

Operational Guidance

Northumberland

Channel Panel

Procedures

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Why this operational guidance is needed:

The 'Channel' programme a process that works to identify a person who would benefit from early intervention and support away from the threat of radicalisation. It is a key part of Prevent; one of the 4P's of the UK's <u>CONTEST</u> counter-terrorism strategy.

This operational guidance responds to a number of statutory asks and sets out a multi-agency approach to safeguarding people from potentially becoming a terrorist or supporting an extremist cause. This guidance uses existing collaboration between Northumberland County Council, the NHS, Police and a range of other partners and agencies. It is not about creating a new process.

We can be proud that Northumberland is seen to be a safe place to live, work, learn or play; where people from a wide-range of backgrounds get on. The Channel process is part of a shared commitment to help sustain that.

If you want to talk to someone about this operational guidance, please contact:

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Channel: Our Approach

- 1.1 In Northumberland, we are clear that vulnerable people being targeted for radicalisation into violent extremism and terrorism, whatever its form, will be safeguarded. This approach will underpin delivery of our legal commitments. Arrangements accord with Channel Duty Guidance.
- 1.2 The <u>Channel</u> programme is a nationally prescribed approach to ensure that individuals targeted for radicalisation are protected. In Northumberland we will ensure professionals from partner agencies are brought together to work on solutions bespoke to each individual's circumstances.
- 1.3 There is no single way of identifying a person vulnerable to radicalisation. The Channel programme forms a part of Northumberland's overall Prevent strategy and this procedure document provides a multi-agency approach to identifying, supporting and safeguarding referred individuals as well as the wider County. The process will be led by Safe Northumberland.

Channel: Statutory Framework and Responsibilities

- 2.1 <u>The Counter Terrorism and Security Act, 2015</u> is intended to ensure effective local co-operation and delivery of the Channel programme. In practice, the legislation requires:
- Local authorities to ensure that a multi-agency Channel panel exists in their area;
- That Local authorities chair that panel;
- That panel meetings develop a Support Plan for individuals accepted as Channel referrals;
- The panel considers alternative forms of support, including health and social services, where Channel is not appropriate; and
- All panel partners, so far as appropriate and reasonably practicable, co-operate with the police and panel in the carrying out of their functions.
- 2.2 <u>Channel Duty Guidance</u> has been issued under sections 36(7) and 38(6) of the Counter-Terrorism and Security Act 2015 (the CTS Act) to support panel members and partners of local panels. Sections 36 to 41 of the CTS Act 2015 sets out the duty on local authorities and partners of local panels to provide support for people vulnerable to being drawn into terrorism.
- 2.3 Safeguarding and promoting the welfare of children, young people and adults is everyone's responsibility. Local authorities have a statutory duty to safeguard children, young people and adults in relation to their social services functions. Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions (including any that are contracted out) have regard to the need to safeguard and promote the welfare of children.
- 2.4 <u>Working Together to Safeguard Children 2015</u> sets out legislative requirements and expectations in individual services to safeguard and promote the welfare of children. Channel is referenced at paragraph 28.
- 2.5 <u>The Care Act, 2014</u> places adult safeguarding on a statutory footing. Local authorities are required to have Safeguarding Adults Boards in their area, and to take the lead in safeguarding enquiries. The Board is expected to provide strategic leadership to the work of the local authority and partner agencies on the development of policy and practice to safeguard adults at risk.
- 2.6 Whilst radicalisation is a safeguarding issue, it is also recognised that not all Channel referrals may meet the criteria for statutory safeguarding involvement, particularly in relation to adults.

