

## Prevent Duty Guidance (PDG) Refresh

## Equality Impact Assessment

May 2023

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#### Equality Impact Assessment [EIA]

### 1. Name and outline of policy proposal, guidance, or operational activity

The UK Government's overall counter-terrorism strategy is set out in CONTEST: The United Kingdom's Strategy for Countering Terrorism<sup>1</sup>. This sets out the current terrorism threat to the UK and provides the framework for organising work to tackle all forms of terrorism. Recognising the evolving landscape of terrorism and diversity in risk and threat, the UK Government regularly updates CONTEST to reflect the developments in counter-terrorism delivery and policy.

Prevent remains one of the key pillars of CONTEST, alongside the other three 'P' work strands:

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

Prevent has three strategic objectives:

- tackle the ideological causes of terrorism
- intervene early to support people susceptible to radicalisation
- enable those who have already engaged in terrorism to disengage and rehabilitate

Prevent deals with all forms of terrorism and we continue to prioritise activity according to the threat posed to our national security.

#### The Prevent duty

The aim of the Prevent duty is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Counter Terrorism and Security Act 2015 this has simply been expressed as the need to "prevent people from being drawn into terrorism".<sup>2</sup>

The duty requires local authorities, schools, colleges, higher education institutions, health bodies, prisons and probation, and the police to consider the need to support people and prevent them from being drawn into or supporting terrorism. It sits alongside long-established duties on professionals to safeguard people at risk from exploitation from a range of other harms such as drugs, gangs and physical and sexual exploitation. The duty is designed to help ensure that individuals who are at risk of radicalisation are supported as they would be under other safeguarding processes.

<sup>&</sup>lt;sup>1</sup> <u>CONTEST 3.0 (publishing.service.gov.uk)</u>

<sup>&</sup>lt;sup>2</sup> Counter-Terrorism and Security Act 2015 (legislation.gov.uk)

The Prevent programme works to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances. Channel is a consent-based early intervention programme, so participation after assessment is voluntary.

One way Prevent seeks to tackle the ideological causes of terrorism is by limiting exposure to radicalising narratives, both online and offline, and to create an environment where radical ideologies are challenged and are not permitted to flourish. Any actions taken to reduce the permissive space for radicalisation should be proportionate, lawful and appropriate and are done so based on already developed policies which take into account relevant legislation.

#### **Prevent Duty Guidance**

The Prevent Duty Guidance (PDG)<sup>3</sup> is statutory guidance from the Home Office issued under section 29 of the Counter-Terrorism and Security Act 2015.<sup>4</sup> Specified authorities listed in Schedule 6 to the Act, are required to have "due regard to the need to prevent people from being drawn into terrorism" and must have regard to this guidance when carrying out the duty.

This statutory guidance is intended for use by:

- senior leadership teams in any of the listed specified authorities under Schedule 6
- Those with dedicated Prevent and / or safeguarding responsibilities
- Those who are in a frontline role, who are likely to engage with individuals who may be at risk of radicalisation

The purpose of this guidance is to set out expectations for each of the statutory sectors and describe how they can implement the Prevent duty so as to be well placed to comply. It also includes sources of further advice to support best practice.

We are updating the Prevent Duty Guidance to reflect several recommendations from the Independent Review of Prevent (IRP) published in February 2023,<sup>5</sup> and to bring it in line with the modern context of the policy and delivery of Prevent. This will not alter the fundamental requirements placed on statutory partners, nor will it amend the core principles of the policy. What it will do, however, is provide clearer and more up-to-date guidance whilst also reflecting recommendations of the IRP, such as revised terminology and language, and the importance of delivering Prevent activity in

<sup>&</sup>lt;sup>3</sup> <u>Prevent duty guidance - GOV.UK (www.gov.uk)</u>

<sup>&</sup>lt;sup>4</sup> <u>Counter-Terrorism and Security Act 2015 (legislation.gov.uk)</u>

<sup>&</sup>lt;sup>5</sup> Independent Review of Prevent's report and government response - GOV.UK (www.gov.uk)

line with the threat. It provides a trusted and centralised guide for the delivery of Prevent by statutory partners.

