

Prevent Strategy: Equality Impact Assessment

June 2011

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Aims, Objectives and Projected Outcomes

The Government recognised that the previous *Prevent* strategy was not as effective as it could be and a full review of the strategy was therefore commissioned. A review team was established and an independent reviewer was appointed.

The Home Secretary asked the review to:

- look at the purpose and scope of the *Prevent* strategy, its overlap and links with other areas of Government policy and its delivery at local level;
- examine the role of institutions – such as prisons, higher and further education institutions, schools and mosques – in the delivery of *Prevent*;
- consider the role of other *Prevent* delivery partners, including the police and other statutory bodies;
- consider how activity on *Prevent* in the UK can be more joined up with work overseas;
- examine monitoring and evaluation structures to ensure effectiveness and value-for-money; and,
- make recommendations for a revised *Prevent* strategy.

The Equality Impact Assessment (EIA) forms part of the review of *Prevent* as outlined above. The aim of the EIA was to take stock of the relevant effects of the previous strategy and to consider whether any aspect of the proposed strategy would have a disproportionate impact on any of

the following protected characteristics (as detailed in the Equality Act 2010):

- Race;
- Religion or belief
- Disability;
- Gender;
- Gender reassignment;
- Sexual orientation;
- Age;
- Pregnancy and maternity; and
- Marriage and civil partnership.

Where negative impact is identified, proposals are made to address that impact wherever possible.

The individuals and organisations likely to have an interest in or likely to be affected by the new strategy are listed below. This list is not exhaustive.

- Members of all communities;
- Police forces in the United Kingdom;
- Local Authorities in the United Kingdom;
- The Home Office;
- Security Services;
- Commission for Equality and Human Rights;
- Independent Advisory Groups;
- Community networks/groups;
- Voluntary and Public Sector working with young people;
- Serious and Organised Crime Agency (SOCA);
- United Kingdom Border Agency;

- The Foreign & Commonwealth Office;
- Department for Education;
- Department for Culture Media and Sport;
- Department for Communities and Local Government; and,
- Department for Business, Innovation, and Skills.

The EIA provided an opportunity for partners, stakeholders and members of the public to share their views on the previous strategy with the Home Office and contribute to the development of a revised strategy.

Collecting Data

A number of data collection methods were employed as part of the review, including an online questionnaire, consultation events and smaller focus groups. Respondents were asked for their views on both the previous *Prevent* strategy and the proposed new strategy.

Specific equality questions were included in the online questionnaire and focus groups. Respondents' opinions of the proposed strategy were often informed by their experience of the previous strategy; these are set out below in relation to the protected characteristics outlined above. The impact of the proposed strategy in terms of Human Rights more generally has also been considered.

Feedback was received for the category of race, religion and belief from the online questionnaire, *Prevent* review (electronic) mail box, consultation events and focus groups. For all other characteristics, feedback was only received from the specific online EIA questions.

Overall trends/patterns

Consultation has identified that the previous strategy was perceived to have had a disproportionate impact with regards to religion and belief and to some extent race, namely on Muslims of South Asian, Middle Eastern or African heritage. There is also some qualitative evidence to suggest that age and gender had also been

impacted to an extent by the strategy in terms of perceived impact on young males. In regards to the proposed strategy it is felt the negative impact on religion/race could be mitigated by expanding the scope of the new strategy to include a wider range of threats. Whilst no regional variations have been identified in this consultation process, given the above it would follow that areas with high proportions of Muslims, particularly young males of South Asian, Middle Eastern or African heritage, could be perceived to have been disproportionately affected by the previous strategy. In terms of disability, there was also some, albeit small, indication that individuals with mental health issues could have been impacted by the strategy.

No significant issues were identified during this process with regards to sexual orientation, pregnancy and maternity, gender identity or marriage and civil partnership.

Quantitative and qualitative data

Race / Religion and belief

Respondents often used the terms 'race' and 'religion/belief' interchangeably; as such the analysis of the comments received under these is included together.

For the purposes of this EIA, Race has been taken to include colour, nationality, ethnic and national origins, in line with the Race Relations Act 1976.

Online consultation – responses to specific EIA questions

The impact on race, religion and belief is the strongest theme emerging from the online EIA consultation in both negative and positive terms and also the area whereby respondents were most divided.

Race

When respondents were asked whether the proposed strategy would have a negative impact on race, the majority of respondents (55%) answered no - it would not have a negative impact on race.

When asked whether the strategy would have a positive impact on race, the majority (63%) again answered no – that the strategy would not have a positive impact either.

