



HM Government

Prevent Multi-Agency
Panel Duty Guidance:
**Protecting people
vulnerable to being
drawn into terrorism**

OGL

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**Prevent Multi-Agency Panel Duty Guidance:
Protecting people vulnerable to being drawn into terrorism.
Statutory guidance for panel members and partners of local panels.**

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Guidance for members of a panel and partners of local panels in Scotland 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 is issued under sections 36(7) and 38(6) of the Counter-Terrorism and Security Act 2015 (the CTSA 2015) to support Prevent Multi-Agency Panel members and partners of local panels.¹ Panel members and partners of local panels must have regard to this guidance.
2. Section 36 of the CTSA 2015 sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism. In Scotland, this duty is met through Prevent Multi-Agency Panels (PMAP). For the purpose of this guidance, the term 'Prevent Multi-Agency Panels' (or 'PMAP') refers to the local authority led support and the duty as set out in section 36 of the CTSA 2015. This is separate and distinct from police-led Prevent case management.
3. This guidance is specifically aimed at members and partners of local panels involved in the PMAP process. The list of authorities who are 'partners' of local panels can be found in Part 2 of Schedule 7 of the CTSA 2015 (and is replicated at Annex C of this guidance). Those authorities are required to co-operate with PMAP in the carrying out of its function under section 36 of the CTSA 2015. As a statutory duty, the requirements of PMAP should be reflected in relevant policy, guidance and the local authority's constitution.
4. The purpose of this document is to:
 - a. provide guidance for PMAP
 - b. provide guidance for panel partners on PMAP delivery
 - c. explain why people may be vulnerable to being drawn into terrorism and describe indicators of vulnerability
 - d. provide guidance on the support that can be provided to safeguard those at risk of being drawn into terrorism
 - e. explain how a Prevent referral is assessed to determine suitability for support through PMAP

¹ Previously known as Prevent Professional Concerns (PPC) Panels

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 our response according to the threat posed to our national security. The most significant of these threats is currently from terrorist organisations associated with al-Qa'ida and Daesh and from lone actors inspired both by those organisations and by extreme right-wing ideologies.²
7. Prevent has three objectives:
 - a. tackle the causes of radicalisation and respond to the ideological challenge of terrorism
 - b. safeguard and support those most at risk of radicalisation through early intervention, identifying them and offering support
 - c. 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 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. Section 26 of the CTSA 2015 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
10. The PMAP process 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.

² This list is not exhaustive. Risk and threat to the UK is subject to constant review and updated accordingly.

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

However, signs that extremist views are being adopted can be used to assess whether an 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 an assessment and specialist support. There may be cases that require a safeguarding response in conjunction with Prevent.

11. Clear distinction should be made between individuals who present with a ‘terrorism vulnerability’ requiring PMAP 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 PMAP and place it into the police-led or Pursue space, if appropriate.⁴

Practice example 1: ‘vulnerable to being drawn into terrorism’

Whilst not exhaustive, this could include cases where individuals:

- are accessing extremist materials
- are espousing scripted extremist narratives
- are demonstrating acute and concerning behaviour changes
- 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 PMAP.

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 that they have been engaging in chat rooms where they have been receiving encouragement to carry out these acts.

⁴ Pursue is a strand of the UK Government CONTEST strategy 2018, aimed at stopping terrorist attacks in this country and against UK interests overseas.

Section 2:

Prevent Multi-Agency Panels

- 12.** The PMAP process was placed on a statutory footing by the CTSA 2015. It focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Each local authority area in Scotland must ensure that a PMAP is in place, having the specific functions as set out in section 36(4) of the CTSA 2015.⁵ PMAP 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
- 13.** The PMAP process provides early support to 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 would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity. Cases adopted onto PMAP should have a vulnerability to being drawn into terrorism. Cases should not be held in PMAP where no such vulnerability exists.⁶
- 14.** Success of the PMAP process is dependent on the co-operation and coordinated activity of partners. It works best when individuals and their families engage and are supported consistently. Further information relating to consent for PMAP support and engaging the individual can be found in Section 6 of this guidance.

⁵ See requirement set out in sections 36(1)(a) and (b), and 36(4) of the CTSA 2015.

⁶ Terrorism relates to any terrorism connected offending, as per the breadth of UK terrorism legislation (including, but not limited to, the CTSA 2015, the Terrorism Act 2000 and amendments, the Terrorism Prevention and Investigation Measures Act 2011 and the Counter Terrorism and Border Security Act 2019)

15. 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 that the person has. The information will then be presented to a PMAP.
16. The CTSA 2015 is intended to secure effective local co-operation and delivery of the PMAP process in all areas and to build on the good practice already operating in many areas. In practice this means:
 - local authorities will have a PMAP in their area
 - the local authority will provide the PMAP chair and deputy chair
 - the panel will develop a support plan for individuals accepted as PMAP cases
 - where PMAP is not appropriate, the panel will consider alternative forms of support, including health and social care services (with reference to any Child's Plan, where one is in place)
 - the panel will ensure that other public protection processes (which can run in parallel with, but not instead of, PMAP) are linked in to the PMAP process where appropriate
 - the panel will ensure accurate records are kept detailing the support plan, agreed actions, decision-making and outcomes
 - all partners of a panel (as specified in Part 2 of Schedule 7), as far as is appropriate and reasonably practicable, will co-operate with the police and the panel in the carrying out of their functions

Monitoring Prevent Multi-Agency Panel duty compliance

17. Sections 36(7) and 38(6) of the CTSA 2015 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. Under section 30 of the CTSA 2015, where a specified authority has failed to discharge the duty imposed on it by section 26(1), the Secretary of State has a power to give directions to that authority for the purpose of enforcing the performance of the duty. 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.
18. National learning has highlighted the importance of compliance with PMAP processes to reduce the risks 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.
19. Support and direction to panels and panel members will be provided by the UK and Scottish Governments to strengthen the consistency of operational practice across the UK. The framework for this support and direction includes:
 - undertaking PMAP observations
 - providing support through PMAP peer reviews
 - panel member or chair training
20. Local authorities may wish to set up regional PMAP peer networks to facilitate the sharing of good practice and provide an additional source of advice and mutual support.

Practice example 2: monitoring compliance

- A newly appointed employee has adopted PMAP 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 PMAP peer reviewer to undertake an observation of a PMAP meeting.
- Recommendations for improvement are made and this, along with the self-assessment audit, are used to agree a six-month improvement plan.

Section 3:

Requirements for Prevent Multi-Agency Panels and partners of a panel

Requirements for panels

- 21.** Section 36 of the CTSA 2015 places a duty on local authorities to ensure that a PMAP is in place for their area. This should constitute a single panel, with a single chair, covering the needs of adults and children. In Scotland, panels are likely to be held in relation to one specific individual at a time, where this is manageable, and membership of the panel should be tailored accordingly. The local authority PMAP 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.
- 22.** As a minimum, the local authority should ensure these meetings are attended and administrated appropriately. The PMAP chair should have the contact details of relevant local partners within their area to aid their ability to call meetings at short notice if required.
- 23.** Section 37(5) of the CTSA 2015 requires PMAP 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 a police officer from a police area in whole or in any part of that local authority. The local authority and the police have shared responsibility for the PMAP process in their area.⁷

⁷ See section 37(1) of the CTSA 2015

For these purposes, a local authority in Scotland is defined as a council constituted under section 2 of the Local Government etc. (Scotland) Act 1994.⁸

- 24.** Section 38 of the CTSA 2015 places a duty 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 CTSA 2015.⁹ The local authority chair and the police must be present at each panel. 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.
- 25.** A panel may also include such other persons as the local authority considers appropriate.¹⁰ Depending on the nature of the referral, this may include, but not be limited to, representatives from the following groups:
- Social work¹¹
 - Local NHS Board
 - Schools, further education colleges and universities
 - Youth services
 - Children's and adult's services
 - Public Protection services
 - Local authority safeguarding managers¹²
 - Local authority Early Intervention Services Home Office Immigration (Immigration Enforcement, UK Visas and Immigration)
 - Border Force
 - Housing
 - Scottish Prison Service
 - Criminal justice social work
 - Secure accommodation providers
- 26.** Organisations that are not subject to the Prevent duty may also be expected to engage with the PMAP for the area if required. For example, NHS contract arrangements may include a contractual obligation to pay due regard to Prevent, under which it may be appropriate for the organisation concerned to engage with the local PMAP.
- 27.** Throughout the PMAP process, alignment and co-ordination with other safeguarding processes should be considered by the panel to address any wider safeguarding needs. Details of additional safeguarding processes are provided at Annex A of this guidance.

