Home Office

Prevent Directorate
Homeland Security Group
Home Office
2 Marsham Street
London
SW1P 4DF

Gurjit Samra-rai
Leicestershire County Council,
County Hall,
Leicester Road,
Glenfield,
Leicester,
LE3 8RA

cc Jane Moore
cc Anita Chavda

27th May 2022

Dear Gurjit,

Assessment of Prevent Duty 2021/2022

As you are aware section 29 of Counter Terrorism-Security Act 2015 places a duty on local Government to have due regard to prevent people from being drawn into terrorism. As part of my role as a regional advisor for Leicestershire I have been evaluating the implementation of the duty for your local area. I would like to thank yourself and your team's cooperation in supporting the Prevent programme. We highly value the work of local partners who play a vital role mitigating the risk of radicalisation and terrorism in our communities.

As part of the agreed process the Home Office has been exclusively using the Prevent Local Authority Performance Scoring Criteria across England and Wales to determine scores (Annex A). Using this tool, we individually score assurance against ten set benchmarks on a scale of 1-5. A score of 3 represents a position where the duty is met, a score of 1-2 indicates that statutory responsibilities are not being met and a score of 4-5 signifies those requirements being exceeded.

We recognise that this process can be subjective and consequently have taken a rigorous approach to scoring by comparing results across all local authorities to ensure consistency. I would also like to add that scoring reflects requirements of the duty as opposed to an in-depth evaluation of how effective Leicestershire has been in reducing risks from radicalisation and terrorism. This is particularly true of benchmark 5 given Channel is subject to additional assurance processes.

Summary of Prevent Duty in Leicestershire

In Leicestershire Prevent is delivered as a partnership with Leicester City Council and Rutland County Council. This is a very effective partnership and allows the Prevent team in Leicester to provide support and expertise to the county. Overall, my assessment is that Prevent is Leicestershire meets the statutory

INVESTORS IN PEOPLE

requirements of the duty in almost every area and in many areas exceeds them. The staff working on Prevent are very committed. Governance, risk assessment and Channel are especially strong. Whilst I have included a number of recommendations in the report these should be caveated against the fact that Prevent delivery is generally excellent.

A summary of your scores can be found in the table below. Benchmark scores are not intended to have equal weighting meaning that the significance of certain benchmarks will be greater than others. Engagement with districts LLR good

	Benchmark	Score
1	Risk Assessment	4
2	Multi Agency Partnership Board	5
3	Prevent Partnership Plan	5
4	Referral Pathway	4
5	Channel Panel[1]	5
6	Prevent problem-solving process	4
7	Training	3
8	Venue Hire and IT Policies	3
9	Engagement activity	2
10	Communications	2

Individual Benchmark Feedback

1. **The Organisation Has a Local Risk Assessment Process Reviewed Against the Counter Terrorism Local Profile**

   Score – 4

   Good Practice – Leicestershire has a well-informed risk assessment process. The CTLP is developed with local partners through an online survey. The CTLP is briefed to the corporate Prevent board and director of children's and family services as well as the PSG and PLOG. Underneath the board is a senior officer's group which includes the CSP managers from six of the seven districts. An update is provided to each of the district CSP's on a regular basis and a briefing provided to the district chief executives. Prevent updates are included in a newsletter to school governors circulated to every school in the county. Risk is therefore well understood across the county with the caveat that understanding is heavily reliant upon the CTLP.

   Areas for Development/Recommendations – Currently there is no situational or corporate risk assessment to provide local context to the risks identified within the CTLP. These are however

---

[1] This benchmark is assessed separately to evaluation undertaken by Channel Quality Assurance Leads and captured within the Channel Annual Assurance Statements, which capture upon compliance with all aspects of the Channel duty guidance.

being drafted. Risk assessment in Leicestershire should include a process to ensure these documents are reviewed on a regular basis. I would also consider a process that sights all frontline staff and elected members on CT risk. It is difficult to expect staff to recognise concerns if they are not sighted on and don't understand risk. Finally, it would be good for all district councils to be represented at the senior officers group.