Religion and belief

When respondents were asked whether the proposed strategy would have a negative impact on religion/belief, the majority of respondents (59%) answered yes – the strategy would have a negative impact on religion/belief.

This category is the strongest area whereby online respondents envisaged a negative impact of the strategy.

When asked whether the proposed strategy would have a positive impact on religion/belief, the majority (57%) answered no – the strategy would not have a positive impact on religion/belief.

The main theme dominating the online comments in terms of perceived negative impact of the *Prevent* strategy on race/religion/belief, was that the previous *Prevent* strategy was too Islam focused and only aimed at Muslims. Respondents felt strongly that the focus on Al Qa'ida-influenced terrorism had led to the stigmatising and stereotyping of Muslims, especially those of South Asian (e.g Pakistani), Middle Eastern and African descent.

A small number of respondents also commented that the previous strategy had provided further fuel to extreme-right wing groups to marginalise Muslims in the UK. Some respondents felt that there should be a clearer methodology for assessing risk which should be known nationally. A small number of respondents also stated that lessons should be learned from the previous strategy in terms of language and terminology. Also that the new strategy should be mindful of stereotyping Muslims.

More positively, a number of online respondents felt that an effective strategy which encouraged dialogue and joint activity between all communities would have a beneficial impact on integration and race relations as it would aid understanding of not only the problem but also of different cultures.

Online consultation – responses to wider *Prevent* review questions

A number of responses from the wider online consultation process also referred to a disproportionate impact on religion in terms of a perceived stigmatisation of Muslims under the previous *Prevent* strategy. It was felt that expanding the strategy to address a wider range of threats (e.g. terrorism by the extreme right wing or other ethnic or religious organisations) would help to mitigate this issue. However, there was a minority who argued that, as a counter-terrorism strategy, *Prevent* should focus exclusively on the greatest threat and not divert scarce resources to tackle other threats.

Consultation events

A minority of participants from the consultation events also referenced an impact on religion/belief in relation to a perceived stigmatisation of Muslims. Expanding the strategy to address a wider range of threats and also a stronger communication strategy were cited as areas which could mitigate such negative impact.

Focus groups

The majority of Muslim respondents within the focus group sessions expressed concern that a strategy which focused solely on Al Qa'ida-inspired terrorism would have a negative impact on individuals of the Muslim faith. This was set out in terms of negative stereotyping of Muslims and Muslim communities and resentment from wider society regarding preferential treatment e.g. in relation to resources. These concerns were also noted by approximately one third of the non-Muslim sample.

	<p><u>Prevent review (electronic) mailbox</u></p> <p>Responses received via the <i>Prevent</i> review electronic mailbox further highlighted concerns regarding the stigmatisation of Muslim communities and a perceived lack of transparency in allocating public resources. It was felt that these factors had served to undermine community cohesion in some parts of the country and fuel anti-Muslim sentiments.</p> <p><u>House of Commons Communities and Local Government Select Committee report, Preventing Violent extremism (2010)</u></p> <p>The House of Commons CLG Select Committee on Preventing Violent Extremism (2010) reported similar findings, stating that the focus on the Muslim community had been unhelpful, stigmatising and alienating and could be perceived as legitimising the extreme right. The committee commented further that, 'the previous system for allocating <i>Prevent</i> funds was not based on risk and work addressing this should be a priority.'</p>
Disability	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The overwhelming majority of respondents did not perceive there to be a negative (96%) or a positive (85%) impact of the proposed strategy in terms of disability.</p> <p>This is supported in the comments whereby the majority of respondents could see no impact on disability or see any relevance between <i>Prevent</i> and disability. Those who did tended to refer to mental health or learning disabilities with opinion split on whether <i>Prevent's</i> impact will be positive or negative. Those who think <i>Prevent</i> will have an adverse impact believe that those with mental health issues will become 'victims of <i>Prevent</i>' as they will be more likely to be arrested and imprisoned. Alternatively, some expressed concern that those with mental/learning disabilities were easy targets for radicalisers and that <i>Prevent</i> would provide support for such people, therefore having a positive impact.</p>
Gender	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>When respondents were asked whether the strategy would have a negative impact on gender, the majority of respondents (78%) answered no - it would not have a negative impact on gender.</p> <p>When asked whether the proposed strategy would have a positive impact on gender, the majority (77%) again answered no – that the strategy would not have a positive impact either.</p>