⁸ See section 41(1) of the CTSA 2015

⁹ Partners required to co-operate with the panel are set out in Part 2 of Schedule 7 of the CTSA 2015 and replicated at Annex C of this guidance.

¹⁰ Section 37(4) of the CTSA 2015

¹¹ Where a child or an adult is in receipt of PMAP support, a social worker from the relevant local authority should be present at the PMAP and be involved in all decision-making.

¹² In the case of child protection, the Lead Professional should perform the coordination role between any child protection process and PMAP.

Determining the lead authority for PMAP

- 28.** If a case involves two or more local authority areas (for example, if the individual resides in one authority but works or attends school in another or, in the case of a looked-after child,¹³ is the responsibility of one authority but housed in another), the lead authority for the purposes of PMAP is always the authority in which the individual ordinarily resides.¹⁴ If there is no such area, the lead authority will be the area with which the individual has the closest connection. This is to enable the individual to draw on the local services within their ordinary place of residence.
- 29.** This should not be affected by the individual taking a temporary absence from the area. Where individuals are temporarily placed outside of their normal place of residence, the placing authority will retain responsibility for convening the panel, including where the individual is in the prison estate outside of the area where they are ordinarily resident.¹⁵ Where an adult is deemed to be of no settled residence, the lead authority for PMAP is then the authority where they are physically present.

Case study 2: residency and lead authority example

- A 12-year-old child is the subject of a Compulsory Supervision Order with the implementing authority named as area A but has been placed in accommodation in area B.
- The accommodation provider has submitted a referral following concerns that the child is being influenced by radicalisers at school.
- The referral is progressed in area B, where the child now resides, and is adopted by a PMAP. Social care services in area A provide consent for the child to receive PMAP support.
- The child's social worker in area A attends or reports into the PMAP meetings and ensures the care plan is revised and updated, progressing any social care actions as needed.
- Other interventions, such as input from school and mental health support, are provided through area B.
- Area B can raise any concerns it has about the care plan directly with social care services in area A.
- Contact was made with the school to consider referrals and school support in relation to tackling the radicalising influences present there.

¹³ Looked-after children includes those children and young people on Compulsory Supervision Orders who may reside at home.

¹⁴ 'Ordinary residence' has been defined by the courts as 'habitual and normal residence in one place'.

¹⁵ Temporary or accidental absences, including for example holidays or hospital visits in another area, or if the individual is accommodated in another area (including within the prison estate), do not necessarily break the continuity of ordinary residence, and local authorities should take this into account.

Governance

- 30.** PMAPs 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 PMAP.
- 31.** Governance may include assessing compliance with PMAP 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 PMAP oversight or delivery. A process of escalation (usually to the local authority Chief Executive, who should have ultimate oversight of the functioning of PMAP), should also be agreed and disseminated to panel members, enabling concerns relating to the form or function of the PMAP in the area to be raised.
- 32.** Details of how to raise Prevent concerns or refer individuals for assessment and to receive support should be promoted locally by the local authority and partners. Questions or queries about Prevent-related concerns can be directed to the local authority Prevent Single Point of Contact (Prevent SPOC).

Section 4:

Prevent Multi-Agency Panel roles

The PMAP case officer, the PMAP chair and PMAP members

33. For the purpose of this guidance, any reference to the 'PMAP case officer' refers either to a police officer from the Prevent Delivery Unit (PDU) within Police Scotland, or to a local authority employee who is responsible for the management of PMAP cases.¹⁶

34. All PMAP case officers are responsible for:

- managing referrals and cases through the PMAP process in accordance with the PMAP guidance and case management principles
- ensuring that referrals are dealt with swiftly and, where appropriate, brought to the attention of the PMAP as soon as possible

- ensuring case information is accurately recorded and retained
- completing the initial vulnerability assessment framework (VAF) and sharing it with PMAP partners
- regularly reviewing and amending the VAF as the case progresses to accurately reflect all relevant vulnerabilities and risk

35. In addition, the PDU officer is also responsible for:

- assessing any escalating risk associated with the individual's potential involvement in terror related activity and transferring cases to the police-led partnership or into Pursue, where appropriate

¹⁶ The Counter-Terrorism and Border Security Act 2019 extended the power to refer individuals to a PMAP to local authorities in addition to a chief officer of police. This power is currently exercised only by those local authorities designated by the Home Office as 'dovetail areas'. In Scotland, the PMAP case officer will normally be a police officer from the Police Scotland PDU.

- 36.** The PMAP case officer should attend every PMAP meeting. 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

- 37.** Section 37 of the CTSA 2015 stipulates requirements relating to the local authority and police PMAP representatives. The local authority representative, the PMAP chair, should be a single designated officer within the responsible local authority.
- 38.** The function of chairing a PMAP is a significant responsibility and as such the local authority chair should be a person that has the required skills and experience.¹⁷ In practice, the local authority Chief Executive should be satisfied of this and ensure that the PMAP chair has sufficient capacity and resources to fulfil their functions. There is no expectation that the PMAP chair be a subject matter expert in child or adult protection, but they 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 to the chair. An annual Assurance Statement will be requested from the local authority by the Scottish Government, which should detail the named officers who are to fulfil these roles and confirm suitable arrangements are in place to meet the requirements set out in this guidance.
- Any changes to the named officers fulfilling these roles should be notified to the Scottish Government.
- 39.** In exceptional circumstances, where there is an urgent need to hold a PMAP meeting and the chair of the responsible local authority is not available, PMAP chairs can be shared across local authority areas. The responsible local authority should be satisfied that a PMAP chair from an external local authority has the required skills and experience and can effectively chair a panel within their local authority area that will effectively manage the terrorism vulnerability associated with the case.
- 40.** As a minimum, the following core competencies should be applied to the appointment of the chair and deputy chair, to ensure PMAP and chair responsibilities are fulfilled to a consistently high standard:
- sufficient authority to direct multi-agency delivery
 - previous experience in chairing multi-agency meetings
 - a sound understanding of the PMAP process, within the context of Prevent and CONTEST
 - a commitment to complete training as required

¹⁷ See section 37(2) of the CTSA 2015, which stipulates that both the local authority and police must be represented on the PMAP by an individual with the required skills and experience.

- 41.** While not mandatory, chairs and deputy chairs of PMAP may wish to acquire UK National Vetting clearance at 'Security Check' (SC) level to enable the police to share more sensitive information with them as part of their PMAP responsibilities and to strengthen local authority involvement in police-led partnership case management. Requests for security clearance vetting should be directed to the Scottish Government, which will liaise with the Home Office regarding such requests.
- 42.** The PMAP chair is responsible for:
- having oversight of all PMAP cases in their area
 - ensuring that the appropriate representatives are invited to each meeting as panel members
 - establishing effective relationships to ensure effective cooperation over information sharing, attendance and delivery of support
 - establishing the appropriate support plan for identified individuals, which takes account of wider family context and needs
 - ensuring that PMAP minutes are accurate and reflect decisions and reasons
 - ensuring an effective support plan is put in place and that consent is sought from the individual (or their representative) before PMAP support is accessed
 - ensuring that 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
 - ensuring appropriate information exchange occurs where an individual transfers between services
 - actively addressing or escalating issues of non-engagement within partner organisations or concerns relating to local PMAP form or function through local governance arrangements
 - applying professional judgment and providing the casting vote on the adoption of cases into PMAP where there is no consensus or majority among panel members
 - highlighting and requesting that identified gaps in local service provision are considered by Chief Executives
 - ensuring information sharing arrangements are in place for the panel in compliance with General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), in partnership with local information governance and legal teams¹⁸
 - liaising with other local authority teams (such as child and adult protection) where appropriate, to ensure that PMAP support is aligned and coordinated with other safeguarding processes
 - where the PMAP chair is not the local authority Prevent SPOC, ensuring close liaison with the Prevent SPOC

¹⁸ The GDPR and DPA 2018 are the principal pieces of legislation governing the process of data relating to individuals. Further details can be found in Annex B of this guidance.

