



London Borough of Barnet,
2 Bristol Avenue,
Colindale,
London NW9 4EW
24 June 2020
Our ref: 6328453

Thank you for your request received on 29 May 2020, for the following information:

I would like to request the following information about the Prevent strategy :

- 1. Are all Prevent projects commissioned by the council evaluated internally?**
- 2. If so, what are the terms of reference?**
- 3. Can you describe what the evaluations involve?**
- 4. How regularly do these evaluations take place?**
- 5. Who is responsible for these evaluations?**
- 6. Are the projects observed in full by the Prevent Coordinator?**
- 7. Can you share the evaluation reports with us?**

We have processed this request under the Freedom of Information Act 2000.

Response

I can confirm that London Borough of Barnet holds the information you requested.

However, we believe that the exemptions detailed below apply to some of the information you requested and so we are withholding that information. Please see the Refusal Notice below.

I would like to request the following information about the Prevent strategy :

- 1. Are all Prevent projects commissioned by the council evaluated internally?***

Yes, by the Prevent Delivery Group..

- 2. If so, what are the terms of reference?***

Evaluations aim to assess whether the project has achieved their intended outcomes.

- 3. Can you describe what the evaluations involve?***

Each project is evaluated against their theory of change/logic model. This is submitted by the project providers to the Local Authority.

- 4. How regularly do these evaluations take place?***

Quarterly by the Prevent Coordinator.

- 5. Who is responsible for these evaluations?***

The Prevent Coordinator.

- 6. Are the projects observed in full by the Prevent Coordinator?***

Projects are observed by either the Prevent Coordinator or the Prevent Education Officer depending on the setting.

- 7. Can you share the evaluation reports with us?***

I can confirm that the council holds this information but cannot share. We are withholding this information under **Sections 24, Section 31, Section 38 and Section 40** of the FOI act. Considerations around using Section 24 include:

Refusal Notice section 24

Section 24 – National Security

(1) Information which does not fall within section 23(1) is exempt information if exemption from section 1(1)(b) is required for the purposes of safeguarding national security.

(2) The duty to confirm or deny does not arise if, or to the extent that, exemption from 1(1)(a) is required for the purpose of safeguarding national security.

In applying this exemption, we have had to balance the public interest in withholding the information against the interest in favour of disclosure.

Factors in favour of disclosure

- Furthering the understanding and participation in the public debate of issues of the day.
- Promoting accountability and transparency by public authorities for decisions taken by them.
- Allowing individuals, companies and other bodies to understand decisions made by public authorities affecting their lives.
- Bringing to light information affecting public health and safety

Factors in favour of withholding

Considerations around using national security include:

- Disclosing all of this councils evaluation reports on Prevent projects would enable individuals to ascertain the strengths and weaknesses of each project
- It would also highlight how Prevent in this area defines success.
- Individuals could use this information to devise counterstrategies to the projects. This would undermine their effectiveness.
- Prevent projects aim to stop people becoming terrorists
- If their effectiveness was undermined it would increase the likelihood of more people becoming terrorists, damaging national security.
- Civil Society Organisations may also be more unwilling to engage with Prevent if they knew:
- That evaluations of their products would be unilaterally disclosed via FOI. This could damage their ability to gain funding for their products elsewhere
- Due to the Prevent programmes controversial nature CSO's may be unwilling to be publicly linked with Prevent for risk of reputational damage.

In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Refusal Notice Section 31

We consider that the qualified exemption set out in Section 31 (Law enforcement) subsection 31(1)(a) applies to the information requested. Therefore, we have decided to withhold the information.

In applying this exemption, we have had to balance the public interest in withholding the information against the interest in favour of disclosure.

Factors in favour of disclosure

- Furthering the understanding and participation in the public debate of issues of the day.
- Promoting accountability and transparency by public authorities for decisions taken by them.
- Allowing individuals, companies and other bodies to understand decisions made by public authorities affecting their lives.
- Bringing to light information affecting public health and safety

Factors in favour of withholding

- Information regarding organisations which receive Prevent funding is highly sensitive. Disclosure of information regarding Prevent funding and the names of the organisations that deliver Prevent could endanger the safety of those individuals who work for the identified organisations.
- Releasing this information, may allow third parties to compare the activity levels of the Prevent programme in different parts of the UK. This may facilitate the identification of intelligence regarding the areas of the UK where the threat to national security has been and is considered to be the greatest. This has the potential to seriously undermine the objectives of the Prevent project, which is a crucial element of the Government's strategy to counter terrorist and extremist activity in the UK 'at source'. It may facilitate the identification of areas where relatively little or no Prevent projects have taken or are taking place and consequently highlight potential target areas to those organisations which Prevent is designed to combat thereby revealing where intelligence shows a threat level serious enough to attract counter measures and compromising the effectiveness of the strategy.