	<p>However, where respondents explained their initial response, it was overwhelmingly felt that men would be most negatively impacted by the <i>Prevent</i> strategy on the basis that they are perceived to be at greatest risk of radicalisation. Arguably this had resulted in them feeling stereotyped and targeted (e.g. under “stop-and-search” counter-terrorism powers). A smaller group felt that women have been negatively impacted by virtue of perceptions (underlying in the strategy) of male dominance and more should be done to redress the balance. However, there was also the view that it is difficult to reach into some groups without encountering gender issues. For example, <i>Prevent</i> aimed at women could be seen as an attempt to undermine traditional relationships between genders within certain cultures.</p> <p>Conversely, some respondents felt that <i>Prevent</i> had had a positive impact on women. Some perceived that women are not treated equally within some groups and <i>Prevent</i> had the potential to remove the constraints that block their participation in the agenda, by empowering them to tackle intolerance and play a more active role in society.</p>
Gender Reassignment	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The overwhelming majority of respondents participating in the online EIA consultation process did not perceive there to be a negative (95%) or a positive (86%) impact of the strategy in terms of gender reassignment.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact on individuals who have undergone gender reassignment. A small minority of respondents commented that such individuals may be more vulnerable due to cultural intolerance and experience of hate crime.</p>
Sexual Orientation	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The majority of online respondents did not envisage any negative (91%) or positive (85%) impact of the proposed strategy in terms of sexual orientation.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact in terms of sexual orientation if the strategy were to be expanded to include a wider range of threats. A small number stated that a positive impact of the <i>Prevent</i> strategy would be in creating a climate in which it was more acceptable to challenge homophobia.</p>

<p>Age</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>When respondents were asked whether the strategy would have a negative impact on age, the majority of respondents (77%) answered no - it would not have a negative impact on age.</p> <p>When asked whether the proposed strategy would have a positive impact on age, the majority (77%) again answered no – that the strategy would not have a positive impact either.</p> <p>The prevailing sentiment amongst those who explained their initial response was that the young are most affected by <i>Prevent</i>. The effect is considered to be both negative and positive. Those who felt that the previous <i>Prevent</i> strategy had had a negative impact stated that the young had been stigmatised and presumptions had been made because of their age.</p> <p>More positively, others felt that the young are being targeted by radicalisers and will suffer most if <i>Prevent</i> does not focus on them. It was noted that the proposed strategy could promote active engagement and raise awareness of the risks. Indeed, several respondents felt it important to target the young to produce balanced and empowered individuals who could better challenge terrorist ideology in the future. Some went further to state that focusing on the young could help raise their aspirations and help them to make positive career choices.</p> <p>It is important to note that whilst many references are made to the ‘young’, very few respondents actually qualified it with a specific age group. Where respondents did offer a definition of ‘young’, the range tended to be from 11 to 35 years old. A number of respondents also expressed concern that <i>Prevent</i> should be age neutral; arguing that <i>Prevent</i> should apply to all age groups as there is no single profile.</p>
<p>Pregnancy and Maternity</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The vast majority of online respondents did not deem there to be either a negative (97%) or positive (91%) impact of the strategy in terms of pregnancy and maternity.</p> <p>The majority of respondents who explained their initial response did not feel that there would be an impact in terms of pregnancy and maternity particularly if the new strategy was inclusive of all communities. A small minority stated the strategy could have a positive impact on integration in terms of promoting cultural awareness if it included all communities.</p>

<p>Marriage and Civil Partnership</p>	<p><u>Online consultation – responses to specific EIA questions</u></p> <p>The majority of respondents did not envisage there to be either a negative (96%) or positive (87%) impact of the strategy in terms of marriage and civil partnership.</p> <p>A small number stated the strategy could have a positive impact on integration if it was inclusive of all communities and addressed a wider range of threats.</p>
<p>Human Rights</p>	<p>The proposed strategy is not intended to interfere with the Convention rights of any person or group, though it is accepted that certain communities may perceive an adverse impact.</p> <p>The rights that are being protected under the Home Office <i>Prevent Strategy</i> are:</p> <ul style="list-style-type: none"> • Article 2: Right to life; • Article 5: Right to liberty and security; • Article 6: Right to a fair trial; • Article 7: No punishment without law; • Article 8: Right to respect for private and family life; • Article 9: Freedom of thought, conscience and religion; • Article 10: Freedom of expression; • Article 11: Freedom of association and assembly; • Article 13: Right to effective remedy; and, • Article 14: Prohibition of discrimination. <p>The Protocols under the Human Rights Act that are being protected are:</p> <ul style="list-style-type: none"> • Article 1, the Protection of Property; and, • Article 2: Right to education. <p>To 'test' whether the proposed <i>Prevent Strategy</i> interferes with Human Rights, consideration has been given to the following three questions. Is the strategy:</p> <ul style="list-style-type: none"> • Legal; • Necessary; and, • Proportionate. <p>It is deemed that the strategy as proposed is legal, necessary and proportionate given the national threat to security posed by terrorism in the United Kingdom and does not therefore interfere with the human rights of any group or individual.</p>

