LESSONS FOR PREVENT

by

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FOREWORD

This Report is a result of two deadly stabbing attacks. Ali Harbi Ali's 2021 assassination of Sir David Amess MP at his constituency surgery in Leigh-on-Sea was a carefully planned act of Islamist-inspired terrorism, directed not only at that exemplary parliamentarian but at the heart of the democratic process. Axel Muganwa Rudakubana's 2024 killing spree at a children's dance club in Southport, though not motivated by any clear ideology, was described by his sentencing judge as equivalent in seriousness to an act of terrorism. He murdered three innocent and defenceless young girls, injured and traumatised others and would have killed many more if he could. Both perpetrators face the rest of their lives in prison.

Several years before their respective attacks, both Harbi Ali (AHA) and Rudakubana (AMR) had been referred by their schools to Prevent – the Home Office programme designed to stop people being drawn into terrorism. Prevent's Channel programme for early intervention had the capacity to address concerns of the kind that were flagged to it. In neither case did it do so. AHA was adopted into Channel, but the programme of mentoring that was planned for him was allowed to peter out when it had hardly begun. AMR's case was three times rejected by police without reaching Channel.

The objective of Prevent is to stop people from becoming terrorists or supporting terrorism. That is a difficult and delicate task, whose success can never be guaranteed. But it can work, and sometimes it does. When Prevent is given a chance but fails adequately to take it, as happened in both these cases, all possible lessons must be learned.

As Interim Independent Prevent Commissioner, I have been tasked by the Home Secretary to examine the interactions of both AHA and AMR with Prevent, to review the measures already taken to address the failings that their cases exposed, and to suggest any further improvements or reforms.

Chapter 1 gives a general account of Prevent, with particular emphasis on the Channel programme for early intervention. Chapters 2 and 3 explain the respective interactions of AHA and AMR with Prevent, and assess progress on recommendations already made in Prevent Learning Reviews. Chapter 4 describes and evaluates a long series of recent changes, completed or still in progress, and Chapters 5 and 6 draw out some broader lessons for the future of Prevent. Ten recommendations are made in Chapters 4-6, and listed, after a brief conclusory Chapter 7, in Chapter 8.

I thank the hundreds of people who freely contributed their time and experience to this Review. They work in central and local government, local and counter-terrorism policing, education and the NHS, community support organisations, NGOs both here and abroad, academia and local communities. Not all were enthusiasts for Prevent, but all have contributed usefully to a necessary debate on how the prevention of crime – the first of the nine Policing Principles attributed to Sir Robert Peel, founder of the Metropolitan Police – can help keep us both safe and free in a world blighted by the extreme violence associated with terrorism.

For assisting me on the Review I am particularly grateful to my deputy Suzanne Jacob OBE, to Daniel Hooton and to the original Independent Reviewers in the AHA and AMR cases, Gary Dunnagan and Tony Jenkyn, who gave me useful assistance on the cases that they had respectively reviewed and in some respects more generally.

This Report was submitted to the Home Office and Counter-Terrorism Police for fact-checking and security clearance. The opinions expressed in it (and any remaining errors) are mine alone.

DAVID ANDERSON
(Lord Anderson of Ipswich KBE KC)

10 July 2025

EXECUTIVE SUMMARY

DESCRIBING PREVENT (chapter 1)

1. Prevent (with particular reference to the ***Channel Programme*** for early intervention) is described in Chapter 1, with an introduction to some topical issues such as the ***relevance of ideology*** (1.27-1.38), the ***sharing, retention and use of data*** (1.39-1.44), the ***limitations*** and ***effectiveness*** of Prevent (1.45-1.53), ***opinions of Prevent*** (1.59) and ***criticisms of Prevent*** (1.54-1.60). Reference is made to the relationship between Prevent and ***counter-extremism*** (1.61-1.65) and to ***international comparisons*** (1.66-1.67, Annex 5).

THE CASE OF ALI HARBI ALI (AHA) (chapter 2)

2. AHA, the Islamist terrorist who murdered Sir David Amess MP in October 2021, was referred to Prevent by his school in 2014. His ***Prevent history*** is described (2.19-2.43), as are the conclusions of the ***2022 Independent Review*** into his case (2.8-2.12, 2.46-2.58) and some ***new information*** obtained during the course of this Review (2.13-2.18, 2.27-2.28).

3. The ***system functioned well*** between AHA's referral to Prevent by staff at his school in Croydon and the decision by Channel Panel to offer AHA an Intervention Provider to engage with him ideologically (2.65).

4. Those early examples of good practice were followed by a ***long string of failings*** (2.47, 2.66), some of which were consistent with practice at the time but most of which were the product of ***poor judgement, poor communication and lack of follow-through***. In particular, AHA's initial meeting with the Intervention Provider (at which he concealed his true beliefs) was not followed up by any of the further meetings that the police had commissioned.

5. Even if these errors had never been made, there can be no assurance that Prevent would have identified the full extent of AHA's slide into a terrorist mindset, let alone averted a crime committed several years later. Disengagement (still more deradicalisation) is always difficult to achieve, and it is the nature of Prevent that not every intervention will succeed (2.68).

6. ***The principal systemic failings*** relating to identification of risk, case management, record-keeping and training ***have been comprehensively addressed*** (2.67), and ***a large number of further relevant initiatives are in train*** (Chapter 4). The possibility of human error can never be entirely excluded; but Sir David's murder has been a spur for ***specific and useful changes to Prevent*** (2.69).

THE CASE OF AXEL RUDAKUBANA (AMR) (chapter 3)

7. AMR killed three young girls and injured many other people in a dance workshop in Southport in July 2024, when he was 17. He was ***not sentenced as a terrorist*** (3.3), but had been referred to Prevent by his school three times between 2019 and 2021. His ***Prevent history*** is described (3.12-3.45), as are the conclusions of the 2024 ***Prevent Learning Review*** into his case (3.46-3.54), and some ***further points for investigation*** identified through an organisational learning process (3.55).

