



HM Government

Channel Duty Guidance:
**Protecting people
vulnerable to being
drawn into terrorism**

Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism

**Statutory guidance for Channel panel
members and partners of local panels**

OGL

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Guidance for members of a panel and partners of local panels in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to provide support for people vulnerable to being drawn into terrorism.

Status and scope of the duty

1. This guidance has been issued under sections 36(7) and 38(6) of the Counter-Terrorism and Security Act 2015 (the CT&S Act) to support panel members and partners of local panels; panel members and partners of local panels must have regard to this guidance. The Counter-Terrorism and Border Security Act 2019 provides an additional provision relating to Channel.
2. Section 36 of the CT&S Act sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. In England and Wales, this duty is met through Channel panels. For the purpose of this guidance, the term 'Channel' refers to the local authority-led support and the duty as set out in the CT&S Act. Separate guidance is in place to cover Scotland.
3. This guidance is specifically aimed at members and partners of local panels involved in the Channel process. The list of partners of local panels subject to the provision can be found in Schedule 7 of the CT&S Act (also replicated in Annex B of this guidance). As a designated statutory duty, the requirements of Channel should be reflected in relevant local policy, guidance and the local authority's constitution.
4. The purpose of this document is to:
 - provide guidance for Channel panels
 - provide guidance for panel partners on Channel delivery (that is, those authorities listed in Schedule 7 to the CT&S Act who are required to co-operate with Channel panels and the police in the carrying out of their respective functions under section 36 of the CT&S Act – the list is also replicated in Annex B of this guidance)
 - explain why people may be vulnerable to being drawn into terrorism and describe indicators that suggest this
 - provide guidance on the support that can be provided to safeguard those at risk of being drawn into terrorism
 - explain how a Prevent referral is assessed to determine suitability for support through Channel

Section 1:

Prevent

5. The aim of Prevent is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Delivery of Prevent is grounded in early intervention and safeguarding.
6. Prevent addresses all forms of terrorism and we continue to prioritise according to the threat posed to our national security. The allocation of resources will be proportionate to the threats we face. The most significant of these threats is currently from terrorist organisations associated with Al Qa'ida, Daesh, terrorists associated with extreme right-wing ideologies and lone actors inspired by such organisations.¹
7. Prevent has three objectives in CONTEST:
 - tackle the causes of radicalisation and respond to the ideological challenge of terrorism
 - safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
 - enable those who have already engaged in terrorism to disengage and rehabilitate
8. The UK Government remains absolutely committed to protecting freedom of speech. But preventing terrorism will mean challenging extremist (and non-violent) ideas that are also part of a terrorist ideology, including instances of unclear, mixed or unstable ideology. Prevent also facilitates interventions to stop people moving from extremist activity to terrorist-related activity.
9. The Counter-Extremism Strategy defines extremism as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.'²

¹ This list is not exhaustive. Risk and threat to the UK is subject to constant review and updated accordingly.

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470088/51859_Cm9148_Accessible.pdf

10. Section 26 of the CT&S Act places a duty on certain bodies in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism'. Separate guidance has been issued on the Prevent duty.³
11. Channel forms a key part of Prevent. The process adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. There is no fixed profile of a terrorist, so there is no defined threshold to determine whether an individual is at risk of being drawn into terrorism. However, signs that extremist views are being adopted can be used to assess whether the offer of early support should be made. Unlike mainstream safeguarding for adults and children, there is no threshold to make a Prevent referral for an individual to access assessment and specialist support. There may be cases that require a safeguarding response in conjunction with Prevent.
12. Clear distinction should be made between individuals who present with a 'terrorism vulnerability' requiring Channel support and those who pose a 'terrorism risk' requiring management by the police. The process for undertaking assessments of risk and vulnerability informs this determination and is kept under review. Should there be an escalation of risk, the police may remove a case from Channel if appropriate.

Practice example 1: 'vulnerable to being drawn into terrorism'

While not exhaustive, this could include cases where individuals:

- are accessing extremist materials
- are espousing scripted extremist narratives
- are demonstrating acute behaviour changes in relation to our working definition of extremism
- have had potentially traumatic exposure to conflict zones
- are acutely intolerant towards people from different ethnic backgrounds, cultures or other protected traits as defined in the 2010 Equality Act

Other complex needs can play a part in amplifying grievance narratives.

The gateway assessment undertaken by police will ultimately determine whether an individual is appropriate for consideration by a Channel panel.

Case study 1: 'unclear, mixed or unstable ideology'

A young person is receiving treatment for depression, which has included suicidal thoughts.

Child and adolescent mental health services support has identified concerns regarding an increasing fixation with committing mass casualties at their school, which seems to have increased since receiving a school suspension for violent behaviour.

The young person recently disclosed engaging in chat rooms where they have been receiving encouragement to carry out these acts.

³ <https://www.gov.uk/government/publications/prevent-duty-guidance>

Section 2:

Channel

- 13.** Channel was first piloted in 2007 and rolled out across England and Wales in April 2012 before being placed on a statutory footing in 2015. Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Section 36(1) (a) and (b) of the CT&S Act relates to a Channel panel in England and Wales and should be a multi-agency partnership having the specific function as per section 36(4). Channel uses a multi-agency approach to:
- identify individuals at risk
 - assess the nature and extent of that risk
 - develop the most appropriate support plan for the individuals concerned
- 14.** Channel provides early support for anyone who is vulnerable to being drawn into any form of terrorism or supporting terrorist organisations, regardless of age, faith, ethnicity or background. Individuals can receive support before their vulnerabilities are exploited by those who want them to embrace terrorism, and before they become involved in criminal terrorist-related activity. Cases adopted onto Channel should have a vulnerability to being drawn into terrorism.
- Cases should not be held in Channel where no such vulnerability exists.⁴
- 15.** Success of Channel is dependent on the cooperation and coordinated activity of partners. It works best when individuals and their families engage and are supported consistently. Further information relating to consent for Channel support and engaging individuals and their families can be found in Section 6 of this guidance.
- 16.** The police or local authority coordinate activity by requesting relevant information from panel partners about a referred individual. They will use this information to make an initial assessment of the nature and extent of the vulnerability the person has. The information will then be presented to a Channel panel.

⁴ Relates to any terrorism-connected offending, as per the breadth of UK terrorism legislation (including CT&SA; Terrorism Act 2000 & amendments; Terrorism Prevention & Investigation Measures Act 2011; Counter-Terrorism & Border Security Act 2019).

17. The CT&S Act is intended to secure effective local cooperation and delivery of Channel in all areas, and build on the good practice already operating in many areas. In practice this means:
- local authorities will have a Channel panel in their area
 - the local authority will provide the panel chair and deputy chair
 - the panel will develop a support plan for individuals adopted as Channel cases
 - where Channel is not appropriate, the panel will consider alternative forms of support, including health care and social care services
 - the panel will ensure accurate records are kept detailing the support plan, agreed actions and decision-making, and outcomes
 - all partners of a panel (as specified in Schedule 7), as far as is appropriate and reasonably practicable, will cooperate with the police and the panel in the carrying out of their functions
19. National learning has highlighted the importance of compliance with Channel processes to reduce the risk of individuals being drawn into or supporting terrorism. Monitoring and oversight responsibilities should sit as part of local governance arrangements within the local authority. These requirements are detailed further in Section 3 of this guidance. Nationally, an enhanced monitoring and escalation framework has been developed to assess compliance and strengthen the consistency of operational practice necessary to reduce the risk of individuals being drawn into terrorism, by providing support and direction to panels and panel members as required.
20. The monitoring and escalation framework includes:
- reviewing referral and case data using the approved Home Office case management system
 - undertaking Channel observations
 - providing support through peer review
 - offering panel or chair training

Monitoring Channel duty compliance

18. Sections 36(7) and 38(6) of the CT&S Act require panels and partners to have regard to this guidance in both the exercising of panel functions and in cooperation with the panel and the police in carrying out their functions. The power to give direction where a specified authority has failed to discharge the duty imposed on it by section 26(1) is provided under section 30 of the CT&S Act. All specified authorities must comply with this duty and are expected to maintain appropriate records to show compliance with their responsibilities and provide reports when requested.
21. Local authorities may wish to set up regional Channel peer networks which may facilitate the sharing of good practice, providing an additional source of advice and mutual support.
22. Prevent and Channel now feature within a range of inspection regimes. Adherence to this guidance provides additional assurances that local cross-sector requirements to safeguard people vulnerable to being drawn into terrorism are being met.⁵

⁵ Inspection regimes such as Office for Standards in Education (Ofsted), Care Quality Commission (CQC) and Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMCFRS) include elements of Prevent within their inspection frameworks. Some of these inspections may be initiated when concerns are raised.

Practice example 2: monitoring compliance

A newly appointed employee has adopted Channel chair responsibilities in a local authority area and has observed that panel processes do not align with the national guidance.

A self-assessment is completed with input from panel members and external input is sought for a Channel peer reviewer to undertake an observation of a Channel panel meeting.

Recommendations for improvement are made, and this, along with the self-assessment audit are used to agree a six-month improvement plan.

Practice example 3: monitoring compliance

An area has had no live Channel cases for 10 months, although the Home Office case management system highlights that referrals are in line with the national average.

A member of the Home Office team attends a Channel panel meeting to undertake an observation and identifies a reticence from panel members to adopt cases due to perceived stigmatisation on individuals. Referrals are instead re-directed to alternative case management forums for discussion.

The Home Office observer makes recommendations for improvement for immediate application and suggests access to available training.

The progression of referrals is monitored at the Home Office for a period with a view to offering further support if needed.

The Home Office will work with Counter-Terrorism Policing Head Quarters to share any concerns and agree necessary steps for improvement in partnership with the local authority and police.

Section 3:

Channel panels and partners of a panel

Requirements for panels

- 23.** Section 36 of the CT&S Act places a duty on local authorities to ensure that a Channel panel is in place for their area. This should constitute a single panel, with a single chair, covering the needs of adults and children.⁶ The local authority Channel chair and panel members should have confidence that their arrangements are appropriate to cater for the unique vulnerabilities associated with those who may be drawn into or support terrorism.
- 24.** As a minimum, the local authority should ensure these meetings are serviced and administrated appropriately. The Channel panel chair should have the contact details of relevant local partners in their area to aid their ability to call meetings at short notice if required.
- 25.** Section 37(5) of the CT&S Act requires Channel panels to be chaired by the responsible local authority (that is, the authority responsible for ensuring

a panel is in place). Members of the panel must include the responsible local authority and the police for the relevant local authority area under section 37(1) of the CT&S Act, and they have principal responsibility for Channel in their areas. Under the CT&S Act, the definition of a local authority is one of the following:

- a county council in England
- a district council in England, other than a council for a district in a county for which there is a county council
- a London Borough Council
- the Common Council of the City of London in its capacity as a local authority
- the Council of the Isles of Scilly
- a county council or county borough council in Wales
- a council constituted under section 2 of the Local Government etc. (Scotland) Act 1994

⁶ Except in instances where combined arrangements have been agreed.