Specific equality issues and data gaps that may need to be addressed through consultation and/or further research

A number of data collection and monitoring arrangements will be put in place in line with the revised strategy. This information will be reviewed regularly and used as a basis for further research and to evaluate delivery of the refreshed strategy.

Race, Religion and Belief

The impact of the new strategy in terms of race and religion will need to be monitored closely. ACPO (TAM) will put in place *Prevent* EIA monitoring arrangements with all Police Forces in England and Wales and ensure that data is shared with OSCT *Prevent* and reviewed on a regular basis.

OSCT *Prevent* will also put in place a Case Management Information System to monitor data including the race and religion/belief of all individuals subject to *Prevent* interventions.

Age

OSCT *Prevent* will include age within its case management monitoring arrangements as described above.

Gender

OSCT *Prevent* will include gender within its case management monitoring arrangements as described above.

Disability and Mental health

There was some qualitative data and anecdotal information which indicated that disability in terms of mental health may be impacted by the strategy. Further research would be required in order to determine this.

OSCT *Prevent* will include disability and mental health within its case management monitoring arrangements as described above.

Involving and Consulting Stakeholders

Internal consultation and Involvement

In addition to extensive consultation with a wide range of Government departments and agencies, a number of directorates within OSCT (Prevent, Pursue, Protect, RICU and the Strategy team) were consulted.

The following Home Office staff networks/ associations were alerted to the *Prevent* review and invited to contribute to the process either online, by email or by mail:

- Home Office Disability network;
- Spectrum;
- A:Gender;
- Home Office Women;
- Hindu Forum;
- Home Office Islamic Network;
- Home Office Christian Network;
- Home Office Sikh Association;
- Pagan Network;
- The Network.

The online consultation included a section to state the individual's profession or organisation, however this information was not mandatory. Where this information was supplied, the questionnaire showed that 4% of responses were received from those identifying themselves as from Government departments and 2% as from faith networks within Government departments.

External consultation and involvement

The review and consultation process were announced in a press notice on 9 November 2010. The online consultation ran between 10 November and 17 December 2010 and was made available through the Home Office public facing website and via a restricted *Prevent* stakeholder website.

Members of the public were able to provide their views on *Prevent* online, via email (to a dedicated address), or by post. In addition, 11 regional consultation events and 24 in depth focus groups were held across England, Scotland and Wales in December and January.

Prevent review online consultation

A questionnaire was produced which covered key aspects of the previous strategy and sought the views of respondents to proposals on where changes to the strategy could be made. In addition, the following specific EIA questions were included in relation to the protected characteristics as given under Aims, Objectives and Projected outcomes:

- In your view would the Government's revised *Prevent* strategy (as discussed in this document) **negatively** impact any of the above groups?
- In your view would the Government's proposed *Prevent* strategy (as discussed in this document) **positively** impact any of the above groups?

Respondents were asked to explain their responses in relation to each of the diversity strands. A total of 169 people responded to the EIA questions. This constituted approximately 52% of those completing the full online questionnaire.

Prevent review consultation events

586 delegates attended 11 events in Glasgow, Nottingham, Cambridge, Warrington, London, Taunton, Woking, Birmingham, Llandrindod Wells, Newcastle and Leeds. These includes representatives from:

- Local Authorities (38%)
- Police (22%)
- Community organisations and faith groups (11%)
- FE, HE and schools (including academics) (6%)
- NOMS and Probation (4%)
- NHS (3%)
- YJB and Youth Offending Services (2%)
- Regional Government Offices (2%)
- Fire and Rescue Services (2%)
- Other (including members of Fire and rescue services, charities, project representatives, consultants, officials from Government Departments) (10%).

Prevent review focus group events

As part of the consultation, 24 focus groups were conducted across England, Scotland and Wales in addition to the consultation events. Respondents were selected using a recruitment screener designed to capture a range of backgrounds (working status, socio-economic group, age, gender). A separate Muslim only sample was also selected, given the perceived negative impact of the previous strategy on this group, in order to ensure that their views were fully represented.