43. The chair should be briefed by the PMAP case officer in advance of panel meetings to aid agenda setting, meeting preparations and identify the appropriate panel members required to attend. The pre-brief should only be used to provide a summary of referrals for consideration at panel. It should be concise and brief and not treated as a decision-making forum or a filter for consideration of PMAP referrals.
46. Panel members are attending the local PMAP not as experts in counter-terrorism, but as experts in their respective profession and the service and support provision available locally.
47. Part 2 of Schedule 7 of the CTSA 2015 details the partners required to cooperate with local panels in Scotland (see Annex C), though membership of panels should be tailored to reflect local provision. Where the case involves a serving member of the armed forces, an appropriate representative from that service, familiar with the individual's circumstances, may be invited to attend.¹⁹ Where the case involves an individual convicted of a crime, the relevant criminal justice social worker should attend.

Panel members

44. Multi-agency involvement in the PMAP 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 also ensures that the full range of information is accessible to the panel, so that vulnerabilities, risk and support needs can be fully assessed.
45. 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 should ascertain what other multi-agency involvement is already in place to support the individual or their immediate family and ensure that these processes are coordinated. Where possible, membership of the PMAP for a particular individual should be consistent to ensure effective management of cases.

¹⁹ This would be subject to securing consent from the individual receiving support.

Section 5:

The Prevent Multi-Agency Panel process

Identifying individuals vulnerable to risk of radicalisation

- 48.** 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
- 49.** All PMAP case officers and local authorities should develop effective links between services, such as the education sector, social care services, health, children and youth services, community justice services and credible community organisations so that services are well placed to identify and refer individuals vulnerable to being drawn into terrorism with whom they may have contact.
- 50.** PMAP case officers and local authorities should use their existing networks to highlight the importance of protecting those who are susceptible to being drawn into terrorism and raise awareness about how PMAP 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.

- 51.** When assessing the vulnerabilities and risks of an individual being drawn into terrorism offending of any kind, consideration should be given to wider 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, or materials sourced via online or social media platforms. Alignment and coordination with other support structures available to address wider safeguarding needs should be considered by the panel.
- 52.** Where appropriate, PMAP can run in parallel with, but must not be replaced by, other safeguarding meetings if relevant safeguarding thresholds have been met. The PMAP chair should ensure that professionals involved in those safeguarding meetings also attend the PMAP to share information and align the processes.²⁰ Details of additional safeguarding guidance are provided in Annex A.

Case study 3: Wider safeguarding/variation in support package

- A 15-year-old pupil began receiving support through PMAP 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 PMAP meeting convened between the PMAP chair, social care services and police to consider the necessary legal safeguards to do this.
- The resulting support plan accounts for changes in vulnerability, with interventions introduced on a phased basis and informed by responsiveness to the support provided.
- Parents were engaged with planned support and updated on progress.

²⁰ For Child Protection issues, the individual attending PMAP is likely to be the Lead Professional.

Risk indicators/ protective factors	Intervention	Provider	When
Over-identification with group, cause or ideology	Travel restrictions put in place	Social care services/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 Intervention Services	0-1 month
Grievance/injustice	Advice on Further Education options	Education/social care services	2-3 months
Grievance/injustice	Pastoral support provided	School	2-8 months
Susceptibility to indoctrination	IP sessions resumed for a short period to assess vulnerability and potential disguised compliance after third party influence resumed	Home Office approved IP	6-7 months

Referral stage

53. 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, and should use the national referral form, where possible.²¹

54. 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 or case will move into (or out of) Prevent.

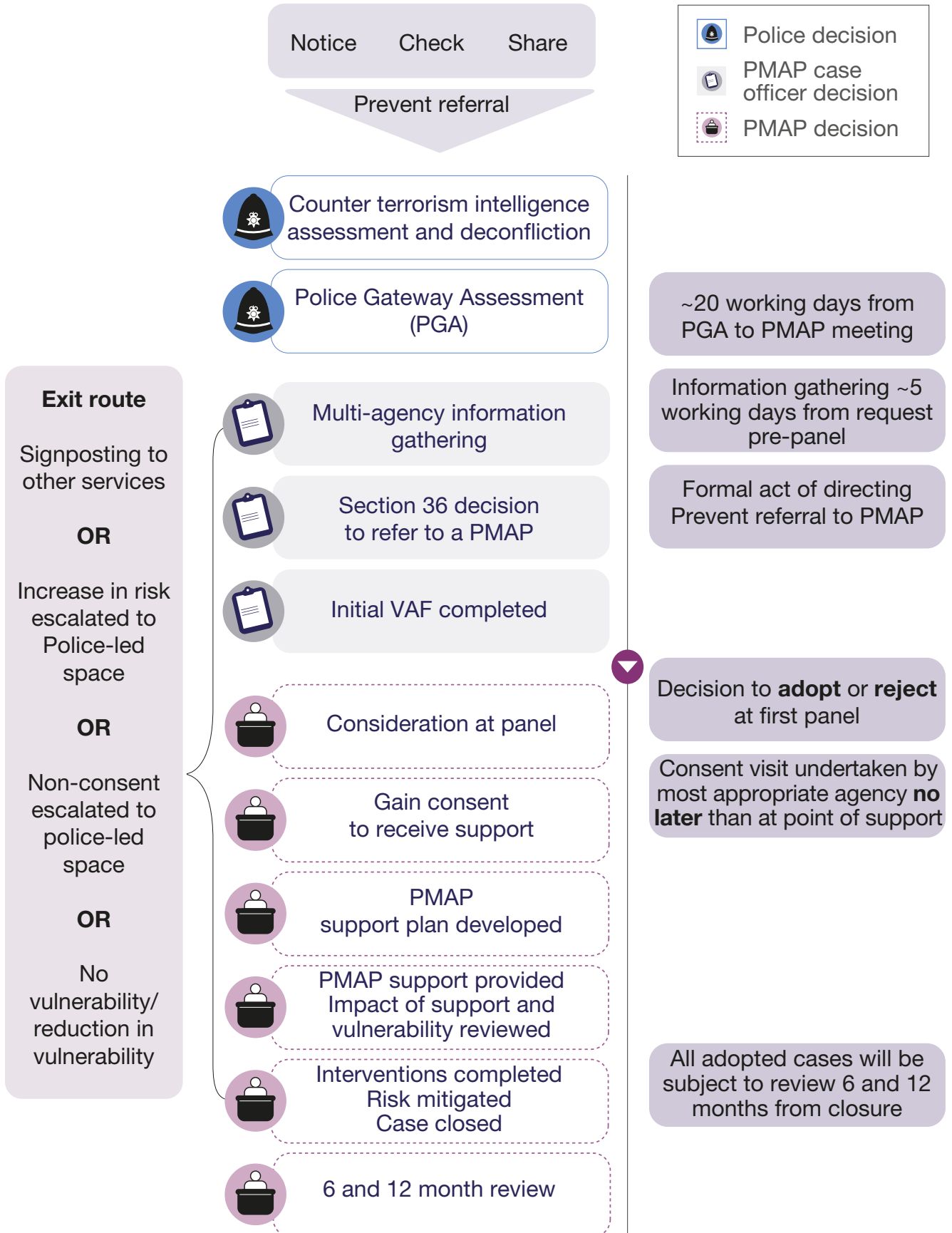
²¹ 'Notice, Check, Share' is the initial procedure applied when there is a concern that someone might be at risk of radicalisation. Details are provided in the Home Office training accessed via <https://www.elearning.prevent.homeoffice.gov.uk/>

55. After this gateway assessment, the primary route for individuals identified as having Prevent-relevant vulnerabilities is support through PMAP.
56. Individuals whom the police reasonably suspect pose a serious or imminent risk of terrorism offending are unlikely to be signposted onwards for support through PMAP. Depending upon the type and level of terrorism risk identified by police, these cases may be accepted for management in the police-led partnership or escalated into the Pursue space.
57. The police-led partnership is distinct from the local authority-led PMAP process and whether cases are put into the police led partnership or PMAP will be determined by the outcome of the gateway assessment.
58. Every case adopted onto PMAP 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, and where deemed appropriate, the police may remove a case from PMAP into the police-led partnership or escalate it into Pursue.