8. On AMR's case, my Review should be seen as a bridge between the Prevent Learning Review and the ***Southport Inquiry*** (3.6-3.8), established this year under Rt. Hon. Sir Adrian Fulford. The Southport Inquiry has powers that I do not. It is tasked with establishing, by early 2026, a definitive account of events over a wider time period than just 2019-21, and in relation to the full extent of AMR's involvement with local services and agencies.

9. AMR's school presented the police with ***three opportunities to progress towards Channel*** a troubled teenager who was already showing signs of both an interest in terrorism and some disturbed and violent characteristics. ***Those opportunities were not taken***: AMR continued to engage with a range of other agencies and was briefly managed by police after his first referral, but was never offered the Intervention Provider that he might have had if he been adopted into Channel (3.68). Indeed he was not even referred for information-gathering, as the JAT assessor had recommended (3.17). I believe he should have been (3.58).

10. Matters of individual fault are not for this Report to determine. The specific decision-making of relevant personnel needs to be judged against the standards, guidance and practice of the time, on the basis of facts that have not yet been definitively found, and after giving those officers most closely involved the opportunity to be heard (3.69). ***The Southport Inquiry is ideally suited to determine the full picture***, and is already advanced in that work. I therefore offer no further case-specific conclusions.

11. It can already be said however that the chances of poor decisions in future can be reduced by ***improvements to standards, guidance and process*** (3.70), and that the police have already started to address many of the weaknesses identified by the

Independent Reviewer (3.49-3.53, Annex 6). If dispassionately evaluated and wisely implemented, these measures have the ***potential to make a material difference*** (3.70), in conjunction with the extensive changes initiated and delivered over the past 12 months (Chapter 4).

12. Linked to the case of AMR is a policy issue of considerable importance for the future: whether ***"violence-fascinated individuals"*** or VFIs, who have no particular ideology but may have the potential to commit crimes with strong similarities to acts of terrorism (5.5) should continue to be ***accommodated within Prevent***. I explore this issue at 5.4-5.29, and conclude that they should.

RECENT DEVELOPMENTS (chapter 4)

13. A large number of initiatives relating to Prevent have been initiated recently, some as part of long-standing workstreams or in response to the Shawcross Review of 2023, and others prompted or given urgency by the Southport attack (4.2).

14. Those initiatives are described and where possible evaluated in Chapter 4. They include reviews of ***Prevent thresholds*** (4.5-4.9) and possible ***disparities of treatment*** (4.10-4.15), together with significant changes to case management including a new ***Prevent Assessment Framework*** (4.24-4.29), a ***Clinical Consultancy Service*** (4.45-4.50) and a new policy for ***repeat referrals*** (4.30-4.32). Channel can now ***co-exist with criminal justice procedures*** (4.57-4.59) and there is a pilot for managing ***cases that are transferred out of Prevent*** (4.62-4.64). A permanent ***Prevent Commissioner*** will be appointed to succeed me (1.7(l)), and given oversight of ***Prevent Learning Reviews*** (4.67). The ***Desistance and Disengagement Programme*** has already been independently evaluated (4.69-4.70), and a major ***independent evaluation of Channel*** is under way (4.71-4.72). The new ***complaints mechanism*** is described (4.74-4.79), and a recommendation made (Recommendation 1).

THE FUTURE SHAPE OF PREVENT (chapter 5)

15. In Chapter 5 I address two questions fundamental to the future of Prevent: the urgent question of ***whether Prevent should accommodate violence-fascinated individuals*** who lack a clear ideology (5.4-5.29), and the longer-term question of whether Prevent could be more effective if ***embedded within a comprehensive violence prevention strategy***, behind a *"big front door"* (5.30-5.44). I review the policy and operational implications, before concluding that both questions should be answered "yes" (Recommendations 2 and 3).

FURTHER ISSUES (chapter 6)

16. To complete my task of identifying gaps or shortcomings that require further improvement, I discuss and where applicable make recommendations on the need for Prevent to ***function more effectively in the online world*** (6.3-6.18); ***Transparency*** (6.19-6.26); ***Information-Sharing*** (6.27-6.34); the ***requirement of consent*** (6.35-6.42) and some ideas for ***better engagement*** with young people, parents and others (6.43).

CONCLUSION (chapter 7)

17. Prevent remains ***controversial*** for sometimes contradictory reasons (7.1), and ***failed*** in both cases under review (7.2). But from an ***intense period of change*** have emerged some ***promising signs*** (7.3) as well as some ***policy dilemmas*** (7.4).

18. At its best, Prevent can achieve ***heartening and inspiring results*** (7.6). Those who take part in it, including many ***committed and impressive Muslims*** (7.7), aim to safeguard both the interests of the public and the wayward individuals they seek to reach before things get worse. Their work requires objective and unflinching scrutiny. As human beings, they deserve our support – and our thanks (7.8).

RECOMMENDATIONS (chapter 8)

19. My 10 recommendations are listed in Chapter 8. Leaving aside the complaints system (Recommendation 1, above), their five major themes can be summarised as follows:

    - It should be clarified that Prevent applies to individuals who have no fixed ideology but ***a fascination with extreme violence or mass casualty attacks*** (Recommendation 2).

    - Prevent could function better if ***formally connected to a broader safeguarding and violence protection system*** (Recommendation 3).

    - Prevent ***needs rapidly to adapt to the online world*** where so much radicalisation takes place (Recommendation 4).

    - ***Public transparency*** about the structures, systems and statistics of Prevent should be the default (Recommendations 5-7).

    - ***Information-sharing and engagement*** should be improved (Recommendations 8-10).

