services who appear to be at risk of supporting or taking part in terrorist acts as defined in the Government’s strategy guidance. The need for vigilance is required because it is known that vulnerable people are often targeted by terrorist groups and organisations for the purposes of radicalisation and potential participation in terrorist activities.

‘There is rapid proliferation of terrorist content on multiple online services. Research has demonstrated that the internet has become the ‘preferred’ avenue for those searching for terrorist propaganda or contacts. The internet continues to make it simpler for individuals and groups to promote and to consume radicalising content’.

“identification” means becoming aware of and recognising when individuals or groups of vulnerable people are at risk of being or have been radicalised into an ideology that achieves its ends through terrorist acts.

“responding” means the safeguarding of that individual or group from further exposure to the risk of radicalisation and possible taking part in terrorist acts. “Responding” includes the reporting of any concerns about anyone who is expressing a close interest in terrorist thinking and activities and anyone who is suspected of having been radicalised and who might be taking part in illegal acts.

Responsibilities

The Board is accountable for:

- ensuring CareTech has an up to date Safeguarding/ and Prevent Policy in place.

The Director of Human Resources is accountable for:

- Ensuring the safe recruitment of staff, including appropriate references and DBS checks at the correct level.
- Ensuring that safeguarding and Prevent policies and practices are a core part of induction.

- Ensuring that colleagues are regularly trained to an acceptable standard.

Staff responsibilities:

- Undertake training and development to understand Prevent and safeguarding for Adults and young people as appropriate.
- Implement the Safeguarding and Prevent Policy.
- Establish and maintain an ethos and environment where young people and vulnerable adults feel secure and are encouraged to talk and are listened to.

Directors/Service Leads

- Oversight of the referral of cases of suspected abuse or allegations to Social Care Services.
- Oversight of the referral of cases to the Channel programme where there is a radicalisation concern.
- Providing advice and support to other staff in relation to Safeguarding Prevent.
- Maintaining a record of any referral, complaint, or concern (even where the concern does not lead to a referral).
- Liaising with the Local Authorities, Safeguarding Partnerships, and other appropriate agencies.
- Ensuring safeguarding record keeping is accurate and secure and providing regular reports to the Board setting out how CareTech has discharged its duties.

Procedure

If anyone has immediate concerns that an individual is presenting an immediate terrorist risk to themselves, others or property, then they should immediately contact the police on 999 and/or the National Counter-Terrorism Hotline on 0800 789 321.

Concerns that an individual may be vulnerable to radicalisation do not mean that you think the person is a terrorist, it means that you are concerned they are prone to being exploited by others, and so the concern is one relating to the safeguarding process. If a member of staff feels that they have a concern that someone is being radicalised, then they should in the first instance discuss their concerns with their immediate line manager.

All concerns must be referred to The Prevent Lead Sarah Palmer Director of Compliance and Regulation for Adults and Specialist Services sarah.palmer@caretech-uk.com who will advise and lead on referrals, supporting staff to complete information within referral forms.

Procedures

Identification

Our aim is that all staff, as a result of understanding this policy and training are able to recognise when any vulnerable individual or group might be exploited by other individuals or groups for the purpose of involving them in terrorist acts.

We also aim for staff to be more aware if any individual or group is becoming exposed to material or influences that place them at risk of exploitation or actively taking part in terrorist acts. Sources of exposure include membership of institutions that are known to promote terrorist thinking and radicalisation (including self-radicalisation), social networks and the internet including social media.

Responding

Staff are expected to report to their line manager any concerns and information indicating that a vulnerable individual or group is being exposed to harmful influences that could result in their taking part in terrorist acts or suspicions or evidence that they are taking part in terrorist acts.

The manager will then assess the situation, which will include assessing the risks of any escalation of the terrorist threats posed by the individual or group. The outcome of this assessment will decide the course of action that follows. The aim will be to prevent and protect people from being caught up in terrorist activities so that they do not suffer significant harm and expose others to significant harm.

