

<b>POLICY TITLE:</b>	<b>Responding to Suspected Radicalisation</b>
<b>Policy Number:</b>	OP08.1
<b>Version Number:</b>	06
<b>Date of Issue:</b>	21/09/2020
<b>Date of Review:</b>	20/09/2021
<b>Author:</b>	Risk & Audit team
<b>Ratified by:</b>	Philip Winterbottom, Designated Nurse for Safeguarding
<b>Responsible signatory:</b>	David Watts – Director of Risk Management
<b>Outcome:</b>	<p>This policy:</p> <ul style="list-style-type: none"> <li>Provides advice, guidance and information for colleagues should they wish to raise concerns about an individual who may be at risk of being drawn into terrorism or committing terrorist acts.</li> </ul>
<b>Cross Reference:</b>	<p>OP05 <a href="#">Mental Capacity</a></p> <p>OP06 <a href="#">Safeguarding Children</a></p> <p>OP08 <a href="#">Safeguarding Adults</a></p> <p>OP21 <a href="#">Whistleblowing (Protected Disclosure)</a></p> <p>HR04.2 <a href="#">Disciplinary Procedure</a></p> <p>IT05 <a href="#">Use of the Service User Network by Service Users</a></p> <p>LE03 <a href="#">Data Protection</a></p> <p>LE05 <a href="#">Service User Information/Interview Requests from the Police or Other External Agencies</a></p>

#### EQUALITY AND DIVERSITY STATEMENT

Priory Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, email [LegalandComplianceHelpdesk@priorygroup.com](mailto:LegalandComplianceHelpdesk@priorygroup.com)

## RESPONDING TO SUSPECTED RADICALISATION

### 1 INTRODUCTION

- 1.1 CONTEST, the government's national counter terrorism strategy, aims to reduce the risk to the United Kingdom and its interests overseas from international terrorism, so that people can go about their lives freely and with confidence.
- 1.2 These forms of terrorism include, but are not limited to:
- (a) Al-Qa'ida and IS influenced groups
  - (b) Far right extremists
  - (c) Environmental extremists
  - (d) Animal rights extremists.
- 1.3 CONTEST has four strategic work streams:
- (a) Pursue: to stop terrorist attacks
  - (b) Protect: to strengthen our protection against terrorist attack
  - (c) Prepare: where an attack cannot be stopped, to mitigate its impact
  - (d) *Prevent*: to stop people becoming terrorists or supporting terrorism.
- 1.4 Preventing someone from becoming a terrorist or supporting terrorism is no different from safeguarding vulnerable individuals from other forms of exploitation. Therefore, this policy should be read alongside:
- OP08 Safeguarding Adults (Anyone aged 18 or over)
  - OP06 Safeguarding Children (Anyone under the age of 18)
- 1.5 This policy applies to all divisions and to all colleagues employed by Priory Group, either directly or indirectly, including volunteers and to any other person or organisation that uses Priory Group premises for any purpose.

### 2 AIM & PURPOSE

- 2.1 The key aim of this policy is to identify how colleagues will be supported to develop an understanding of the *Prevent* Strategy and how they can utilise their existing knowledge and skills to recognise that someone may have been, or is being radicalised.
- 2.2 This policy sets out where colleagues can seek advice and how to escalate their concerns. Where concerns need to be raised with external agencies, this policy describes how referrals will be managed within the existing multi-agency safeguarding processes.
- 2.3 This policy sets out how *Prevent* related referrals or requests for information from external agencies will be managed.

### 3 ENGAGEMENT WITH THE *PREVENT* STRATEGY

- 3.1 The *Prevent* Strategy 2011 addresses all forms of terrorism and non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists then exploit. *Prevent* deals with all kinds of terrorist threats to the UK. The most significant of these threats is currently from organisations in Syria, Iraq and Al Qa'ida and IS associated groups. Terrorists associated with the extreme right wing also pose a continued threat to safety and security. The aim of *Prevent* is to stop people from becoming terrorists (often referred to as being radicalised) or supporting terrorism. It operates in the pre-criminal space before any criminal activity has taken place.
- 3.2 The Department of Health is a key strategic partner in The *Prevent* Strategy as health, education and social care sector colleagues may meet and treat people who are vulnerable to radicalisation.

- 3.3 The three key objectives of the *Prevent* Strategy are to:
- (a) Challenge the **ideology** that supports terrorism and those who promote it
  - (b) Prevent vulnerable **individuals** from being drawn into terrorism and ensure that they are given appropriate advice and support
  - (c) Work with sectors and **institutions** where there are risks of radicalisation.