2. **There is an Effective Multi-Agency Partnership Board in Place to Oversee Prevent Delivery in the Area.**

   Score – 5

   Good Practice – There is a mapped governance structure for Prevent in LLR. A Prevent strategic partnership group (PSG) provides strategic governance and accountability chaired at director level. This reports to the Prevent Executive Board chaired by the deputy mayor for the city and to the corporate Prevent board within the county. Below the PSG, a Prevent leads operational group is responsible for driving delivery of the Prevent delivery plan which has both city and county representation at an appropriate level. The Channel chair reports to PSG and Executive. Overall Prevent governance in LLR is very strong.

   Areas for Development/Recommendations – None

3. **The Area Has an Agreed Prevent Partnership Plan**

   Score – 5

   Good Practice – There is an effective multi-agency delivery plan in place which is used to drive Prevent delivery across LLR. The delivery plan is informed by both the CTLP and local risk assessment processes and is overseen by a strategic board. The plan reflects actions to meet the statutory duty as well as risk mitigation. It is however lengthy and quite complicated. The plan does contain and reference specific actions for the county and those actions report separately at county level to the corporate Prevent board. I would caveat the recommendations below with the observation that the plan is actually very good and seen as good practice by other areas. Of note is the fact that each district council has its own plan, understands their statutory duty and any risks identified are included within each council's risk register.

   Areas for Development/Recommendations – Consider simplifying the plan to ensure that it can be used to drive business at PSG. This is something the Prevent Coordinator in the city has identified and is working on doing. Ensure that actions required to mitigate the risks identified in the CTLP problem statements are referenced in the plan.

4. **There is an Agreed Process in Place for the Referral of Those Identified as Being at Risk of Radicalisation**

   Score – 4

   Good Practice – There is a clear and well understood referral pathway. This is explained on the Leicestershire County Council website with contact details for the Prevent officers and the Police and other relevant information. The national referral form is utilised across the partnership. Feedback is provided to referrers and the process aligns well with mainstream safeguarding processes.

Areas for Development/Recommendations – It would be good to make better use of available data to inform training plans and mitigate risk.

5. **There is a Channel Panel in Place, Meeting Monthly, with Representation from all Relevant Sectors.**

   Score – 5

   Good Practice – Channel operates as a single panel for LLR with three joint chairs one of whom is from the county council. It meets monthly and is well attended by all relevant statutory partners. There is a Channel pre-meet to ensure the appropriate people are invited to panel for each case. A TOR is agreed, VAF and IP's are utilised effectively. Channel QA statement is submitted on time. Written consent is obtained when possible and appropriate. Reviews are brought back systematically. Overall Channel operates very effectively in LLR.

   Areas for Development/Recommendations – Chair to consider who is the most appropriate person to obtain consent and conduct initial visit and ensure this decision is made by the panel. This is not always CTP.

6. **There is a Prevent Problem Solving Process in Place to Disrupt Radicalising Influences.**

   Score – 4

   Good Practice – There is a very effective PLP in Leicestershire which is well attended by relevant partners and looks at CT risks from institutions, localities, and individuals. Prevent problem solving in the county is supported by colleagues from the city and the response is proportionate to the risk. Where necessary the county can rely on the expertise within the city to support them and this partnership works well.

   Areas for Development/Recommendations – None

7. **There is a training programme in place for relevant personnel**

   Score – 3

   Good Practice – There is no formal Prevent training strategy in Leicestershire however training has historically been offered to different cohorts of staff based on their role. This has included both online and face to face WRAP style training (although not for the past 2 years). A training subgroup of the PSG is planned but is not yet in place. This will ensure that Prevent training is delivered in a more strategic way. Training is mandated at district council level.