26. In the case of two-tier authorities, it is the responsibility of the county council to chair the panel and take on all the responsibilities as detailed in Section 4 of the guidance.
27. Section 38 of the CT&S Act places a duty to cooperate on all partners of a panel, as far as is appropriate and reasonably practicable, to assist the police and the panel in carrying out their functions under the CT&S Act. The local authority chair and the police will be present at each panel. Schedule 7 to the CT&S Act lists the partners required to cooperate with the panel (see Annex B), alongside other members, as determined by the panel (section 37(4)). If the panel chooses one of the Schedule 7 partners to be a member, there is an expectation that the partner will agree to sit on the panel if requested to do so.
28. Depending on the nature of the referral, the panel may also include, but not be limited to, representatives from the following groups:
- NHS
 - social workers
 - schools, further education colleges and universities
 - youth offending services
 - children's and adults' services
 - local safeguarding arrangements
 - local authority safeguarding managers (adult and/or children)
 - local authority Early Help services
 - Home Office Immigration (Immigration Enforcement, UK Visas and Immigration)
 - Border Force
 - housing
 - prisons
 - probation providers
29. For organisations that are not subject to the Prevent duty, there may be an expectation to engage with the Channel panel for the area if required. For example, NHS contract arrangements include a contractual obligation to pay due regard to Prevent, by which it may be appropriate to engage with the local Channel panel.

Determining the lead authority for Channel

30. If a case involves two or more upper-tier local authority areas (e.g. if the individual resides in one authority but works or attends school in another, or in the case of a looked-after child who is the responsibility of one authority but housed in another), the lead authority for the purposes of Channel is always the authority in which the individual resides. There are two reasons for this:
- the individual will draw on local services within their place of residence
 - counter-terrorism policing responsibilities include managing risk in their respective policing area
31. This should not be affected by the individual taking a temporary absence from the area. Where individuals are placed temporarily outside of their normal place of residence, the placing authority will retain responsibility for convening the panel.⁷ Where an adult is deemed to be of no settled residence, the lead authority for Channel is then the authority where they are physically present.

⁷ The courts have held that temporary or accidental absences, including, for example, holidays or hospital visits in another area, do not necessarily break the continuity of ordinary residence, and local authorities should take this into account.

32. The Department of Health and Social Care provides oversight and guidance on ordinary residence, and if required of ordinary residence disputes, in accordance with the relevant Care Act 2014 provisions as well as the Care and Support Statutory Guidance 2015.⁸

Case study 2: residency and lead authority example

A 12-year-old child is the subject of a care order by area A, which has placed him in a children's home in area B.

The accommodation provider has submitted a referral following concerns that he is being influenced by radicalisers at school.

The referral is progressed in area B, where the child now resides and is adopted on Channel. Social care in area A provide consent for the child to receive Channel support.

The child's social worker in area A attends or reports into the Channel meetings and ensures his care plan is revised and updated, progressing any social care actions as needed.

Other interventions, such as access to Connexions, input from school and mental health support, would be provided through area B.

Area B can raise any concerns it has about the care plan direct with social care in area A or via area A's Independent Reviewing Officer. Contact was made with the school to consider referrals and school support in relation to tackling the radicalising influences present there.

Combined panels

33. Section 41(3) of the CT&S Act makes provision for two or more local authorities to have a panel in place for a combined area, allowing for proportionate and efficient use of resources. Where local authorities decide to run panels in conjunction with more than one other local authority, the authorities can determine between them who should chair the meeting. Panel members and the chair should be satisfied that the combined panel is fit for purpose and that it will effectively manage the terrorism vulnerability associated with cases supported through Channel.
34. Combined panels should have the following members:
- representation from each local authority relevant to the referrals and cases to be discussed
 - police representation for each of the local authorities relevant to the referrals and cases
 - other panel members as referrals and cases dictate, which may also include partners listed in paragraph 28

⁸ <https://www.gov.uk/government/publications/care-act-statutory-nce/care-and-support-statutory-guidance#Chapter19>

Practice example 4: combined panels

An area where there had been no Channel cases for 12 months opted to have a combined Channel panel with a neighbouring authority that also has a low number of Channel cases.

Meetings were scheduled monthly in advance, but only convened when the panel considered referrals or held a live case.

Chairing and deputy chairing responsibilities were split between the two areas with both attending panel meetings, providing opportunity for their skills, experience and case exposure to be kept up to date.

A full panel meeting was convened quarterly to review practice and agree panel development.

Governance

- 35.** Channel panels are most effective when clear governance processes are in place to provide local oversight and ensure accountability. Each local authority area should determine the most appropriate governance arrangements for its Channel panel. Where there is a combined panel, Channel governance should feed into multi-agency arrangements as appropriate for each authority. Governance responsibilities could be held by existing statutory multi-agency partnerships, such as Community Safety Partnerships or County Strategy Groups, or through other local strategic bodies such as CONTEST boards.
- 36.** Functions of the governance arrangements may include assessing compliance with Channel duty requirements, overseeing implementation of development plans, and assessing referral data and anonymised case studies to monitor performance. To ensure clear lines of accountability are maintained, it is recommended that the chair for strategic governance should not hold responsibility for elements of Channel panel oversight or delivery. The local strategic governance structure should provide relevant data to inform development of the counter-terrorism local profile (CTLTP) for the area, as well as be briefed on CTLTP content and kept abreast of changes to the local threat picture.⁹ A process of escalation should also be agreed and disseminated to panel members enabling concerns relating to the form or function of the Channel panel in the area to be raised.
- 37.** Details of how to raise Prevent concerns or refer individuals for assessment to receive support should be promoted locally by the local authority and partners. The National Prevent Referral Form should be utilised to make referrals wherever possible.

⁹ A CTLTP is a report that outlines the threat and vulnerability from terrorism-related activity within a specific area. Further details can be obtained from local Counter-Terrorism Policing.

Section 4:

Channel panel roles

The police counter-terrorism case officer and Channel coordinator

- 38.** For the purpose of this guidance, any reference to the Channel Case Officer refers to either the police counter-terrorism case officer (CTCO) or the Home Office-funded Channel coordinator, employed by the local authority.¹⁰
- 39.** All Channel Case Officers are responsible for:
- managing referrals and cases through the Channel process in accordance with the Channel guidance and case management principles
 - ensuring that referrals are dealt with swiftly, and where appropriate, brought to the attention of the Channel panel as soon as possible
 - ensuring case information is accurately recorded and retained on the Home Office-approved case management system
 - regularly reviewing and amending the vulnerability assessment framework (VAF) as a case progresses to accurately reflect all relevant vulnerabilities and risk.

In addition, the CTCO is responsible for:

- assessing any escalating risk associated with the individual's potential involvement in terror-related activity and transferring cases to police-led partnership or into Pursue wherever appropriate.¹¹
- 40.** The CTCO should attend every Channel panel. The chair should also consider the value of having local policing as standing members to add local context and provide local support and tactical options.

The local authority chair

- 41.** Section 37(2) of the CT&S Act stipulates requirements relating to the local authority representative and the police. The local authority representative, the Channel chair, should be held by a designated officer within the responsible local authority. Where a panel covers more than one local authority area, chairing responsibilities are to be agreed between the authorities.

¹⁰ The Channel coordinator role referenced here relates only to those local authorities designated by the Home Office to make the section 36 decision.

¹¹ Pursue is a strand of Contest 2018 aimed at stopping terrorist attacks in this country and against UK interests overseas.

42. The function of chairing a Channel panel is a significant responsibility, and as such the local authority Chief Executive Officer, or the equivalent Head of Paid Service, should be satisfied that the designated chair is ‘a person considered to have the required skills and experience’ and ensure they have sufficient capacity and resource to fulfil these functions. This should be an officer with the appropriate authority to facilitate the engagement of multi-agency partners and the direction of their resources to aid delivery of the support plan. To build resilience into the process, a deputy chair role should also be designated to an officer of similar standing as the chair. An annual Assurance Statement will be requested from the local authority detailing the named officers designated by the Chief Executive Officer to fulfil these roles and to confirm suitable arrangements are in place to meet the requirements set out in this guidance. Any changes to the named officers fulfilling the chair/deputy roles must be notified to the Home Office.
43. To enable the chair/deputy chair to take full ownership of the Channel process and apply appropriate challenge where necessary, both roles should hold a degree of independence from Home Office-funded programmes that have responsibility for Prevent or elements of Channel delivery. As a minimum, the following core competencies should be applied to the appointment of the chair/deputy chair, to ensure Channel panels and the chair responsibilities are fulfilled to a consistently high standard:
- holding sufficient authority to direct multi-agency delivery
 - having previous experience in chairing multi-agency meetings
 - having a sound understanding of Channel, within the context of Prevent and CONTEST
 - not holding a Home Office-funded position responsible for elements of Channel or Prevent delivery
 - committing to complete training as required
44. While not mandatory, it is recommended that chairs/deputy chairs of Channel panels acquire UK National Vetting clearance at ‘Security Check’ (SC) level to enable police to share more sensitive information with the Channel chair as part of their Channel responsibilities and to strengthen local authority involvement in police-led partnership case management. Requests for security clearance vetting should be directed to the Home Office.
45. The Channel panel chair is responsible for:
- having oversight of all Channel cases in their area
 - ensuring that the appropriate representatives are invited to each meeting as panel members
 - establishing effective relationships across partners of the panel to ensure effective cooperation over information sharing, attendance at panel meetings and delivery of support
 - establishing the appropriate support plan for identified individuals, which takes account of wider family context and needs, by using the expertise of the panel
 - ensuring that vulnerabilities of persons at risk of being drawn into terrorism are assessed by the panel and accurately reflected in Channel minutes
 - ensuring an effective support plan is put in place and that consent is sought from the individual (or their representative) before support is accessed
 - ensuring the most appropriate panel member is tasked to update individuals/families on progress where appropriate

- ensuring individuals and/or organisations on the panel carry out their elements of the support plan, holding partners to account where necessary through proactive management of actions, enquiries and interventions
- ensuring all decisions and the rationale for decisions are reflected within the Channel panel minutes
- ensuring appropriate information exchange occurs where individuals transfer between services
- ensuring the panel functions effectively to address identified vulnerabilities
- actively addressing or escalating issues of non-engagement within partner organisations or concerns relating to local Channel form or function through local governance arrangements where needed
- applying professional judgement and providing the casting vote on the adoption of cases where there is no consensus among panel members
- highlighting and requesting that identified gaps in local service provisions are considered by commissioners
- ensuring information sharing arrangements are in place for the panel in compliance with General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA 2018), in partnership with local information governance and legal teams¹²
- liaising with other local authority teams (such as child and adult protection) if appropriate, to ensure that Channel support is aligned and coordinated with other safeguarding processes

46. The chair should be briefed by the Channel Case Officer in advance of panel to aid agenda setting, meeting preparations and identify the appropriate panel members required to be in attendance. The pre-brief should only be used to provide a summary of referrals for consideration at panel: it should be concise, brief and not treated as a decision-making forum or a filter for consideration of Channel referrals.