- 3.4 Services such as those provided by Priory Group are expected to be involved in delivering objectives (a) and (b) only.

#### **4 PROCESS OF EXPLOITATION**

- 4.1 Evidence suggests that there is no obvious profile of a person who is likely to become involved in terrorist-related activity, or single indicator of when a person might move to support extremism. However, the increasing body of information indicates that factors thought to relate to personal experiences of vulnerable individuals affect the way in which they relate to their personal environment and may make them susceptible to exploitation or supporting terrorist activities (See 4.4). Vulnerable individuals who may be susceptible to radicalisation can be service users, people we support, carers or colleagues.

- 4.2 Radicalisers often use a persuasive rationale or narrative and are usually charismatic individuals who are able to attract people to their cause which is based on a particular interpretation or distortion of history, politics and/or religion.

- 4.3 The key challenge for the health, education and social care sector is to ensure that, where there are signs that someone has been or is being drawn into terrorism, that all colleagues are aware of the support available and are confident in referring the person for further support.

- 4.4 **Vulnerability Factors** - Radicalisers usually attract people to their cause through a persuasive rationale contained within a storyline or narrative that has the potential to influence views. Inspiring new recruits, embedding the beliefs of those with established extreme views and/or persuading others of the legitimacy of their cause is the primary objective of those who seek to radicalise vulnerable individuals.

- 4.4.1 **What factors might make someone vulnerable?** - In terms of personal vulnerability, the following factors may make individuals susceptible to exploitation. None of these are conclusive in themselves and therefore should not be considered in isolation but in conjunction with the particular circumstances and any other signs of radicalisation:

**Identity crisis** - Adolescents/vulnerable adults who are exploring issues of identity can feel both distant from their parents/family and cultural and religious heritage, and uncomfortable with their place in society around them. Radicalisers can exploit this by providing a sense of purpose or feelings of belonging. Where this occurs, it can often manifest itself in a change in a person's behaviour, their circle of friends, and the way in which they interact with others and spend their time.

**Personal crisis** - This may, for example, include significant tensions within the family that produce a sense of isolation of the vulnerable individual from the traditional certainties of family life.

**Personal circumstances** - The experience of migration, local tensions or events affecting families in countries of origin may contribute to alienation from UK values and a decision to cause harm to symbols of the community or state.

**Unemployment or under-employment** - Individuals may perceive their aspirations for career and lifestyle to be undermined by limited achievements or employment prospects. This can translate to a generalised rejection of civic life and adoption of violence as a symbolic act.

**Criminality** - In some cases a vulnerable individual may have been involved in a group that engages in criminal activity or, on occasion, a group that has links to organised crime and be further drawn to engagement in terrorist-related activity.

**Grievances** - The following are examples of grievances which may play an important in the early indoctrination of vulnerable individuals into the acceptance of a radical view and extremist ideology:

- (a) A misconception and/or rejection of UK foreign policy
- (b) A distrust of Western media reporting
- (c) Perceptions that UK government policy is discriminatory, for example counter-terrorism legislation)
- (d) Ideology and politics
- (e) Provocation and anger (grievance)
- (f) Need for protection
- (g) Seeking excitement and action
- (h) Fascination with violence, weapons and uniforms
- (i) Youth rebellion
- (j) Seeking family and father substitutes
- (k) Seeking friends and community
- (l) Seeking status and identity.

**Other Factors** - The following have also been found to contribute to vulnerable people joining certain groups supporting terrorist related activity:

- (a) Ideology and politics
- (b) Provocation and anger (grievance)
- (c) Need for protection
- (d) Seeking excitement and action
- (e) Fascination with violence, weapons and uniforms
- (f) Youth rebellion
- (g) Seeking family and father substitutes
- (h) Seeking friends and community
- (i) Seeking status and identity.