## 2. Summary of the evidence considered in demonstrating due regard to the Public Sector Equality Duty.

In ensuring that development of the Prevent Duty Guidance has been conducted with due regard to the Public Sector Equality Duty, we have considered the impact of amending the guidance on the full range of protected characteristics outlined in the Equality Act 2010 (age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity).

We recognise that radicalisation is a complex process for individuals, and that there is no single factor at work. Terrorists come from a broad range of backgrounds and appear to become involved in terrorism in different ways and for differing reasons. Therefore, there is no single, targeted, demographic that Prevent impacts directly. There are several different factors for radicalisation and anybody could be referred to Prevent, should there be sufficient concern.

In line with the on-going Public Sector Equality Duty, we will continue to consider the impact of these policies as they develop.

We have drawn on information from:

- Consultation with sectors and front-line practitioners. This has included working with third-party consultancy to conduct one-to-one interviews with users of the guidance to understand their experience with it. Our compliance with the Public Sector Equality Duty has been a key consideration in those discussions.
- Prevent referral data. We regularly gather and publish data on Prevent<sup>6</sup>, including information on the programme's interaction with individuals with protected characteristics. This includes publishing annual statistics on the Channel early intervention programme<sup>7</sup>.
  - In the year ending March 2022, 804 Prevent referrals were adopted as a Channel case, which equates to 13% the same as the previous year (659 of 4,915).
  - Of the 804 Channel cases adopted in 2021-22, the most common were due to concerns regarding Extreme Right-Wing radicalisation (339: 42%), followed by concerns regarding Islamist radicalisation (156: 19%).
  - As in previous years, where gender was specified (6,403), most referrals were of males (5,725: 89%), and where age was known

<sup>&</sup>lt;sup>6</sup> <u>Individuals referred to and supported through the Prevent Programme, April 2021 to March 2022 -</u> <u>GOV.UK (www.gov.uk)</u>

<sup>&</sup>lt;sup>7</sup> <u>Individuals referred to and supported through the Prevent Programme, April 2021 to March 2022 -</u> <u>GOV.UK (www.gov.uk)</u>

(6,393), those aged 15 to 20 accounted for the largest proportion (1,902: 30%).

- Windrush Lessons Learned Review: Independent review by Wendy Williams. We have worked extensively to assess Prevent policy and delivery against the lessons identified from the Windrush review. We will continue to do so as we refresh the Prevent Duty Guidance.
- We have worked closely with relevant government departments and external partners to reflect on where improvements could be made to the Prevent Duty Guidance and to develop an updated version.

## 3a. Consideration of limb 1 of the duty: Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act.

#### Age

**Direct Discrimination** – None. Whilst age may be a factor in a person's susceptibility to radicalisation as there is a tendency for people referred to Prevent to be younger, age is not determinative or grounds for referral to Prevent. What matters is a person's susceptibility or risk, which must be considered in the individual case in the round, taking into account all factors. These policies do not directly discriminate against people due to their age.

**Indirect Discrimination –** More young people are referred to Prevent than any other age group. In the year ending March 2022, individuals aged 15 to 20 accounted for the largest proportion of the 6,393 referrals to Prevent (1,902: 30%) where age was known. Individuals aged under 15 accounted for the second largest proportion of referrals (1,829: 29%) where age was known, closely followed by individuals aged 21-30 (1,046: 16%). Those aged under 15 and 15 to 20 accounted for a larger proportion as individuals moved through the programme, accounting for over a third of those discussed at a Channel panel (37%) and adopted as a Channel case (37%). This is in line with previous data since the year ending March 2016, as individuals aged under 15 and 15 to 20 have consistently accounted for most referrals, discussions at panel and Channel cases.

Younger people are overrepresented in Prevent compared to the general population. This is primarily as it is an early intervention programme and the education sector is a statutory Prevent duty partner, together with other sectors that are likely to have close interaction with children and young people (e.g. children's services within a local authority). Nonetheless, we do not consider that the application of the Prevent duty is a provision, criteria or practice that unjustifiably places a young person at a particular disadvantage compared to older people. The legitimate aim of the Prevent duty is to stop people becoming terrorists or supporting terrorism and, to the extent that young people might be disadvantaged, it is proportionate to the risk that terrorism poses to society and public safety – it is a reality acknowledged above that young people have greater interaction with the authorities under

the duty who are well-placed and more likely to spot radicalising influences, e.g. teachers.