Panel members

47. Multi-agency involvement in the Channel process is essential to ensure that individuals at risk of being drawn into terrorism have access to a wide range of support, from specialist services to diversionary activities. Multi-agency involvement in Channel is essential to ensure the full range of information is accessible to the panel, so that vulnerabilities, risk and support needs can be fully assessed.
48. Panel members have a responsibility to work collaboratively with the chair and panel partners to aid the mitigation of identified risk and vulnerabilities. This will include attending panel meetings as required, contributing towards the support plan, and sharing information necessary and proportionate to the effective working of the panel (in line with the panel's locally agreed information sharing agreement). Panel members are attending the local Channel panel not as experts in counter-terrorism, but as experts in their respective profession and the service and support provision available locally. Where possible, membership of Channel should be consistent to ensure effective management of cases.

¹² The GDPR and DPA 2018 are the principal legislation governing the process of data relating to individuals. Further details can be found in Annex A of this guidance.

49. Schedule 7 of the CT&S Act details partners required to cooperate with local panels (see Annex B), though membership of panels should be tailored to reflect local provision. NHS England guidance is available for mental health services on their roles and service standards.¹³ Where the case involves a serving member of the armed forces, an appropriate representative from that service who is familiar with the individual's circumstances may be invited to attend.¹⁴
50. In two-tier arrangements, the Channel Case Officer must ensure the Prevent lead for the district or borough council is contacted, as a matter of course to request information to inform the VAF. Borough or district councils should be included within Channel information-sharing agreements to facilitate this information exchange. It is also good practice for the county council chair to liaise with representatives at the district or borough council level where the individual resides to keep them updated on referrals within their area, and for these to be invited to attend the panel where appropriate.

¹³ <https://www.england.nhs.uk/wp-content/uploads/2017/11/prevent-mental-health-guidance.pdf>

¹⁴ This would be subject to securing consent from the individual receiving support.

Section 5:

Channel process

Identifying individuals vulnerable to risk of radicalisation

- 51.** There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include:
- peer or family pressure
 - influence from other people or via the internet
 - bullying
 - being a victim or perpetrator of crime
 - anti-social behaviour
 - family tensions
 - hate crime
 - lack of self-esteem or identity
 - personal or political grievances
- 52.** All Channel Case Officers and local authorities should develop effective links between services, such as the education sector, social services, health, children's and youth services, offender management services and credible community organisations, so services are well placed to identify and refer individuals vulnerable to being drawn into terrorism with whom they have contact.
- 53.** Channel Case Officers and local authorities should use their networks to highlight the importance of protecting those who are susceptible to being drawn into terrorism and to raise awareness about how Channel can offer support. Details of available training for practitioners are provided in Section 7 of this guidance. It is not expected that panel members, or professionals making a referral, should be experts in terrorism or radicalisation, however, they should be experienced practitioners in their own field.
- 54.** When assessing the vulnerabilities and risks of an individual being drawn into terrorism offending of any kind, consideration should be given to contextual safeguarding principles, and the full range of relevant indicators, influencing factors and relationships that may have an impact on an individual's level of risk and vulnerability at any given time. This may include direct contact with extremists, community, family influences or the influence of wider networks, such as materials sourced via online or social media platforms. Alignment and coordination with other support structures, available to address

wider safeguarding needs (e.g. Multi-Agency Risk Assessment Conference (MARAC) or child in need), should be considered by the panel.¹⁵ A safeguarding overview is provided in Section 9 of this guidance.

Case study 3: contextual safeguarding/variation in support package

A 15-year-old pupil began receiving support through Channel following a Prevent referral from their school.

The pupil had disclosed making plans to travel to continental Europe after becoming fixated on a right-wing group based there.

Further discussions revealed the pupil was being influenced by a third party with known links to this group.

Enquiries were ongoing with police to identify the third party.

Initial support centred on reducing the immediate risk of travel with an emergency Channel panel meeting convened between the Channel chair, social care and police to consider the necessary legal safeguards to do this.

The resulting support plan accounts for changes in vulnerability, with interventions informed by responsiveness to the support provided. Parents were engaged with planned support and updated on progress.

Risk Indicators/ Protective Factors	Intervention	Provider	When
Over-identification with group, cause or ideology	Travel restrictions put in place	Social Care/police	Immediate
Susceptibility to indoctrination	Ideological support provided	Home Office-approved Intervention Provider (IP)	0-2 months
Strengthen parental protective factors	Parental training provided on internet awareness	Early Help	0-1 month
Grievance/injustice	Advice on Further Education options	Connexions	2-3 months
Grievance/injustice	Pastoral support provided	School	2-8 months
Susceptibility to indoctrination	IP sessions resumed for a short period to assess the pupil's vulnerability and potential disguised compliance after third party influence resumed	Home Office-approved IP	6-7 months

¹⁵ Multi Agency Risk Assessment Conference (MARAC) is a partnership response to supporting victims of domestic abuse.

Referral stage

55. Prevent referrals are often likely to be made in the first instance by individuals who come into contact with those who appear to be at risk of being drawn into terrorism, usually following a degree of deliberation on the part of the referrer. Individuals making a referral should follow the 'Notice, Check, Share' procedure before making a referral to the police.¹⁶
56. All Prevent referrals are triaged in the first instance by specialist police officers and staff. These officers determine whether there is reasonable cause to suspect that an individual is vulnerable to being drawn towards any terrorism offences, and therefore appropriate for support through Prevent. This 'gateway assessment' draws upon police databases and other resources to determine the level of vulnerability and risk around the referred individual, and whether the referral/ case will move into (or out of) Prevent.
57. After this gateway assessment, the primary route for individuals identified as having Prevent relevant vulnerabilities is support through local authority-led, multi-agency Channel panels.
58. After the gateway assessment, individuals whom the police reasonably suspect pose a serious or imminent risk of terrorism offending, are unlikely to be signposted onwards for support through Channel. Depending upon the type and level of terrorism risk identified by police, these cases may be adopted for management in the police-led partnership or escalated into the Pursue space.

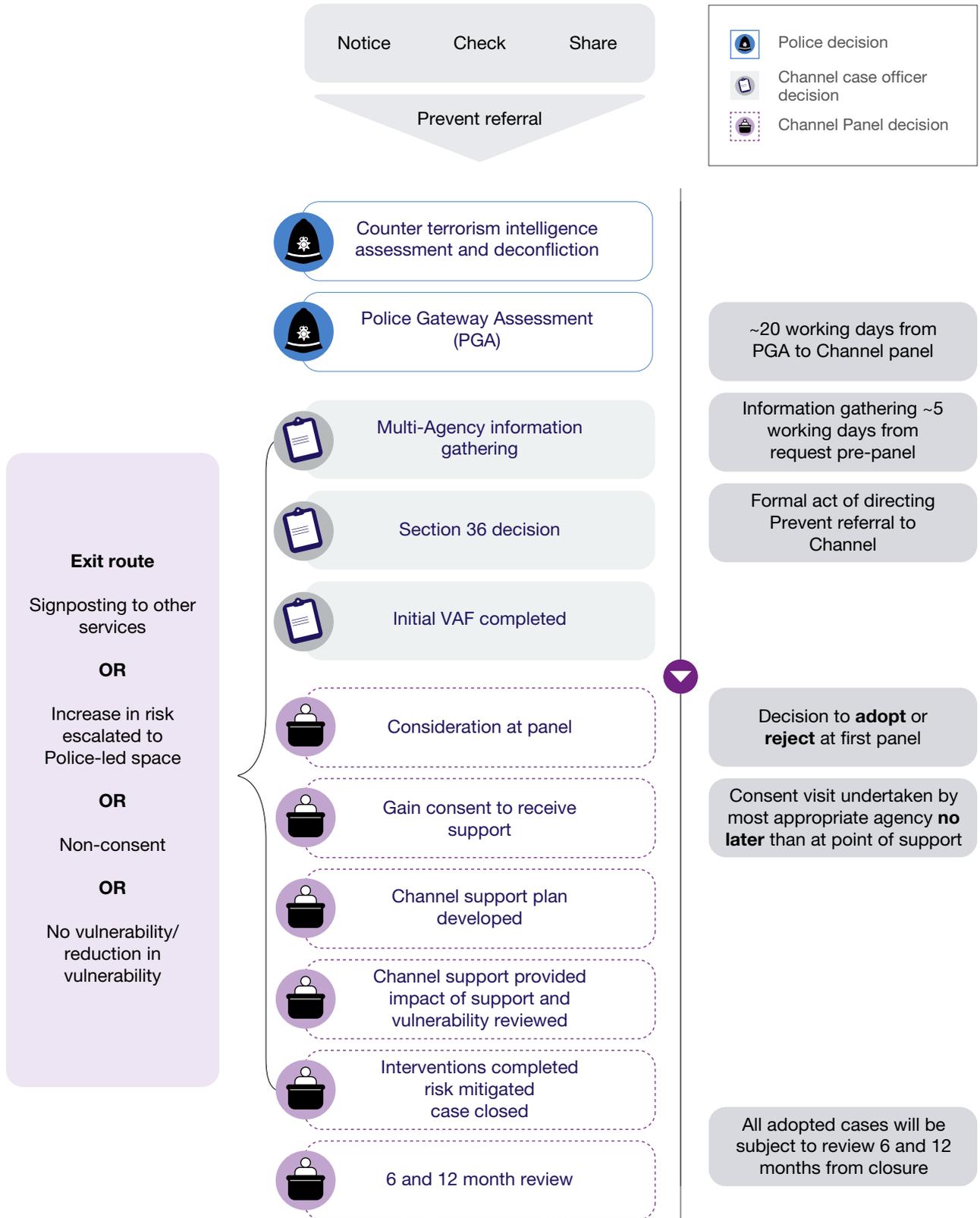
59. Every case adopted into Channel is kept under review and routinely re-assessed for any changes to identified vulnerabilities and risks in relation to terrorism-connected offending. Should there be an escalation of risk, where deemed appropriate, the police may remove a case from Channel to police-led partnership or escalate it into Pursue.

Screening and information gathering stage

60. If the initial information received through the referral shows there is not a vulnerability that puts the individual at risk of being drawn into terrorism, then the case is not suitable for Channel; the Channel Case Officer will refer the individual to other more appropriate support services. The reasons for that referral and details of onward signposting must be recorded appropriately. This will ensure that only those referrals where there is a genuine vulnerability of this kind are progressed to Channel.

¹⁶ 'Notice, check, share' is the initial procedure applied when there is a concern that someone might be at risk of radicalisation. Details are provided in the Home Office training accessed here: <https://www.elearning.prevent.homeoffice.gov.uk/>
Local referral routes may include submission via local authority mechanisms, however, all Prevent referrals will be forwarded to police.