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1. THE PREVENT STRATEGY

INTRODUCTION

1.1. Prevent is part of the UK's CONTEST counter-terrorism strategy.[1] It operates in England, Scotland and Wales but not in Northern Ireland.[2] Its aim is to stop people from becoming terrorists or supporting terrorism, and to support the rehabilitation and disengagement of those already involved in terrorism. Government responsibility for CONTEST, including Prevent, sits with the Homeland Security Group (**HSG**) within the Home Office.[3]

1.2. The objectives of Prevent, as defined in the current CONTEST strategy, are in descending order of generality:

(a) tackling the ideological causes of terrorism; [4]

(b) intervening early to support people susceptible to radicalisation;[5] and

(c) enabling people who have already engaged in terrorism to disengage and rehabilitate.

Those objectives are delivered by a range of partners including Counter-Terrorism Policing (**CTP**),[6] Home Office, local police forces, local authorities and independent contractors such as civil society organisations (**CSOs**) and Intervention Providers. There is also an International Prevent Programme.[7]

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1 The aim of CONTEST is to reduce the risk from terrorism to the UK, its citizens and interests overseas, so that people can go about their lives freely and with confidence. Other than Prevent, its components are ***Pursue*** (detection, investigation and disruption of terrorist activity), ***Protect*** (reducing vulnerability of people, buildings and infrastructure to attack) and ***Prepare*** (minimising the impact of attacks). See CONTEST: the United Kingdom's Strategy for Countering Terrorism, CP 903, July 2023.

2 Prevent is a reserved matter, implemented in Scotland and Wales using some devolved structures and partners. This Report refers to England by default, making reference to devolved arrangements where differences are significant.

3 HSG was known prior to April 2021 as the Office for Security and Counter-Terrorism (**OSCT**). A key to the acronyms used in this Report is at **Annex 1**.

4 Terrorism is defined in law as, broadly, the use or threat of serious violence or damage which (1) is designed to influence the government or to intimidate the public or a section of the public, and (2) is for the purpose of advancing a political, religious, racial or ideological cause: Terrorism Act 2000, s1.

5 Radicalisation is somewhat awkwardly defined in the Prevent Duty guidance, 2023, §35, as "*the process of a person legitimising support for, or use of, terrorist violence*". The guidance emphasises that there is no single pathway or conveyor belt to being radicalised: factors may include exposure to radicalising influences, real and perceived grievances (often created or exacerbated by extremist narratives) and a person's own susceptibility, linked in some cases to specific vulnerabilities.

6 The CTP network consists of 11 regional counter-terrorism units and counter-terrorism intelligence units, co-ordinated and supported by CTPHQ in London.

7 This supports international partners in developing preventative approaches to tackling terrorism, and

1.3. The first objective of Prevent is advanced by working in partnership to disrupt and reduce the influence of radicalisers on susceptible audiences and to reduce the availability of, and access to, terrorist content.[8] The second objective is principally addressed by the Channel Programme for early intervention (**Channel**), explained in more detail below. The third objective is pursued by the Desistance and Disengagement Programme (or **DDP**), which seeks to manage the risk of individuals who have been involved in terrorism by providing theological, ideological and practical mentoring from specialist Intervention Providers and multi-faith prison chaplaincy staff.[9]

1.4. The Home Office oversees Prevent activity across England, Scotland and Wales, and may award funding to support delivery.[10] Prior to 2024, the Home Office assessed delivery in "*up to 50 Prevent priority areas*":[11] there are currently 28 priority areas.[12] An annual prioritisation exercise, led by the Homeland Security Analysis and Insight (**HSAI**) team at the Home Office, determines priority areas based on regional consultations with Prevent partners and a range of quantitative factors including Pursue risk, Prevent managed cases, hate crime, community tensions, deprivation and levels of employment.

1.5. Prevent accounts for roughly 3% of overall counter-terrorism expenditure of more than £3bn per year. That is substantially less than is devoted to Pursue, Protect or Prepare.

BRIEF HISTORY OF PREVENT

1.6. A useful history of Prevent is given in Sir William Shawcross's 2023 Independent Review of Prevent (**the Shawcross Review**).[13] Prevent has evolved alongside other

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had a budget allocation in 2023-24 of £33.1m: CSSF Programme Summary 2023-24.

8 Prevent Duty guidance, 2023, §19. See further W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, Chapter 3: the first objective of Prevent was reworded in response to his Recommendation 1. Prevent funds a wide range of civil society organisations (**CSOs**) for resilience-building initiatives ranging from critical thinking workshops and online safety training for parents to mentoring and sport. The Research, Information and Communications Unit (**RICU**) within HSG formerly had a "*strategic communications*" role, but its effectiveness was questionable and it now limits itself to the preparation and circulation of open-source research.

9 See Factsheet: Desistance and Disengagement, updated July 2024. Unlike Channel, DDP can be mandatory for some individuals subject to probation, Terrorism Exclusion Orders or Terrorism Prevention and Investigation Measures.

10 Prevent Duty Guidance, 2023, §93.

11 Revised Prevent Duty Guidance: for England and Wales (2015), §4.1.

12 The priority areas for 2025-26 are Birmingham, Bradford, Brent, Bristol, Calderdale, Cambridgeshire, Cardiff, Derby, Enfield, Essex, Haringey, Hertfordshire, Kent, Kirklees, Lambeth, Lancashire (with Blackburn and Darwen, and Blackpool), Leeds, Leicester, Liverpool, Luton, Manchester, Newham, Nottingham, Redbridge, Sheffield, Surrey, Tower Hamlets and Westminster.

13 W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, Annex D. The Shawcross Review was commissioned pursuant to the Counter-Terrorism and Border Security Act 2019 s20. It built on initial work performed by Lord Carlile CBE QC, who stepped down after his appointment was challenged by

aspects of the CONTEST strategy, and in reaction to events including a number of terrorist or other attacks. In some cases, the perpetrators of these attacks had been unknown to Prevent.[14] In others, the perpetrators had previously been referred to Prevent: there are several recent examples of both terrorist[15] and non-terrorist[16] attacks where this was the case.