In mitigation, we ensure that training is provided to statutory partners, that clear guidance is in place, and that each referral is assessed in a consistent way, with support tailored to the individual. Some dedicated Prevent practitioners (such as Prevent education officers) work primarily with young people, and therefore changes to Prevent policy may affect those young people more than older people who have less engagement with statutory partners. We will take into consideration any potential equality impact with a full specific assessment of all new policy approaches taken forward as part of the refresh of the Prevent Duty Guidance.

#### Disability

**Direct Discrimination –** None. All individuals who are referred for Prevent support are assessed in the same way and disability is not a factor in that assessment. Individuals are given a tailored package of support designed to meet their individual circumstances, which could include support specific to any health, social care or accessibility needs. Representatives from the NHS and the local authority attend each Channel multi-agency panel to provide expert guidance in the development of those support packages. The joint police and NHS vulnerability support service provides expert advice on cases where mental ill-health may be an underlying factor.

**Indirect Discrimination –** Anecdotal observations from the Prevent network suggest possible over representation of mental health issues amongst Prevent casework. A mental health condition is considered a disability if it has a long-term effect on your normal day-to-day activity (The Equality Act 2010). It is therefore possible that individuals with such disabilities may be referred to Prevent at a higher rate than the general population. As Prevent is a supportive intervention, this should not disadvantage those referred in any way. We will take into consideration any potential equality impact with a full specific assessment of all new policy approaches taken forward as part of the refresh of the PDG.

One way Prevent seeks to tackle the ideological causes of terrorism is by limiting exposure to radicalising narratives, both online and offline, and to create an environment where radical ideologies are challenged and are not permitted to flourish. Any actions taken to reduce the permissive space for radicalisation should be proportionate, lawful and appropriate and are done so based on already developed policies which take into account relevant legislation. These policies do not directly discriminate individuals due to their disability but assess the situation objectively.

#### Gender reassignment

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early

to support people susceptible to radicalisation. All individuals who are referred for Prevent support are assessed in the same way and gender reassignment is not a factor in that assessment.

**Indirect discrimination** – We have no evidence to suggest Prevent indirectly discriminates on grounds of gender reassignment, nor can we foresee a scenario where this group would suffer indirect discrimination as a result of the Prevent Duty Guidance. However, we remain alert to unforeseen events, and should we discover such evidence, or such a scenario arise, we would immediately investigate and implement remedial measures.

#### Marriage and civil partnership

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation. All individuals who are referred for Prevent support are assessed in the same way, and marriage and civil partnership are not factors in that assessment.

**Indirect discrimination** – We have no evidence to suggest Prevent indirectly discriminates on grounds of marriage or civil partnership, nor can we foresee a scenario where this group would suffer indirect discrimination as a result of the Prevent Duty Guidance. However, we remain alert to unforeseen events, and should we discover such evidence, or such a scenario arise, we would immediately investigate and implement remedial measures.

#### **Pregnancy and maternity**

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation. All individuals who are referred for Prevent support are assessed in the same way and pregnancy is not a factor in that assessment.

**Indirect discrimination** – Pregnancy and maternity is not a relevant protected characteristic for the purpose of indirect discrimination but, in any event, we have no evidence to suggest such impact.

#### Race

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation regardless of race. Training is provided to Prevent duty statutory partners to enable them to spot the signs of radicalisation and make appropriate, informed referrals. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances, regardless of race. Channel is a consent-based early intervention programme, so participation is voluntary.

**Indirect discrimination** – Prevent tackles the causes of radicalisation by delivering outreach events and supporting grassroots projects that tackle specific radicalisation risks in communities. These events and projects are delivered in areas we have prioritised for action, where the risk and threat are highest. The representation of different ethnicities or racial identities amongst the population of a specific geographic area is not a consideration in identifying which areas to prioritise for action. Participation in these events and projects is voluntary.