Case study 4: Parallel safeguarding processes

- Concerns were raised by a teacher following notable changes in a pupil's behaviour. The pupil had become withdrawn, had been drawing swastikas on their notepad and had started refusing to engage with non-white pupils in their class. The pupil had also disclosed concerns about returning home.
- The teacher reported the concerns to the school designated safeguarding lead (DSL). The DSL agreed that a safeguarding referral was required under 'getting it right for every child' (GIRFEC) and that a Prevent referral was also appropriate. Both referrals were made simultaneously.
- The counter-terrorism intelligence assessment of the Prevent referral revealed that the young person's uncle was a member of an extreme right-wing group and was likely to be a radicalising influence. The Prevent referral was passed to a PMAP.
- In parallel, the GIRFEC referral proceeded to an initial referral discussion where it was agreed it met the threshold for intervention. The lead professional was invited to attend PMAP meetings to provide updates. This ensured that the safeguarding processes were aligned and all vulnerabilities were identified and managed without delay.

Diagram 1.0



Screening and information gathering stage

- 59.** 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 PMAP. The PMAP case officer will refer the individual to other more appropriate services with support from the relevant local authority. 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 a PMAP.
- 60.** All Prevent referrals will first be triaged through a gateway assessment of risk and vulnerability by the police, which should determine the most appropriate forum for the case to be discussed. Those that are appropriate for consideration at PMAP are subject to a further, more detailed vulnerability assessment led by the PMAP case officer. This assessment of vulnerability is informed by information sharing with wider PMAP partners and must be circulated to PMAP 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 other public protection processes are aligned with the PMAP process, where appropriate.
- 61.** Once the gateway assessment and multi-agency information gathering is complete and the referral is deemed to be appropriate for consideration at PMAP, a decision under section 36(3) is made to refer the individual to the panel (the 'section 36 decision'). This decision can be made by a chief officer of police or by a local authority.²² Once the section 36 decision is made, the referral should be treated as a local authority led PMAP case and be recorded accordingly. The PDU officer should be in receipt of, or as a minimum, cited on, partner responses to the request for information. All minutes of PMAP meetings must be recorded appropriately.
- 62.** Where a Prevent referral is made, it is good practice for the referrer to be contacted by the police or PMAP 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.
- 63.** A Prevent referral can only be considered if it is progressed through the pathway detailed in diagram 1.0.

²² The Section 36 decision is normally delegated to a designated officer.

- 64.** The PMAP must decide whether or not to adopt the case for every referral 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.

Co-operation by partners of a panel

- 65.** Partners of a panel may be requested to provide information about an individual to the PMAP 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.
- 66.** Partners of panels are required to co-operate with the panel and police in providing any relevant information so that the PMAP can determine whether an individual is vulnerable to being drawn into terrorism.²³ Partners are expected to respond to the PMAP case officer within five working days of receipt of any information requests.

Information sharing

- 67.** The partners of a panel are required to co-operate with the PMAP chair and the police in carrying out their functions for PMAP. The duty to co-operate 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. As each organisation is responsible for their own data protection compliance, it is important that local organisational data protection and information governance leads and legal teams are consulted on the principles of information sharing with the panel.
- 68.** The GDPR, DPA and the Human Rights Act 1998 (HRA 1998) are not barriers to justified information sharing, but instead provide a framework to ensure that personal information (defined as 'any information relating to an identified or identifiable natural (living) person') about individuals is shared appropriately.²⁴ Under the GDPR and DPA 2018, information may be shared where there is a lawful basis to do so. A full list of lawful bases, as published on the Information Commissioner's Office (ICO) website, can be found in Annex B.

²³ See section 38 of the CTSA and Part 2 of Schedule 7 for the list of statutory partners

²⁴ <http://www.legislation.gov.uk/ukpga/1998/42/contents>

- 69.** 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 B). Information should only be used for the purpose for which it was requested and at all times the minimum amount of personal data should be requested and shared in order to meet the original purpose, in line with the GDPR principle of data minimisation.
- 70.** Information shared for the purposes of PMAP must be carried out in accordance with the GDPR and the DPA 2018. For further information about this panel members should contact the ICO, their information governance officer and/or their legal team. Further information on information sharing, including all lawful bases, is detailed in Annex B.
- 71.** Consent to share information is distinct from consent to receive support. These two issues should not be conflated or treated as a single consent.
- 72.** 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 Annex B of this guidance.²⁵
- 73.** If a panel partner has any concerns about the appropriateness of sharing the requested information, they should consult with the PMAP case officer, the local authority PMAP chair, legal advisers and their own information governance teams to ensure all are satisfied that the information requested is lawful, proportionate and necessary.
- 74.** If panel partners have provided information for PMAP, 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.

²⁵ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Practice example 3: cross-sector information sharing

- An employer referred an employee after Daesh-inspired 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 were received from panel partners:
 - Children, young people and families services: family had 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 their 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 Daesh-inspired group activity
- The PMAP Information Sharing Agreement (ISA) identified legal bases allowing swift exchange of relevant and proportionate information.
- A comprehensive picture of the individual and family circumstances was developed and context was provided for their spouse's service disengagement and potential coercion.
- The panel identified the most appropriate agency to discuss the PMAP process with the individual and seek consent for support.
- Risk to their spouse, children and staff was factored into these discussions and mitigating actions agreed. Support was reopened to the family.
- Actions, decision-making rationale, progress and outcomes were accurately recorded within the PMAP minutes.

Disclosure and confidentiality

- 75.** The PMAP process is a voluntary programme through which individuals consent to receive support to address their vulnerabilities and reduce the risk to them. Individuals should therefore not be subject to any negative consequences as a result of their involvement in the PMAP process (unless criminality subsequently becomes apparent). Where a Prevent referral is adopted onto PMAP, insofar as possible, the fact and details of those interventions should remain confidential and should not be routinely disclosed outside the partners involved in the PMAP process.
- 76.** While PMAP is a confidential and voluntary process, information shared for the purposes of PMAP may be subject to disclosure to a third party when it is legal and proportionate to do so, e.g. to a Sheriff court.
- 77.** Information relating to an individual's PMAP support package, for example PMAP minutes or Intervention Provider (IP) reports, may be subject to disclosure where a legal framework requires or enables that disclosure to be made. Requests for disclosure of PMAP documentation can come from several sources, including:
- courts and tribunals
 - the Police Investigations & Review Commissioner
 - the Procurator Fiscal
 - the Scottish Children's Reporter
 - individuals (as Subject Access Requests)
- 78.** While documents such as the VAF will be controlled by the authoring organisation, members of the PMAP 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.
- 79.** 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 B.
- 80.** A confidentiality declaration should be read and signed by PMAP partners in attendance at the start of each meeting to ensure these principles of confidentiality and disclosure are understood and agreed.

