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Wales

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# Prevent Policy and Referral Process

## Policy Statement

The policy provides information regarding how Public Health Wales will implement the Prevent strategy and provide training for relevant staff. It also includes the process for the escalation of concerns.

## Policy Commitment

This policy aims to ensure:

- PHW staff develop an understanding of the Prevent Duty and how they can utilise their existing knowledge and skills to recognise that someone may have been or is at risk of being radicalised and drawn into terrorism.
- Public Health Wales staff know how to safeguard and support individuals, whether service users or staff, who they feel may be at risk of being radicalised.
- That appropriate systems are in place within Public Health Wales for staff to raise concerns if they think this form of exploitation is taking place. The promotion and operation of safe environments where extremists are unable to operate.

## Supporting Procedures and Written Control Documents

[All corporate policies and procedures are available on the Public Health Wales website](#)

This Policy will be supported by the process for raising PREVENT concerns which is included in the appendix.

Other supporting documents are:

- The Counter Terrorism and Security Act 2015
- [Prevent duty guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Statutory & Mandatory Training Policy

<b>Scope</b> This policy applies to all of our staff in all locations including those with Honorary Contracts.	
<b>Impact Assessments</b>	An Equality, Welsh Language and Health Impact Assessment has been completed and can be viewed on the policy webpages.
<b>Approved by</b>	Quality Safety and Improvement Committee
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<b>Group with authority to approve supporting procedures</b>	Quality Safety and Improvement Committee
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### **Disclaimer**

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<b>Summary of reviews/amendments</b>				
<b>Version number</b>	<b>Date of Review</b>	<b>Date of Approval</b>	<b>Date published</b>	<b>Summary of Amendments</b>
2	1/2/2023	18/07/23		Amendments made to reflect revision of The Prevent Duty

				Guidance for England and Wales Act in 2021 in addition to changes in the delivery of PREVENT training.
1	2015	27/05/15		New policy

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## **1. Introduction**

The Prevent Strategy published by the United Kingdom Government in 2011 is part of the overall counter terrorism strategy – CONTEST. The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people from becoming terrorists or supporting terrorism.

The Counter Terrorism and Security Act 2015 places a legal duty on organisations such as Public Health Wales to have '*due regard to the need to prevent people from being drawn into terrorism*' and give regard to guidance issued under the Act when carrying out this duty.

The Prevent Duty Guidance for England and Wales was issued under the Act in July 2015, with a revised version issued in 2021. The full document can be found via the link below:

[Prevent duty guidance - GOV.UK \(\[www.gov.uk\]\(https://www.gov.uk\)\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92421/prevent-duty-guidance-for-england-and-wales-2021.pdf)

Building Partnerships Staying Safe, the Health sector contribution to HM Government's Prevent Strategy: guidance for healthcare workers, April 2012 (Welsh Government); provides strategic direction and governance for the Welsh NHS on the UK Government's CONTEST strategy.

## **2. Purpose**

The purpose of this policy is to provide a framework for the implementation of the UK Government Prevent Strategy within Public Health Wales and the action required by staff where concerns exist that vulnerable persons are being drawn into extremist activities.

This policy aims to ensure:

- PHW staff develop an understanding of the Prevent Duty and how they can utilise their existing knowledge and skills to recognise that someone may have been or is at risk of being radicalised and drawn into terrorism.
- Public Health Wales staff know how to safeguard and support individuals, whether service users or staff, who they feel may be at risk of being radicalised;

### 3. Scope

This policy applies to all staff including temporary, agency, hosted, seconded and volunteer staff. Staff are responsible for:

- Sharing any concerns relating to Prevent with their manager and the Corporate Safeguarding;
- Completing the relevant Prevent training.

### 4. Definitions

**Terrorism** is defined in the Terrorism Act (2000) as an action that 'endangers or causes serious violence to a person or people, causing serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of political, religious or ideological gain.'

**Radicalisation** in this strategy refers to the process by which people come to support terrorism and forms of extremism leading to terrorism.

**Extremism** is 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. This includes supporting calls for the death of members of the armed forces, either in this country or overseas.

A **Prevent Concern** is one which is based on something that raises our suspicions that an individual is at risk of radicalisation and is assessed by using the professional judgement of the member of staff and/or their manager and the Prevent lead.

**Vulnerability** in the context of Prevent is seen as a person who is susceptible to extremists' messages and is at risk of being drawn into terrorism or supporting terrorism.

**Channel** is a multi-agency partnership that works with existing safeguarding partnerships and crime reduction panels in order to assess the referrals of vulnerable individuals that are at risk of being drawn into terrorism. Channel is administered and coordinated by the police but is chaired by the local authority. Channel is part of the Prevent strand of HM Government's counter terrorism strategy CONTEST. The Channel group provides a mechanism for supporting individuals who may be vulnerable to terrorist related activity by assessing the nature and the extent of the potential risk and agreeing

and providing an appropriate support package tailored to the individual's needs.