In 2021-22, 16% of Prevent referrals related to concerns about Islamist radicalisation. We can infer that most of these individuals were Muslim, many of whom are likely to be from ethnic minorities, according to publicly available data. <sup>8</sup> <sup>9</sup> <sup>(6)</sup> This does not take into account referrals related to other types of concern (the majority of Prevent referrals), where ethnicity is harder to infer. However, those people who are referred in relation to Extreme Right-Wing ideologies are more likely to be white, since white nationalism forms part of those ideologies in some cases. 20% of referrals in 2021-22 related to concerns around Extreme Right-Wing radicalisation.

While this means that Prevent may indirectly impact people of particular ethnic or racial backgrounds more than others, the number and type of referrals received by Prevent in 2021-22 reflects the risk of radicalisation. Prevent is a supportive programme designed to stop people becoming terrorists or supporting terrorism, regardless of their racial or ethnic background. Taking part in Prevent is voluntary and there is no criminal sanction. The programme aims to help to protect individuals from activity that could result in them obtaining a criminal record, causing harm to communities or to society, or suffering from the harmful impact of terrorism and radicalisation themselves. By intervening early, Prevent aims to reduce the potential negative outcomes for individuals who are at risk of being radicalised.

#### **Religion or belief**

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation regardless of their religion or belief. Training is provided to Prevent duty statutory partners to enable them to spot the signs of radicalisation and make appropriate, informed and proportionate referrals. Our training makes clear that adherence to a particular religion or belief, including a particular subset of a religious belief, should not be considered in isolation as evidence of radicalisation. All individuals who are

<sup>&</sup>lt;sup>8</sup> Data Viewer - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)

<sup>&</sup>lt;sup>9</sup> <u>Population estimates by ethnic group and religion, England and Wales - Office for National Statistics</u> (ons.gov.uk)

referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances. This may include mentoring support from specialist intervention providers who are experts in a range of ideologies.

There are longstanding concerns by some commentators that Prevent unfairly targets Muslims. However, Prevent does not concentrate on specific religions or beliefs and adherence to a faith is not grounds for taking any action under the Prevent duty. The religious composition of a geographic area is not a consideration in identifying which areas to prioritise for Prevent action. Rather, Prevent focuses on tackling radicalisation risks that are often drawn from extreme ideologies, which may or may not be rooted in religious belief (e.g. Islamist terrorism and extreme right-wing terrorism).

There have also been misperceptions that Prevent referrals should be made if somebody holds strong political views or takes part in political activism. Lawful, non-violent protest or activism does not meet the threshold for Prevent referrals. We are clear in our Prevent training that holding legitimate political views is not an indicator for extremism provided they are not expressed or furthered by statements, deeds or actions which result in harassment, intimidation or threats of violence against individuals or society itself. To be protected, a philosophical belief must be worthy of respect in a democratic society and not affect the fundamental rights of others.

**Indirect discrimination** – Of the 804 cases that Channel managed in 2021-22, 42% were supported for concerns related to extreme right-wing radicalisation, and 19% were supported for concerns related to Islamist ideology. The government response to the Independent Review of Prevent clearly highlights the need to take a balanced and proportionate approach across the various ideologies we see.

Based on the high percentage of referrals related to Islamist extremist ideology, it is possible to infer that people of Muslim faith are overrepresented within Prevent, in comparison to the general population (6.5% of people described themselves as Muslim in the 2021 Census). While this means that Prevent may indirectly impact Muslims more than people of other religions and beliefs, the number and type of referrals received by Prevent in 2021-22 reflects the threat from Islamist terrorism and the associated risk of radicalisation. To be clear, the ideology held by Islamist extremists, and the crimes committed by Islamist terrorists, are completely distinct from Islam and are overwhelmingly rejected by Muslims around the world. Prevent activity should align with the risk of radicalisation to terrorism, and in recent years the threat has primarily come from Islamist terrorism. Should the threat shift, Prevent activity will shift accordingly.

Prevent is a supportive programme that aims to stop people, whatever their religion or beliefs, from becoming terrorists or supporting terrorism. There is no criminal sanction and it is intended to protect them from activity that could result in them obtaining a criminal record, causing harm to communities or to society, or suffering from the harmful impact of terrorism and radicalisation

themselves. By intervening early, Prevent aims to reduce the potential negative outcomes for individuals who are at risk of being radicalised.