Vulnerability Assessment Framework

- 81.** The PMAP process assesses vulnerability using a consistently applied VAF built around three criteria:
- a. engagement with a group, cause or ideology
 - b. intent to cause harm
 - c. capability to cause harm²⁶
- 82.** The criteria are considered separately as experience has shown that it is possible to be engaged without intending to cause harm and 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).
- 83.** 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

- 84.** Association with organisations that are not proscribed is not, on its own, reason enough to justify a Prevent referral.²⁷ 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 PMAP, not the association alone.
- 85.** 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 become known within PMAP discussions, it is the role of the PDU officer to escalate them.

²⁶ This reference to 'harm' includes harm to self, others or the wider public. It incorporates escalation towards non-violent offending (such as travel, glorification of terrorism, funding for terrorism) in addition to acts of violence.

²⁷ 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 Prevent Multi-Agency Panel cases

- 86.** Where a case has been adopted by a PMAP in one area and the individual relocates to another area within Scotland, the case should be transferred to the PMAP of the new local authority ('the receiving panel'). It should be assumed that the case will be adopted at the receiving panel.
- 87.** The PMAP case officer in the original local authority area ('the transferring area') should ensure that all of the case information and documentation is passed over to the receiving panel. This should be accompanied by a notification by Police Scotland to the receiving PDU area (if this is different). The PMAP chair in the transferring area should request contact details for the PMAP chair of the receiving panel from the Scottish Government. The transferring PMAP chair, in partnership with the PMAP case officer, should facilitate a discussion with the receiving PMAP chair to provide some context and rationale to the case, and follow up in writing. The lead authority should always be the authority where the individual resides; details relating to determining the lead authority are provided in paragraphs 28 – 29 of this guidance.
- 88.** Where a case has been adopted by a PMAP in Scotland and the individual relocates to England or Wales, the case should be transferred to the relevant local authority Channel panel. The transferring PMAP chair should request contact details for the receiving Channel chair from the Scottish Government and ensure that the receiving police force area is notified.

- 89.** Where the panel decides liaison with authorities abroad is required, these discussions will be led by police.

Case study 5: Case transfer

- A 19-year-old had been in receipt of PMAP support for six months after being targeted by an extreme right-wing group.
- The individual received support from an IP and a third-party organisation and has been 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 PMAP in their new location.
- The PMAP chair sent a secure email to the receiving PMAP chair with an overview of the individual's circumstances and support plan.
- A PMAP was arranged in the receiving local authority area to discuss the individual, and the case was subsequently adopted.
- A review of the VAF and support plan was completed, and housing and employment identified as areas requiring focus.

Targeted support and case management of convicted offenders

Prisons

- 90.** The PMAP process can be used where appropriate to provide support to individuals vulnerable to being drawn into terrorism who are serving custodial sentences and who are referred as part of internal risk management processes. This can apply in cases where 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 prison based social work will continue to have a role in assessing risk, vulnerability and the influence of potential radicalising sources.
- 91.** The decision to refer an individual who is serving a custodial sentence to Prevent must be agreed in close consultation with prison staff and prison based social work.

Multi-agency public protection arrangements

- 92.** Multi Agency Public Protection Arrangements (MAPPA) provide a multi-agency framework to assess and manage the risk posed by certain types of offenders. Where an individual managed under MAPPA is also suitable to be managed by a PMAP, the relevant MAPPA and PMAP chairs should agree how the case is best managed to avoid duplication of risk management procedures and ensure effective sharing of information.

Desistance and disengagement

- 93.** 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 offences under the Terrorism Act (TACT offences) or TACT-related offences, 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.²⁸

Police-led partnerships

- 94.** Police-led partnerships cover the management of individuals, groups or institutions that are not suitable for PMAP but which have identified Prevent-related issues requiring support or mitigation.
- 95.** The PMAP process brings together a wide network of support available to reduce an individual's vulnerability to being drawn into terrorism or any terrorism-connected offending. The terrorism vulnerability and the risk for the case is kept under review by police and may be removed from PMAP if the risk escalates to a level that police believe cannot be safely managed by PMAP. The police-led partnership may continue to include multi-agency working but meetings would be chaired by Police Scotland. The police-led partnership is separate and distinct from the local authority-led PMAP process.

²⁸ <https://homeofficemedia.blog.gov.uk/2019/11/05/fact-sheet-desistance-and-disengagement-programme/>

Police investigations

- 96.** Circumstances may arise where an individual who is in receipt of PMAP 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 PMAP support. A PMAP can continue to provide support, with any information shared between PMAP partners used to assess individual vulnerabilities, risk and support needs. Where information is exchanged which suggests criminal activity, the police are duty bound to investigate.

Justice social work and youth justice

- 97.** Individuals who are supervised in the community by justice social work or youth justice services and at risk of being drawn into terrorism may be managed by both the appropriate social worker and a referral to Prevent. In those circumstances, the allocated criminal justice social worker should attend PMAP meetings.

Section 6:

Prevent Multi-Agency Panel functions

Panel meetings

98. PMAP meetings 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.²⁹ As a minimum, there should be a minuted discussion between the chair, relevant partners and the PMAP case officer to review progress and actions.
99. The composition of the panel is a decision that should be made based on the nature of individual cases and time bound actions that may be required. The PMAP chair should ensure the PMAP case officer is kept informed of any changes to panel membership.
100. 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's agreement to the confidentiality statement, which should include those partners inputting virtually.

101. An anonymised VAF should be circulated in full to panel members relevant to the case by the PMAP case officer in advance of meetings so that all relevant panel members can contribute their knowledge, experience and expertise. Doing so will enable the PMAP case officer to present the referral to the PMAP based on the information gathered from panel partners and the outcome of the VAF.

²⁹ This recommended practice is informed by reviews held to identify national learning, following terrorist incidents.

102. 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.³⁰ 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 a vulnerability to being drawn into terrorism that may be reduced through PMAP 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, PMAP minutes should be retained in line with the local authority's agreed data retention period.

103. To help structure efficient practice for PMAP, a range of standardised templates have been made available by the UK Government for local adaptation if appropriate. These include terms of reference, information sharing agreements, and consent forms.

104. 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.³¹

Local governance arrangements, which should include the process for escalating concerns regarding the form or function of PMAP, should be clearly communicated to panel members.

Support plans

105. 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 VAF 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.

106. Section 36(4) of CTSA 2015 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

³⁰ Section 149 of 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.

³¹ See section 37(6) of the CT&S Act.

- carry out further assessments, after periods as 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

Risk

- 107.** Risk is a theme that runs through the entire PMAP process; risk to the individual, risk to the public and risk to partners or organisations providing support to the individual, including any IPs. The PMAP 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 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.
- 108.** 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.

- 109.** 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.
- 110.** The assessment and management of 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. The police are the most appropriate agency throughout the entire life of each PMAP case to assess and manage this risk.
- 111.** The risk relating to the individuals' terrorism vulnerability is held by the PMAP. This involves ensuring the risk posed to the individual from being drawn into terrorism or from wider safeguarding harms is addressed and reduced.
- 112.** 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
- 113.** 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 PMAP
 - should be referred to a different support mechanism or
 - should exit the process

- 114.** There is a clear expectation that PMAP cases remain open until either of the following:
- it is deemed by the panel that the terrorism vulnerability has sufficiently reduced to warrant exit (where there is no consensus or panel majority on the decision to close a case, the chair has the casting vote) or
 - if the terrorism risk has increased, that the case is escalated to the police for consideration
- 115.** If consent to receive support is not ultimately secured, or consent is withdrawn, the case will be closed to PMAP. Where a terrorism risk remains, this should be passed to the Police Scotland PDU officer for management by the police.
- 116.** Information sharing should also highlight any wider risks posed that 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 PMAP 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 PMAP duty.

Practice example 4: Risk-based, auditable decision-making

- An individual had been supported through PMAP 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 PMAP 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 PMAP 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

- 117.** As support received through PMAP remains voluntary, consent is required from the individual, subject to capacity considerations detailed below.³² All individuals who receive support through PMAP must be made aware that they are receiving this as part of a programme to protect people from being drawn into terrorism, and be told what the aims of the programme are and what to expect.