How the NHS in Wales links in with Prevent is outlined in the Department of Health and Welsh Government document.

[Building Partnerships, Staying Safe: guidance for healthcare organisations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/building-partnerships-staying-safe-guidance-for-healthcare-organisations)

## **5. Responsibilities**

### **5.1 Public Health Wales**

Public Health Wales has a responsibility to set strategic objectives regarding the Safeguarding of children and adults, ensure there is Board level leadership, an overall policy in place which incorporates the Prevent Strategy and relevant legislation, and ensure an organisational culture which places service users' staff and their wellbeing at the centre of safeguarding practice. The Board is also responsible for gaining assurance that there are arrangements in place to ensure that employees are aware of and operate within the policy.

### **5.2 Chief Executive**

The Chief Executive holds overall responsibility for the Prevent strategy in Public Health Wales. The Chief Executive has overall responsibility to have processes in place to:

- Ensure that all staff are aware of this policy and adhere to its requirements.
- Has delegated responsibility to the Executive Director of Quality, Nursing and Allied Health Professionals ensure that there are appropriate arrangements in place to meet the requirements of this policy

### **5.3 Executive Director of Quality, Nursing and Allied Health Professionals**

The Executive Director of Quality, Nursing and Allied Health Professionals provides executive leadership and has delegated responsibility for ensuring there are organisational arrangements in place to safeguarded children and adults, and for the implementation of this policy.

### **5.4 Executive Directors & Directors**

The Chief Executive, Executive Directors and Directors have key roles and responsibilities to ensure that Public Health Wales meets requirements set out by statutory and regulatory authorities. They are responsible for ensuring that all operational managers and their staff within their Directorates are aware of this policy, understand its requirements and support its implementation with staff. The Business Executive Team has the responsibility to ensure that the arrangements for the safeguarding of adults and children are being managed appropriately across the organisation.

### **5.5 Head of Digital Experience and Services (Informatics)**

The Head of Informatics is responsible for promoting and taking steps to ensure responsible and effective use of the internet and email by all staff in line with Public Health Wales NHS Trust policies and to raise concerns where indicators of counter terrorism are identified through internet or email use.

### **5.6 People and Organisational Development**

The People and Organisational Development team are responsible for ensuring there are arrangements in place to implement an appropriate training and awareness programme which is accessed by all relevant staff, collating training data and reporting to the Executive Team and Board as required. Staff groups who require this training have been identified within the Safeguarding Training Strategy which has been made available to all managers.

### **5.7 Quality, Safety and Improvement Committee**

As part of the overarching Safeguarding arrangements the committee is responsible for gaining assurances regarding the effectiveness of organisational arrangements and compliance with the requirements of this policy through reports, thematic reviews and audit activity is being achieved.

### **5.8 Named Lead for Safeguarding**

The Named lead for Safeguarding supports the Executive Director for Quality, Nursing and Allied Health professionals on safeguarding matters. They are responsible for providing leadership on the operational application of this policy, expert advice, and support on Prevent concerns raised by staff and supporting managers and in liaison with other relevant services and sectors as required.

## **5.9 Managers**

Managers are responsible for:

- Ensuring that all staff are aware of this policy and their role with its application.
- Advising staff on the Ensuring that staff identified through their job description (and any other relevant staff) complete Prevent Training at the appropriate level. processes to escalate a concern.
- Facilitating the appropriate escalation of Prevent concerns (flowchart appendix 2)
- Liaising with P&OD if the concern raised is about a member of staff.

## **5.10 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. Therefore, all staff need to be aware of this policy and their role with its application.

All members of staff have responsibility for raising any concerns relating to prevent standards and reporting these to their manager and then the Named Lead for Safeguarding in line with the escalation flowchart (appendix 2).

Concerns must also be documented on the PHW Safeguarding Incident reporting on the Datix reporting system.

## **6. Training**

**6.1** All staff who work with service users on a regular basis and those who manage them will complete Prevent training at the appropriate level. These sessions will ensure that staff are:

- Aware of their professional responsibilities, particularly in relation to the safeguarding of vulnerable adults and children.
- Correctly recognise exploitation of vulnerable individuals who have been or are at risk of being radicalised
- Understand the organisational policies, escalation procedures and processes in place through which they can raise concerns and share information.
- Be aware of who to contact to discuss and raise concerns.
- Aware of the processes and support available once they raise a concern.



## **6.2 Structure of the training**

- The eLearning training session covers the statutory and mandatory training required for Preventing Radicalisation - Awareness of Prevent. This is an eLearning package available to PHW staff through ESR. 2 courses are available on ESR which are NHS England packages, however these courses are also relevant in the context of NHS Wales as guided by the Home Office.