1.7. Partly because of the controversy surrounding it, the Prevent strategy has been subject to close internal scrutiny and has been frequently adapted throughout its history. Significant milestones include the following:

(a) ***Prevent began*** in 2003, two years after the 9/11 attacks in the USA, as part of the original CONTEST strategy. It focused entirely on the risk from Islamist terrorism, and aimed both to prevent the radicalisation of Muslim youth in the UK and to help resolve international causes of tension.

(b) ***Channel*** was piloted from 2007 before being rolled out nationally in 2012 and placed on a statutory footing in 2015.

(c) 2007 also saw the creation within the Home Office of the ***Research, Information and Communications Unit*** (**RICU**), which aimed to improve the communication of Prevent work to the public and to develop counter-narratives to challenge propaganda from al-Qaeda and similar groups.

(d) After a ***Prevent Review*** overseen by Lord Carlile, the coalition government concluded in 2011 that the Prevent strategy had *"failed to confront the extremist ideology at the heart of the threat we face"*. The scope of Prevent was broadened to include non-violent extremism, and renewed emphasis was

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Rights Watch UK.

[14] Terrorist attackers not previously referred to Prevent include the perpetrators of three 2017 mass casualty attacks which between them killed 35 innocent people. However three of the five attackers (Khalid Masood – Westminster Bridge; Salman Abedi – Manchester Arena; Khuram Butt – Borough Market) were or had been on MI5's radar as subjects of interest, and so were known to the CT system.

[15] Known to Prevent at some stage prior to their committing terrorist offences were the Parsons Green tube bomber, who was actually a Channel subject at the time of the attack (Ahmed Hassan, 2017), the Fishmonger's Hall double murderer, who had taken part in DDP (Usman Khan, 2019), the Forbury Gardens triple murderer (Khairi Saadallah, 2020) and the killer of Sir David Amess (Ali Harbi Ali, 2021), as well as the inciter of terrorism Daniel Harris (2022). The Texas synagogue hostage-taker (Malik Faisal Akram, 2022) had been referred to Prevent in the UK; he may have had a terrorist motivation but was killed before this could be confirmed.

[16] Persons known to Prevent but whose subsequent serious offences did not class as terrorism included the Wembley Park murderer (Danyal Hussein, 2020), the Croydon killer of Sgt Ratana (Louis de Zoysa, 2020), the murderer of Thomas Roberts (Lawangeen Abdulrahimzai, 2022), a recent school attacker whose Prevent history is not in the public domain, and the Southport attacker (Axel Rudakubana, 2024). Jake Davison, who murdered five people in Plymouth before killing himself (2021), was said at the inquest not to have been referred to Prevent because of informal advice from the local Prevent lead that his case was not suitable. For other recent offences involving the use or threat of extreme violence which were not prosecuted as terrorism, see 5.5, below.

placed on challenging the ideology underlying Islamist terrorism. At the same time, Prevent was updated to include all forms of terrorism, including that inspired by the extreme right wing – though it was still perceived to be primarily concerned with Islamist terrorism.

(e) The ***Prevent Duty***[17] was created by CTSA 2015, accompanied by Prevent Duty guidance and Channel Duty guidance,[18] in response to the increased threat from Islamic State and the hundreds of UK nationals travelling to Syria and Iraq.[19]

(f) Also in 2015, and separately from Prevent, a ***counter-extremism strategy*** was introduced to tackle extremist ideologies which were regarded as the root cause of terrorism and other social harms.[20]

(g) Prevent and Channel referral ***statistics*** were published for the first time in November 2017, in response to pressure for more transparency, and continue to be updated annually.

(h) The ***2018 revision of the CONTEST strategy*** followed the terrorist attacks of 2017 at Westminster Bridge, Manchester Arena, Borough Market and Finsbury Park Mosque. It continued to emphasise the importance of ideology in motivating terrorist groups and individuals, alongside "*social, cultural, material, psychological and other reasons*", and placed renewed emphasis on supporting the rehabilitation and disengagement of those already involved in terrorism via DDP.

(i) The ***Shawcross Review*** was published in February 2023. The guiding principles underlying its 34 recommendations were that Prevent should "*go back to first principles*", improve the capacity of frontline providers to "*understand the ideological nature of terrorism*", enhance its approach to delivery, and encourage public trust by responding to disinformation, improving transparency and establishing better oversight.[21]

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[17] The Prevent Duty requires specified authorities, including local authorities, criminal justice agencies, education and child care bodies, health and social care and police, to have "*due regard to the need to prevent people from being drawn into terrorism*": CTSA 2015 s26 and Schedule 6.

[18] Both Prevent Duty guidance and Channel Duty guidance are published and kept up-to-date.

[19] Also known as Islamic State of Iraq and the Levant (**ISIL**), Islamic State of Iraq and Syria (**ISIS**) and Daesh, Islamic State was a Salafi-jihadi terrorist organisation and eschatological cult which, aided by numerous foreign fighters, sought to establish a caliphate in north-western Iraq and eastern Syria between 2014 and 2019. Islamic State encouraged its supporters, including in the West, to conduct terrorist attacks in its name.

[20] Though the promised Counter-Extremism Bill was never published and the counter-extremism strategy is not currently active, a Commission for Countering Extremism was set up and has been led successively by Sara Khan DBE and Robin Simcox.

[21] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, p157.

(j) The recommendations of the Shawcross Review were accepted by the then Home Secretary, Suella Braverman MP,[22] and are now said to be reflected in the 2023 formulation of the CONTEST strategy.[23] They include the creation of a ***Standards and Compliance Unit*** (**StaCU**) to process and investigate complaints.[24]

(k) The Southport atrocity of July 2024, whose perpetrator had been three times referred to and rejected by Prevent, prompted a further period of reflection within both government and policing, and a large number of ***policy and operational initiatives.***

(l) In December 2024, Home Secretary Yvette Cooper announced that there would be an ***Independent Prevent Commissioner*** to provide consistent oversight, increase effectiveness and develop insight into the Prevent system over the longer term.