³² See section 36(4)(b) of the CTSA 2015

- 118.** 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, when given, should be informed, explicit and freely given, without coercion or duress. The offer of support through PMAP 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.
- 119.** 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. Paragraphs 122–123 provide 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 PMAP but provide alternative support by signposting the referral to other mainstream services, such as children or adult social care services.
- 120.** Where consent to receive support is initially refused or withdrawn, further assessments may be carried out by the panel as is deemed appropriate.³³ Where a terrorism risk remains, this could be passed to the Police Scotland PDU officer for management by the police.
- 121.** Information discussed at PMAP may be sourced from a variety of partners but will be controlled and processed by the local authority as the lead agency for PMAP. Individual data rights apply to individuals referred to PMAP, 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 PMAP support as outlined above. The Data Protection Information Notice for the local authority should be updated in partnership with local information governance and legal teams to reflect PMAP statutory functions.³⁴
- 122.** In instances where the individual is discussed but is considered not appropriate for support, is not adopted onto PMAP and is therefore not approached for consent, the right to be informed is met through the Police Scotland Data Protection Information Notice, which is available on the Police Scotland website. Local authorities may wish to apply an exemption to notification on a case-by-case basis. The responsibility to inform does not apply to counter-terrorism police, who process data under Part 3 of the DPA 2018.

³³ See section 36(4)(e) of the CTSA 2015. Where consent is not secured within 3 months, the case should be closed.

³⁴ <https://ico.org.uk/your-data-matters/your-right-to-be-informed-if-your-personal-data-is-being-used/>

Capacity to provide consent – adults, children and young people

- 123.** 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 Adults with Incapacity (Scotland) Act 2000 provides safeguards within a statutory framework to protect the rights of those who may not be able to make their own decisions.³⁵ Where there is consideration of PMAP support for an adult who is deemed not to have capacity to make an informed decision regarding that support, a multidisciplinary review at a case conference will need to be sought in line with the code of practice for local authorities.³⁶
- 124.** Where the consent to receive support from PMAP 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

- 125.** 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 PMAP. If the child is thought to be at risk from significant harm,³⁷ whether that is physical, emotional, mental, intellectual, social or behavioural harm, then social care services for the relevant local authority area must be involved in

decisions made about the child. There may be circumstances where the PMAP and social care services determine that a child is in need.³⁸ In instances where compulsory intervention might be required, referral to the Children's Reporter or direct referral to the courts should be considered. More information on protecting children can be found in the National Guidance for Children Protection.³⁹

Support to address identified vulnerabilities

- 126.** The involvement of the correct panel partners ensures that those at risk have access to a wide range of support 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. When dealing with children, support considered must take account of any Compulsory Supervision Order and the terms of any Child's Plan that may be in place.

³⁵ Codes of practice for the Adults with Incapacity Act are available at <https://www.gov.scot/collections/adults-with-incapacity-forms-and-guidance/>

³⁶ <https://www.gov.scot/publications/adults-incapacity-scotland-act-2000-code-practice-local-authorities-exercising-functions-under-2000-act/pages/5/>

³⁷ See paragraphs 40 – 45 of the National Guidance for Child Protection 2014.

³⁸ A child in need will be determined using the definitions within section 93(4) of the Children (Scotland) Act 1995.

³⁹ <https://www.gov.scot/publications/national-guidance-child-protection-scotland/>

127. 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.

128. 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 needs identified within the VAF, which should include consideration of wider 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 or accommodation provision
- drugs and alcohol awareness – substance misuse interventions
- mentoring – work with a suitable adult as a role model to provide personal guidance or pastoral care

129. 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. Support offered should be met from existing local services.

130. 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, where possible, 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.

Monitoring Prevent Multi-Agency Panel support

- 131.** The PMAP case officer is responsible for regularly liaising with the support provider(s), updating the VAF and assessing progress. Where there is a live case or referrals presented for consideration, a PMAP should be held at least monthly but may be held more regularly if required to effectively manage and mitigate the risk and vulnerabilities. The PMAP case officer should update the VAF every three months as a minimum, to ensure that the progress being made in supporting the individual is being captured. The VAF 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.
- 132.** If the panel is satisfied that the terrorism vulnerability has been successfully reduced or managed, they should recommend that the case then exits the process. A closing VAF should be completed by the PMAP case officer as soon as possible, setting out the reason for the panel's recommendations. The recommendations will need to be endorsed by the PMAP chair and the PMAP case officer. In the event of no consensus or panel majority on the decision to close a case, the chair has the casting vote.
- 133.** If the panel is not satisfied that the 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 PDU officer must consider escalating the case through existing police mechanisms and the panel must make recommendations as to whether the case remains suitable for PMAP.
- 134.** The VAF captures changes in risk and vulnerability while panel minutes record agreed decisions aligned to this assessment. Together, they inform PMAP decision-making and risk management and must be retained for future reference.

Accessing specialist support

Intervention providers

- 135.** Intervention providers (IPs) are ideological and theological specialists. They are experienced in assessing ideological drivers, and possess a high level of understanding of 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 PMAP identifies that the individual would benefit from an IP, the PDU 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 PMAP case officer within five working days of the intervention session being completed, where this is reasonably practicable. The PMAP case officer will use this report to provide an update to the PMAP and update the VAF when needed. IP reports should be made available to the PMAP chair. Whilst standing panel members should not need routine access to IP reports, they may be viewed on request via the PMAP case officer. The IP reports are produced for the specific purpose of informing PMAP 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 75 – 80.

- 138.** In Scotland, PMAP 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 PMAP, 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 PDU officer is responsible for liaison with the support provider and for monitoring the delivery of that element of the support package.

Intervention Support Fund

- 139.** Most support available to PMAP is funded by the statutory bodies that provide it. The major exception to this is the use of ideological and theological mentoring through IPs, which are funded by the Scottish Government through the PDU officer.

140. The Home Office has additional funding by way of the Channel Intervention Support Fund that can be used in instances where provision from statutory partners, IPs or third sector organisations is not appropriate to reduce identified vulnerability. These funds are intended to be used flexibly for activity or costs which take place alongside other PMAP 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. For details of eligibility and how this fund can be accessed please contact the Scottish Government.⁴⁰

Vulnerability support hubs

141. Vulnerability support hubs are now in place to support the Police Scotland PDU. 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. Hubs provide early assessment of an individual's mental health and psychological needs which may have an impact on levels of risk, inform the VAF and aid the development of PMAP support plans. Vulnerability support hub services are accessed through the PDU officer.

Immigration enforcement

142. Specialist advice and support regarding immigration is available to PMAP for addressing queries, sourcing information and advice, and where appropriate, seeking immigration representation on PMAP. PMAP chairs 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 vulnerabilities that need to be addressed, such as substance misuse or mental health issues. Under section 36(6) of the CTSA 2015, where it is determined that support via PMAP is not appropriate, the panel must consider whether an individual should be referred to a provider of health or social care services and, if so, make the arrangements it considers necessary. It is good practice for the PMAP chair to consider inviting these partners to panel meetings. Once a decision on managing the case has been reached by the panel, the PMAP chair should confirm the recommendation and ensure that the decision is properly recorded, and that arrangements are made to refer the individual.

⁴⁰ Contact SVT@gov.scot

Reviewing Prevent Multi-Agency cases

- 144.** All cases which have been adopted by a PMAP must be reviewed by the panel at 6 months and 12 months from the point of case closure. At the point of closure, the PMAP case officer should accurately and appropriately record the closure on the relevant 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 PMAP cases that are adopted but are subsequently referred elsewhere. The review process should be informed by relevant information from PMAP partners to the PMAP 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 which has been closed pending review at 6 and 12 months, the PMAP 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 PMAP 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 PMAP chair networks to facilitate the sharing of good practice in running PMAP. These networks should come together via video conferencing or in person to share best practice, discuss case studies and provide mutual support and advice. They are a good opportunity for local authority areas that have few PMAP cases to learn from more experienced areas, and for new PMAP chairs to observe practice. PMAP chairs also have the opportunity to attend regular national forums to share good practice more widely.