## **5 INTERNET USAGE AND SOCIAL MEDIA**

- 5.1 Vulnerable individuals may be exploited in many ways by radicalisers and this could be through direct face to face contact, or indirectly through the internet, social networking or other media.
- 5.2 Social media is a popular and extensively used method of communication, but it can be misused to try to radicalise and recruit vulnerable people. Instances have been reported of young and vulnerable people being encouraged to leave the UK to travel to join terrorist groups in Syria and Iraq.
- 5.3 Access to extremist material is often through leaflets and local contacts. However, the internet plays an important role in the communication of extremist views. It provides a platform for extremists to promote their cause and encourage debate through websites, internet forums and social networking. It is a swift and effective mechanism for disseminating propaganda material and is not always possible to regulate. Depending on the service, local procedures on accessing the Internet must be complied with.
- 5.4 Colleagues should be aware of anyone making frequent visits to websites showing images such as armed conflict around the world and providing speeches and access to material from those involved in the radicalising process.
- 5.5 A dedicated website to report suspected terrorism or suspicions that some may be involved in terrorism is available at:  
[www.direct.gov.uk/en/CrimeJusticeAndTheLaw/Counterterrorism/DG\\_183993](http://www.direct.gov.uk/en/CrimeJusticeAndTheLaw/Counterterrorism/DG_183993)  
You can also:
  - (a) Call the police or Report your suspicions to them online.
  - (b) Report suspicious activity to MI5.
  - (c) Report online terrorist material.

You can remain anonymous, however will be encouraged to provide your contact information.

## 6 RESPONSIBILITIES

6.1 Radicalisation is a process not a one off event, and there is no single route or pathway to radicalisation. Evidence indicates that those targeted by radicalisers may have doubts about what they are doing. It is because of this doubt that frontline colleagues need to have mechanisms and interventions in place to support an individual being exploited and to help them move away from terrorist activity. Therefore, the UK Government is clear about the responsibilities that organisations such as Priory Group have with regard to delivering the *Prevent* strategy.

6.2 Priory Group has a duty to ensure safe environments where extremists are unable to operate. It is essential, therefore, that all colleagues know how they can support vulnerable individuals (service users, people we support, carers or colleagues) who they feel may be at risk of becoming a terrorist or supporting extremism. *Prevent* is an on-going initiative and designed to become part of the everyday safeguarding routine.

6.3 Specific responsibilities include:

6.3.1 **The Chief Executive** - devolves the responsibility for compliance and monitoring to the Director of Risk and Safety ensuring that the organisation meets its statutory and non-statutory obligations in respect of maintaining appropriate standards of safeguarding adults and children at risk, privacy and confidentiality for service users and their carers.

6.3.2 **Director of Risk Management** - Board level leadership and responsibility for *Prevent* rests with the Director of Risk Management. The Board will receive regular reports on *Prevent* related matters via the Assurance Committee. As *Prevent* Lead and Single Point of Contact (SPOC) for *Prevent*, the Director of Risk Management will work in partnerships with safeguarding colleagues across the organisation.

6.3.2.1 As *Prevent* Lead, the Director of Risk Management will ensure that quarterly *Prevent* returns are submitted to the Clinical Commissioning Group/Regional *Prevent* Co-ordinator, in line with NHS England guidance. This data relates to the Safeguarding clause of the NHS Standard Contract and progress being made by the organisation to implement *Prevent*. This includes data relating to referrals and the numbers of colleagues having completed training.

6.3.3 **Site/Service Managers** - are responsible for ensuring that all employees are aware of this policy and the relevance to everyday practice and for ensuring that colleagues have received appropriate training in relation to patient and carers rights.

6.3.4 **All Colleagues** - have a responsibility to familiarise themselves with this policy and to adhere to its process.

## 7 RAISING CONCERNS ABOUT SERVICE USERS

7.1 In the event that a colleague has concerns that a service user or carer may be at risk of being drawn into terrorism, has begun to express radical extremist views or may be vulnerable to grooming or exploitation by others, the primary point of contact will most often be the local safeguarding team. Colleagues can also contact their local police force or dial 101 (the non-emergency number). The police will talk to colleagues in confidence about concerns and help them to obtain access to support and advice.

7.1.1 The Department for Education has a dedicated telephone helpline (020 7340 7264) to enable Education Division colleagues to raise concerns relating to radicalisation. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

7.1.2 The Director of Risk and Safety as *Prevent* Lead will support this process as required.

7.2 All such concerns should be discussed with the service user's care team prior to referral. If it is determined that a safeguarding referral needs to be made, this should be completed in accordance with local inter-agency safeguarding procedures. Colleagues can also seek general advice from the local Safeguarding lead/officer or the Director of Risk and Safety, as the corporate *Prevent* Lead. A Raising a *Prevent* Concern form (**OP Form: 20**) should also be completed and sent to the Director of Risk and Safety as a means of ensuring that a report is submitted centrally to NHS England.