Diagram 1.0: Pathway Diagram



61. All Prevent referrals will first be triaged through a gateway assessment of risk and vulnerability by the police. Those that are appropriate for consideration at Channel are subject to a further, more detailed vulnerability assessment led by the Channel Case Officer. This assessment of vulnerability is informed by information sharing with wider Channel partners and must be circulated to Channel panel members in advance of the meeting. As part of this more detailed assessment, the local authority should ascertain to what extent services are already involved with the individual, including through immediate family, and liaise with relevant teams to ensure safeguarding processes are aligned with the Channel process where appropriate.
62. The gateway assessment should determine the most appropriate forum for the referral to be discussed. Once the gateway assessment and multi-agency information gathering is complete and the referral is deemed to be appropriate for consideration at Channel by the section 36 decision, it should be recorded on the Home Office-approved case management system used for recording and managing Channel cases. The CTCO should be in receipt of, or as a minimum cited on, partner responses to the request for information. All minutes of Channel meetings must be recorded on this system.¹⁷
63. Where a Prevent referral is made, it is good practice for the referrer to be contacted by the police or Channel Case Officer where it is appropriate to do so. This may be in instances where clarification is needed on aspects of the referral and to be advised on either the outcome of their referral or provided with advice on any continuing engagement with the individual concerned. Assurances should be given that re-referrals can be made where concerns continue or escalate.
64. A Prevent referral can only be considered if it is progressed through the pathway detailed in diagram 1.0.
65. Channel panels must decide on whether or not to adopt for all referrals presented for consideration. This can include adopting cases while an approach is made to source an individual's consent for support or where further information gathering is undertaken. There should be no instances where there is no decision on case adoption; decisions must not be deferred, nor referrals held for a period of 'monitoring' by panels without adoption.

Cooperation by partners of a panel

66. Partners of a panel may be requested to provide information about an individual to the Channel Case Officer during the information gathering stage. It is considered good practice for the panel to draft a local information sharing agreement to expedite the appropriate sharing of information. A template for local adaptation is available on the KnowledgeHub.¹⁸
67. Section 38 of the CT&S Act requires the partners listed in Schedule 7 (repeated in Annex B to this guidance) to cooperate with the panel and the police in providing any relevant information so that it can determine whether an individual is vulnerable to being drawn into terrorism. Partners are expected to respond to the Channel Case Officer within five working days of receipt of any information requests.

¹⁷ The Counter-Terrorism & Border Security Act 2019 extended provision for local authorities designated by the Home Office to make the section 36 decision. Within those designated local authorities, this decision is typically made by the supervisor of the Channel Case Officer.

¹⁸ <https://www.khub.net/group/prevent1>

Information sharing

- 68.** The partners of a panel must cooperate with the panel and the police in carrying out their functions for Channel. The duty to cooperate extends as far as is compatible with the partners' legal responsibilities in respect of their functions. Compliance with the duty does not require or authorise the making of a disclosure that would contravene the DPA 2018 or the GDPR. It is important that local organisational information governance leads and legal teams are consulted on the principles of information sharing with the panel.
- 69.** The GDPR, DPA 2018 and Human Rights Act 1998 (HRA 1998) are not barriers to justified information sharing, but instead provide a framework to ensure that personal information about individuals is shared appropriately.¹⁹ Under the GDPR and DPA 2018, information may be shared where there is a lawful basis to do so, for example when fulfilling a statutory function such as that set out in section 36 of the CTS&A. A full list of lawful bases, as published on the Information Commissioner's Office (ICO) website, can be found in Annex A.
- 70.** When requesting information from or sharing information with partners, the basis on which the request is being made should be stated clearly. When responding to a request to share information, the grounds for doing so must be legitimate and in accordance with the law (see Annex A). Information should only be used for the purpose for which it was requested.
- 71.** Information shared for the purposes of Channel will often include special category data. When sharing special category data, a lawful basis under Article 9 must be identified supplementary to the lawful basis under Article 6 GDPR. Further information on information sharing, including all lawful bases, an example lawful basis and special category data is detailed in Annex A.
- 72.** Consent to share information is distinct from consent to receive support. These two issues should not be conflated or treated as a single consent.
- 73.** Processing authorities must be aware of the individual rights of the data subject. While consent is not necessarily required for information sharing, the data controller must take steps to ensure the subjects' individual rights are met. More information on individual rights can be found on the ICO website and is detailed further in paragraphs 118-123.²⁰
- 74.** If a panel partner has any concerns about the appropriateness of sharing the requested information, they should consult with the Channel Case Officer, the local authority Channel panel chair, legal advisers and their own information governance teams to ensure all are satisfied that the information requested is lawful, proportionate and necessary.
- 75.** If panel partners have provided information for the Channel panel, it is highly likely that they will be invited to attend the meeting to discuss the individual case. Panel partners invited to meetings should attend to ensure that the full range of an individual's vulnerabilities can be discussed, and expert advice sought from attendees.

¹⁹ <http://www.legislation.gov.uk/ukpga/1998/42/contents>

²⁰ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Practice example 5: cross-sector information sharing

An employer referred an employee, after Islamist extremist materials were left on a work photocopier and staff had reported their increased intolerance towards non-Muslim colleagues.

Following the Prevent referral, information was requested, and the following responses received from panel partners:

- Early Help: accessed domestic abuse and parenting advice but disengaged from services
- mental health: previously in receipt of services but case closed due to non-attendance
- housing: individual is sole tenant and lives with spouse and two children
- anti-social behaviour team: neighbours report abusive visitors; tenant is threatening to staff. Tenancy enforcement pending and individual is on the 'potentially violent persons' register
- local policing: attended to reports of domestic abuse; previous conviction for violent disorder with use of a weapon linked to an Islamist extremist group activity

The Channel panel Information Sharing Agreement identified legal bases allowing swift exchange of relevant and proportionate information.

A comprehensive picture of individual and family circumstances was developed. Context was provided for their spouse's service disengagement and potential coercion.

The panel identified the most appropriate agency to discuss Channel with the individual and seek consent for support.

Risk to their spouse, children and staff was factored into discussions and mitigating actions agreed. Support was re-opened to the family.

Actions, decision-making rationale, progress and outcomes were accurately recorded within the Channel minutes.

Disclosure and confidentiality

- 76.** Channel is a voluntary programme through which individuals consent to receive support to address their vulnerabilities and reduce the risk to them. They should therefore not be subject to any negative consequences as a result of their involvement in Channel (unless criminality subsequently becomes apparent). Where a Prevent referral is adopted onto Channel, insofar as possible, the fact and the details of those interventions should remain confidential and should not be routinely disclosed outside of the partners involved in the Channel process.
- 77.** While Channel is a confidential and voluntary process, information shared for the purposes of Channel may be subject to disclosure to a third party when it is legal and proportionate to do so, e.g. to a family court.
- 78.** Information relating to an individual's Channel support package, for example Channel minutes or IP reports, may be subject to disclosure where a legal framework requires or enables that disclosure to be made. Requests for disclosure of Channel documentation can come from several sources, including:
- courts (including family and coroner's courts, and tribunals)
 - Independent Police Complaints Commission
 - Crown Prosecution Service
 - subject access requests
- 79.** While documents such as the VAF will be controlled by the authoring organisation, members of the Channel panel who receive this document may need to disclose it if required. Document disclosure should be with the agreement of the authoring organisation on advice from local information governance and legal teams.
- 80.** Where a request to disclose information is received, the purpose of the disclosure should be specified and recorded in all cases. Before disclosure is made, the request should be carefully considered to establish whether it is appropriate to disclose all or some of the information sought in all the circumstances. An informed decision should be made about how much information to disclose. In conjunction with local information governance and legal teams, the chair should consider what information would be lawful and appropriate to share. There should be a lawful basis for sharing information and it must be necessary and proportionate to do so. Further details are provided in Annex A.
- 81.** A confidentiality declaration should be read and signed by Channel partners in attendance at the start of each meeting to ensure these principles of confidentiality and disclosure are understood and agreed.

Vulnerability assessment framework

82. Channel assesses vulnerability using a consistently applied VAF built around three criteria:
- **engagement** with a group, cause or ideology
 - **intent** to cause harm
 - **capability** to cause harm²¹
83. The criteria are considered separately, as experience has shown that it is possible to be engaged without intending to cause harm, and that it is possible to intend to cause harm without being particularly engaged. Experience has also shown that it is possible to desist (stop intending to cause harm) without fully disengaging (remaining sympathetic to the cause), though losing sympathy with the cause (disengaging) will invariably result in desistance (loss of intent).
84. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Links with extremist groups

85. Association with organisations that are not proscribed is not, on its own, reason enough to justify a Prevent referral.²² If professionals at a local level determine that someone attracted to the ideology of such groups also exhibits additional behavioural indicators that suggest they are moving towards terrorism, then it would be appropriate to make a referral. It would be the presence of additional behavioural indicators that would inform whether a referral should be made and considered for adoption at Channel.
86. Association with or support for a proscribed group is a criminal offence. It may be appropriate in some cases for individuals believed to be on the periphery of proscribed organisations to be referred to Prevent to offer support. Professionals at a local level should contact the police where there are concerns that a proscription offence may have been committed. Where these concerns come to light within Channel panel discussions, it is the role of the CTCO to escalate them.

²¹ Our reference to 'harm' includes harm to self, others or the wider public. It incorporates escalation towards non-violent terrorism-related offences (as per the breadth of the UK's terrorism legislation), in addition to plans or attempts to commit any relevant acts of violence.

²² Sections 11-13 of the Terrorism Act 2000 makes it a criminal offence to belong to, support, or display support for a proscribed organisation. A list of proscribed groups can be found at: <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>

Transferring Channel cases

87. Where a case has been adopted by a Channel panel in one area, and the individual relocates to another area, the case should be transferred to the Channel panel of the new local authority, i.e. the receiving panel. It should be assumed that the case would be adopted at the receiving panel.
88. The Channel Case Officer in the transferring area should amend the case management system to reflect the transfer, allowing access to case information. This should be accompanied by a notification by police to the receiving police force area. The chair should request contact details for the Channel chair within the receiving local authority area from the Home Office. The originating Channel chair, in partnership with the Channel Case Officer, should facilitate a discussion with the receiving Channel chair to provide some context and rationale to the case and follow up in writing. The principles of 'ordinary residence' should be followed where case transfers are considered. The lead authority should always be the authority where the individual resides or is present. Details relating to the lead authority are provided in paragraph 30.
89. Where the panel decides liaison with authorities abroad is required, these discussions will be led by police.

Case study 4: case transfer

A 19-year-old had been in receipt of Channel support for six months, after being targeted by an extreme right-wing group.

The individual received support from an IP and from Connexions, securing a Prince's Trust placement and exploring employment options.

After being thrown out of the family home they began sofa-surfing and eventually decided to move to a different location with their partner.

As their vulnerabilities of being drawn into terrorism remained, the case was transferred to the Channel panel in their new location.

Details were changed on the case management system and the Channel chair sent a secure email to the receiving panel's chair with an overview of the individual's circumstances and support plan.

The case was added to the agenda of the next scheduled meeting and subsequently adopted.

A review of the VAF and support plan was completed, and housing and employment identified as areas requiring focus.

Channel, targeted support and offender management

Prisons

90. Channel can be used where appropriate to provide support to individuals vulnerable to being drawn into terrorism as a consequence of radicalisation who are serving custodial sentences and who are referred as part of internal risk management processes. This can apply in cases whereby individuals are due to be released from prison and there is a need for some form of intervention or support before or following release to address identified vulnerabilities. Police and probation will continue to have a role in assessing risk, vulnerability and the influence of potential radicalising sources.
91. The decision to refer an offender to Prevent must be agreed in close consultation with prison staff and the National Probation Service.