Practice example 5: Sharing good practice

- Where PMAP chairs networks have formed 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 support 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 practitioners working within the England and Wales Channel process. However, the processes for Channel and PMAP are similar and, as such, this training is recommended for PMAP chairs, panel members and partners who may be asked to contribute to a 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, Prevent face-to-face training sessions may be made available. These sessions would be organised through the local authority Prevent SPOC and are 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 PMAP 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 PMAP chairs and PMAP case officers.

Other local training

- 152.** There may be other training available within local authority or regions that cater for the specific needs of sectors. Clarification on this should be sought in the first instance from local authority SPOC 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, the PMAP process, the radicalisation process and how to intervene to prevent someone from being drawn into terrorism. The Home Office and Scottish Government may commission additional training to meet the needs of PMAP nationally. Liaise with your local CONTEST Board and/or Prevent SPOC regarding available PMAP 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 there is compliance with legal requirements and organisational policy.

Freedom of Information (Scotland) Act requests

154. All recorded information held by a public authority is covered by the right to information under the Freedom of Information (Scotland) Act 2002 (FOISA). Within FOISA, there is a presumption in favour of disclosure to enhance greater openness in the public sector to 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 PMAP process.

155. It is good practice to consider the implications of the release of the information on third parties when complying with FOISA legislation. In the context of PMAP, third parties may

include local and national delivery partners. The Codes of Practice of FOISA facilitate 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 PMAP may receive FOISA requests. If a FOISA request is made, all information will need to be assessed against FOISA 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 FOISA requests relevant to PMAP and assessments of individuals, and to protect third parties, all local partners who receive such a FOISA request should bring it to the attention of their local panel. The chair should notify the PMAP case officer and the Scottish Government, who will advise if any further consultation is necessary, for instance with other UK Government departments. Further information about FOISA is available from the Scottish Information Commissioner.⁴¹

⁴¹ Available here: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.aspx>

Subject access requests

- 157.** Under section 45 of the DPA 2018, individuals can also make a subject access request (SAR) to see data held about them, or children they have parental responsibility for.⁴² The individual can request information on any records held about them and any organisation holding personal data can be subject to these requests. The right to make a SAR is described in the GDPR Article 15,⁴³ Rights of Access by the data subject. Exemptions to these rights are found in the DPA 2018 Schedule 2 Part 4.⁴⁴
- 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 4.⁴⁵
- 159.** To achieve consistency in responses, any requests for SAR should be brought to the attention of the PMAP chair.

Other information requests

- 160.** Other requests which an individual can make under data protection law include the right of rectification and the right to be forgotten. In addition, individuals have the right to be informed that their data is being processed, restrict processing and object to processing, in certain circumstances. They also have the right not to be subject to automated decision-making.

- 161.** All such requests must be recognised and formally responded to by the organisation holding their personal data. Any requests relating to data processed as part of the functioning of PMAP should be brought to the attention of the PMAP chair.

Enquiries

- 162.** Please note that national, international and specialist media queries about PMAP are managed by the Home Office Press Office and the Scottish Government and should be referred to directly on the following contact details:

Home Office Press Office

020 7035 3535

Scottish Government

SVT@gov.scot

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

⁴² The cut-off age for requests such as this in Scotland is 12 years old.

⁴³ <https://gdpr-info.eu/art-15-gdpr/>

⁴⁴ Guidance on exemptions can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>

⁴⁵ <http://www.legislation.gov.uk/ukpga/2018/12/schedule/2/part/4/enacted>

Section 9: Annexes

ANNEX A

Safeguarding

1. While there is no threshold to make a Prevent referral for an individual to access assessment and specialist support, it is recognised that there will be occasions where the assessment and support provided through PMAP to prevent individuals at risk of being drawn into terrorism will run alongside other safeguarding processes.⁴⁶ A brief overview of the safeguarding frameworks for adults and children is outlined here for reference.

Child Protection

2. All agencies, professional and public bodies and services that deliver adult and/or child services have a responsibility to recognise and actively consider potential child abuse and neglect. They are required to identify and consider the individual's needs, share information where appropriate to do so, share concerns with other agencies and work collaboratively with other services to improve positive outcomes.

They must all treat the need to safeguard and promote the wellbeing of the child as a primary consideration.

3. The Scottish approach to child protection is based upon children's rights. Getting it right for every child (GIRFEC)⁴⁷ is the national approach in Scotland to improving outcomes for children through promoting, supporting, and safeguarding their wellbeing so that they can become confident individuals, effective contributors, successful learners, and responsible citizens. Safeguarding sits within a continuum which seeks to provide early support to prevent children from harm or the risk of harm. Where safeguarding is required, the GIRFEC approach is consistently applicable to those processes. Within this framework there will be range of support from universal, additional and intensive services which can work as single agencies or jointly through an integrated approach; whereby support should be proportionate within this continuum.

⁴⁶ In Scotland these are more commonly known as Child and Adult Protection processes

⁴⁷ [Getting it Right for Every Child](#)

4. Child Protection refers to measures which protect a child from abuse, neglect, maltreatment and exploitation. Child protection is part of a continuum of collaborative duties upon agencies working with children. The GIRFEC approach promotes and supports planning for such services to be provided in the way which best safeguards, supports and promotes the wellbeing of children and ensures that any action to meet needs is taken at the earliest appropriate time to prevent acute needs arising.
5. Where children and adults are particularly vulnerable and/or have complex needs, services must work together to take a collective and co-ordinated approach. Any identified child protection concerns must be the subject of immediate response by reporting through documented formal procedures.⁴⁸ On the basis of the assessment of risk, social work services and police will decide whether any immediate action should be taken to protect the child and any others in the family or the wider community.
6. Where information is received that a child may have been abused or neglected and/or is suffering or is likely to suffer significant harm an Inter-agency (or Initial) Referral Discussion (IRD) must be convened as soon as reasonably practical. IRDs are required to ensure co-ordinated inter-agency child protection processes up until the point of a child protection case conference. An IRD discussion can be initiated by police, health or social work services.
7. A lead professional who will be a qualified social worker is required, within a child protection investigation, to ensure co-ordination of assessment and next steps within a developing but coherent single plan. They provide a point of contact for family/ carers/advocates/guardians and professionals who need support to gain sufficient understanding of what is happening stage by stage. They may provide a signpost for additional advice and support. The IRD record should identify this person before closure.
8. Consideration will always be given to the needs and potential risks to other children in the same household and children who are likely to become members of the same household.
9. The legal duty to investigate and report issues in relation to child protection is derived from two sources: the Police and Fire Reform (Scotland) Act 2012, which provides the mandate for police officers; and the Children's Hearings (Scotland) Act 2011, which sets out the duties and powers of local authorities, constables, courts and other persons. In the case of the local authorities and the police, section 60 of the Children's Hearings (Scotland) Act 2011 places a duty on them to refer to the Principal Reporter where it is likely that a child is in need of protection, guidance, treatment or control and that a compulsory supervision order is necessary.⁴⁹ This Act also requires that, if the Principal Reporter considers that a ground of referral applies and that compulsory measures of supervision are necessary, they must refer the case to a Children's Hearing.