## **6.3 Measuring impact and compliance**

Quantitative:

- Training Numbers recorded on ESR and reported to the Safeguarding Group Meeting
- Number of Prevent concerns reported and the number of Referrals made
- Provision of Prevent data will be included in the annual safeguarding report

## **7. Process for raising concerns**

**7.1** When staff identify a person at risk of exploitation by radicalisers or exhibiting extremist beliefs or behaviours, they must share these concerns. Should any staff member have a concern relating to an individual's behaviour which indicates that they may be being drawn into terrorist-related activity, they will need to take into consideration how reliable or significant these indicators are.

**7.2** Indicators may include:

- graffiti symbols, writing or artwork promoting extremist messages or images.
- service-users/staff accessing terrorist-related material online, including through social networking sites.
- parental/family reports of changes in behaviour, friendships or actions and requests for assistance.
- partner healthcare organisations', local authority and/or police reports of issues affecting others or in other organisations.
- staff or service-users voicing opinions drawn from terrorist-related ideologies and narratives;

- the use of extremist or 'hate' terms to exclude others or incite violence.

**7.3** It may be that a service-user or staff member is facing multiple challenges in their life, of which exposure to terrorist-related influences is just one. Staff will need to use their judgment in determining the significance of any changes in behaviour where sufficient concerns are present.

**7.4** The concern should be initially shared with the line manager, who will contact the Named Lead for Safeguarding to discuss the case. A decision will be made to refer to Channel or whether some other action is required. It may be decided that the case is discussed with the Channel coordinator to establish whether the case should be managed under Prevent or under counter terrorism legislation and in these circumstances limited and proportionate information may be shared prior to consent in exceptional cases.

## **8. Referral to Channel Panel**

**8.1** If it is decided that a referral to Channel is the appropriate course of action, in most cases consent should be sought from the individual to make the referral (remember that this is at a pre-criminal stage and active engagement is required to effectively support the individual concerned).

**8.2** On receipt by Channel, each referral is screened for suitability according to the vulnerability and risk factors. Appropriate referrals will go through a preliminary assessment coordinated by the Channel coordinator and key statutory partners. A Channel panel, chaired by the local authority, will then take place, where the individual's needs will be identified, and a support plan will be put in place.

**8.3** Where a referral has been made by Public Health Wales and is being considered at a Channel panel the Named Lead for Safeguarding or nominated deputy will take the lead however the referrer may need to attend as well. The aim of the panel is to ensure all agencies work closely to examine areas of concern in a planned and logical way which safeguards both the individual and the organisations. The Channel panel will monitor each case on a six-weekly basis, with a further review meeting for each case at 6 and 12 months, once the referral has exited the process.

**8.4** It is important to note that not all individuals who are radicalised and commit acts of terrorism are susceptible or vulnerable and may be acting out of choice. If you are concerned that an individual is

engaged in the planning or implementing an act or acts of terrorism:

- If there is an immediate threat to life, **ring the Police on 999**
- Or **Crimestoppers 0800 555111**
- Otherwise, **ring the Anti-Terrorist Hotline on 0800 789 321**

The Named Lead for Safeguarding must always be informed before a report is made to the Police or Anti-Terrorism Hotline unless a delay would increase the risk of immediate harm. The Named Lead for Safeguarding will complete the All Wales Partners Prevent Referral Form.

[All Wales Prevent Partners Referral Form - English \(south-wales.police.uk\)](https://south-wales.police.uk/all-wales-prevent-partners-referral-form-english)

[All Wales Prevent Partners Referral Form - Welsh \(south-wales.police.uk\)](https://south-wales.police.uk/all-wales-prevent-partners-referral-form-welsh)