In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Refusal Notice Section 38

Section 38(1) (b) – Health & Safety

In applying this exemption, we have had to balance the public interest in withholding the information against the interest in favour of disclosure.

Factors in favour of disclosure

- Furthering the understanding and participation in the public debate of issues of the day.
- Promoting accountability and transparency by public authorities for decisions taken by them.
- Allowing individuals, companies and other bodies to understand decisions made by public authorities affecting their lives.
- Bringing to light information affecting public health and safety

Factors in favour of withholding

- Disclosing the information regarding the organisation that work with Prevent would potentially divulge the existence of detailed information about organisations and individuals engaged in the delivery of, and who are supporting a range of activities to prevent terrorism. The information requested would jeopardise the personal security of individuals and organisations by potentially making them targets of reprisals or reactions, thereby endangering their wellbeing and health and safety. This information could put individuals at considerable risk of serious injury or harm from those who support terrorism and seek to damage the UK's interests, and harm individuals within its communities.
- The information would enable terrorists or criminals to gain knowledge about where counter terrorism, law enforcement and public safety measures are focussed and could target individuals, organisation and areas where resources are low. This exposes the individuals, organisations and the public to a greater risk.

In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Refusal Notice Section 40(2)

[Part 1 of Schedule 19](#) of the Data Protection Act 2018 amends the personal data exemption under section 40 of the Freedom of Information Act 2000(FOI). These are consequential amendments designed to ensure that the correct provisions of the GDPR and the new Act are referenced instead of the now repealed DPA 1998. They will not fundamentally impact when personal data can, and cannot, be disclosed in response to an FOI request.

Personal Information is governed by the Data Protection Act legislation and is defined as any information relating to an identified or identifiable natural person ('data subject'). It adds that: an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location number, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The withheld information is exempt because disclosure would contravene the first data protection principle which requires that personal data is processed fairly and lawfully. Disclosure of the requested information would breach this principle and in particular the requirement of fairness because individuals working for the council have a reasonable expectation of privacy and do not expect that the council would disclose their names or contact details in response to a freedom of information request, especially as they are relatively junior and not in public facing roles. The council's redaction policy states that officers' names and contact details under the level of Assistant Director will generally not be released. All of the posts redacted are under the Assistant Director level.

Further information

If you are interested in the data that the council holds you may wish to visit Open Barnet, the council's data portal. This brings together all our published datasets and other information of interest on one searchable database for anyone, anywhere to access. <http://open.barnet.gov.uk/>

Advice and Assistance : Direct Marketing

If you are a company that intends to use the names and contact details of council officers (or other officers) provided in this response for direct marketing, you need to be registered with the Information Commissioner to process personal data for this purpose. You must also check that the individual (whom you wish to contact for direct marketing purposes) is not registered with one of the Preference Services to prevent Direct Marketing. If they are you must adhere to this preference.

You must also ensure you comply with the Privacy Electronic and Communications Regulations (PECR). For more information follow this Link www.ico.org.uk

For the avoidance of doubt the provision of council (and other) officer names and contact details under

FOI does not give consent to receive direct marketing via any media and expressly does not constitute a 'soft opt-in' under PECR.

Your rights

If you are unhappy with the way your request for information has been handled, you can request a review within the next 40 working days by writing to the Information Management Team at: foi@barnet.gov.uk. Or by post to Information Management Team (FOI) London Borough of Barnet, 2 Bristol Avenue, Colindale, NW9 4EW

If, having exhausted our review procedure, you remain dissatisfied with the handling of your request or complaint, you will have a right to appeal to the Information Commissioner at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (telephone: 0303 123 1113; website www.ico.org.uk). There is no charge for making an appeal.