⁴⁸ National Guidance for Child Protection in Scotland 2014 and [Getting it Right for Every Child](#)

⁴⁹ Scottish Children's Reporters' Administration

Adult Protection

- 10.** Part 1 of the Adult Support and Protection (Scotland) Act 2007 provides measures to identify, and provide support and protection for those individuals, aged 16 and over, who are vulnerable to being harmed, whether as a result of their own or someone else's conduct. These measures include placing a duty on local authorities to make necessary inquiries and investigations to establish whether or not an adult is at risk from harm and whether further action is required to protect the adult's well-being, property or financial affairs. The 2007 Act places a duty on particular public bodies (i.e. the bodies listed in section 5(1) of the 2007 Act) to co-operate with local authorities and each other where harm is known or suspected. While local authorities have the lead role in adult protection, effective intervention will only come about as a result of productive cooperation and communication between a range of agencies and professionals. Good practice should be that all relevant public bodies would cooperate with assisting inquiries and investigations, not only those who have a duty to do so under the Act.
- 11.** A Council Officer, who is an individual appointed by a local authority under section 64 of the Local Government (Scotland) Act 1973, is required for an adult protection investigation. Where it is known or believed that an adult is at risk from harm and the local authority might need to intervene, there is a duty on the local authority to make the necessary inquiries to establish whether or not action is required to stop or prevent harm occurring. Council Officers have rights of entry to places where adults are known or believed to be at risk of harm. If, following inquiries or investigations,

a Council Officer believes that action is required, the local authority can apply to the sheriff for a Protection Order. The range of protection orders include Assessment Orders (which may be to carry out an interview or medical examination of a person), Removal Orders (removal of an adult at risk) and Banning Orders or Temporary Banning Orders (banning of the person causing, or likely to cause, the harm from being in a specified place). Where an adult experiences abuse or neglect support can be provided at the same time as, or instead of, using court powers.
- 12.** A public body or office holder authorising an intervention or carrying out a function under the 1973 must be satisfied that this will benefit the adult and is the least restrictive option available. They must take into account the adult's wishes and feelings, past and present, in so far as these can be ascertained, and the views of the nearest relative, primary carer, or other relevant parties. They should provide information and support to enable the adult to participate as fully as possible.

- 13.** It is essential that PMAP members, partners to local panels and other professionals ensure that children, young people and adults are protected from harm. While the PMAP 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 PMAP will be delivered may often overlap with implementation of wider safeguarding duties, especially where vulnerabilities have been identified that require intervention from social services, or where the individual is already known to social services.
- 14.** 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 PMAP support, the social worker relevant to that local authority should be present at the panel and be involved in all decisions. PMAP can run in parallel with other safeguarding meetings where relevant safeguarding thresholds have been met.

ANNEX B

Sharing information with partners

1. The GDPR⁵⁰ and DPA 2018⁵¹ are the principal legislation governing the process of data relating to individuals. Every organisation involved in PMAP is individually responsible for complying with data protection legislation and should consult their own internal processes and guidelines, appointed data protection officer, information governance leads and legal advisors, where appropriate, when considering information sharing.
2. The ICO's guide to the GDPR can be found on the ICO website.⁵² 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 data⁵³ 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')

⁵⁰ GDPR – <https://gdpr-info.eu/>

⁵¹ DPA 2018 – <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

⁵² 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/>

⁵³ Personal data is defined by the GDPR as 'any information relating to an identified or identifiable natural (living) person'

- 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 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 which can be found on the ICO website, are replicated here:⁵⁴
- 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 PMAP partners to consider their role and in relation to data sharing as part of the PMAP 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.

⁵⁴ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>

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.⁵⁵ 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.
6. Some processing of information for PMAP purposes may fall under Part 3 of the Data Protection Act 2018, which covers data processing when carried out by competent authorities for law enforcement purposes. Organisations should consult the ICO guidance and their own data protection specialists if they are unsure.⁵⁶

Article 6 GDPR, section 8 DPA 2018

7. 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. The PMAP process is a statutory function as per section 36 of the CTSA 2015.

Article 9 GDPR, Part 2 Schedule 1 DPA 2018

8. 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 set out in section 36 of the CTSA 2015.
9. Your panel may deem it of substantial public interest to share special category data for the purposes of PMAP.

Special category data

10. Special category data is personal data that needs more protection because it is sensitive. It is likely that PMAP will require special category data to make an informed decision regarding the nature of support required for individuals referred to PMAP. More information about special category data can be found on the ICO website.⁵⁷

⁵⁵ 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/>

⁵⁶ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-law-enforcement-processing/>

⁵⁷ <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 C

Partners required to co-operate with local panels

(Part 2 of Schedule 7 of the Act – Partners of local panels)

Criminal Justice

- The governor of a prison in Scotland (or, in the case of a contracted out prison, its director).
- The governor of a young offenders institution (or, in the case of a contracted out young offenders institution, its director).

Health and social care

- A Health Board constituted under section 2(1)(a) of the National Health Service (Scotland) Act 1978.
- A Special Health Board constituted under section 2(1)(b) of that Act.
- Healthcare Improvement Scotland.

Education, childcare, etc.

- The proprietor or governing body of an independent school within the meaning given by section 135(1) of the Education (Scotland) Act 1980.
- The proprietor or governing body of a grant-aided school within the meaning given by that section.
- The proprietor or governing body of a post-16 education body within the meaning of the Further and Higher Education (Scotland) Act 2005.

ANNEX D

The Vulnerability Assessment Framework

This annex provides a description of the VAF used by PMAP 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

The three criteria are assessed by considering 22 factors that can contribute to vulnerability (13 associated with engagement, six that relate to intent and three 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 can also be added to and are not considered an exhaustive list. By regularly updating the VAF, the progress that is being made in supporting an individual can be tracked through changes in the assessment.

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.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- a. spending increasing time in the company of other suspected extremists
- b. changing their style of dress or personal appearance to accord with the group
- c. day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- d. loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- e. possession of material or symbols associated with an extremist cause (e.g. the swastika for right-wing groups)
- f. attempts to recruit others to the group/cause/ideology
- g. communications with others that suggest identification with a group/cause/ideology

h. Example indicators that an individual has an **intention** to cause harm, use violence or other illegal means include:

- a. clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- b. using insulting or derogatory names or labels for another group
- c. speaking about the imminence of harm from the other group and the importance of action now
- d. expressing attitudes that justify offending on behalf of the group, cause or ideology
- e. condoning or supporting violence or harm towards others
- f. plotting or conspiring with others

Example indicators that an individual is **capable** of causing harm or contributing directly or indirectly to an act of terrorism include:

- a. having a history of violence
- b. being criminally versatile and using criminal networks to support extremist goals
- c. having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- d. having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills)

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

The VAF should initially be completed by the PMAP 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.

The VAF should complement and inform rather than replace professional judgement and/or other forms of safeguarding assessments when deciding on the most appropriate types of support at panel meetings.

ANNEX E

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 for Scotland

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

Scottish Local Authorities – CONTEST Prevent - Code of Practice

<https://www.westlothian.gov.uk/media/15087/Prevent-Guidance/pdf/CONTESTPrevent-LocalAuthorityGuidance.pdf>

National Guidance for Child Protection in Scotland 2014

<https://www.gov.scot/publications/national-guidance-child-protection-scotland/>

Adult Support and Protection Code of Practice 2014

<https://www2.gov.scot/Resource/0044/00449622.pdf>

Adults with incapacity: code of practice for local authorities

<https://www.gov.scot/publications/adults-incapacity-scotland-act-2000-code-practice-local-authorities-exercising-functions-under-2000-act/pages/5/>

Information Commissioner's Office Guide to Data Protection

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

NHS Scotland Resilience: Playing Our Part

<https://webarchive.nrscotland.gov.uk/20200918233510/https://www.readyscotland.org/ready-government/nhsscotland-resilience/prevent-guidance-for-health-boards/>

ANNEX F

Glossary of Terms

CTSA 2015	Counter Terrorism and Security Act 2015
DDP	Desistance and Disengagement Programme
DPA 2018	Data Protection Act 2018
FOISA	Freedom of Information (Scotland) Act 2002
GDPR	General Data Protection Regulation
HRA 1998	Human Rights Act 1998
ICO	Information Commissioner's Office
IP	Intervention Provider
ISA	Information Sharing Agreement
MAPPAs	Multi-Agency Public Protection Arrangements
PDU	Prevent Delivery Unit, Police Scotland
PMAP	Prevent Multi-Agency Panel
SAR	Subject Access Request
SC	Security Check
SPOC	Single Point of Contact
TACT	Terrorism Act
TEO	Temporary Exclusion Order
TPIM	Terrorism Prevention Investigation Measure
VAF	Vulnerability Assessment Framework