1.8. The Home Secretary asked me to serve as Interim Prevent Commissioner in January 2025, pending a procedure to appoint a permanent post-holder, "*to provide an independent strategic function for Prevent to ensure that it can meet its objectives as effectively as possible*".[25]

1.9. I was, additionally, tasked with conducting a review of the Prevent history between 2019 and 2021 of Axel Rudakubana (**AMR**), the perpetrator of the Southport attacks of 2024, evaluating subsequent changes and identifying remaining gaps or shortcomings. Later I was asked to perform the same function in relation to the Prevent history between 2014 and 2016 of Ali Harbi Ali (**AHA**), the killer of Sir David Amess MP in 2021. This Report discharges both specific mandates, and does so within the context of the Interim Commissioner's broader terms of reference.

THE CHANNEL PROGRAMME

1.10. The Channel programme for early intervention is the best-known component of Prevent, and the only one governed by Act of Parliament.[26] It is the aspect of Prevent chiefly relevant to the two cases under review (though AMR was not progressed into Channel), and the chief focus of the remainder of this Report.

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[22] The Response to the Independent Review of Prevent, HC 1073, February 2023.

[23] CONTEST: the United Kingdom's Strategy for Countering Terrorism, CP 903, July 2023; Independent Review of Prevent: One Year On Progress Report, February 2024.

[24] See Standards and Compliance Unit Annual Report 2024-25, May 2025.

[25] Home Office, Independent Prevent Commissioner, 14 February 2025.

[26] Counter-Terrorism and Security Act 2015 (CTSA 2015), Part 5, ss 26-41. More detail is in the Channel Duty Guidance, 2023.

Referrals to Prevent

1.11. The process for referring an individual to Channel is as follows:

(a) The ***Prevent Duty*** requires institutions including schools, colleges, universities, health authorities, local authorities, police and prisons to have due regard to the need to prevent people from being drawn into terrorism.[27]

(b) ***Prevent referrals*** of an individual to the police may however be made by anyone. A National Referral Form is available; its use is encouraged in guidance but not required, and some local authorities have produced their own variants.

(c) After a referral, CTP conducts a process of ***deconfliction and triage***. This process resulted, in 2023-24, in 87% of those referred to Prevent being deemed not suitable for Channel consideration. Some of the cases not referred received no further action, some were escalated to Pursue, and a majority were signposted to other services. The stages in this process are as follows:

(1) A CTP Fixed Intelligence Management Unit (**FIMU**) conducts a deconfliction exercise against a range of police records. The function of the FIMU is to receive information, assess it, decide and recommend an outcome: the so-called ***RADO process***. Though the FIMU is not part of Prevent and none of the six RADO outcomes refer expressly to Prevent, some may be understood as favouring a Prevent intervention.[28]

(2) A Counter-Terrorism Case Officer (**CTCO**) then conducts a Prevent Gateway Assessment (**Gateway Assessment** or **PGA**) which is informed by the referral, the FIMU assessment and other available sources of information. The exercise was guided from 2018 by a set of questions contained in the Dynamic Investigation Framework (**DIF**), replaced with effect from September 2024 by the Prevent Referral Screen (**PRS**) in the Prevent Assessment Framework (**PAF**).[29]

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[27] CTSA 2015 s26 and Schedule 6; Prevent Duty Guidance (2023).

[28] RADO outcomes (1)-(3) indicate attention from Pursue. RADO (4) indicates CT relevance: such cases can either be escalated to Pursue or referred to Prevent for management under a Police Led Partnership (**PLP**). RADO (5) indicates CT relevance requiring Prevent attention only. RADO (6) indicates no CT relevancy, though the case may still be taken up by Prevent.

[29] The PAF is a live document, which is updated at key stages of a referral's progress through Prevent. Section B of the PAF is the Prevent Referral Screen.

(3) The CTCO's Supervisor signs off on the decision either to progress the case for further information-gathering or to close the case to Prevent. Current guidance is to progress the case for information-gathering if "*there is a reasonable suspicion that a Prevent issue is present (however minor)*".

(4) The CTCO then conducts a process of ***information-gathering***. Once that is complete, the CTCO and their supervisor decide (once again supported by the PRS)[30] whether the case is suitable for Channel. A ***section 36 decision*** to refer to Channel may be made only if there are "*reasonable grounds to believe that an individual is vulnerable to being drawn into terrorism*".[31]

(5) If that criterion is not satisfied, the case is ***closed to Prevent*** and assessors are directed to signpost any unaddressed intervention or support needs to appropriate partner agencies.[32]

Channel

1.12. Once a section 36 decision to refer to Channel has been made, a case is considered at one of about 200 ***Channel Panels*** (or Prevent Multi-Agency Panels (**PMAP**) as they are known in Scotland)[33] across Great Britain. Channel Panels are chaired by local authorities and consider local cases at their monthly meetings, which are attended by the CTCO and multi-agency partners including education professionals, health services, housing and social services. They function essentially as follows:

(a) Prior to the first Channel Panel meeting, the ***Susceptibility Assessment*** must be completed by the CTCO.[34] The aim of this initial assessment is to identify the relevant susceptibility factors. A decision is taken at the first meeting whether an individual will be ***adopted into Channel***.

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[30] For decisions subsequent to the Gateway Assessment, the PAF replaced in 2024 the Vulnerability Assessment Framework (**VAF**), which was based on the Extremism Risk Guidance used within HM Prison and Probation Service (**HMPPS**).

[31] CTSA 2015 s36(3). "*Vulnerable*" is the term used in s36 and therefore still applied by CTP at this crucial stage, notwithstanding the preference of the Shawcross Review (Recommendation 2), now reflected in Prevent guidance, for the term "*susceptible*" to be used where possible. An opportunity is awaited for an amendment to section 36.