The Channel Programme: Local Arrangements

- 3.1 Channel is an intervention focusing on support at an early stage sometimes referred to as the "pre-criminal space". Northumberland's Channel programme partners will work to:
- · Identify individuals at risk;
- Assess the nature and extent of that risk:
- Develop the most appropriate Support Plan for individuals concerned; and
- Support the strategic lead of Safe Northumberland in development of local policy and practice
- 3.2 Channel will ensure that any vulnerable child, young person, or adult regardless of faith, ethnicity, age or postcode receives support before their vulnerabilities are exploited by others who want them to embrace or act-out terrorism or support others into extremist ideologies.
- 3.3 Success in safeguarding individuals, families, groups and the wider County is dependent on the co-operation and co-ordinated activity of partner agencies and consent of those involved. Channel will be most effective if people are referred in a consistent manner and individuals fully engaged.
- 3.4 Existing referral routes and forms, known by staff across safeguarding partnerships, will be used to identify an individual who might benefit from a Prevent referral. This provides efficiency of process, avoids an individual inadvertently 'falling through the net' and enables a range of safeguarding options to be considered outside of the Channel programme. Safer Northumberland's lead officer (Northumberland Strategic Community Safety Manager) will consider any referral once appropriate consents have been provided through safeguarding. Safeguarding partnerships will hold responsibility until that point.
- 3.5 Safer Northumberland's lead will be supported by a Channel Multi-Agency Panel (with terms of reference set out at Appendix A). Safer Northumberland will be responsible for agreeing, with partners, an appropriate course of action to any Prevent referral. This will not necessarily be a Channel Panel meeting, but may see recourse to safeguarding professionals or to no further action. Members of the Multi-Agency Panel will form the basis of any Channel Panel held to provide continuity and to develop local expertise, experience and accountability. Risk is a theme that runs through the entire Channel process; risk to the individual, to the public and to partner organisations who do not respond. Ownership of risk will lie with the Channel Multi-Agency Panel.
- 3.6 Channel panels will meet as required. It is not proposed this is every month as suggested in national guidance. This reflects the current number of referrals in Northumberland and avoids unnecessary administrative burden on partners. Northumberland is generally a safe place and the Channel Panel process will assist in ensuring it remains a place where people from different backgrounds get on.
- 3.7 Review meetings for individual engaged through Channel Panel referral will be arranged at 6 and 12 months intervals, based on the circumstances of the individual, and considered at the Channel Multi-Agency Panel.

The Channel Programme: Panel Meetings

- 4.1 The Channel Multi-Agency Panel will determine if an individual should be referred into the Channel programme following a preliminary assessment of key risks. Channel Panel members will be drawn from appropriate agencies as determined by the Channel Multi-Agency Panel. Panel members will intentionally be different for each referral reflecting the particular vulnerabilities and circumstances of the person being referred. A Single Point of Contact sets out named officers within key organisations the Channel Multi-Agency Panel can call upon see Appendix B.
- 4.2 If the individual to be discussed is a child known to Children's Services, or if there is concern a child might be at risk of significant harm, the relevant social worker will be present and be involved in all decisions about the child. Similarly if the individual is a vulnerable adult the relevant social worker will be present and involved in all decisions.
- 4.3 Northumberland's Channel Panel Referral process is shown as a flowchart at Appendix C.

Information Sharing

- 5.1 Information sharing for the Northumberland Channel Panel process will be covered by the Safer Northumberland Information Sharing Protocol and associated information schemes, including for complaints and potential breaches (internal and external). Partner organisations will be responsible and accountable for any misuse of information supplied, including any consequences for this by its employees, servants or agents.
- 5.2 Those involved in this process commit, on behalf of their organisations, to present all relevant information. This is for the benefit of the individual and wider society to enable an appropriate response to be found to possible vulnerabilities. Information will be provided as soon as practicably possible with an indicative timescale of no more than five working days for all correspondence. Effective information sharing is key to the delivery of Prevent. This will require the sharing of personal information between partners. As a multi-agency process, existing collaboration can help to support those at risk. Prevent guidance covers **personal** and **sensitive personal** data about specific individuals at risk of radicalisation held by any Channel partner agency that is necessary and proportionate to share for the purposes of reducing risk. Information sharing may include:
- Name, date of birth, address(es), aliases and gender
- Information relating to recent contact, including meetings, sightings, phone calls and others present at the address/meeting
- Details of attendance/non-attendance at appointments and attendance at other settings, including emergency departments/other health settings
- Information about attitude, demeanour and behaviour
- Information about Court Orders, bail conditions and other legal issues
- Historic relevant information, such as previous convictions, family or relationship history, other safety concerns or substance misuse issues
- Information regarding housing or accommodation issues/options
- Information about children's attendance and behaviour at school
- Other information relating to risks facing the victim or persons identified as at risk
- 5.3 Prevent information will be shared only for the purposes for which it is provided and will be stored securely and open only to those with a legitimate interest. Use of information for another purpose is only permitted in exceptional circumstances and where disclosure would be lawful, proportionate and justifiable (including in accordance with the Data Protection Act, 1998). Information

