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# **Prevent Peer Review Report**

**Midlothian Council**

**May 2019**

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## 1. Executive Summary

This is a report on the Prevent peer review hosted by Midlothian Council on 8<sup>th</sup> and 9<sup>th</sup> May 2019.

The Scottish Government has worked closely with the UK Government and Scottish local authorities to design and implement a peer review process to enhance the support available to councils and partners in their delivery of the Prevent Duty and other legislative requirements established by the Counter Terrorism and Security Act 2015.

The peer review hosted by Midlothian Council is the fifth such review held in Scotland after a successful pilot exercise in February 2018. As such, the overall aims of the review were twofold; firstly to support the council through identifying good practice and making suggestions for improvement; and secondly, continuing to develop the process to ensure its effectiveness and relevance for Scottish local authorities. To this end any feedback that Midlothian Council wishes to provide will be gratefully received.

The review team found that Midlothian Council have a clear and positive intention to engage with the Prevent strategy and deliver their obligations under the Counter Terrorism and Security Act 2015. There was evidence to illustrate the strong leadership demonstrated by the SPOC, together with the fact that SPOC's role and seniority within the organisation is located at the right level.

Midlothian Council have taken important steps towards developing internal processes necessary for the effective implementation of Prevent. This could be seen through the existence of processes covering such aspects as referrals; training; and the Prevent Professional Concerns (PPC) process. Together with the presence of established internal and multi-agency groups, these steps present a real opportunity for future development with the need for an effective governance process to manage and direct future performance.

### *Key Findings:*

- Midlothian Council can demonstrate a clear desire to engage with the Prevent agenda and an enthusiasm to deliver in a proportionate and considered way. The leadership of the SPOC, together with staff perspectives voiced during interview, highlighted a willingness to deliver Prevent obligations and fit these in with the wider council's delivery of services.
- The key challenge for the council is to use this positive approach to Prevent in order to implement an effective and formalised governance structure that manages delivery and encourages accountability and collaboration. Identifying success and gaps in performance is a central element of Prevent delivery for all specified authorities and it is recommended that Midlothian Council seeks to establish such processes in the future.
- Overall, the review team was of the opinion that the previous activity undertaken by the council since 2015 has provided the foundations for future success and all recommendations made in this report can be taken forward through existing

groups and business area functions, thus avoiding any increase in demand for resources.

### *Acknowledgments*

*The Scottish Government is grateful to Midlothian Council for hosting this review and hopes that it was beneficial to staff and partners. The peer review team were warmly welcomed by council staff and partners and would like to thank everybody they met for their time and contributions. The team would particularly like to thank the Single Point of Contact, Joan Tranent, for collating and providing evidence to the review team and for her support during the review itself.*

## **2. Prevent Peer Reviews – Background**

The Scottish Prevent peer review process is a sector-led improvement model which aims to evaluate the delivery of Prevent outcomes in a local authority; identifying good practice and making positive recommendations for improvement. The process was developed by the Scottish Government in collaboration with the UK Government and Scottish local authorities in order to support local authorities deliver the Prevent Duty<sup>1</sup>.

The Prevent Duty came into force in July 2015 (and in September 2015 for higher and further education institutions) and required specified authorities – including local authorities – to have ‘*due regard to the need to prevent people from being drawn into terrorism*’.

The peer reviews are intended to be a constructive and supportive process with the central aim of helping local authorities and partners improve how they deliver Prevent outcomes. It is not an inspection or audit and is an entirely voluntary process available to local authorities.

The peer review approach is based on mature reflection, constructive self-assessment and critical friend challenge. It has two objectives: firstly, to support the development of an informed view, adequately evidenced, of how an area is doing in terms of delivering the Prevent Duty in partnership, and secondly, to identify practical actions to improve outcomes and productivity.

The UK Government has published statutory Prevent Duty guidance for Scotland which outlines what is expected of specified authorities under the duty and highlights the following as being key areas of delivery:

- **Leadership** – includes understanding the risk of radicalisation; ensuring proper governance structures; and communicating the importance of the duty.

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<sup>1</sup> **Disclaimer:** The recommendations offered in this report are based on the discussions and evidence considered during the Prevent peer review. This document is intended to be advisory and as such judgement and discretion should be exercised over how best to implement. It covers the substance of the review and there may be elements that have not been considered.