[32] In 2023-24, 13% of referrals were discussed at a Channel Panel and considered for support. As of May 2024, 7% of all 2023-24 Prevent referrals had been adopted as a Channel case (512 in total) and another 2.5% were still being considered.

[33] The PMAP Duty Guidance was first published in 2021.

[34] This is section C of the PAF.

(b) When an individual is adopted, the Channel Panel identifies an appropriate agency to seek the ***individual's consent*** (or that of a parent or guardian) for a ***support plan***.[35] The purpose of a support plan is to address an individual's susceptibility to being drawn into terrorism; it may have educational, vocational, housing, mental health or other components. Numerous "*partners*" are required to cooperate with the Panel, to the extent consistent with data protection law.[36] The CTCO is responsible for liaising with support provider(s) and updating the PAF. The Channel Panel assesses the progress and effectiveness of the support plan.

(c) As well as co-ordinating support and overseeing existing activity, a Channel Panel may commission an ***Intervention Provider*** (or **IP**) to provide mentoring for as long as it is considered useful: normally at least 4-6 sessions, often more.[37] Intervention Providers are tasked depending on their availability and expertise, which is usually ideological or theological in nature. Many are former police officers, social workers or teachers, though the network is diversifying. I was told in several parts of the country that it can be difficult to find appropriate Intervention Providers. I was however struck by the commitment and enthusiasm of those I met, and by their certainty that their mentoring can achieve useful results.

(d) An individual ***leaves the Channel programme*** (after completion of a Closure Susceptibility Assessment) when the Panel deems that the terrorism risk has sufficiently reduced to warrant exit, or if increased risk warrants an escalation to police, or if consent to Channel support has not been obtained.[38]

(b) The progress of individuals who have left Channel (including those who were adopted into Channel but subsequently referred elsewhere) must be subject to ***6-month and 12-month reviews***.[39] Panels have a discretion to undertake more frequent reviews within the initial 12-month period, and one further review between 12 and 24 months after closure.

1.13. CTCOs are responsible for ensuring that case information is kept up to date, accurately recorded and retained on the Home Office-approved Prevent Case Management Tracker (**PCMT**), the workflow recording system operated by CTP since

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[35] CTSA 2015 s36(4)-(5).
[36] CTSA 2015 s38 and Schedule 7.
[37] Such mentoring depends on the establishment of trust and is not always limited to simple dialogue. At its best it can be inventive: Intervention Providers told me of cases in which they had achieved useful results by taking an individual with anti-semitic leanings to the National Holocaust Centre, or someone attracted by the thought of fighting in Syria to participate in activities with disabled veterans.
[38] Channel Duty Guidance, 2023, §77.
[39] *Ibid.*, §§ 86-88.

2018.[40] CTP retains access to the entirety of the PCMT, but the Home Office has access only to data which post-dates a section 36 decision to refer a case to a Channel Panel.[41]

1.14. A flowchart depicting the decision-making stages is at **Annex 2** to this Report.[42]

1.15. CTP emphasised to me the importance of clear ownership of risk. The ***allocation of risk*** is as follows:

(a) ***Channel Panels*** hold responsibility for the provision and review of support.

(b) ***Agencies*** are responsible for the element of risk that they are responsible for addressing during the support plan.

(c) ***CTP*** is responsible throughout the process for assessing and managing the risk of terrorism-related offending.[43]

1.16. While Channel has in the past not been available to individuals who are subject to criminal investigation under Pursue, changes to the Channel Duty guidance now reflect a revised policy position issued in January 2025 and known as ***Routes to Intervention***.[44] Channel support may run alongside a Pursue investigation if it does not impede that investigation or affect the integrity of an individual's informed consent. Appropriate cases might include, for example, cases in which a young person has been charged with downloading or disseminating terrorist material, and faces a substantial wait prior to trial.

Police-led Partnerships

1.17. A case may as an alternative to Channel be transferred at any stage into a ***police-led partnership*** **(PLP).**[45] Led by police working with other agencies, a PLP Panel meeting may be used to manage individuals, groups or institutions with Prevent-relevant issues who are not suitable for Channel (for example, because consent

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[40] Between 2014 and 2024, records of Channel referrals were entered into the Case Management Information System (**CMIS**), which could be read by the Home Office for monitoring purposes. Several frontline practitioners told me that CMIS was difficult to operate and poorly adapted to its task.

[41] See 3.54, 6.32-6.34 and Recommendation 9, below.

[42] It is taken from the Channel Duty Guidance (2023), p27.

[43] Prevent Duty Guidance (2023), §§136-138.

[44] See further 4.57-4.59, below.

[45] See further 6.40, below. Transfer to a PLP is most common at the Gateway Assessment (as occurred with AMR's first referral), at the section 36 stage, or in the event that the referral subject does not consent to engage with a Channel support plan.

to support has been refused but a risk of further radicalisation or potential terrorist offending remains).[46]

1.18. CTP develops a PLP case management plan for the individual. The principal aim is to provide support, often via partner agencies who also participate in Channel Panels. In cases where consent is required (broadly, supportive interventions that require engagement by the subject), it cannot be compelled; but if consent is forthcoming, I was told that the case will invariably be returned to a Channel Panel for management within Channel.

Dovetail

1.19. A significant alteration to the Channel system as described above was piloted under the name of Dovetail in nine localities in 2017, and then in the entire North West region in 2018-2021. Though Dovetail is no longer in force, it was the system applicable in the North West during all three of AMR's referrals to Prevent, and is for that reason briefly described here.