One way Prevent seeks to tackle the ideological causes of terrorism is by limiting exposure to radicalising narratives, both online and offline, and to create an environment where radical ideologies are challenged and are not permitted to flourish. Any actions taken to reduce the permissive space for radicalisation should be proportionate, lawful and appropriate and are done so based on already developed policies which take into account relevant legislation. These policies do not directly discriminate individuals due to their religion or belief but assess the situation objectively.

#### Sex

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation regardless of their sex. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances.

**Indirect discrimination** – Annual published Prevent statistics show that most Prevent referrals are male (89% of referrals in 2021-22). This means that men are overrepresented in Prevent compared to the general population (men accounted for 49% of the population in England and Wales in the 2021 Census). There is limited empirical research on sex and radicalisation to confirm it as a risk factor. However, some studies have shown that certain pathways into radicalisation and recruitment methods are more common for men than women, and vice versa. We mitigate the risk of males being disproportionately represented in Prevent by providing training to statutory partners, ensuring clear guidance is in place on the risk, assessing each referral in a consistent way, and tailoring any support provided to the individual. We have no evidence to suggest Prevent indirectly discriminates on grounds of sex. Should we discover such evidence, we would immediately investigate and implement remedial measures.

#### **Sexual orientation**

**Direct discrimination** – None. The Prevent programme is to stop people from becoming terrorists or supporting terrorism and works to intervene early to support people susceptible to radicalisation regardless of their sexual orientation. All individuals who are referred for Prevent support are assessed in the same way and sexual orientation is not a factor in that assessment. We do not record sexual orientation of individuals referred to Prevent.

**Indirect discrimination** – We have no evidence to suggest Prevent indirectly discriminates on grounds of sexual orientation, nor can we foresee a scenario where this group would suffer indirect discrimination as a result of the Prevent

Duty Guidance. However, we remain alert to unforeseen events, and should we discover such evidence, or such a scenario arise, we would immediately investigate and implement remedial measures.

# 3b. Consideration of limb 2: Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

It is important to note for all characteristics listed below, that Prevent interventions are supportive and aimed at achieving better outcomes for the individual than any outcomes linked to engaging in terrorism. If people of any characteristic are affected by the Prevent duty, it will likely result in greater opportunities, not less. These may include mentoring and in some cases facilitating access to training, for example. The only opportunities Prevent seeks to restrict are opportunities to engage in terrorism.

#### Age

Individuals of all ages are supported by Prevent. Prevent training is provided to all Prevent duty partners on spotting the signs of radicalisation and making appropriate referrals. All referrals are assessed in the same way, using the same process, national guidance and tools. The support provided is tailored to each person's needs and the Channel multi-agency panel includes appropriate expertise – for example, in supporting young people and older individuals who may not be in contact as frequently with Prevent duty partners.

#### Disability

For those who are responsible for delivering Prevent and who fall under the Prevent duty, Prevent training for frontline sectors is fully accessible and can be used with a range of accessibility aids, including screen readers. For those people who are referred to Prevent, there are no barriers to accessing Prevent support and Channel panels are mandated to ensure that reasonable adjustments are in place for those with disability-related needs. Expert advice is available on cases where mental ill-health may be an underlying factor. Training is provided to Channel panels and intervention providers on effectively supporting those with autism spectrum conditions.

#### **Gender reassignment**

There is no specific reference to gender reassignment in the Prevent duty Guidance. All individuals who are referred for Prevent support are assessed in the same way and gender reassignment is not a factor considered.

#### **Pregnancy and maternity**

There are no specific references to pregnancy and maternity in the Prevent Duty Guidance. All individuals who are referred for Prevent support are assessed in the same way and pregnancy or maternity is not a factor considered.

#### Race

Prevent supports people to safeguard them from being radicalised, regardless of race. Training is provided to Prevent duty statutory partners to enable them to spot the signs of radicalisation and make appropriate, informed referrals. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances, regardless of race. Where language barriers may exist, Channel multi-agency panels are required to put appropriate translation services in place.