- **Capabilities** – includes effective training; a referral process; and relevant policies and processes.
- **Partnership** – includes how the authority works with the local CONTEST group; other collaborative initiatives; and how the council links with national networks.
- **Information Sharing** – includes having relevant agreements in place; and whether the understanding of threat and risk is maintained and kept up to date.

Whilst there are fourteen aspects within the self-assessment framework, this report will present findings and recommendations based on the four key areas of delivery as shown above.

### 3. Review Process

The peer review team consisted of:

- Mark McCall – Service Manager, Safer Communities, Fife Council (Lead Peer)
- Odette Robson – Head of Safer Communities, North Yorkshire County Council
- Ritchie Johnson – Director of Business Services, Aberdeenshire Council
- Stuart Fletcher – Safeguarding and Vulnerability Team, Scottish Government (Review Manager).

The review consisted of six stages:

**Stage 1: Self-Assessment** – Midlothian Council provided a review of their Prevent delivery set against the fourteen key aspects of the Prevent Duty.

**Stage 2: Evidence Review** – key documents were provided to support the self-assessment and these were reviewed by the team to identify key lines of enquiry.

**Stage 3: On-Site Review** – the peer review team visited Midlothian Council for a two-day review on 8<sup>th</sup> and 9<sup>th</sup> May 2019 and held interviews with key stakeholders.

**Stage 4: Presentation of key findings** – at the conclusion of the on-site work initial findings were presented to a group of senior representatives from Midlothian Council.

**Stage 5: Review Report** – This report sets out the key findings and recommendations for Midlothian Council. Whilst the focus is on the local authority, many of the findings will be applicable to the wider partnership.

**Stage 6: Follow-up support** – Midlothian Council may wish to seek further support or peer mentoring to explore any of the issues highlighted within this report. The Scottish Government welcomes any further opportunities to support the council in this regard.

#### **4. Self-Assessment Framework**

The self-assessment framework forms the basis of Prevent peer reviews. It includes statutory obligations from the Prevent Duty, along with good practice and aspects relating to the multi-agency support mechanism provided to vulnerable individuals (Prevent Professional Concerns – PPC). The framework comprises the following aspects which Midlothian Council used to formulate the evidence provided to the review team:

1. The organisation can demonstrate active engagement with Prevent partners; has appointed a single point of contact (SPOC) for Prevent; and is aware of the different channels through which support for Prevent delivery can be obtained.
2. A representative of the local authority is engaged with the local CONTEST group and oversees the delivery of Prevent in collaboration with other local partners.
3. The local authority is engaged with the local CONTEST group which has considered and agreed a local Prevent implementation plan informed by the ERTLP.
4. The organisation has sufficient partnership contacts to enable the identification and mitigation of threats and risks that emerge outside of the ERTLP process (for example, community tensions following a terrorist incident).
5. The organisation has an agreed training programme in place and has conducted an internal training needs analysis to effectively target Prevent awareness raising according to staff roles.
6. The organisation has an agreed process in place for the referral of those identified as being at risk of radicalisation and information concerning this process is accessible to all staff.
7. There are suitable processes and policies in place to enable the formation of a Prevent Professional Concerns (PPC) multi-agency panel where required and a chairperson has been identified who will oversee the meeting and actions.
8. The organisation has agreed an Information Sharing Protocol (ISP) with relevant local partners to support both Prevent Case Management (PCM) and Prevent Professional Concerns (PPC) processes.
9. There is a venue hire policy in place to ensure the organisation's venues and resources are not used by extremists.
10. There is an effective IT policy in place to prevent users of the organisation's networks from accessing extremist materials.
11. The organisation has implemented the Prevent Duty across its school estate and in relevant policy areas that affect young people.

12. Prevent has been embedded within commissioning and procurement processes and Prevent is given consideration in the organisation's relationship with arms-length companies where relevant.
13. The organisation has a communications plan in place to proactively communicate the reality and impact of Prevent work to senior management, elected members and front-line staff.
14. The organisation engages with a range of community groups, both faith based and secular, to encourage an open and transparent dialogue on the Prevent agenda.

## **5. Summary of Findings**

In order to effectively capture the results of the review, the fourteen aspects as shown within the self-assessment above have been grouped into the four key delivery areas of Leadership; Capabilities; Partnership; and Information Sharing. Identified good practice and suggested areas of improvement are shown within each area.