will be retained no longer than is necessary to achieve the specific objective and will then be destroyed. Disposal of information will be the responsibility of the partner organisation.

5.4 Channel Multi-Agency Panel members will make every effort to provide time to meet and consider each referral, prioritising this work as a key safeguarding issue. All organisations involved commit to take from each referral any lessons learned, including around policy, practice and training. Reporting on this will be the responsibility of Safe Northumberland's in consultation with the Channel Multi-Agency Panel.

Participant Consent

- 6.1 Our default position will be, wherever possible, to seek consent from an individual to share their information. Our expectation is that consent will be sought from the organisation making the referral. There will be times, however, when seeking consent may not be possible as it might prejudice an intended outcome/there are gateway exemptions that permit sharing without consent:
- Crime and Disorder Act, 1998: Section 115 confers a power to disclose information to a relevant authority on a person where disclosure is necessary or expedient for the purposes of the Act. Section 17 of the Act includes a duty for relevant authorities to do all they can to prevent crime and disorder in their area
- Common Law Powers: Decisions to share for policing purposes are covered by the Code of Practice of Police Information (MOPI). This defines policing purposes as: protecting life and property, preserving order, preventing the commissioning of offences, bringing offenders to justice, and any duty or responsibility of the police arising from Common or Statute Law
- Local Government Act 1972: Section 111 provides for local authorities to have 'power to do anything which is calculated to facilitate or is conducive or incidental to the discharge of any of their functions'
- Local Government Act 2000: Section 2(1) provides that every local authority shall have the power to do anything which they consider is likely to achieve the promotion or improvement of the economic, social or environmental wellbeing of the area'
- National Health Service Act 2006 and Health and Social Care Act 2001: Sections 251 and 60
 respectively provide a power to the Secretary of State to make regulations governing the
 processing of patient information
- Offender Management Act 2007: Section 17 enables disclosure to and from providers of probation services by or to Government Departments, councils, police and others where disclosure is for probation purposes or is connected to the management of offenders
- 6.2 If an organisation cannot obtain consent, or consent is refused, personal information cannot be shared. Here, our process will be that the issue is referred to the Channel Multi-Agency Panel to determine the most suitable partner to try and gain consent/consider support through mainstream services or through other aspects of the UK counter terrorism strategy.
- 6.3 **Consent to participation in the Channel programme:** Participation is voluntary. Section 36(4)(b) of the Counter Terrorism and Security Act 2015 requires consent to be given by an individual in advance of support being put in place and by a parent/guardian in the case of a child. Individuals receiving support through the Channel programme must be aware they are receiving this as part of protecting people from being drawn into terrorism, what the aims of the programme are and what an individual can expect (support). Where an adult does not wish to continue into Channel, it maybe appropriate to provide alternative support through mainstream services or through other aspects of the UK counter terrorism strategy. In these cases, consent will be considered through the Channel Multi-Agency Panel route.