1.20. Under Dovetail, the police CTCO remained responsible for a Prevent referral until the conclusion of the Gateway Assessment, consistently with sensitivities regarding the sharing of CTP intelligence. At the information-gathering stage, the CTCO was replaced by a Channel Co-ordinator employed by a local authority, who might for example be a former social worker, probation officer or police officer. The functions of case officer were performed throughout the remainder of the Channel process by the Channel Co-ordinator, who might service two or three different Channel Panels but who was able to build up a specialised understanding of the role without the other claims on a CTCO's time.[47]

1.21. A Home Office process evaluation of the regional (North West) Dovetail model in 2021 confirmed that Dovetail had led to improved Channel processes, pointing in particular to better case and Panel management, improved multi-agency working, greater use of Intervention Providers and greater consistency across Panels. Dovetail also improved Home Office oversight and management of Channel, though it was said to be unclear whether it had been successful in freeing up police time to work on higher-risk cases. Practitioners with experience of Dovetail in the North West confirmed to me that Channel co-ordinators had the ability (unlike CTCOs) to focus on Channel to the exclusion of other activities, and that they could often use their contacts and resources to improve the speed and efficiency with which information

[46] Since people under overt CT investigation are now permitted to be in Channel, subjects with an imminent risk of terrorism offending are likely to be in PLP only if information-sharing restrictions mean that the CTP investigation may not be shared with the subject or indeed the local authority.

[47] CTCOs are often deployed in different ways within CTP (for example to support executive action in Pursue, or run PLP cases, or conduct local impact assessments).

could be gathered from agencies. It was also reported to me that the use of Channel co-ordinators tended to improve partner buy-in and to contribute to the willingness of Channel Panels to own the process.

1.22. The Home Office noted, however, that Dovetail appeared in some cases to have created or exacerbated tensions between police and local authorities, with the main cause being lack of clarity over roles and responsibilities. Dovetail was also more expensive – unsurprisingly, since the additional resource which was made available to local authorities in pilot areas was not offset by any reduction in the CTP budget.

CHANNEL STATISTICS

1.23. 6,922 people were ***referred to Prevent*** in 2023-24, broadly in line with numbers since 2015.[48] 40% of referrals came from the education sector (82% of those aged 11-17), 28% from police, 10% from the health sector and 8% from local authorities. Other referrers included the prison and probation service (**HMPPS**) (3%), friends and family (2%) and community (2%).

1.24. I heard evidence from across the country of a large increase in referrals in Q1 2025, following the publicity surrounding AMR's case. Reactions to the incel-themed Netflix series Adolescence, released in March 2025, may also have played a part in encouraging referrals.[49] Statistics yet to be published will record the extent of any such increase, the extent to which is mirrored in adoptions into Channel, and whether it is best understood as a spike or a more permanent upward shift in numbers.

1.25. 512 cases (7% of referrals) were ***adopted into Channel*** in 2023-24, taking to almost 5,000 the number of individuals supported by Channel since the introduction of the Prevent Duty in 2015.

1.26. The ***median age*** for a Prevent referral in 2023-24 was 16: 11-15 year olds comprised 40% of those referred where age was known, and an even higher proportion (50%) of those adopted as a Channel case. 88% of those referred and 92% of those adopted were ***male***.

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[48] See generally Prevent Official Statistics, year to March 2024. The 2023-24 total of 6,922 is slightly above the average since the Prevent Duty was enacted in 2015: see Figure 3. The scale of Prevent referrals has always been tiny compared (for example) with referrals to children's social care, which numbered more than 620,000 in 2023-24.

[49] See, e.g., Emily Jane Davies, "Counter terror police issue warning to parents to look out for signs their child is at risk of radicalisation online in wake of Netflix show Adolescence", Mail Online 3 April 2025; Charlotte Lynch, "Report your children to Prevent if they're watching misogynist videos online', police urge parents", LBC 3 April 2025.

THE RELEVANCE OF IDEOLOGY

1.27. The purpose of Prevent interventions, as noted at 1.2(b) above, is *"to support people susceptible to radicalisation"* – radicalisation being a process tending towards the use of or support for terrorist violence. A political, religious, racial or ideological motive is an essential part of the legal definition of terrorism. But adherence to an extreme ideology is in law neither a necessary nor a sufficient condition for entry into Prevent or Channel. Thus:

(a) CTP continues to apply the statutory standard of "***vulnerable to be drawn into terrorism***" to people who could not necessarily be described as "*susceptible to radicalisation*".

(b) ***Susceptibility to radicalisation does not require a fully-formed ideology***,[50] though evidence of an ideological factor has in practice often been required for access to Prevent. Radicalisation takes many forms;[51] and even members of an established terrorist cell may be drawn in not principally by ideology but by other factors such as personal, vicarious or group grievance, criminal associations and loyalty to accomplices.[52]

(c) Conversely, ***adherence even to a hateful or anti-democratic ideology does not always imply willingness to commit or support violence in its name***. An individual may be an adherent of the Great Replacement theory,[53] or a Hindu supremacist, or favour the re-establishment of an Islamic caliphate, while drawing the line at causing harm to other people or to property.[54] The numerous adherents of such ideologies, distasteful as they may be to the majority, are by no means all on a path to supporting or perpetrating terrorism.

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[50] There are powerful practical reasons why Prevent is not limited to those with an established ideology. In particular, it is generally accepted in counter-terrorism that deradicalisation is harder than diversion or disengagement : it is easier to act before an ideology has taken hold.

[51] As noted in the Prevent guidance: see fn 5, above.

[52] A central theme of Petter Nesser's authoritative study of European jihadism, "Islamist terrorism in Europe" (Hurst, 2018).

[53] Sometimes linked to accusations of "white genocide", the Great Replacement theory holds that elites are complicit in the replacement by mass migration of European populations by non-white (notably Muslim) peoples. Variants on the theory are heard from far-right politicians around the world who are opposed to violence and have no association whatever with terrorism. However, the theory has also helped to inspire terrorists such as Brenton Tarrant, who killed 51 people in two New Zealand mosques in 2019 after writing a manifesto entitled "The Great Replacement".

[54] No such line, of course, was drawn by terrorist groups such as Islamic State, which sought to use sympathy for a theocratic caliphate as a historic symbol of global Islamic unity in order to recruit followers to its murderous cult.