### **Leadership**

#### ***Good practice:***

- The review team found clear evidence of the strong leadership demonstrated by the Prevent SPOC with an enthusiasm to see the successful implementation of Prevent which was reflected by the other staff interviewed as part of this review. Crucially the SPOC is a visible and accessible member of staff with expertise being in an area of council business which is aligned to the Prevent strategy.
- The creation of a deputy SPOC role is recognised to be a positive development and will greatly assist the organisation in consolidating progress made to date.
- The leadership shown by the SPOC and deputy SPOC has been very positive for the organisation and this has been complemented by the support shown by the Chief Executive, combined with that of an elected member and staff in relevant business areas.
- The review team found that the structures and processes established by the shared public protection service has ensured that Prevent has been established as a recognised part of the safeguarding landscape.

#### ***Suggested areas of improvement:***

- The review team recognised that the council's Prevent group was a positive forum to allow for the discussion of issues. However, it is recommended that the focus and membership of this group are reviewed in order to identify clear outcomes and drive activity. In addition, this group provides a clear opportunity to establish a more robust governance process around Prevent performance and

reporting could be made upwards to the established public protection and CONTEST groups.

- Midlothian Council may also wish to consider involving East Lothian Council within any enhanced Prevent group to widen the benefits already seen through the shared services approach seen in public protection.
- The review team were of the opinion that the enthusiasm demonstrated by the council would be enhanced through establishing clear expectation and outcomes for staff throughout the organisation who have responsibility for delivering Prevent in their respective business areas. This process could be owned by the Prevent group which would ensure performance monitoring and feedback.
- The suggested review of the Prevent group could also include the development of an action plan with which to measure progress and report performance. The action plan could draw from the self-assessment; the findings of this review; and any local threat and risk which needs to be mitigated. Consideration could also be given to establishing a Prevent communications plan which could identify how internal and external messaging could be designed and circulated.
- The suggested communications plan could seek to ensure that Prevent information is more prominently located on the internal intranet and could be highlighted via a brief internal campaign led by the Chief Executive and SPOC. Further information could be include reference to local activity, together with threat and risk.

## **Capabilities**

### ***Good practice:***

- The review team found that a referral process has been developed and shared as a diagram and guidance note across the organisation. The referral pathway provides information as to the SPOC's contact details (for East and Midlothian) and outlines the process used after an initial referral to identify whether a case will progress to a multi-agency panel or be dealt with via other means. The existence of such a process is a positive development, particularly in highlighting the role played by the SPOC as a conduit for progressing concerns.
- Through the interviews conducted with staff there was evidence that staff understand the process and know what to do if they have a concern regarding an individual.
- Midlothian Council has obviously invested significant effort in the provision of staff training since the legislation was enacted in 2015 and the existence of eLearning and Prevent as a standing part of public protection training was a notable example of good practice. The public protection training was also shown to be linked to the staff appraisal system which is a useful way to ensure compliance.
- The review team found that the council's understanding of their responsibilities in relation to the hosting and chairing of a PPC multi-agency panel meeting was good and, crucially, there was an understanding of the risk involved and how this should be mitigated in collaboration with partners.
- There was evidence that Prevent is considered within IT and venue hire policies. The review team were particularly impressed with the approach to IT and that this had assisted with the identification of a potential vulnerability which could then be mitigated.



***Suggested areas of improvement:***

- The implementation of training across the organisation has been positive, but the review team recommends that there is now an opportunity to carry out a full stocktake and evaluation of training undertaken so far. This could identify what will be required in the future and will also, through a training needs analysis, identify any potential gaps in business areas.
- Any review of Prevent training should give consideration to any opportunities to collaborate with East Lothian Council, together with other local partners. Midlothian Council may also wish to utilise Scottish Government funding to support any training events or initiatives.
- The existence of a referral process is positive, but this report recommends that work is now undertaken in conjunction with the Prevent Delivery Unit East (PDUE) and the Scottish Government to ensure that it is fit for purpose. This would benefit from having revised police procedure included (Police Gateway Assessment – PGA), alongside information that clearly outlines the role of police and local authorities in the taking of decisions relating to the PPC process and closure of a case.
- The existing IT policy covers restrictions in place to stop users viewing content that may be extreme or radicalising in nature, but does not make any explicit reference to the council's obligations under the Prevent Duty. Midlothian Council may wish to revise this policy to ensure that this is fully reflected.
- The review team found that the council's approach to the PPC referral was positive and that consideration should be given to undertaking a de-brief of this process to capture any learning for council staff and relevant external partners.
- Midlothian Council should also take the opportunity to review commissioning and procurement processes to ensure that Prevent obligations are properly reflected and adhered to.