6.3 In the case of a child, there may be circumstances when a parent / guardian does not consent for the child to be supported through the Channel programme. However, if the child is thought to be at risk from significant harm, whether physical, emotional, mental, intellectual, social or behavioural harm (as defined by section 31(9) of the Children Act 1989), then the law requires that Children's Services must be involved in decisions about the child. There may be grounds where the Channel Panel and Children's Services determine a child is in need (as defined by section 17 of the Children Act 1989) to child protection, including through the Channel programme. In such cases, statutory assessments may need to be carried out under sections 17 or 47 of the Act to avoid risk from significant harm. Where a child or parent /guardian does not wish to continue into Channel, it maybe appropriate to provide alternative support through mainstream services or through other aspects of the UK counter terrorism strategy. In these cases, consent will be considered through the Channel Multi-Agency Panel route.

Confidentiality

7.1 All partners involved in the Channel programme commit to confidentiality. Agencies respect that at least one partner organisation considers vulnerabilities presented are important enough to outweigh the duty of confidence to the individual. Agencies agree that no information will be shared outside of Channel Panel meetings without express consent of the agency providing it. Chanel Panel members will all sign a confidentiality statement for each Channel case (see Appendix D). Failure to comply will be considered a breach of subject confidentiality and confidentiality of the agency concerned. This does not preclude or prevent existing or future support being provided. Records will be kept by Safe Northumberland.

Northumberland Channel Multi-Agency Panel: Terms of Reference

A. Purpose and Focus:

- 1. Channel is an early intervention programme that seeks to develop an appropriate support package to protect, support and divert people away from the risk they may face being radicalised into terrorist-related or other extremist activity
- 2. The Channel programme will look to safeguard children, young people and vulnerable adults at risk of radicalisation or recruitment into all forms of terrorism

B. Aims: This group will:

- 1. Provide consistent, multi-agency operation of Channel programme arrangements within the County of Northumberland, supporting the oversight and decision-making of strategic safeguarding and community safety groups operating across the County
- 2. Provide a single and multi-agency point of entry for Prevent referrals through safeguarding, assessing the best response for individuals who live, work, learn or study in Northumberland who are identified as potentially vulnerable to radicalisation
- 3. Determine whether the Channel programme would be an appropriate method of support for vulnerable individuals who have been referred
- 4. Establish and contact staff needing to support individual Channel Panel meetings held, to help steer vulnerable people away from supporting violent extremism
- 5. Ensure there is no discrimination in delivery of interventions on the grounds of faith, ethnicity, age, geography or postcode. Also race, (dis)ability, sexual orientation or gender identity
- 6. Ensure the confidentiality of individuals is respected and where cases are not deemed suitable for Channel, sign these off at the earliest opportunity or refer to other appropriate safeguarding mechanisms or areas of CONTEST led by the police

C. Membership and Operation of the Group:

- 1. The Multi-Agency Panel will meet on a six weekly basis. Frequency reflects Northumberland's assessed level of risk based on referrals made. The Multi-Agency Panel will review these terms of reference and operating arrangements on an annual basis, including frequency, scope and its membership
- 2. Members of the Multi-Agency Panel will be (Section 37 (1) of the Crime and Terrorism Act):
 - a. (Chair) Strategic Community Safety Manager, Northumberland County Council (Section 37(5) of the Act)
 - b. Northumbria Police Prevent Practitioner, or representative as determined by the Force, In addition (section 37(4)) of the Act:
 - c. Service Manager Adult Safeguarding, Northumberland County Council
 - d. Northumberland Children's Safeguarding Board Co-ordinator, Northumberland County Council
 - e. Designated Nurses (Children and Adults), Northumberland Clinical Commissioning Group
 - f. Senior Manager Initial Contact, Referral and Assessment, Children's Services
 - g. Prevent Co-ordinator. Safer Northumberland