Multi-Agency Public Protection Arrangements

92. Multi-Agency Public Protection Arrangements (MAPPA) are reserved for those who present the highest risk of harm in their local community. Most people are managed within MAPPA because of the nature of their offending. In some cases, agencies may determine that an individual's vulnerability is such that it is best managed through the MAPPA process.

93. Where this is the case, the multi-agency public protection panel can, if necessary, seek the advice of the Channel Case Officer. It should be noted that all offenders convicted of Terrorism Act (TACT) offences will be managed through MAPPA.
94. However, where an offender is MAPPA-eligible for other offences, managed through ordinary agency MAPPA meetings and deemed to be vulnerable to being drawn into terrorism as a consequence of radicalisation, a Prevent referral should be made.²³ It will then be for the lead agency to liaise with the local Channel panel to determine how this risk should best be managed.

Desistance and Disengagement

95. The Prevent strand of CONTEST 2018 details additional targeted support through the Desistance and Disengagement Programme (DDP), which focuses on rehabilitating those who have been involved in terrorism or terrorism-related activity and reducing the risk they pose to the UK. The programme provides support to individuals who have been convicted of a TACT or TACT-related offence, as well as those subject to Terrorism Prevention Investigation Measures (TPIMs) and those who have returned from conflict zones and are subject to Temporary Exclusion Orders (TEOs). Further information about DDP is available on the Home Office website.²⁴

²³ Ordinary agency management level 1 is where the risks posed by the offender can be managed by the agency responsible for the supervision or case management of the offender. This does not mean that other agencies will not be involved, only that it is not considered necessary to refer the case to a level 2 or 3 MAPPA meeting.

²⁴ <https://homeofficemedia.blog.gov.uk/2019/11/05/fact-sheet-desistance-and-disengagement-programme/>

Police-led partnerships

96. Police-led partnerships cover the management of individuals, groups or institutions that are not suitable for Channel, but which have identified Prevent-relevant issues requiring support or mitigation.
97. Channel brings together a wider network of support available to reduce an individual's vulnerabilities to being drawn into terrorism or any terrorism-connected offending. The terrorism vulnerability and risk for the case is kept under review by police and the case may be removed from Channel if the risk escalates to a level that police believe cannot be safely managed by the Channel panel.

Police investigations

98. Circumstances may arise where an individual who is in receipt of Channel support is the subject of an investigation by police for a non-terrorism related offence. In this instance, the individual is not precluded from accessing Channel support. Channel can continue to provide support, with any information shared between Channel partners used to assess individual vulnerabilities, risk and support needs. However, where information that suggests criminal activity is exchanged, the police are duty bound to investigate.

Probation and youth offending

99. Offenders who are supervised in the community by a provider of probation or youth offending services, and are at risk of being radicalised and drawn into terrorism, may be managed by both the appropriate offender management service and Prevent.

Section 6:

The Channel Panel

Panel meetings

- 100.** Channel panels should be held monthly where there are referrals forwarded to panel for consideration or where a live case is held, though there may be occasions where meetings need to be held more frequently.²⁵ As a minimum, there should be a minuted discussion between the chair, relevant partners and the Channel Case Officer to review progress and actions. It is good practice to schedule meetings 12 months in advance to support partner planning and, in the absence of live cases, to meet at least quarterly. These meetings can be used to review practice, conduct audits, develop or monitor improvement plans or to plan and deliver panel training. It is good practice for Channel panels to schedule an annual development day to inform improvement plans for the coming year.
- 101.** The composition of the panel is a decision which should be made based upon the nature of individual cases and time bound actions that may be required. The Channel chair should ensure the Channel Case Officer is kept informed of any changes to panel membership.
- 102.** Where partner input is required and a physical partner presence cannot be secured, the chair has discretion to facilitate the virtual input from partners, through systems such as video- or tele-conferencing provision, though this should not be the default method of convening panel meetings. The chair will need to be satisfied that the confidentiality and integrity of the meeting is maintained and that the minutes reflect the panel members' agreement to the confidentiality statement, which should include those partners inputting virtually.
- 103.** An anonymised VAF should be circulated in full to panel members relevant to the case by the Channel Case Officer in advance of meetings so that all relevant panel members can contribute their knowledge, experience and expertise. The Channel Case Officer will present the referral to the Channel panel based on the information gathered from panel partners and the outcome of the vulnerability assessment.

²⁵ This requirement is informed by reviews held to identify national learning following terrorist incidents.

- 104.** Panel members should also have due regard to their Public Sector Equality Duty and be sensitive in their considerations. The panel must fully consider all the information available to them to make an objective decision on the support to be offered, without discriminating against the individual on the basis of their protected characteristics.²⁶ The panel must first decide whether to adopt the referral to panel. A decision to adopt will be made because the panel agrees that there is vulnerability to being drawn into terrorism that may be reduced through Channel support. This decision is often distinct from decisions on the nature of the support plan; these do not always occur during a single panel meeting. An auditable record of decision-making should be kept to enable quality assurance: accurate and agreed minutes provide an important account of this process. Following case closure, Channel panel minutes should be retained in line with the local authority's agreed data retention period. The Home Office Channel Data Privacy Information Notice and retention schedules can be found on the Home Office website.²⁷
- 105.** To help structure efficient practice for Channel panels, a range of standardised templates are available for local adaptation if appropriate. These include terms of reference, information sharing agreements and consent forms.
- 106.** Panel consensus should be sought on all decisions. Where this cannot be achieved, the opinion of the panel majority should be sought, with the chair holding the casting vote. Local governance arrangements, which should include the process for escalating concerns regarding the form or function of Channel panels, should be clearly communicated to panel members.

Support plans

- 107.** Each case is handled separately. People deemed appropriate to receive support will have a tailored package developed for them, according to their identified vulnerabilities. Using the initial vulnerability assessment and their professional expertise, the panel should develop a package to support the needs of the individual and use the information to inform the assessment and mitigation of any risk posed to potential support providers. The wider family context must be considered as part of this assessment, and the panel should agree on arrangements for updating families on progress where it is appropriate to do so.
- 108.** Section 36(4) of CT&S Act requires panels to:
- prepare a plan for an individual whom the panel considers appropriate to be offered support to reduce their vulnerability to being drawn into terrorism
 - make arrangements for support to be provided as described in the plan, where consent is given
 - keep the support given under review
 - revise or withdraw a support plan if at any time the panel considers it appropriate
 - carry out further assessments, after periods the panel considers appropriate, of an individual's vulnerability to being drawn into terrorism where:
 - the necessary consent to the provision of support is refused or withdrawn
 - the panel has determined that support should be withdrawn
 - prepare subsequent support plans if considered appropriate

²⁶ The Equality Act 2010 places a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity and foster good relations. This applies generally, but also to the assessment of need and risk faced.

²⁷ <https://www.gov.uk/government/publications/channel-data-privacy-notice>

Risk

- 109.** Risk is a theme that runs through the entire Channel process – risk to the individual, risk to the public, and risk to partners or organisations providing support to the individual, including any IPs. The Channel panel in its entirety holds responsibility for the terrorism-related vulnerabilities of a case, meaning the adequate provision and review of supportive interventions around the complex needs and causes of the terrorism-related concern. Statutory partners are responsible for the safeguarding around an individual's intrinsic and contextual vulnerabilities that can be exploited by others, or that may exacerbate the complex needs of an individual, to the extent that this individual may be drawn increasingly towards terrorism offending. The police are responsible for the identification and mitigation of imminent risks of individuals mobilising towards any terrorism offences, and the desistance of such high-risk and/or criminal behaviours.
- 110.** Support offered for some individuals could span several agencies, and each agency involved will own the element of risk they are responsible for addressing through the support plan.
- 111.** The risk of an individual's involvement in terrorism offending lies with the police. This is the risk posed by the individual to themselves and to society through their escalating or potentially active involvement in any criminality associated with terrorism legislation. The police are the most appropriate agency throughout the entire life of each Channel case to assess and manage this risk.
- 112.** The risk relating to the individuals' terrorism vulnerability is held by the Channel panel. This involves ensuring the risk posed to the individual from being drawn into terrorism or from wider safeguarding harms is addressed and reduced.
- 113.** In assessing the terrorism vulnerability, consideration should be given to:
- the risk posed to the individual of being radicalised and exploited
 - wider vulnerabilities and needs of the individual
- 114.** At this point, panel members in attendance at a meeting should collectively assess the risk and decide whether the person:
- is vulnerable to being drawn into terrorism and, therefore, appropriate for Channel
 - should be referred to a different support mechanism
 - should exit the process
- 115.** There is a clear expectation that Channel cases remain open until either of the following:
- it is deemed by the panel that the terrorism vulnerability has sufficiently reduced to warrant exit
 - the terrorism risk has increased and the case is escalated to the police for consideration
- 116.** If consent to receive support is not ultimately secured, or consent is withdrawn, the case will be closed to Channel.
- 117.** Information sharing should also highlight any wider risks posed, which professionals need to be aware of in advance of any visits being undertaken. This could include, but is not limited to, recording where there is a history of violence, threatening behaviour or use of weapons. Partners of the Channel panel must satisfy themselves that their own processes for undertaking risk assessments to ensure the safety of staff and others are in place and adhered to while fulfilling their Channel duty.

Practice example 7: risk-based, auditable decision-making

A case had been supported through Channel for three months and had a support plan in place aligned to the vulnerabilities captured on the VAF. Action updates were provided at each meeting and all decisions relating to the support were accurately recorded in the minutes.

The VAF and support plan were reviewed at each meeting by the Channel Case Officer.

When the individual established links to individuals who were part of an ongoing police investigation, it was deemed that the risk had increased, and the police decided to close the case to Channel as it would be managed within the police-led partnership.

The case was subject to review at 6 and 12 months following closure.

Consent for support

- 118.** As support received through Channel remains voluntary, section 36(4)(b) of the CT&S Act requires consent to be given by the individual, subject to capacity considerations detailed below. All individuals who receive support through Channel must be made aware that they are receiving this as part of a programme to protect people from being drawn into terrorism, what the aims of the programme are and what to expect.
- 119.** Consent to receive support should take the form of a signed agreement to support the auditable decisions of the panel and secured no later than at the point of offering support. When seeking consent, consideration should always be given to who is the most appropriate professional to seek that consent. Consent should be informed, explicit, and freely given, without coercion or duress. The offer of support through Channel should be fully explained and supported by written information which details what provision is available and how their personal data will be used to assess vulnerabilities, risks and determine the support package.
- 120.** This communication should be in an appropriate language and explained in terms fitting to individual needs, to ensure the aims of the programme are understood, and that consent is informed. Paragraph 124 provides further details on capacity to consent. Where someone does not wish to continue with the process, it may be appropriate to close the case to the Channel panel but provide alternative support by signposting the referral to other mainstream services, such as children or adult social care services.
- 121.** Where consent to receive support is initially refused or withdrawn, section 36 4(e) (i) CT&S Act makes provision for further assessments to be carried out by the panel, as is deemed appropriate.²⁸ Where a terrorism risk remains, this would be passed to the CTCO for management by the police.
- 122.** Information discussed at a Channel panel may be sourced from a variety of partners but will be controlled and processed by the local authority as the lead agency for Channel. Individual data rights apply to individuals referred to Channel, including, among others, the right to be informed of their data being processed. Local authorities therefore have a responsibility to inform an individual that their data is being processed. This notification will best form part of the informed consent required to access Channel support as outlined above.²⁹ The Data Protection Information Notice

²⁸ Where consent is not secured within 3 months, the case should be closed.