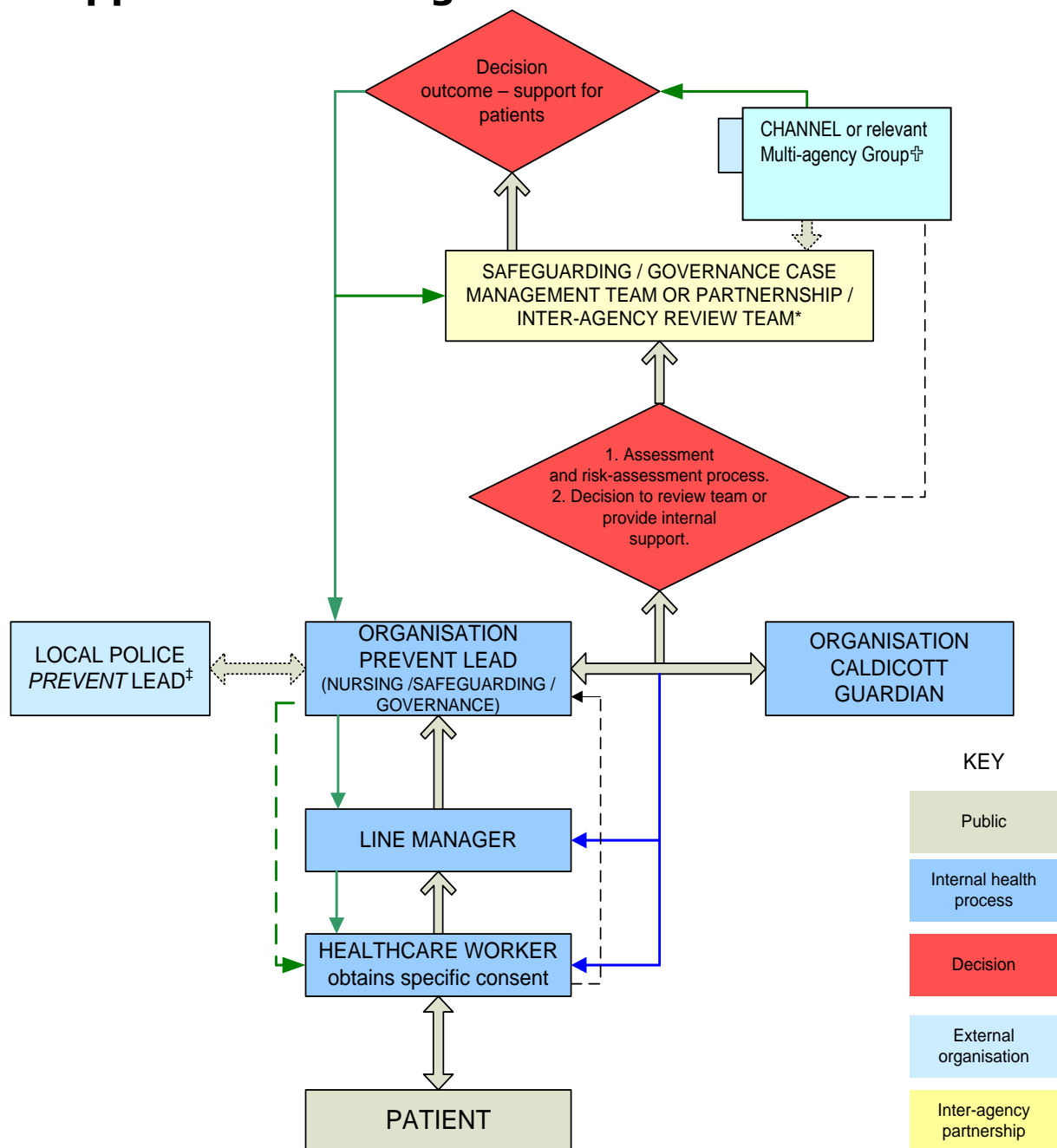
## **9. Confidentiality and Information Sharing**

**9.1** Staff should ensure they share information appropriately both professionally and legally when there is a safeguarding concern and in line with the Welsh Accord on Sharing Personal Information (WASPI). Prevent is based on the active engagement of the vulnerable individual and is at a pre-criminal stage, therefore appropriate consent should be obtained from the individual involved prior to a referral to Channel intervention both to comply with the WASPI and to establish an open relationship with the vulnerable individual at the start of the process.

**9.2** In exceptional circumstances, where seeking consent prior to referral would cause immediate significant harm to the vulnerable individual and/or where the vulnerable person lacks capacity to give consent, a referral may be made without consent in their best interests.

**9.3** Where there is concern or evidence that an individual is actually engaged in the planning or undertaking of terrorist acts, or staff are concerned for their safety or welfare, then consent is not required to share any information that may be required to assess and manage the risk of a serious criminal offence occurring. In these cases the individual should not be informed that information is being shared without multiagency agreement of what is required to ensure the safety of others. If staff are not sure on information sharing or consent issues, they should seek advice from the Named Lead for Safeguarding.

## Appendix 1 Raising Prevent concerns



\* To include representatives from other public sector services, such as local authorities, education, social care, etc.

† This is an advisory role and it will be at the discretion of healthcare practitioners and safeguarding leads to contact police *Prevent* leads for advice and support as necessary. Police *Prevent* leads can also assist safeguarding leads and Caldicott Guardians with advice on risk-assessment procedures.

‡ Channel Groups provide a mechanism for supporting individuals who may be vulnerable to terrorist-related activity by assessing the nature and the extent of the potential risk, agreeing and providing an appropriate support package tailored to an individual's needs. Channel is a multi-agency panel (including Health) and the local Channel lead is normally located within police or local authority.

## Appendix 2: Process for Raising a Prevent Concern in Public Health Wales