#### **Religion or belief**

Prevent focuses on tackling radicalisation risks that are often drawn from extreme ideologies, which can be linked to religion or belief. The Prevent duty applies equally across the full range of extremism risks and individuals referred into Prevent are assessed in the same way. The recently published government response to the Independent Review of Prevent<sup>10</sup> clearly highlights the need to take a balanced and proportionate approach across the various ideologies we see. To ensure equality in the support package we provide to individuals adopted as a Prevent case, specialist intervention providers are trained and equipped to support the full range of ideologies.

#### Sex

Prevent is designed to support individuals who are assessed to be at risk of radicalisation, regardless of sex. All individuals that are referred for Prevent support are assessed in the same way. Those receiving support from Prevent can specifically request to work with male or female intervention providers. Some Prevent grass-roots projects are specifically aimed at male or female participants. Participation in these projects is entirely voluntary.

#### **Sexual orientation**

There is no specific reference to sexual orientation in the Prevent Duty Guidance. All individuals who are referred for Prevent support are assessed in the same way and sexual orientation is not a factor considered.

<sup>&</sup>lt;sup>10</sup> The response to the Independent Review of Prevent (accessible) - GOV.UK (www.gov.uk)

#### 3c. Consideration of limb 3: Foster good relations between people who share a protected characteristic and persons who do not share it.

Prevent is sometimes viewed with mistrust, particularly within some Muslim communities. This is primarily due to the misperception that it disproportionately targets Muslims. The commitments we have made in the government response to the Independent Review of Prevent will help to tackle misperceptions as it includes work to build public trust in Prevent; improve Prevent communications; rapidly rebut false stories on Prevent; and increase the transparency of how Prevent operates and how members of the public can make complaints.

In the updated Prevent Duty Guidance, we make the thresholds for Prevent clearer, consistent and proportionate.

We work to continuously improve our delivery of Prevent and how we engage with communities on the issue of radicalisation. We seek feedback from Prevent practitioners and frontline professionals who come under the Prevent duty, to ensure that we meet our obligations under the Public Sector Equality Duty and seek to mitigate any adverse impact Prevent might have on fostering good relations.

The Prevent Duty Guidance also provides advice and support to partners to reduce permissive environments. These are environments where ideological causes of terrorism are challenged and the divisiveness that they create between different groups and people is reduced.

#### Age

We do not consider that the updated Prevent Duty Guidance is likely to improve or harm relations between people of different ages.

Individuals of all ages are supported by Prevent. Prevent training is provided to all Prevent duty partners on spotting the signs of radicalisation and making appropriate referrals. All referrals are assessed in the same way, using the same process, national guidance and tools. The support provided is tailored to each individual's needs and the composition of the Channel multi-agency panel includes appropriate expertise – for example, in supporting older individuals who may not be in contact as frequently with Prevent duty partners as young people (e.g. school pupils).

#### **Disability**

We do not consider that the updated Prevent Duty Guidance is likely to improve or harm relations between people who have a disability and people who do not.

For those who are responsible for delivering Prevent and who fall under the Prevent duty, Prevent training for frontline sectors is fully accessible and can

be used with a range of accessibility aids, including screen readers. For those people adopted as a Prevent case, there are no barriers to accessing Prevent support and Channel panels are mandated to ensure that reasonable adjustments are in place for those with disability-related needs. Expert advice is available on cases where mental ill-health be an underlying factor. Training is provided to Channel panels and intervention providers on effectively supporting those with autism spectrum conditions.

#### **Gender reassignment**

We do not consider that the updated Prevent Duty Guidance will harm relations between people who share the protected characteristic of gender reassignment and those who do not. Indeed, there is the chance that it may improve relations in tackling radicalising ideologies that perpetuate anti-LGBTQ+ narratives.

#### **Pregnancy and maternity**

We do not consider that the updated Prevent Duty Guidance is likely to improve or harm relations between people who share this protected characteristic and those who do not.

#### Race

We do not consider that the updated Prevent Duty Guidance is likely to harm relations between people of different races. Prevent supports people to safeguard them from being radicalised, regardless of race. Training is provided to Prevent duty statutory partners to enable them to spot the signs of radicalisation and make appropriate, informed referrals. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances, regardless of race. Where language barriers may exist, Channel multi-agency panels are required to put appropriate translation services in place.