Experienced recruiters sourced respondents through a mix of on-street and snowballing techniques. The total number of individuals selected was approximately 124. This consisted of 37 in the Muslim sample and 87 in the non-Muslim sample. None of the individuals selected had been involved in any previous *Prevent*

consultations or were working in a *Prevent*/ stakeholder role or for community organisations with a political interest.

Given the findings of the online consultation in terms of the impact of the previous strategy on race/religion/belief, the following question was included in the focus groups for discussion:

‘Some people are concerned that if the strategy focuses on Al Qa’ida inspired terrorism then this creates problems for the Muslim population in the UK, for example:

- Inadvertently focus on Islam as a religion;
- Stigmatise or reinforce stereotypes of Muslims as terrorists;
- Provide far right groups with ‘fuel’ to marginalise Muslims in the UK.

How much do you think the *Prevent* strategy should take this into account? In what ways? What could it do to mitigate this problem?’

Prevent review (electronic) mail box and postal responses

78 responses to the wider *Prevent* review were also received via email and post, including from:

- The Equality and Human Rights Commission;
- The Civil Service Muslim Network;
- The North Wales Regional Equality Network.

ACPO (TAM)

In 2008 ACPO (TAM) commissioned all Police Forces in England and Wales to undertake an EIA on the delivery of the *Prevent* strategy within their force. 33 Police forces responded to this request.

Other parts of OSCT

An Equality Impact Assessment has also been conducted as part of the refresh of CONTEST and as part of the review of counter-terrorism and security powers, and protective security. The findings of these reports are available separately.

Assessing Impact

The EIA has highlighted concerns that the previous *Prevent* strategy has been perceived to have disproportionately impacted on religion/belief and to some extent on race, specifically Muslims of South Asian/Middle Eastern/African descent. The nature of this impact has been perceived to be largely negative, with members of the Muslim community reporting that they have felt targeted, 'spied upon' and unfairly labelled as potential terrorists. Responses have also indicated that support to Muslim groups under the *Prevent* banner has had a beneficial impact on integration and helped to raise the aspirations of young people and steer them towards positive career choices.

Consultation also suggested that including a wider range of threats in the new strategy would mitigate the negative impact on Muslim communities. The review looked carefully at the issue of stigmatisation and the strategy will be expanded to include all forms of terrorism. However, the most significant threat to the United Kingdom remains that from Al Qa'ida-influenced terrorism. The new strategy will therefore primarily work to tackle this threat, although activity will take place to address other threats. It is recognised that young people and young men in particular are more vulnerable to the risks associated with terrorism. Given this, there may continue to be a perception of disproportionate impact on young men under the new strategy.

In order to mitigate against negative impact of the new strategy upon any individual or group, more robust monitoring arrangements are being developed in relation to delivery of the strategy to ensure greater transparency and improved evaluation. A more sophisticated risk assessment process has also been developed to understand where *Prevent* work needs to be prioritised. The Department for Communities and Local Government will lead on developing an integration strategy.

Furthermore, the consultation process has also demonstrated a need for much stronger communications from the centre in terms of the aims and purpose of the strategy. The Research, Information and Communication Unit will work closely with *Prevent* in order to develop this further. In addition, training for frontline staff working on *Prevent* will also be enhanced and more focused in line with priority areas, sectors and institutions.

We judge that these measures will result in a more tightly focused *Prevent* strategy and help to mitigate further against disproportionate negative impact of the revised strategy.

Action Plan - PREVENT Equality Impact Assessment Report - June 2011

Action / activity	Owner and interested stakeholders	Dependencies / risks / constraints	Completion date	Progress update
ACPO (TAM) to put in place <i>Prevent</i> EIA monitoring arrangements with all Police Forces in England and Wales and ensure that data is shared with OSCT <i>Prevent</i> and reviewed on a regular basis.	ACPO (TAM)	Accurate and timely completion by Police Forces (ACPO will liaise with all forces to ensure consistency).	Ongoing	
OSCT <i>Prevent</i> to review all <i>Prevent</i> EIA data collected by ACPO (TAM).	OSCT PREVENT	Accurate and timely completion by Police Forces.	Ongoing	
OSCT <i>Prevent</i> to put in place a Case Management Information System to monitor data of individuals subject to <i>Prevent</i> interventions. This information will be reviewed regularly and used as a basis for further research and to evaluate delivery of the refreshed strategy.	OSCT PREVENT	Accurate and timely completion by practitioners.	Ongoing	

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