## **8 ESCALATING CONCERNS ABOUT A COLLEAGUE**

8.1 Although there are relatively few instances of health, care or education colleagues radicalising others or being drawn into extremist acts, it is still a risk that the organisation needs to be aware of and have processes within which to manage any concerns for example disciplinary action.

8.2 Where any employee expresses views, brings material into the organisation, uses or directs service users to extremist websites or acts in other ways to promote terrorism, Priory Group will look to use non-safeguarding processes in order to address the concerns.

8.3 Where a colleague has a concern about a colleague, this should be raised with their line manager. (The processes in OP21 Whistleblowing (Protected Disclosure) can also be used for reporting concerns.) The Line Manager will discuss the concerns with the Regional Manager/Operations Director, the Priory Group *Prevent* Lead and Human Resources Advisor in the first instance. In all such cases the Priory Group *Prevent* Lead will support the completion of/complete a Raising a *Prevent* Concern form (**OP Form: 20**), on behalf of the colleague as a means of ensuring that clearly identifying the precise nature of the concerns a report is submitted centrally to NHS England.

8.4 The Priory Group *Prevent* Lead will liaise with the Executive Lead for Safeguarding (Group Director of Nursing) and the Group Designated Nurse for Safeguarding in order to assess and manage any related safeguarding risks and, where appropriate, the appropriate Police *Prevent* Lead. The Human Resources Advisor will lead on advising the line manager in relation to the disciplinary process should this be appropriate.

## **9 PARTNERSHIP WORKING**

9.1 It should be stressed that there is no expectation that Priory Group will take on a surveillance or enforcement role as a result of *Prevent*. Rather, it must work with partner organisations to contribute to the prevention of terrorism by safeguarding and protecting vulnerable individuals and making safety a shared endeavour.

9.2 The Priory Group *Prevent* Lead will engage where necessary with partnership groups with the responsibility to share concerns raised within the organisation.

9.3 The Priory Group *Prevent* Lead and/or delegated colleague will represent the Priory Group at local *Prevent* Steering Groups and, as appropriate, Channel meetings. (Channel is the process through which statutory partners agree the appropriate level of support to an individual at risk of being drawn into terrorism or committing terrorist acts).

## **10 CONFIDENTIALITY, INFORMATION SHARING AND DISCLOSURE**

10.1 Priory Group colleagues or other workers providing services on behalf of Priory Group must ensure they share information appropriately, both professionally and legally when there is a safeguarding concern and in-line with the Information Commissioner's Guidance set out in LE03 Data Protection.

- 10.2 *Prevent* ultimately aims to ensure the active engagement of the vulnerable individual and is at a pre-criminal stage, however consent is not required from the individual involved prior to a *Prevent* referral being made.
- 10.3 If colleagues are uncertain about information sharing or consent issues, they should seek advice from the local or Group Caldicott Guardian. All information shared must comply with all relevant data protection requirements.
- 10.4 Any disclosures or discussions on information sharing or consent should be recorded in the service user's records.

## 11 REQUESTS FOR INFORMATION ABOUT AN INDIVIDUAL RAISED BY ANOTHER ORGANISATION

- 11.1 Generally, requests for information should be in writing, justifying the grounds for disclosure, and submitted to the manager of the service from which the information is sought. However, with concerns relating to preventing individuals from becoming drawn into terrorism, sharing information may become routine. The seriousness of the potential crime and the risk of harm to the individual may outweigh the need to maintain confidentiality. The amount of information shared should be appropriate and proportionate to the concern raised.
- 11.2 In situations where there are concerns about radicalisation and/or extremism where **disclosures to (or information sharing with) the police may become routine**, a formal protocol should be developed by the Priory Group *Prevent* Lead together with relevant divisional colleagues and agreed between the organisation and the police, so that all colleagues involved know what to do.
- 11.3 **NB:** The **Crime and Disorder Act 1998** (see Appendix 3) does not in itself constitute a statutory requirement for organisations such as Priory Group to disclose service user information to other agencies. This should be determined on a case by case basis with an informed *Prevent* Lead for each organisation.
- 11.4 If the Priory Group *Prevent* Lead is asked to share information for the purposes of preventing an individual from being drawn into terrorism the following question should be considered:
- By sharing the information, is the intention to protect the individual from criminal exploitation, grooming (being drawn into terrorism) or self-harm?
  - In sharing information, is a serious crime being prevented or detected?
  - Is the information that has been requested appropriate to the risk of the serious crime of exploitation to the individual who may be drawn into supporting terrorism?
  - In being drawn into terrorism does this individual pose harm to themselves or the wider public?
  - Can the public interest justification be clearly stated?
- (If in doubt, seek legal advice via [Legalmailbox@priorygroup.com](mailto:Legalmailbox@priorygroup.com))