The government response to the Independent Review of Prevent makes a commitment to increase the transparency in how Prevent operates, further improve guidance and training, and rebut false claims about the Prevent programme. The outreach events and grassroots projects that Prevent supports in communities will also help to foster good relations among people of different ethnic or racial backgrounds.

#### **Religion or belief**

We do not consider that the updated Prevent Duty Guidance is likely to harm relations between people of different religions or beliefs and, indeed, may improve them.

There are some misconceptions that Prevent disproportionately targets Muslims. However, Prevent does not target specific religions or beliefs. The religious composition of a geographic area is not a consideration in identifying which areas to prioritise for Prevent action. Rather, it focuses on radicalisation risks that are often drawn from extreme ideologies.

The government response to the Independent Review of Prevent committed to implementing a consistent threshold for referrals across the full range of ideologies that might be present where an individual is at risk of radicalisation, this is included in the updated Prevent Duty Guidance. This will help to ensure that a consistent, proportionate and robust threshold is met before a case is accepted on Prevent and Channel, regardless of a person's religion or belief.

We have seen in the past that any discussion of Prevent prompts a response from critics on all sides, including those who think it unfairly targets Muslims and those who think it does not target Muslims enough. Public commentary around the PDG may therefore lead to reactions in some quarters that do not foster good relations between Muslims and non-Muslims. This is mainly about the public perception of Prevent, not the PDG itself, and is already the case. Since such reactions are common whenever anything about Prevent is in the news, the new PDG does not in itself harm relations and such commentary is unavoidable when publicising Prevent activity. We will, however, ensure we have strong communications, including reactive lines, around publication to tackle any misconceptions that may harm relations with religious groups.

#### Sex

We do not consider that the updated Prevent Duty Guidance is likely to harm good relations between people of different sex. Prevent is designed to support individuals who are assessed to be at risk of radicalisation, regardless of sex. All individuals who are referred for Prevent support are assessed in the same way. Those receiving support from Prevent can specifically request to work with male or female intervention providers.

Some Prevent grassroots projects are specifically aimed at male or female participants and participation in these projects is entirely voluntary. Indeed, there may be some positive impact in that some radicalising ideologies to be tackled are underpinned by misogyny.

#### **Sexual orientation**

We do not consider that the updated Prevent Duty Guidance is likely to harm relations between people of different sexual orientation. Indeed, there is the chance that it may improve relations in tackling radicalising ideologies that perpetuate anti-LGBTQ+ narratives.

There is no specific reference to sexual orientation in the updated Prevent Duty Guidance. Prevent is designed to support individuals who are assessed to be at risk of radicalisation. All individuals who are referred for Prevent support are assessed in the same way and sexual orientation is not a factor considered.

## 4. Summary of foreseeable impacts of policy proposal, guidance or operational activity on people who share protected characteristics

Protected characteristic group	Potential for positive or negative impact	Explanation	Action to address negative impact
Age	Some potential for negative impact	The majority of Prevent referrals relate to people in younger age brackets. Any change in approach may therefore have a disproportionate impact on age as a characteristic, as younger people are overrepresented in Prevent compared to the general population.	Prevent is designed to support individuals of any age that are assessed to be at risk of radicalisation. All individuals who are referred for Prevent support are assessed in the same way and are given a tailored package of support designed to meet their individual circumstances. Channel is a consent- based early intervention programme, so participation is voluntary. Training is provided across the education sector to ensure there is a good understanding of the signs of radicalisation and where to get support.
Disability	Not likely		
Gender reassignment	Not likely		
Marriage and civil partnership	Not likely		
Pregnancy and maternity	Not likely		