   Areas for Development/Recommendations – There is limited mandating of training or monitoring of compliance within the county council. I would recommend a training subgroup of the PSG is established, as planned, to develop a training plan ensuring that identified cohorts of staff receive training appropriate to their role. The training plan should be multi-agency, training should be mandated where possible and compliance monitored. Consider implementing basic Prevent training as part of staff induction for all staff. Include training for venue hire staff on completing basic due diligence checks as part of the venue hire policy. Also consider training for elected members and commissioned services staff. Finally available data should be used to inform training plans, and these should be reviewed regularly. Mandating of training would bring Leicestershire in line with the majority of local authorities in the region.

8. **There is a Venue Hire Policy in Place, to Ensure that Premises are not Used by Radicalising Influencers, and an Effective IT Policy in Place to Prevent the Access of Extremist Materials by Users of Networks.**

   Score – 3

   Good Practice – There is an IT policy in place. A venue hire policy has been drafted and agreed. An audit of council owned venues has been completed and staff have a good awareness

   Areas for Development/Recommendations - Include basic training for venue staff in the training plan. Encourage partner organisations and the voluntary sector to adopt a similar policy.

9. **There is Engagement with a Range of Communities and Civil Society Groups, both Faith-Based and Secular, to Encourage an Open and Transparent Dialogue on the Prevent Duty.**

   Score – 2

   Good Practice – There is no community engagement taking place at a county council level and the county don't really have any direct links with communities. District councils do undertake community engagement with partners, VCS organisations, community groups and parish councils. This tends to be ad-hoc engagement and is mostly in response to an incident or issue. There are opportunities to use existing structures to engage diverse communities and improve confidence in Prevent accepting that capacity is an issue.

   Areas for Development/Recommendations – Develop a Community Engagement plan and activity to improve the understanding of Prevent, mitigate risk, and improve public confidence in the policy. This should focus on the highest risk areas of the county. Consideration should be given to the fact that any planned engagement should be proportionate to the risk.

10. **There is a Communications Plan in Place to Proactively Communicate and Increase Transparency of the Reality / Impact of Prevent Work, and Support Frontline Staff and Communities to Understand what Prevent Looks Like in Practice.**

    Score – 2

    Good Practice – Some internal communications on Prevent with staff are undertaken. There is a Prevent page on the Leicestershire County Council website which provides good information and contacts. Prevent newsletters and booklets are shared with partners.

    Areas for Development/Recommendations – No external communications have been undertaken in the recent past and there is no Prevent communications plan. I would recommend that a Prevent communications plan is developed to improve the understanding of Prevent, mitigate risk, and improve public confidence in the policy. This should focus on the highest risk areas of the county. Consideration should be given to the fact that any planned activity should be proportionate to the risk.

Recommendations

Following my assessment, I am highlighting the following recommendations for improvement. However, as part of our ongoing support I will look to work with you to review progress against all the recommendations in this report throughout the year.

- Complete a situational and corporate risk assessment. Ensure that all staff are sighted on CT risk.
- Develop a formal training strategy to ensure the training offer is evidence based and utilises resources in an effective way. Training should be mandated and compliance monitored.
- Consider developing a proportionate Comms and engagement strategy to improve the understanding of Prevent, mitigate risk, and improve public confidence in the policy

We are aware that the tools and resources available to local authorities varies considerably and that implementation of the duty may be more challenging in some local authorities more so than others. The Home Office's Prevent Local Delivery team are here to support you with these areas of development and are able to provide advice and guidance throughout the year.

 If you have any questions or any feedback on this process, please do not hesitate to contact me.

Kind Regards.,

Ian Stubbs
Prevent Regional Advisor and Account Manager
East Midlands

T   07918 495968
E   IanRabley.Stubbs@homeoffice.gov.uk

Annex A – Prevent Local Authority Performance Scoring Criteria

Benchmark 1 - Risk Assessment

The organisation has a local risk assessment process reviewed against the Counter Terrorism Local Profile