²⁹ <https://ico.org.uk/your-data-matters/your-right-to-be-informed-if-your-personal-data-is-being-used/>

for the local authority should be updated to reflect Channel statutory functions. An example consent form which incorporates this notification can be accessed on the KnowledgeHub.³⁰

- 123.** In instances where the individual is discussed but is considered not appropriate for support, is not adopted, and is therefore not approached for consent, the right to be informed is met through the Home Office Data Protection Information Notice, which is available on the Home Office website.³¹ In these instances, there is therefore no requirement for any contact to notify the individual where the referral is not adopted at panel. Local authorities may wish to apply an exemption to notification on a case-by-case basis. The Data Protection Information Notice for the local authority should also be updated to reflect Channel statutory functions, in partnership with local information governance and legal teams. The responsibility to inform does not apply to counter-terrorism police, who process data under Part 3 DPA 2018. When notifying individuals of local authority data processing in relation to Channel, reference to the Home Office-owned case management system must also be made.³²

Capacity to provide consent – adults, children and young people

- 124.** An individual's right and capacity to make decisions about issues that affect them is always assumed. Where the capacity of an individual to make a specific decision is brought into question, the Mental Capacity Act 2005 provides safeguards within a statutory framework to protect the rights of those who may not be able to make their own decisions.³³ Where a 'best interests' decision to consent to Channel support is made for an adult who is deemed not to have capacity to make an informed decision regarding that support, an assessment to determine capacity and their ability to make this decision should be undertaken in line with Care Act 2014 guidance.³⁴ Guidance issued by DHSC provides further information on assessing capacity and can be found online.³⁵
- 125.** Where the consent to receive support from Channel is being sought in relation to an individual under 18, the consent of the parent/guardian will need to be secured.

When parental consent cannot be obtained

- 126.** In the case of a child, there may be certain circumstances when a parent/guardian does not give consent for their child to be supported through Channel. If the child is thought to be at risk from significant harm, whether that is physical, emotional, mental, intellectual, social or behavioural harm, then social services for the relevant local authority area must be involved in decisions made about the child. There may be circumstances where the Channel panel and social services

³⁰ <https://www.khub.net/group/prevent1>

³¹ <https://www.gov.uk/government/publications/channel-data-privacy-notice>

³² <https://www.gov.uk/government/publications/channel-data-privacy-notice/channel-data-privacy-information-notice>

³³ Professional guidance on the Mental Capacity Act is available at <https://www.gov.uk/government/collections/mental-capacity-act-making-decisions>

³⁴ <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

³⁵ <https://www.gov.uk/government/publications/reference-guide-to-consent-for-examination-or-treatment-second-edition>

determine that a child is in need.³⁶ More information on safeguarding children can be found in the Working Together to Safeguard Children guidance (for England),³⁷ and the Keeping Learners Safe guidance (for Wales).³⁸

Support to address identified vulnerabilities

- 127.** The involvement of the correct panel partners 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 guidance from an IP to increase theological understanding and/or challenge the claims of violent ideologies. It can also include wider diversionary activities such as appropriate training courses. The partners involved should be tailored to the vulnerabilities of the person getting support.
- 128.** As part of agreeing a full wrap-around package of support, the panel must decide how to connect the individual with the support providers. All decision-making should be clearly documented and aligned to identified vulnerabilities.
- 129.** The type of activities that are included in a support package will depend on vulnerability and local resource. To illustrate, a diversionary activity with lower level support may be sufficient for someone who is in the early stages of being drawn into terrorism. The support offered should be directly aligned to the needs and risks identified within the vulnerability assessment, which should include consideration of wider contextual and transitional safeguarding needs. The following kinds of support might be considered appropriate:
- **Theological/ideological support** – structured sessions using a Home Office-approved IP to understand and challenge ideological, theological or fixated thinking. Use of IPs should be considered for all cases
 - **Life skills** – work on life skills or social skills generally, such as dealing with peer pressure
 - **Anger management sessions** – formal or informal work dealing with anger
 - **Cognitive/behavioural contact** – cognitive behavioural therapies and general work on attitudes and behaviours
 - **Constructive pursuits** – supervised or managed constructive leisure activities
 - **Education skills contact** – activities focused on education or training
 - **Careers contact** – activities focused on employment
 - **Family support contact** – activities aimed at supporting family and personal relationships, including formal parenting programmes
 - **Health awareness contact** – work aimed at assessing or addressing any physical or mental health issues
 - **Housing support contact** – activities addressing living arrangements, accommodation provision or neighbourhood
 - **Drugs and alcohol awareness** – substance misuse interventions
 - **Mentoring** – work with a suitable adult as a role model to provide personal guidance or pastoral care

³⁶ An assessment of a child's needs will be determined using definitions within section 17 or section 47 of the Children Act 1989, for England and section 21 of the Social Services and Well-being (Wales) Act 2014.

³⁷ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

³⁸ <https://gov.wales/keeping-learners-safe>

- 130.** The panel is collectively responsible for ensuring delivery of the overall package of support, but not for managing or funding the support providers. Where support is provided by a panel partner, they should be present at the panel meeting to provide an update on progress and are responsible for the delivery of that element of the overall support package; funding for any support offered should be met from existing local services.
- 131.** Providers of support to people at risk of being drawn into terrorism (including providers who are not specified as panel partners), need to be credible with the individual receiving support and understand the local community. Given their important role, their reliability, suitability to work with people at risk of being drawn into terrorism, and commitment to shared values need to be established. Chairs and police must satisfy themselves that the potential support provider is suitable, and does not pose a risk, before commissioning them. Partners should conduct their own due diligence to establish suitability before appointment. Any concerns raised by panel members should be discussed at the panel.
- 133.** If the panel is satisfied that the terrorism vulnerability has been sufficiently reduced or managed, they should recommend that the case then exits the process. A closing VAF should be completed by the Channel Case Officer as soon as possible setting out the reason for the panel's recommendations. The recommendations will need to be endorsed by the Channel panel chair and the Channel Case Officer.
- 134.** If the panel is not satisfied that terrorism vulnerability has been reduced to an acceptable level, the case should be reconsidered. A new action plan should be developed, and alternative support put in place. If the terrorism risk has increased, the Channel Case Officer must consider escalating the case through existing police mechanisms. The panel must determine whether the case remains suitable for Channel. The vulnerability assessment captures changes in risk and vulnerability while panel minutes record agreed decisions aligned to this assessment. Together, they inform Channel panel decision-making and risk management and must be retained on the Home Office-approved case management system for future reference.

Monitoring Channel support

- 132.** The Channel Case Officer is responsible for regularly liaising with the support provider(s), updating the VAF and for assessing progress. Where there is a live case or referrals presented for consideration, a Channel panel should be held monthly. The Channel Case Officer should update the vulnerability assessment every three months as a minimum, to ensure that the progress being made in supporting the individual is being captured. Vulnerability assessments should be reassessed more frequently to inform a key panel meeting, where the provision of support has reached a particular milestone, or there have been significant changes to circumstances or levels of risk.

Accessing specialist support

Intervention Providers (IPs)

- 135.** Intervention Providers (IPs) are ideological and theological specialists. They are experienced in assessing ideological drivers, possess a high level of understanding around extremist narratives, and have the ability to counter them. They receive comprehensive training in support of their roles through the IP Professionalisation programme. IPs are also subject to a rigorous recruitment process and must receive Ministerial approval to work on the programme.

- 136.** Where the individual has a need for theological/ideological support to address extremist views, or possesses an unclear, mixed or unstable ideology, Home Office-approved IPs must be commissioned. The IP aims to increase theological understanding and challenge extremist ideas or fixated thinking where they are used to legitimise terrorism, or to otherwise understand the extent of concerns relating to ideology. Use of a Home Office IP must always be a consideration for live cases and kept under review where not commissioned. A record must be kept detailing the panel's decision and its basis. Where the Channel panel identifies that the individual would benefit from an IP, the Channel Case Officer will be responsible for arranging the provision of that service.
- 137.** Where a Home Office IP has been commissioned, written reports on progress will be prepared and returned to the Channel Case Officer within five working days of the intervention session being completed. The Channel Case Officer will use this report to provide a verbal update to the Channel panel and update the VAF when needed. IP reports should be made available to the Channel panel chair. While standing panel members should not need routine access to IP reports, they may be viewed on request via the Channel Case Officer. The IP reports are produced for the specific purpose of informing Channel panels of the risks of radicalisation and the vulnerabilities present. Therefore, they should not be shared beyond standing panel members. Further details on disclosure are referenced in paragraphs 76-81.
- 138.** In England and Wales, IPs must first have been approved by the Home Office. With all other services provided as part of the support package, the chair and police must be satisfied that these providers are suitable to deliver these interventions. Individuals and organisations holding extremist views or supporting terrorist-related activity of any kind, in this country or overseas, have no place in delivering support through Channel nor will they be given public funding to do so. This applies irrespective of the source of the funding: central government, local government, policing or other publicly funded bodies. Where support is through Home Office-approved IPs, the Channel Case Officer is responsible for liaison with the support provider and for funding and monitoring the delivery of that element of the support package.

Intervention Support Fund

- 139.** Most support available in Channel is funded by the statutory bodies that provide it. The major exception to this is ideological and theological mentoring through IPs, which is funded by the Home Office through the Channel Case Officer.
- 140.** The Home Office has additional funding by way of the Channel Intervention Support Fund, which can be used in instances where provision from statutory partners, IPs or third sector organisations is not appropriate to reduce identified Channel vulnerability. These funds are intended to be used flexibly for activity or costs that take place alongside other Channel interventions and should be linked to identified vulnerabilities. Use of these funds must be pre-approved by the Home Office to cover non-theological/non-ideological support, training or one-off purchases to support the effectiveness of an intervention. The Channel Case Officer will have details of eligibility and how this fund can be accessed.

Vulnerability support hubs

- 141.** Vulnerability support hubs are now in place to support the CTCOs. The hubs use a formulation-based approach to jointly triage referrals (police and health) to rate the concern and urgency of each case based on the referral information, and clarify whether individuals are known to mental health services. The Hub provides early assessment of an individual's mental health and psychological needs, which may impact on levels of risk, inform the vulnerability assessment and aid the development of Channel support plans. Vulnerability support hub services are accessed through the CTCO.

Immigration enforcement

- 142.** Specialist advice and support regarding immigration is available to Channel panels for addressing queries, sourcing information and advice, and where appropriate, seeking immigration representation on Channel panels. Channel panels will be notified of arrangements for accessing this service.

Onward referrals to alternative forms of support

- 143.** Information sharing between partners will sometimes reveal no evidence that the individual is at risk of being drawn into terrorism. It may identify other personal vulnerabilities that need to be addressed, such as substance misuse or mental health issues. Under section 36(6) of the CT&S Act, where it is determined that support via Channel is not appropriate, the panel must consider whether an individual should be referred to support from health providers or social care services, and, if so, make such arrangements as the panel considers necessary.