- 3. This Multi-Agency Panel will receive referrals of individuals for whom there is a concern of radicalisation on a fully-completed Safeguarding Adults Initial Enquiry Form (adults) or Referral and Initial Information Record form (children). When such forms are received there will be a preliminary assessment:
 - a) A copy of the form(s) will be sent by the relevant safeguarding team to Northumberland Strategic Community Safety Manager and Northumbria Channel Police Practitioner, notifying the Single Point of Contact for adult or children's social care (Appendix B) at the same time. Notification will be within one working day, but with an anticipation it will be as soon as possible. The safeguarding team should also make telephone/personal contact to advise the Northumberland Strategic Community Safety Manager and Police Practitioner that a form is being referred. In the absence of the Northumberland Strategic Community Safety Manager, the Prevent Co-ordinator will act on behalf of the Strategic Community Safety Manager. In the absence of the Northumbria Channel Police Practitioner, the Chief Inspector, Special Branch will be informed and will appoint someone to act on behalf of the Force.
- b) The Northumberland Strategic Community Safety Manager and Police Practitioner will consider:
 - a. If it appears there is a valid referral and the Channel Multi-Agency Panel should meet. A referral to the Channel programme will not be considered if it is:
 - i. Malicious or misguided
 - ii. It is not clear the person is vulnerable to radicalisation
 - iii. The person is being managed through multi-agency Public Protection arrangements
- c) In some circumstances, it may only be possible to complete an accurate assessment after a period of time has elapsed and more information has become available. Multi-Agency Panel members will support any request for assistance in securing this. The Multi-Agency Panel will be responsible for ensuring all such referrals are assessed as soon as possible
- d) If a referral to the Channel programme does need to be considered, the Prevent Co-ordinators will call the Channel Multi-Agency Panel together as soon as is practicable
- 4. The Multi-Agency Panel will consider the outcome of the preliminary assessment and confirm an accurate picture of vulnerabilities to inform an appropriate course of action bespoke to the vulnerable individual's needs using a Vulnerability Assessment Framework form. Assessment will be consistently applied using a framework built around three dimensions of (Appendix D):
 - a) Likely engagement with a group, cause or ideology
 - b) Intent to cause harm
 - c) Capability to cause harm
- 5. If a referral is not deemed appropriate for the Channel programme, it will exit the process. When a decision is taken to exit, considering will be given to alternative forms of support, including health and social services or a referral into other aspects of the CONTEST strategy

- 6. If the Multi-Agency Panel determines an individual should be referred into the Channel programme, it will consider if other professionals are required to sit with them as a Channel Panel. Multi-Agency Panel members will support all requests in meeting timescales determined (which could be before the next scheduled meeting)
- 7. The following support programmes may be considered (though are not an exhaustive list):
 - Counselling: providing advice and support in dealing with a range of personal issues that could lead to vulnerability
 - Faith guidance: Helping an individual develop their knowledge to better challenge the claims of violent, extremist ideology
 - **Civic engagement:** exploring political engagement, civic challenge, human rights, women's rights, social justice and citizenship
 - Working with support networks: engaging family and peers to provide help and support for the person concerned
 - Mainstream Services: for example education, employment, health, housing
- 8. The Channel Panel will develop a Support Plan for every individual. It is essential that everyone at the meeting agrees that all actions can effectively be managed, including those involved in the preliminary assessment. Support will be bespoke to the individual and depend on risk, vulnerability and available resources. Ownership of the risk of involvement in terrorism will lie with the police. This is the risk posed by the individual to themselves and society through their potential active involvement in criminality associated with terrorism. The police are the most appropriate agency, throughout the life of every Channel case, to assess and manage this risk
- A record of each Channel Panel meeting and Support Plan arrangements will be recorded through a Vulnerability Assessment Framework form that will be securely stored by Safe Northumberland
- 10. The Police Practitioner will liaise with the support provider and can ask the Channel Multi-Agency Panel Chair to convene a further meeting if risk is not being reduced or new matters become apparent around the person concerned. All cases will also be reviewed at least every six months
- 11. The Multi-Agency panel will maintain a record of referrals made and outcomes agreed. It will record any malicious or misguided referrals and other data. It will identify management information to share with safeguarding boards, CONTEST and Safer Northumberland Board, on request.