1. Local authority's Prevent leads uninformed about local threat of radicalisation and terrorism. CTLP not utilised and no local Prevent risk assessment process in place.
2. Prevent risk is described in broader, cross-partner risk assessments. Prevent partnership understanding is limited and relies solely on CTLP to understand risk.
3. Prevent activity is informed by a risk assessment, utilising the CTLP and local understanding. Risk assessment process is limited (e.g. low partnership engagement) and is not widely disseminated.
4. Prevent activity largely corresponds to local threat. Risk assessment process incorporates evidence from a combination of local knowledge, data and the CTLP. LA officers proactively work with police to develop the CTLP. Risk is presented to the Prevent partnership.
5. Risk assessment process clearly integrates all local risks as well as corporate risks such as the risks of not meeting the Prevent Duty. Relevant local partners of appropriate seniority are all aware of these risks and regularly discuss evolving threat and emerging issues. The assessment drives Prevent activity.

Benchmark 2 - Multi Agency Partnership Board

There is an effective multi-agency partnership board in place to oversee Prevent delivery in the area.

1. Little or no governance of Prevent.
2. Only single agency governance of Prevent.
3. Prevent is nominally overseen by a multi-agency group but rarely discussed.
4. Delivery against the Partnership Plan is clearly driven by a multi-agency group, with oversight of referral pathways and Channel. Some ad-hoc partnership work occurs with neighbouring local authorities.
5. There is an effective Prevent Partnership Board (including the use of existing multi-agency forums) driving delivery against the Partnership Plan and is established within the local authority governance structure. There is proactive involvement of a designated elected member and impact of Prevent work (including impact on local communities) is effectively monitored. Local authority Prevent leads share relevant information between Partnership Board and regional Prevent network meetings.

Benchmark 3 - Prevent Partnership Plan

The area has an agreed Prevent Partnership Action Plan.

1. No Prevent action plan in place.
2. A Prevent action plan exists but is owned by a single agency with no link to risk assessments. Actions have no timeframes or owners and are not regularly reviewed.

3. Multi-agency Prevent plan in place which references recommendations from the CTLP or risk assessment. Actions are reviewed infrequently and owned by one or two individuals.
4. The multi-agency Prevent plan describes statutory obligations. All relevant partners are named and involved in its development. Actions are clearly linked to the risk assessment, have ambitious timeframes and are owned by a broad range of partners.
5. The action plan achieves all of the above and is overseen by the Multi Agency Partnership Board. Partners are regularly held to account for actions. The plan includes progress updates which are disseminated across the organisation and used to inform future delivery.

Benchmark 4 - Referral Pathway

There is an agreed process in place for the referral of those identified as being at risk of radicalisation.

1. No agreed local process in place for the referral of those who are identified as at risk of being drawn into terrorism.
2. The agreed local Prevent referral pathway is inconsistently applied and little understood by those likely to generate or receive safeguarding referrals. There are frequent delays with identifying Prevent concern and sharing information with relevant partners.
3. Information on the agreed local referral pathway is accessible to those likely to generate or receive safeguarding referrals. Prevent referral processes are not necessarily mainstreamed into regular safeguarding systems. Counter-Terrorism Police are immediately notified of all Prevent referrals for deconfliction.
4. Clear and agreed Prevent referral pathways are understood and utilised by those likely to generate and receive safeguarding referrals. The process complements and functions well with mainstream safeguarding mechanisms. Information on referral pathways is documented and easily accessible. Cohorts likely to generate and receive safeguarding referrals are proactively targeted for training on Prevent referral pathways.
5. Feedback is provided where appropriate to the referrer. Process aligns with mainstream safeguarding systems, ensuring a holistic approach to safeguarding needs. Individuals not supported through Channel are referred on to other multi-agency services where appropriate. The success of referral pathways is reviewed regularly using relevant data, with training plans adapted accordingly.

Benchmark 5 - Channel Panel

There is a Channel Panel in place, meeting monthly, with representation from all relevant sectors.