Protected characteristic group	Potential for positive or negative impact	Explanation	Action to address negative impact
Race	Some potential for negative impact	From the most recent referral statistics, we can infer that any changes to policy regarding Prevent referrals may indirectly affect ethnic minorities more than white people.	All referrals to Prevent are assessed in the same way, regardless of race. Training is provided to frontline partners to help them understand the signs of radicalisation and how to get Prevent support. The number and type of referrals received by Prevent in 2021-22 reflects the current threat from terrorism and associated risk of radicalisation. Prevent is a supportive programme that aims to safeguard people, whatever their racial or ethnic background, from becoming terrorists or supporting terrorism. There is no criminal sanction and it helps to protect from activity that could result in individuals obtaining a criminal record, causing harm to communities or to society, or suffering from the harmful impact of terrorism and radicalisation themselves. By intervening early, Prevent aims to reduce the potential negative outcomes for individuals who are at risk of being radicalised.
Religion or belief	Some potential for negative impact	There is a longstanding misperception in some communities that Prevent unfairly targets Muslim communities. This is despite most Prevent referrals being unrelated to Islamist extremism. The Prevent Duty	The updated Prevent Duty Guidance will assist statutory partners in ensuring that the Prevent duty is implemented effectively and proportionately. The re-drafting of the Prevent Duty Guidance will be based on comprehensive engagement with frontline practitioners, allowing a balanced and informed view. A range of other work is also underway to tackle misperceptions and improve public confidence in Prevent, including:

Protected characteristic group	Potential for positive or negative impact	Explanation	Action to address negative impact
		Guidance is unlikely to significantly change this long- held misperception.	<ul> <li>A GOV.UK page that explains Prevent and the way it works</li> <li>outreach to sectors, grassroots organisations and communities to explain Prevent</li> <li>annual publication of a full range of Prevent statistics</li> <li>improved Prevent training for all Prevent Duty statutory partners</li> <li>new oversight mechanisms to improve the transparency of Prevent</li> <li>a programme of research and evaluation to continually improve our understanding of the impact of Prevent on those who come into contact with it.</li> <li>Communications plans to accompany publication, including strong reactive lines to tackle misperceptions</li> </ul>
Sex	Some potential for negative impact	Men are overrepresented in Prevent compared to the general population. There is limited empirical research on sex and radicalisation to confirm it as a risk factor. However, some studies have shown that certain pathways into radicalisation and recruitment methods were	We mitigate any risk of a potential negative impact by providing training to statutory partners, ensuring clear guidance is in place on the risk, assessing each referral in a consistent way, and tailoring any support provided to the individual.

Protected characteristic group	Potential for positive or negative impact	Explanation	Action to address negative impact
		more common for men than women, and vice versa.	
Sexual orientation	Not likely		

### 5. In light of the overall policy objective, are there any ways to avoid or mitigate any of the negative impacts that you have identified above?

The updated Prevent Duty Guidance will assist statutory partners in ensuring that the Prevent duty is implemented effectively and proportionately. The re-drafting of the Prevent Duty Guidance will be based on comprehensive engagement with frontline practitioners, allowing a balanced and informed view.

There is a range of other work also underway to improve Prevent delivery, tackle misperceptions and address concerns, and improve public confidence in Prevent, including:

- the launch of a GOV.UK page that explains Prevent and the way it works
- outreach to sectors, grassroots organisations and communities to explain Prevent and to understand concerns about how it works
- annual publication of a full range of Prevent statistics that enable greater transparency in how those referred into Prevent are being supported
- improved and fully accessible Prevent training for all Prevent Duty statutory partners, which is also available to the public
- new oversight mechanisms to improve the transparency of Prevent and to provide a clearer route for the public to make complaints about Prevent.
- a programme of research and evaluation work to continually improve our understanding of how the programme is working, who it is reaching and the impacts, including equality impacts, on those who come into contact with the Prevent system. This includes evaluating Channel and research to better understand individuals referred to Prevent for concerns about mixed, unstable and unclear ideologies

#### 6. Review date: May 2023

#### 7. Declaration

I have read the available evidence and I am satisfied that this demonstrates compliance, where relevant, with Section 149 of the Equality Act and that due regard has been made to the need to: eliminate unlawful discrimination; advance equality of opportunity; and foster good relations.

#### Signed by the Deputy Director of Prevent, Homeland Security Group

Date: 26 May 2023

SCS sign off:

Name/Title: Cathryn Ellsmore

Directorate/Unit: Prevent, Homeland Security Group

Lead contact:

Date: 26 May 2023

For monitoring purposes all completed EIA documents and updated EIAs **must** be sent to the

Date sent to PSED Team: 23 May 2023 for first review