## 12 COLLEAGUE TRAINING

- 12.1 Priory Group adheres to the guidance provided in the NHS England *Prevent* Training and Competencies Framework which provides clarity on the level of training required for healthcare workers:  
<http://www.england.nhs.uk/wp-content/uploads/2015/02/train-competnc-frmwrk.pdf>  
All colleagues receive an introduction to *Prevent* as part of the mandatory safeguarding training modules that should be completed after joining Priory Group.
- 12.2 The *Prevent* Lead will ensure that a WRAP delivery plan, which is sufficiently resourced with WRAP facilitators, is also included in the organisation's safeguarding training portfolio.

- 12.3 Access to appropriate and approved training must be authorised by completing a training request via Learning and Development.

## 13 REFERENCES

### 13.1 Legislation

Care Act 2014  
Counter-Terrorism & Security Act 2015  
Crime and Disorder Act 1998  
Data Protection Act 2018  
Equality Act 2010  
Human Rights Act 1998  
Terrorism Act 2006

### 13.2 Guidance

[Statutory Prevent Duty Guidance](#) (links to guidance for England, Scotland and Wales)  
Department for Education (2015) The Prevent Duty: Departmental advice for schools and childcare providers  
Department of Health (2011) Safeguarding Adults: The role of health services  
Home Office and Department for Education (2015) How Social Media is Used to Encourage Travel to Syria and Iraq. Briefing note for schools

### Appendices:

**Appendix 1** – Information Sharing

**Appendix 2** – Reporting flow chart for Raising Concerns

**Appendix 3** – Definitions of Terms

### Associated Forms:

**OP Form: 20** – [Raising a 'Prevent' Concern](#)

**APPENDIX 1****Information Sharing**

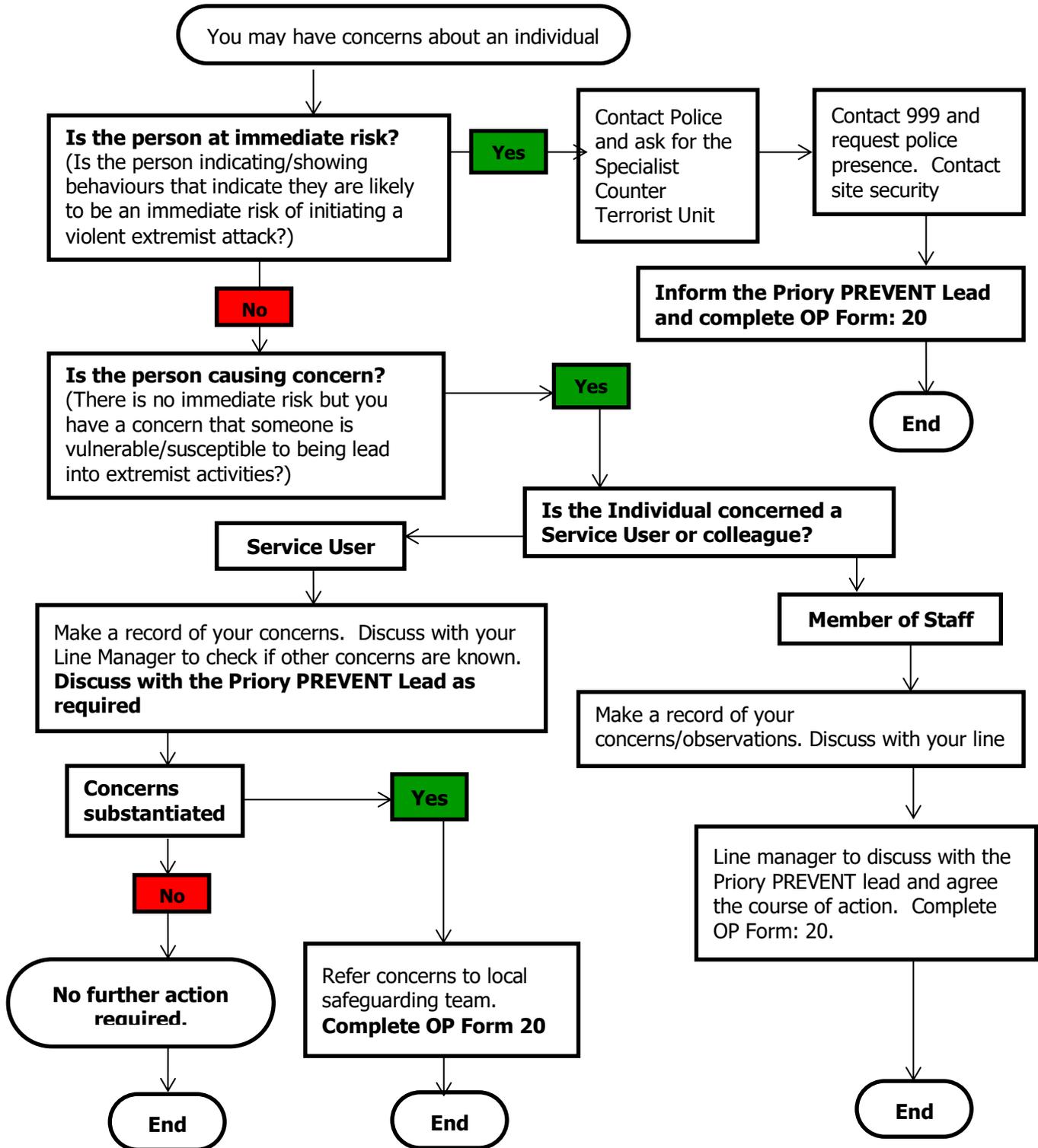
There are some statutory reasons to share information without consent of the individual according to statutory guidelines. Listed below is the ground in which sharing information is legal:

Prevention and detection of crime	Crime and Disorder Act 1998
Prevention and detection of crime and/or the apprehension or prosecution of offenders	Data Protection Act 2018, Section 29
To protect vital interests of the data subject; serious harm or matter of life or death	Data Protection Act 2018,
For the administration of justice (usually bringing perpetrators to justice)	Data Protection Act 2018
For the exercise of functions conferred on any person by or under any enactment (police/social services)	Data Protection Act 2018
Child protection – disclosure to social services or the police for the exercise of functions under the Children Act, where the public interest in safeguarding the child’s welfare overrides the need to keep the information confidential	Data Protection Act 2018
Right to life Right to be free from torture or inhuman or degrading treatment	Human Rights Act 1998, Articles 2 & 3
Overriding public interest	Common Law
In accordance with a court order	The Court Order itself

**APPENDIX 2**

**Reporting flow chart for Raising Concerns**

Action to take if you suspect an individual is being radicalised or self-radicalised into extremist activities



## APPENDIX 3

## Definitions of Terms

<b>Terrorism</b>	Actions of individuals or groups who seek to bring about social or political change through actions intended to cause serious harm, loss of life or raise attention through fear and/or damage to property to cause loss of life, disruption or raise attention by fear and/or damage to property
<b>Radicalisation</b>	The process of grooming an individual to support, encourage or condone violence to advance terrorist ideology.
<b>Extremism</b>	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. We also include our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
<b>CONTEST Strategy</b>	Sits under the home office and is a national strategy or long-term plan of action designed to reduce the risk of terrorism, by stopping people becoming terrorists, preventing terrorist attacks, strengthening the UK's resilience to terrorism and facilitating emergency preparedness procedures in the event of attack.
<b>Prevent Strategy</b>	Challenging terrorist ideologies, supporting those who are vulnerable to these ideologies and working with institutions where radicalisation may occur (including the internet and social media).
<b>Vulnerability</b>	In the context of <i>Prevent</i> is a person who is <b>susceptible</b> to extremists' messages and is at risk of being drawn into terrorism or supporting terrorism at a point in time.
<b>CHANNEL</b>	<p>Multi-agency approach to protect people at risk from radicalisation. CHANNEL uses existing collaboration between local authorities, statutory partners (such as education and health sectors, social services, children's and youth services and offender management services, the police and the local community to:</p> <ul style="list-style-type: none"> <li>(a) Identify individuals at risk of being drawn into terrorism;</li> <li>(b) Assess the nature and extent of that risk; and</li> <li>(c) Develop the most appropriate support plan for the individual concerned.</li> </ul> <p>CHANNEL is about safeguarding children and adults from being drawn into committing terrorist-related activity. It is about early intervention to protect and divert away from the risk they face before illegality occurs</p>