**Partnership**

***Good practice:***

- Midlothian Council were found to have located their implementation of the Prevent Duty within a partnership environment which maximises the benefits of already existing structures such as the shared public protection facilities. The appreciation of the benefits of partnership working will provide a positive opportunity to develop delivery in the future.
- The council is a visible and engaged partner within the national SPOC network and the local CONTEST group. Both of these structures are important ways in which a collaborative approach to Prevent delivery can be maintained and the fact that a peer review has been hosted also bears testimony to the desire of the council to participate in national initiatives. The council was also found to have ownership of relevant actions contained within the CONTEST implementation plan.

***Suggested areas of improvement:***

- The review team suggests that Midlothian Council may wish to consider holding an exercise with local partners to review existing arrangements in order to ensure effective collaboration, joint governance and mutual support. This activity could be led by the CONTEST group, or alternatively the previously suggested refreshed CONTEST Prevent group could undertake this task as a core part of their development.
- The council may also give consideration to strengthening links with community and third sector groups in order to establish a positive dialogue about Prevent and ensure that any community tensions are effectively monitored. However, it is acknowledged that all external engagement about Prevent should be driven by need and proportionate to local threat and risk, so this recommendation will need to be carefully considered in relation to the local context. At the very least the strengthening of links will enable the SPOC to be better aware of local tensions which may have an impact on Prevent delivery.

**Information Sharing**

***Good Practice:***

- Midlothian Council recognised the need for a suitable Prevent Information Sharing Agreement to be in place and this is being worked on. The review team found that the absence of a completed document has not precluded information sharing between statutory bodies and there is evidence that referrals are made appropriately and multi-agency work undertaken where necessary. This process has certainly been enhanced by the shared and co-located public protection arrangements.
- A review of a recent PPC referral was shown to have identified improvements in the sharing of information and the review team were of the opinion that this was positive in showing the organisation's desire to improve processes involved in Prevent delivery.

***Suggested areas of improvement:***

- The review team found that informal information sharing takes place in relation to local threat and risk and is undertaken with the police and other partners. It is recommended that this process is approached in a more formal manner and work undertaken to document issues with actions taken to mitigate any evident risks. It is suggested that the CONTEST Prevent group could lead on this work.
- The absence of an ERTLP document was also noted and on-going work is intended to plug this gap and ensure the council are informed of local threat and risk through this process.

## 6. Next Steps and Further Support

All recommendations are presented as suggestions that Midlothian Council may wish to consider in order to build upon their current delivery of Prevent. The Scottish Government is keen to provide further support to the council and partners in the following ways:

- **SPOC Network:** The existing network can be utilised to provide further support should Midlothian Council wish to seek advice or good practice from other areas of Scotland. Whilst the network is divided on a geographical basis, the council's SPOC is welcome to attend or dial in to meetings taking place in other areas of the country.
- **Peer to Peer Mentoring:** An expert peer may be identified from elsewhere in Scotland or the rest of the UK that could assist with a particular issue or theme. The Scottish Government is happy to facilitate an introduction of peers and support further discussion, either remotely or face to face, dependent on circumstances.
- **SPOC Knowledge Hub:** The Scottish Government will continue to support the current online knowledge hub that has been created for Prevent SPOCs. Questions to other SPOCs can be posted on this facility, along with information that may benefit the wider network.
- **Further Peer Review:** The Scottish Government may be able to facilitate a follow-up review at a later date should the authority wish to independently measure progress made on any aspect.

## **Appendix A**

### **Participating Agencies**

#### Midlothian Council

- Prevent Single Point of Contact
- Senior Education Manager
- Contingency Planning Officer
- Information Governance/Security Services Lead
- Service Manager
- Public Protection Manager

#### Police Scotland

- Detective Sergeant, Prevent Delivery Unit