D. Information and Sharing Confidentiality

1. All Multi-Agency panel members will agree to confidentiality requirements as set out in this Channel Panel procedure document endorsed by safeguarding and community safety boards

E. Accountability:

The multi-agency panel will be accountable to the Safer Northumberland Strategy Board

Appendix B

Northumberland Channel Panel: Single Points of Contact:

Panel Partner	Single Point of Contact		
Northumberland County Council (Chair)	lan Billham Strategic Community Safety Manager ian.billham@northumberland.gov.uk / 01670 623731		
Northumbria Police	Detective Inspector Gary Kay - Special Branch specialbranch@northumbria.pnn.police.uk / 101 ext. 63854		
	Chief Inspector Northern Area Command		
Children's Social Care, Northumberland County Council			
I	Patrick Boyle Senior Manager patrick.boyle@northumberland.gov.uk		
	Robin Harper Coulson Children's Safeguarding Board Manager robin.harper-coulson@northumberland.gov.uk		
Adults Social Care, Northumberland County			
Council (Vice Chair)	Karen Wright Strategic Safeguarding Adults Manager karen.wright01@northumberland.gov.uk		
Youth Offending Team			
Northumberland Hospitals NHS Foundation Trust	Jane Smyth		
Northumberland, Tyne and Wear NHS Foundation Trust	Jan Gray - Head of Safeguarding and Public Protection an.grey@ntw.nhs.uk / 0191 245 6631		
Northumberland Clinical Commissioning Group	Fiona Kay		
(also represents General Practitioners)			
Community Rehabilitation Company	Mark Ryland		
National Probation Services	TBC		
Community and Voluntary Sector	TBC		
Education	Jane Walker Virtual Headteacher iane.walker@northumberland.gov.uk		
	Carol Leckie		

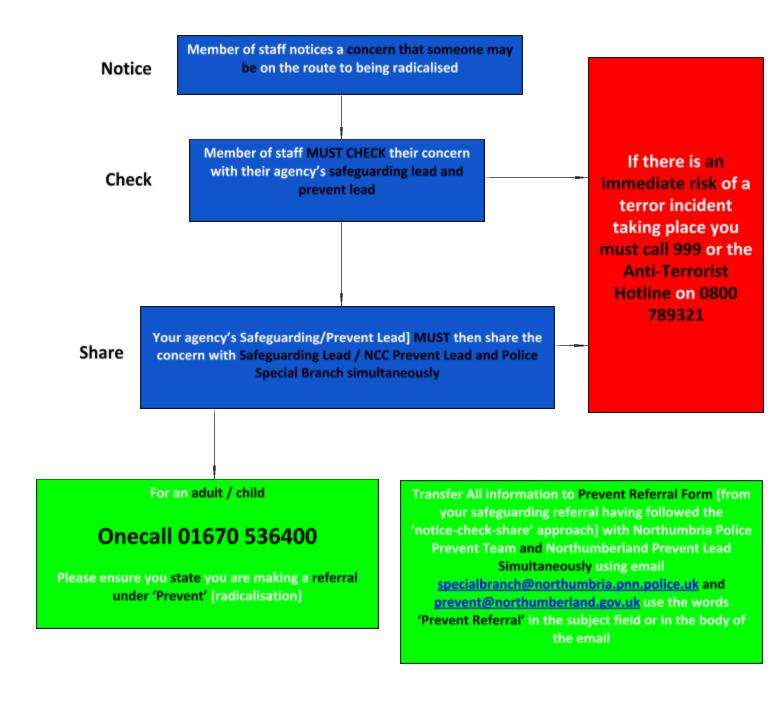
carol.leckie@northumberland.gov.uk
Julie Young Strategic Housing Services Manager julie.young03@northumberland.gov.uk

Appendix c

Northumberland Process for Channel Panel

Screening Referrals Or referral to alternative support Not Appropriate **Appropriate** Collective assessment of vulnerability and risk Seek **Appropriate Endorsement** Multi- Agency Panel Develop action plan Review **Delivery of Support**

Northumberland Process Map for Reporting a Prevent Concern



Northumberland Channel Panel: Common Vulnerability Factors

In Northumberland, the Channel Panel process will consistently assess vulnerability by application of a framework built around three dimensions:

- A person's engagement with a group, cause or ideology
- A person's intent to cause harm; and
- A person's capability to cause harm

Factors will be consistently applied regardless of where potential radicalisation might come from, be that, for example, the extreme far right or internationally-inspired terrorism, eg Daesh (so called ISIS).