1. No named chair or deputy. A panel may exist but has not met for a significant period of time.
2. Panel meets occasionally. No terms of reference or other standard operating papers exist. Lack of clarity over the named chair and deputy. Partners rarely attend. Limited use of interventions. Cases not regularly reviewed at 6/ 12 months.
3. Named Channel chair but no deputy. Panel meets sporadically with representation from some partners. Interventions are tailored to the individual. It is sometimes unclear when cases are formally adopted or closed.
4. Panel has a named chair and deputy. Panel functions well and meets regularly with most partners in attendance. Intervention providers and other bespoke interventions are used appropriately. Panel systematically reviews closed cases at 6/12 months.
5. Channel chair and deputy are trained, independent from other Channel roles/ oversight measures, and part of the national network. Panel meets monthly and has clear TOR, uses risk assessment tools, commissions a range of holistic interventions. Accurate record keeping, cases systematically reviewed and timely submission of the annual Quality Assurance Statement.

Benchmark 6 – Prevent problem-solving process

There is a Prevent problem-solving process in place to disrupt radicalising influences.

1. No formal mechanism or strategy in place for identifying and disrupting radicalising influences, including individuals, institutions and ideologies present in the area.
2. Named leads exist but may have a limited understanding of the local risk and mechanisms for disrupting radicalising influencers. Any disruptions activity is solely managed by the police.
3. Established multi-agency mechanisms are in place to identify and disrupt local radicalising influences. Mechanisms align with and involve local police.
4. Local partners, such as local businesses and education establishments, are engaged in the process as required. Information sharing is consistent and effective, including ad-hoc insights provided to the Home Office. Mechanisms and tactics for disruption are tailored to the local need but may include responding to radicalisers who operate via recruitment in public spaces, out of school settings or one-off events.
5. All relevant local partners are fully aware of how to respond tactically to radicalising influences and are involved in the coordination and delivery of the strategy. Detailed and timely local insights are shared with the Home Office. All named leads are trained in disruptions and have suitable security clearance. Deputies are named.

Benchmark 7 – Training

There is a training programme in place for relevant personnel.

1. No Prevent training taking place.
2. Training exists only as signposting to e-learning and is voluntary. No record of those undertaking learning.
3. Suitably experienced trainers undertake face to face sessions which are proactively advertised to all relevant staff. Raw attendee numbers are collated. Links to E-learning are proactively circulated via internal communications. All relevant staff in the partnership and its commissioned services understand when and how to make Prevent referrals and where to get additional support.
4. Suitably experienced trainers undertake face to face sessions. Staff mandated to attend training based upon role in organisation. Training is offered to different teams and sectors (including education) and is successfully tailored to the audience. Records kept of attendance. E-learning targeted at relevant practitioners and attendees asked to retain evidence of completion. All local statutory partners understand when and how to make Prevent referrals and where to get additional support.
5. Strategies in place to identify those requiring training. Prevent training embedded in all staff induction programmes. Plan in place to identify and deliver training jointly with statutory partners, ensuring clear uniformity and reduction in mixed messages. Strategy in place to prioritise cohorts (using Prevent referral source data to justify where possible), upskill others to conduct training, and collaborate with key partners (CTP, Health, Probation). Prevent leads regularly engage with learning & development opportunities.

Benchmark 8 – Venue Hire and IT Policies

There is a venue hire policy in place, to ensure that premises are not used by radicalising influencers, and an effective IT policy in place to prevent the access of extremist materials by users of networks.

1. No regard to Prevent Duty evident in local authority's venue hire or IT policies.
2. Some regard to Prevent Duty evident in the venue hire guidance issued for council owned properties. However, mitigation measures have not been effectively communicated to staff responsible for taking venue bookings. Basic firewall in place for IT systems operating in council buildings.

3. Audit of council-owned venues undertaken to understand and identify risk. Clear policies created for council owned venue hire and included in contracting arrangements. Venue staff have a sound awareness of the local risks and threats. Firewall blocks terrorist content for council staff.
4. Venue hire policies in place for all publicly owned venues and staff responsible for bookings are trained on how to conduct appropriate open source due diligence checks. A directory of all publicly owned venues exists. Information on local risks and threats is shared across agencies. Events are disrupted where risk and threat are identified. Firewall blocks terrorist content for council staff and IT provision for the public (libraries etc).
5. Information shared, in collaboration with partners such as counter-terrorism police, with all relevant venue staff on local risks and threats. Venue staff are aware of who to contact for additional support or information. Multi-agency tasking is in place to analyse issues and disrupt activity in partnership. Those responsible for other venues (parish councils, faith & community organisations, private sector companies) are encouraged to adopt similar policies. Firewall blocks terrorist content for publicly provided WiFi hotspots. The local authority report concerns to relevant national bodies (Home Office, Department for Education, NHS England).