It is good practice for the Channel panel chair to consider inviting these partners to panel meetings. Once a decision on managing the case has been reached by the panel, the Channel panel chair should confirm the recommendation and ensure that the decision is properly recorded, and that arrangements are made to refer the individual.

Reviewing Channel cases

- 144.** All cases which have been adopted by a Channel panel must be reviewed by the panel at 6 months and 12 months from the point of case closure. At the point of closure, it is the responsibility of the Channel Case Officer to accurately record the closure on the case management database to ensure review triggers are flagged at the appropriate time. This review process must be undertaken for all Prevent referrals that are adopted by the panel. This includes those Channel cases that are adopted but are subsequently referred elsewhere or offered support under Channel. The review process should be informed by relevant information from Channel partners to the Channel Case Officer. Information should be submitted within five working days of the request being made and should include police checks, relevant service involvement, change of circumstances, current social care involvement, any concerns since case closure and contact with the initial referrer.
- 145.** Where new information that may have an impact on risk comes to light regarding a case that has been closed pending review at 6/12 months, the Channel chair will be notified and the case subject to reassessment by the police.

Exit reviews

- 146.** Panels should strive to improve their practice and effectiveness in reducing terrorism vulnerability and tailoring support plans to needs identified in the VAF. To enable panels to gain greater insight into their practice, consideration should be given to capturing the experience of individuals exiting the Channel process which could be used to highlight good practice or areas requiring improvement.

Sharing good practice

- 147.** Local authorities and the police may find it useful to form regional Channel chair networks to facilitate the sharing of good practice in running Channel panels. These networks should come together to share best practice, discuss case studies and provide mutual support and advice. This can be a useful resource for those local authority areas that have few Channel cases in order to learn from more experienced areas, or for new Channel chairs to observe practice. Channel panel chairs also have the opportunity to attend regular national forums to share good practice more widely.

Practice example 8: sharing good practice

Where Channel chairs networks have formed, usually on the basis of a Counter-Terrorism Policing region, they have found value in coming together to share practice and learning, provide mutual support, and coordinate training.

These networks provide an excellent platform to review anonymised cases, share good practice and understand ineffective practice across local authority areas.

Section 7:

Training

148. The successful delivery of Prevent is dependent on the engagement of national, regional and local partners across multiple sectors, including the community and voluntary sector. Public sector frontline staff have been identified as a key group that can make an important contribution to the identification and referral of individuals who may be vulnerable to being drawn into terrorism as a consequence of radicalisation.

149. Alongside sector-specific training, panel members and partners should complete the Home Office Prevent eLearning training:

- Prevent Awareness – this module provides an introduction to Prevent and explains how it aims to safeguard vulnerable people from being radicalised to supporting terrorism or becoming terrorists themselves:

www.elearning.prevent.homeoffice.gov.uk

- Prevent Referrals – this module is aimed at staff who may notice signs of vulnerability to radicalisation. It is designed to provide staff with the confidence and ability to raise their concern when someone may be at risk:

www.elearning.prevent.homeoffice.gov.uk/preventreferrals

- Channel Awareness – this module is aimed at Channel panel chairs, panel members, and partners that may be asked to contribute to a panel meeting. It provides an introduction to Channel, how it operates, and how to organise a panel. It also covers information sharing:

www.elearning.prevent.homeoffice.gov.uk/channelawareness

150. In addition to the eLearning, as an introduction to Prevent, face-to-face training sessions may be made available. This session would be organised through the local authority Prevent single point of contact and is designed to help attendees understand what may make individuals susceptible to radicalisation.

- 151.** The Home Office has commissioned a range of additional training to meet the needs of Channel chairs, deputy chairs and panel members in fulfilling the requirements set out within this guidance and to understand the national risk and threat picture. Information regarding available training will be sent directly to Channel chairs and Channel Case Officers and can be sourced from the Home Office.

Other local training

- 152.** There may be other training available within local authorities or regions which cater for the specific needs of sectors. Clarification on this should be sought in the first instance from local authority Prevent single points of contact, or through individual organisations. Panel members and panel partners are not expected to become experts in countering radicalisation that draws people into terrorism. However, all should have undertaken the relevant training detailed above to ensure they understand Prevent, Channel, the radicalisation process and how to intervene to prevent someone from being drawn into terrorism. The Home Office may commission additional training to meet the needs of Channel panels nationally. Liaise with Channel Case Officers regarding available Channel training.

Section 8:

Information requests

153. When considering information requests, it is important that local organisational information governance leads and legal teams are consulted and are satisfied that compliance with legal requirements and organisational policy are adhered to.

Freedom of Information Act requests

154. All recorded information held by a public authority is covered by the right to information under the Freedom of Information Act 2000 (FOI Act). Within the FOI Act, there is a presumption in favour of disclosure to enhance greater openness in the public sector and thus enable members of the public to better understand the decisions of public authorities and ensure that services provided by the public sector are seen to be efficiently and properly delivered. We want, as far as possible, to be open and transparent about the Channel process.

155. It is good practice to consider the implications of the release of the information on third parties when complying with FOI legislation.³⁹ In the context of Channel, third parties may include local and national

delivery partners. The Code of Practice of the FOI Act facilitates consideration by public authorities of the interests of third parties and stakeholders who may be affected by any decision to disclose information by setting standards for consultation. All public authority partners involved in Channel may receive FOI requests. If an FOI request is made, all information will need to be assessed against FOI legislation to see if it is disclosable or not. All requests for the release of information held must be assessed on a case-by-case basis.

156. To achieve a consistent approach in responding to FOI requests relevant to Channel panels and assessments of individuals, and to protect third parties, all local partners who receive such an FOI request should bring it to the attention of their local panel. The chair should notify the Channel Case Officer and the Office for Security and Counter-Terrorism in the Home Office, who will advise if any further consultation is necessary, for instance with other central government departments.

³⁹ <https://www.gov.uk/government/publications/freedom-of-information-code-of-practice>

Subject access requests

- 157.** Under section 45 of DPA 2018, individuals can also make a subject access request (SAR) to see data held about them or children they have parental responsibility for. The individual can request information on any records held about them. Any organisation holding personal data can be subject to these requests. The right to make a SAR is described in the GDPR Article 15, Rights of Access by the data subject.⁴⁰ Exemptions to these rights are found in the DPA 2018 Schedule 2 Part 4.
- 158.** There are a limited number of exemptions, and not all personal information needs to be released in all circumstances. Exemptions to these rights are listed and described in the DPA 2018 Schedule 2 Part 4.⁴¹
- 159.** As with FOI Act requests, to achieve consistency in responses, any requests for subject access requests should be brought to the attention of the Channel panel chair.

Enquiries

- 160.** Please note that national, international and specialist media queries about Channel are managed by the Home Office Press Office and should be referred to directly on the following number:

Home Office Press Office
020 7035 3535

- 161.** It is also helpful if you can make the Home Office Press Office aware, at an early stage, of any local media interest you receive.

⁴⁰ <https://gdpr-info.eu/art-15-gdpr/>

⁴¹ <http://www.legislation.gov.uk/ukpga/2018/12/schedule/2/part/4/enacted>

Section 9:

Safeguarding

- 162.** While there is no threshold to make a Prevent referral there will be occasions where the assessment and support provided through Channel to prevent individuals at risk of being drawn into terrorism will run alongside safeguarding processes. A brief overview of the safeguarding frameworks for adults and children are outlined here for reference.
- 163.** Safeguarding and promoting the welfare of children, young people and adults is everyone's responsibility. Safeguarding partners, as defined under the Children Act 2004 (and amended by the Children and Social Work Act, 2017), have a statutory duty to work with relevant appropriate agencies within their locality to safeguard and protect children. A safeguarding partner in relation to a local authority area in England is:
- (a) the local authority (b) a clinical commissioning group for an area any part of which falls within the local authority area (c) the chief officer of police for an area any part of which falls within the local authority area. All three safeguarding partners have equal responsibility for fulfilling the role and for selecting the relevant agencies they will work with to safeguard and protect children in each locality, and to publish their local arrangements.
- 164.** The statutory guidance Working Together to Safeguard Children 2018, sets out the legislative requirements and expectations on inter-agency working to safeguard and promote the welfare of children in England.⁴² In Wales, the Keeping Learners Safe guidance should be referred to. It includes advice on radicalisation.⁴³
- 165.** Safeguarding adults is also a key role for local authorities. Under the Care Act 2014, local authorities are required to have Safeguarding Adults Boards in their area. These boards provide strategic leadership to the work of the local authority and partner agencies on the development of policy and practice in relation to safeguarding adults at risk. Guidance on safeguarding adults is relevant in England in this context.

⁴² <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

⁴³ <https://gov.wales/keeping-learners-safe>

- 166.** Under the Social Services and Well-being (Wales) Act 2014, there is a duty on relevant partners to report suspected cases of adults at risk and a complementary duty for the local authority to make enquiries into whether that adult is at risk of a safeguarding harm, and to determine if any action needs to be taken in response. Provision is overseen by six Safeguarding Children Boards and six Safeguarding Adults Boards in accordance with Part 7 of the Social Services and Well-being (Wales) Act 2014.
- 167.** It is essential that Channel panel members, partners to local panels and other professionals ensure that children, young people and adults are protected from harm. While the Channel provisions in Chapter 2 of Part 5 of the CT&S Act are counter-terrorism measures (since their ultimate objective is to prevent terrorism), the way in which Channel will be delivered may often overlap with implementation of the wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from social services, or where the individual is already known to social services.
- 168.** It is imperative that Prevent referrals are considered by the local authority and panel partners alongside their work to safeguard vulnerable individuals. Key links should be established with social services and other panel partners to ensure that an individual receives the most appropriate support available. Where a child or an adult is in receipt of social care support, as well as support through Channel, the social worker relevant to that local authority should be present at the panel and be involved in all decisions. Channel can run in tandem with, but must not be replaced by, other safeguarding meetings where safeguarding thresholds have been met.
- 169.** Where Serious Case Reviews, Safeguarding Adult Reviews or Domestic Homicide Reviews are triggered due to a serious incident or a death involving an individual supported through Channel, it is expected that input from the Channel chair is sought to support the identification of practice improvements and shared learning. In these instances, the Home Office should be notified. Report findings detailing recommendations and any identified learning should also be forwarded.

Section 10:

Annexes

ANNEX A

Sharing information with partners

1. The GDPR⁴⁴ and DPA 2018⁴⁵ are the principal legislation governing the process of data relating to individuals.
2. The ICO's guide to the GDPR can be found on the ICO website.⁴⁶ The GDPR is European Union-wide legislation. Article 5 of the GDPR sets out seven key principles which lie at the heart of the general data protection regime. Article 5(1) requires that personal data shall be:
 - a. processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
 - b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
 - c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
 - d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
 - e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely

⁴⁴ GDPR – <https://gdpr-info.eu/>

⁴⁵ DPA 2018 – <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

⁴⁶ ICO guide to GDPR – <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
3. The lawful bases for processing, that can be found on the ICO website, are replicated here:⁴⁷
 - a. **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
 - b. **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
 - c. **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
 - d. **Vital interests:** the processing is necessary to protect someone's life.
 - e. **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
 - f. **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)
 4. It is the responsibility of Channel panel partners to consider their role in relation to data sharing as part of the Channel process. Information governance and legal teams should be engaged where deemed appropriate to ensure data sharing is necessary, proportionate and legal. Organisations should also document the nature, basis and agreement of data sharing in line with the GDPR principle of accountability. This will include having data sharing agreements in place among all the parties involved that are regularly updated and signed-off at the appropriate level.