Indicators someone might be engaged with an extremist group cause or ideology:

- Spending time in the company of suspected terrorists
- Changing style of personal appearance. eg dress, to accord with a group
- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause
- Loss of interest in friends/activities not associated with the extremist ideology, group or cause
- · Possession of materials or symbols associated with an extremist cause, eg swastika
- Attempts to recruit others to the ideology, group or cause of an extremist cause
- Communication with others suggesting identification with an extremist ideology, group or cause

Indicators someone has the intention to cause harm by violence/other illegal means:

- Identifying others as threatened what they stand for/blaming that group for social/political ills
- Using insulting or derogatory language to reference another group
- Speaking about immense harm from another group and the importance of action now
- Expressing attitudes that justify offending on behalf of an ideology, group or cause
- Condoning or supporting violence towards others
- Plotting or conspiring with others

Indicators someone is capable of contributing directly/indirectly to acts of terrorism:

- Having a history of violence
- Being criminally versatile/using criminal networks to support extremist ideology, group or cause
- Having occupational skill that can enable acts of terror
- Having technical expertise that can be deployed towards an act of terror

Further Reading:

<u>Channel Panel guidance</u>
Protecting the UK against terrorism (library)

Northumberland Channel Panel: Undertaking of Confidentiality

I(PRINT) am involved with the work of Safer Northumberland in respect of the Counter Terrorism and Security Act 2015 duty to prevent people from being drawn into terrorism and to protect vulnerable people which may involve me:

- Reading or viewing information that is the intellectual property of Safer Northumberland or other partnership agencies held/displayed on computer or displayed by other electronic means, or
- Reading or viewing manually held information in written, printed or photographic form.

I understand and agree that confidentiality and security of information is integral to the success of partnership working, to ensuring trust between partners and ensuring the integrity of the work of the Safe Northumberland partnership. I undertake that:

- I will take all reasonable precautions when dealing with data and information obtained in my work with Safer Northumberland by following the Secure Operating Procedures published by Safer Northumberland and which have been made available to me,
- I shall keep information confidential
- I shall not communicate or discuss with any person (other than any work colleague who I know has been authorised to receive it) the content of any information that I come into contact with,
- I shall not retain, extract, copy or in any way use any of the information that I come into contact with other than for purposes of my work within Safer Northumberland,
- I shall return any copies of information for secure destruction as soon as they are no longer required,
- I will immediately report any actual and/or suspected breaches of security to the line manager of the person responsible or (if unknown) another responsible senior manager.

I understand that during my involvement with the work of Safer Northumberland that my actions in relation to information I have access to will be covered by the terms of:

- The Data Protection Act 1998
- The Human Rights Act 1998
- The Freedom of Information Act 2000
- Common law duty of confidence
- Counter Terrorism and Security Act 2015

I have read, understood and accept the above:

Working Together to Safeguard Children Guidance 2015

I re-iterate my commitment to take all reasonable precautions when dealing with data obtained from the system in line with the Secure Operating Procedures provided by Safer Northumberland

I understand that any breach of this Undertaking of Confidentiality may result in disciplinary action under my contract of employment, prosecution under the powers of the above listed legislation, or civil legal action for damages, or all of these. In addition it may be a breach of the duty to co-operate with the Panel in respect of carrying out its functions contrary to section 38 of the Counter Terrorism and Security Act 2015.

Name	Organisation	
Signed		
Date		