Benchmark 9 - Engagement activity

There is engagement with a range of communities and civil society groups, both faith-based and secular, to encourage an open and transparent dialogue on the Prevent Duty.

1. No local Prevent-related community engagement taking place.
2. Some community engagement takes place on an ad hoc basis – such as in response to incidents – but no regular programme undergoing with a significant focus on Prevent, and no evidence of join-up with local partners.
3. Community engagement takes place at regular but infrequent standpoints, such as annual events and bi-monthly engagement with key groups. Engagement provides an opportunity for dialogue on Prevent with local citizens, including members of the public and key community figures such as school governors, faith leaders and youth workers. Consistent join-up with local partners, e.g. CSOs, to deliver engagement.
4. Basic engagement strategy in place, with community engagement taking place at regular, frequent standpoints – such as monthly engagement with key groups and two-three roundtable events per year depending on the area's unique circumstances. Strategy reviewed semi-regularly and some join-up with local partners to bolster approach. Prevent Advisory Group or similar permanent structure(s) in place but may not meet regularly and membership not fully representative of the local community. Occasional, ad hoc sessions with elected members. Evidence that engagement is leading to increased awareness and trust in Prevent or removal of other local barriers.
5. Bespoke engagement strategy in place and community engagement is fully embedded in business-as-usual Prevent delivery. Engagement spans community and elected members, and is regularly reviewed and refined to ensure it targets the right audiences and is impactful. Engagement through an established Prevent Advisory Group or similar permanent structure(s) that meets regularly (such as quarterly), allowing sufficient focus on Prevent and which is representative of the local community. Evidence that engagement is leading to significantly increased awareness and trust in Prevent, as well as other bespoke local objectives and/or removal of local barriers.

Benchmark 10 – Communications

There is a communications plan in place to proactively communicate and increase transparency of the reality / impact of Prevent work, and support frontline staff and communities to understand what Prevent looks like in practice.

1. No activity to illustrate local Prevent activity through local authority website, or other channels such as newsletters or social media. No other proactive communications activity.

2. Limited and sporadic activity (e.g. in response to specific incidents) on owned media channels containing reference to the Prevent programme, such as the local authority website, social media or newsletters. Owned media channels are kept updated with accurate contact details. No communications strategy in place and no other proactive communications activity taking place, such as media or resource development.

3. No communications strategy in place but evidence of regular proactive communications activity, such as monthly news stories on owned media channels such as newsletters, and quarterly development of comms materials such as case studies (where possible). Press opportunities are flagged with the Home Office comms team for support and some instances of proactive opportunities being highlighted – such as local achievements. Owned media channels have accurate contact details and detailed information about Prevent.

4. Communications strategy in place that works to set objectives (such as increasing transparency and awareness, or reducing inaccuracies about the programme). Opportunities for positive press are consistently shared with Home Office comms and reactive opportunities are flagged for support. Regular (e.g. monthly) publication of new materials and resources to owned channels, such as newsletters or on the Local Authority website. Owned media channels have accurate contact details and detailed, localised information about Prevent.

5. Extensive communications strategy in place, tailored to local objectives and audiences. Approach reviewed/ evaluated annually or more frequently where appropriate. Strategy is aligned with partners' activity with regular comms join-up, such as sharing each other's resources if applicable. Evidence of comprehensive and regular implementation, such as publication of information through owned media channels – such as statistics, and development of bespoke resources such as videos, where possible. Area volunteers to support national publications and regularly flags opportunities for proactive press to the Home Office.

This page is intentionally left blank