Lawful bases for processing to consider

5. You must have a valid lawful basis in order to process personal data. The ICO website provides information on identifying and, importantly, documenting the lawful bases your panel identifies.⁴⁸ When processing special category data, you must identify both a lawful basis for general processing and an additional condition for processing that type of data. There are six available lawful bases for processing.

⁴⁷ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

⁴⁸ **ICO guide to lawful basis for processing** – <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

Article 6 GDPR, section 8 DPA 2018

6. Under Article 6(1)(e) GDPR and section 8 of the DPA 2018 data may be shared if it is necessary for the purpose of a statutory function. Channel is a statutory function as per section 36, CT&S Act.

Article 9 GDPR, Part 2 Schedule 1 DPA 2018

7. Under Article 9(2)(g) GDPR and paragraph 6 of Part 2, Schedule 1 DPA 2018, information may be shared where there are reasons of substantial public interest, and for the discharge of a statutory function, which is set out in section 36 of the CT&S Act.
8. Your panel may deem it of substantial public interest to share special category data for the purposes of Channel.

Special category data

9. Special category data is personal data that needs more protection because it is sensitive. It is likely that Channel panels will require special category data to make an informed decision regarding the nature of support required for individuals referred to Channel. More information about special category data can be found on the ICO's website.⁴⁹

⁴⁹ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

ANNEX B

Partners required to cooperate with local panels

(Schedule 7 of the Act – Partners of local panels) panels

Ministers of the Crown and government departments

- A Minister of the Crown.
- A government department other than an intelligence service.

Local government

- A local authority (other than a local authority that is a member of the panel in question)
- A person carrying out a function of a local authority by virtue of a direction made under section 15 of the Local Government Act 1999.

Criminal justice

- The governor of a prison in England and Wales (or, in the case of a contracted-out prison, its director).
- The governor of a young offender institution or secure training centre (or, in the case of a contracted-out young offender institution or secure training centre, its director).
- The principal of a secure college.
- A youth offending team established under section 39 of the Crime and Disorder Act 1998.
- A provider of probation services within the meaning given by section 3(6) of the Offender Management Act 2007.

Education, child care etc.

- A sixth form college corporation within the meaning given by section 90(1) of the Further and Higher Education Act 1992.
- The governing body of an institution within the further education sector within the meaning given by section 91(3) of that Act.
- A person who is authorised by virtue of an order made under section 70 of the Deregulation and Contracting Out Act 1994 to exercise a function specified in Schedule 36A to the Education Act 1996.
- A person with whom arrangements have been made for the provision of education under section 19 of the Education Act 1996 or section 100 of the Education and Inspections Act 2006 (cases of illness, exclusion etc).
- The proprietor of:
 - a. a school that has been approved under section 342 of the Education Act 1996
 - b. a maintained school within the meaning given by section 20(7) of the School Standards and Framework Act 1998
 - c. a maintained nursery school within the meaning given by section 22(9) of that Act
 - d. an independent school registered under section 158 of the Education Act 2002
 - e. an independent educational institution registered under section 95(1) of the Education and Skills Act 2008
 - f. a 16 to 19 Academy within the meaning given by section 1B of the Academies Act 2010
 - g. an alternative provision Academy within the meaning given by section 1C of that Act
 - h. a special post-16 institution within the meaning given by section 83(2) of the Children and Families Act 2014

- A person who is specified or nominated in a direction made in relation to the exercise of a local authority's functions given by the Secretary of State under section 497A of the Education Act 1996 (including that section as applied by section 50 of the Children Act 2004 or section 15 of the Childcare Act 2006).
- A person registered under Part 2 of the Care Standards Act 2000 in respect of:
 - a. a children's home as defined in section 1 of that Act
 - b. a residential family centre as defined in section 4 of that Act
 - c. a fostering agency as defined in that section
 - d. a holiday scheme for disabled children, within the meaning of the Registered Holiday Schemes for Disabled Children (England) Regulations 2013 (S.I. 2013/1394)
- The governing body of a qualifying institution within the meaning given by section 11 of the Higher Education Act 2004.
- A person registered under Chapter 2, 2A, 3 or 3A of Part 3 of the Childcare Act 2006 or under section 20 of the Children and Families (Wales) Measure 2010 (nawm 1).
- A body corporate with which a local authority has entered into arrangements under Part 1 of the Children and Young Persons Act 2008.
- A person who is specified in a direction made in relation to the exercise of a local authority's functions given by the Welsh Ministers under section 25 of the School Standards and Organisation (Wales) Act 2013 (anaw 1) (including that section as applied by section 50A of the Children Act 2004 or section 29 of the Childcare Act 2006).
- The governing body of an educational establishment maintained by a local authority in Wales.

- The governing body or proprietor of an institution (not otherwise listed) at which more than 250 students, excluding students undertaking distance learning courses, are undertaking:

- a. courses in preparation for examinations related to qualifications regulated by the Office of Qualifications and Examinations Regulation or the Welsh Government
- b. courses of a description mentioned in Schedule 6 to the Education Reform Act 1988 (higher education courses)

Health and social care

- A clinical commissioning group established under section 14D of the National Health Service Act 2006.
- An NHS Trust established under section 25 of the National Health Service Act 2006.
- An NHS foundation trust within the meaning given by section 30 of the National Health Service Act 2006.
- A Local Health Board established under section 11 of the National Health Service (Wales) Act 2006.
- An NHS trust established under section 18 of the National Health Service (Wales) Act 2006.

Police

- A chief officer of police for a police area in England and Wales (other than a chief officer who is a member of the panel in question).

ANNEX C

Vulnerability assessment framework

This annex provides a description of the vulnerability assessment framework used by Channel to guide decisions about whether an individual needs support to address their vulnerability to being drawn into terrorism as a consequence of radicalisation and the kind of support that they need.

It should not be assumed that the characteristics set out below necessarily indicate that a person is either committed to terrorism or may become a terrorist. The assessment framework involves three dimensions: engagement, intent and capability, which are considered separately.

1. Engagement with a group, cause or ideology.

Engagement factors are sometimes referred to as 'psychological hooks'. They include needs, susceptibilities, motivations and contextual influences and together map the individual pathway into terrorism. They can include:

- feelings of grievance and injustice
- feeling under threat
- a need for identity, meaning and belonging
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control others
- susceptibility to indoctrination
- a desire for political or moral change
- opportunistic involvement
- family or friends' involvement in extremism
- being at a transitional time of life
- being influenced or controlled by a group
- relevant mental health issues

2. Intent to cause harm.

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology
- 'them and us' thinking
- dehumanisation of the enemy
- attitudes that justify offending
- harmful means to an end
- harmful objectives

3. Capability to cause harm.

Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage can take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Factors can include:

- individual knowledge, skills and competencies
- access to networks, funding or equipment
- criminal capability

4. The three criteria are assessed by considering 22 factors that can contribute to vulnerability (13 associated with engagement, 6 that relate to intent and 3 for capability). These factors taken together form a holistic view of the vulnerability of an individual that will inform

decisions on whether an individual needs support and what kind of support package may be appropriate. These factors are not an exhaustive list. By undertaking regular vulnerability assessments, the progress that is being made in supporting an individual can be tracked through changes in the assessment.

5. Completing a full assessment for all 22 factors requires thorough knowledge of the individual that may not be available at the point of the initial referral. However, there are a number of behaviours and other indicators that may indicate the presence of these factors.
6. Example indicators that an individual is **engaged** with an extremist group, cause or ideology include:
 - spending increasing time in the company of other suspected extremists
 - changing their style of dress or personal appearance to accord with the group
 - day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
 - loss of interest in other friends and activities not associated with the extremist ideology, group or cause
 - possession of material or symbols associated with an extremist cause (e.g. the swastika for right-wing groups)
 - attempts to recruit others to the group/cause/ideology
 - communications with others that suggest identification with a group/cause/ideology
7. Example indicators that an individual has an **intention** to cause harm, use violence or other illegal means include:
 - clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
 - using insulting or derogatory names or labels for another group
 - speaking about the imminence of harm from the other group and the importance of action now
 - expressing attitudes that justify offending on behalf of the group, cause or ideology
 - condoning or supporting violence or harm towards others
 - plotting or conspiring with others
8. Example indicators that an individual is **capable** of causing harm or contributing directly or indirectly to an act of terrorism include:
 - having a history of violence
 - being criminally versatile and using criminal networks to support extremist goals
 - having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
 - having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)
9. The examples above are not exhaustive and vulnerability may manifest itself in other ways.
10. The vulnerability assessment should initially be completed by the Channel Case Officer and then be circulated in full to panel members in advance of meetings so that all relevant panel members can contribute their knowledge, experience and expertise to the case.
11. The vulnerability assessment should complement and inform rather than replace professional judgement and/or other forms of safeguarding assessment when deciding on the most appropriate types of support at panel meetings.

ANNEX D

Other relevant guidance

CONTEST: the United Kingdom's strategy for countering terrorism

<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>

Prevent duty guidance

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Working together to Safeguard Children

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Keeping Children Safe in Education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Care Act 2014

<http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

Care Act Factsheets

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets/care-act-factsheets>

Information Commissioner's Office Guide to Data Protection

<https://ico.org.uk/for-organisations/guide-to-data-protection/>

GMC Confidentiality: good practice in handling patient information guidance

<https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/confidentiality>

Caldicott Guardian Manual

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/581213/cgmanual.pdf

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Guidance for mental health services in exercising duties to safeguard people from the risk of radicalisation

<https://www.england.nhs.uk/wp-content/uploads/2017/11/prevent-mental-health-guidance.pdf>

NHS England Prevent Training and Competencies Framework

<https://www.england.nhs.uk/publication/prevent-training-and-competencies-framework/>

Social Services and Well-being (Wales) Act 2014, Section 21

<https://www.legislation.gov.uk/anaw/2014/4/section/21>

Keeping learners safe – provides advice on radicalisation and supplements the above Welsh guidance on safeguarding children

<https://gov.wales/keeping-learners-safe>

Glossary of terms

CT&S Act	Counter-Terrorism & Security Act 2015
CTCO	Counter-Terrorism Case Officer
CTLP	Counter-Terrorism Local Profile
DDP	Desistance and Disengagement Programme
DPA 2018	Data Protection Act 2018
FOI Act	Freedom of Information Act 2000
GDPR	General Data Protection Regulation
HRA 1998	Human Rights Act 1998
ICO	Information Commissioner's Office
IP	Intervention provider
MARAC	Multi-Agency Risk Assessment Conference
MAPPA	Multi-Agency Public Protection Arrangements
SAR	Subject access request
SC	Security check
TACT	Terrorism Act
TEO	Temporary exclusion order
TPIM	Terrorism Prevention Investigation Measure
VAF	Vulnerability assessment framework