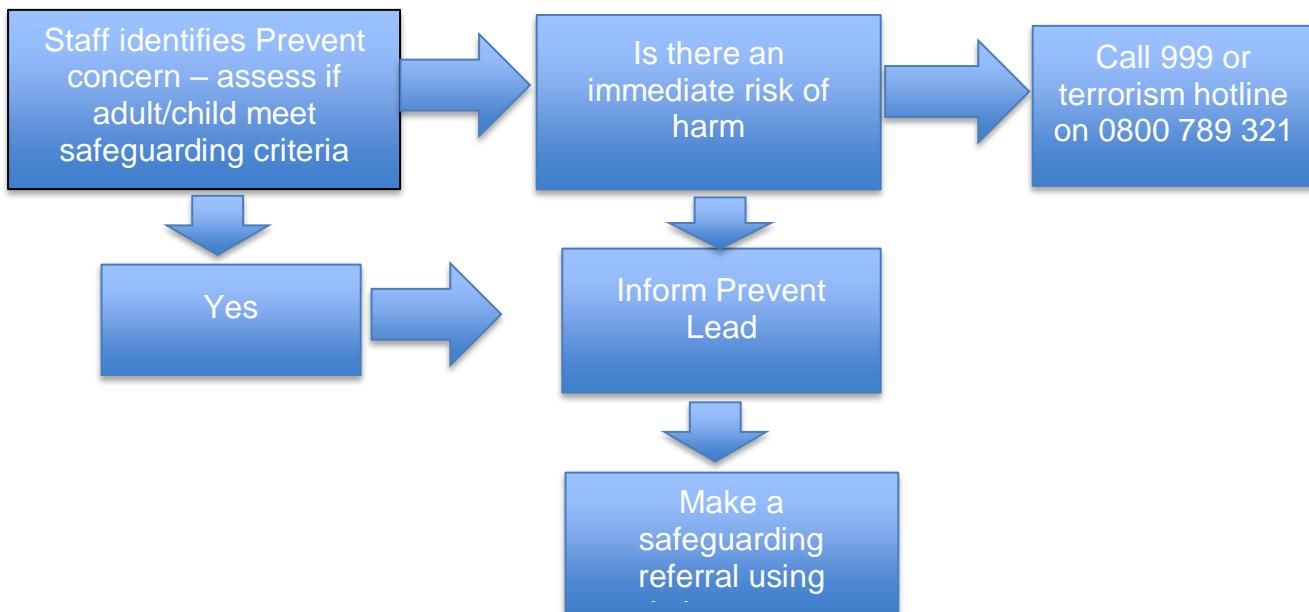
Prevent referral protocol into Channel

Channel is a supportive multi-agency process, designed to safeguard those individuals who may be vulnerable to being drawn into any form of terrorism. Channel works by identifying individuals who may be at risk, assessing the nature and extent of the risk, and where necessary, providing an appropriate support package tailored to their needs.

A multi-agency panel, chaired by the local authority, decides on the most appropriate action to support an individual after considering their circumstances. It is about early intervention to protect and divert people away from the risk they may face at an early opportunity and allows us to intervene to prevent individuals being drawn into terrorist related activity. Partnership involvement ensures that those at risk have access to a wide range of support ranging from mainstream services such as health and education through to specialist mentoring or faith guidance and wider diversionary activities such as sporting activities.

Each support package is monitored closely and reviewed regularly by the multi-agency panel.

All referrals to Channel will be made by the Prevent Lead Sarah Palmer Director of Compliance and Regulation Adult and Specialist Services. See process below



Examples

Where the concerns and risks are relatively small or the situation is in the early stages, the outcome might well be reflected in adjustments to the individual's service plan to divert or minimise further exposure or contact, eg by providing advice, monitoring or controlling access to harmful information on the internet.

Where there is evidence that the individual is at more serious risk of being harmed as a result of exposure or contact to radicalisation (or self-radicalisation) the appropriate action will be to inform the local safeguarding adults board and following its procedures so that further assessment and an appropriate protection plan can be put into place.

Where there is evidence that the individual/group has already engaged in illegal terrorist activities or is about to do so, thereby posing a risk to public safety, the police will be immediately informed (together with/followed by notification to the safeguarding adult's authority and care regulator).

In taking any action to prevent, divert or formally report the activities of the people who are at risk of radicalisation or are suspected of taking part in activities that could result in terrorism, CareTech is mindful of the need to protect people's freedoms and human rights of individuals to think and act independently within the law.

CareTech recognises the importance of involving the person or persons in its actions and (in other than possibly the reporting of illegal acts) obtaining their consent to any proposed course of action designed to keep them safe from further harm in these respects. Individuals who might lack the mental capacity to take their own decisions in respect of being exposed to or having contact with harmful influences, which might lead them into terrorism, are made subject to best interests' assessments and decisions in line with mental capacity/incapacity law.

CareTech will continue to work with the local authority agencies to assess all identified risks to the people who use its services of being drawn into potential acts of terrorism, and acting promptly to reduce those risks in line with local plans.

Revision History

Date of next review January 2027

Date of review January 2026

Date of release September 2021