1.28. For these reasons, Channel is both more and less than a scheme for ideological diversion. There is a strong emphasis on relevant behaviours in Prevent assessments. Nonetheless, in order to assess whether Prevent support is required and if so of what kind, the ideology associated with a Prevent case (if one exists) is recorded on the PCMT at the outset, and updated as further information becomes available.

1.29. Every practitioner to whom I spoke told me that recent years have seen a significant rise in individuals with an interest in or potential for extreme violence whose ideologies are mixed, unstable or unclear (**MUU**), in the terminology used until recently, or who may be principally driven by non-ideological factors.[55] This phenomenon, and the desirability of managing it within Prevent, was identified as early as June 2019 in a joint letter from the Director of Prevent at the Home Office and the National Coordinator for Prevent at CTP (**Annex 3** to this Report), which stated:

> *"When it comes to preventing people being drawn into terrorism, our responsibility is to offer interventions and support to all individuals who are at risk, irrespective of whether that risk is being driven by a true belief in an ideological cause or group, or whether an involvement to either of these is being driven by other vulnerabilities and complex needs.*
>
> ...
>
> *The power of Prevent lies in tackling vulnerability early to prevent future harm. Oversimplifying the assessment of risk to offer support only to those with a very clear or embedded extremist ideology risks missing opportunities to support those with perhaps less obvious, but no less relevant or urgent, vulnerabilities."*

1.30. There were almost 2,000 MUU referrals in 2017-18 (27% of the total), of which only a tiny handful were adopted into Channel.[56] The 2019 letter sought to reflect what the system was already seeing and provide clarity on whether it could be accepted. It requested Prevent Boards and Channel Panels to

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[55] A 2021 Home Office Factsheet stated: "*Mixed, unstable or unclear reflects instances where the ideology presented may involve a combination of elements from multiple ideologies (mixed), shift between different ideologies (unstable), or where the individual does not present a coherent ideology yet may still be vulnerable to being drawn into terrorism (unclear).*" The "MUU" category has been replaced (1.32 below), in part because of a tendency to apply "*unclear*" too widely, though the MUU category was viewed by some as a useful *aide memoire* and remains in occasional informal use. Indeed it is echoed in my instructions for this Review: see 5.2, below.

[56] There were 7,318 Prevent referrals in 2017-18; according to the 2019 letter, "*less than 1%*" of the MUU referrals ultimately received support via Channel. That percentage had risen by 2019-20, the year of AMR's first referral, but only to 4%: Home Office, Individuals referred to and supported through the Prevent programme, 2019-2020, p.12.

> *"consider those individuals who appear to have an interest in multiple, concurrent, and even contradictory extremist ideologies or causes, or who seem to shift from one extremist ideology / cause to another"*

and to

> *"consider the possibility of an individual's obsessive interest in public massacres of any kind as a possible signal of vulnerability"*.

That initiative coincided with a marked rise in the adoption of MUU cases into Channel. In 2019-2020 – the year of AMR's first engagement with Prevent – 18% of those adopted into Channel were classed as MUU, and the following year the figure was 30%.[57]

1.31. The identification of the MUU phenomenon in 2019 bears out a description of Prevent that I heard from both senior civil servants and police officers as *"the canary in the coalmine"*, identifying new issues in radicalisation (whether Islamist, extreme right-wing, incel or violence-fascinated) and trying to deal with them until the rest of the system catches up. There is a widespread perception that this phenomenon is rapidly increasing, with the ubiquity of the internet and habits of isolation learned during the Covid pandemic often cited as contributing factors.

1.32. Since 1 April 2024, ideologies suitable for Prevent have been classed in 16 categories: Islamist Extremism; Extreme Right Wing; Northern-Ireland related Dissident Republican Extremism; Northern Ireland-related Unionist/Loyalist Extremism (NI); Left Wing Extremism; Anarchist Extremism; Environmental Extremism; InCel Extremism; Pro-Khalistan Extremism; Hindutva Extremism; Other Religious Extremism; Other Ideology; Multiple Ideologies (with no dominant ideology); Fascination with Extreme Violence or Mass Casualty Attacks (where no other ideology); No Ideology – other susceptibility to radicalisation identified; and No Ideology Identified.[58] Those categories are defined for Prevent practitioners in terms that often (though not always) emphasise that it is only violent forms of the ideology in question that are of interest.

1.33. The numbers of referrals to Prevent and adoption into Channel in each of the current 16 categories will become evident only when the statistics for 2024-25 are

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[57] See W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §§4.45-4.59. In both years, MUU referrals are said to have constituted 51% of the total. Three real-life MUU case studies are set out in **Annex 4** to this Report.

[58] Anti-semitism is not recorded as a category: but as the Shawcross Review observed at §4.81, by reference to its own observations of Channel, *"hatred of Jews is an issue which in fact unites both Islamists and Extreme Right-Wing, as well as the Extreme Left …"*.

published. The headline figures for 2023-24, when fewer categories were in use, are as follows:

Prevent referrals and Channel adoptions by ideology as % of the total 2023-24

Nature of concern	Prevent referral (6,921 cases)	Channel adoption (512 cases)
Vulnerability but no ideology or CT risk	36%	6%
Extreme right-wing	19%	45%
Conflicted ideology	18%	18%
Islamist	13%	23%
No risk, vulnerability or ideology	8%	6%
School massacre	2%	4%
Other (inc. left-wing, international, NI)	2%	4%
Incel	1%	2%

1.34. Three points in particular stand out from that table. First, almost twice as many extreme right-wing as Islamist cases were adopted into Channel.[59] Secondly, cases *not involving* Islamist and extreme right-wing ideology constituted around two thirds of Prevent referrals and a third of cases adopted into Channel. Thirdly, cases where there is no ideology or terrorism risk constituted no less than 44% of referrals but only 12% of Channel adoptions.

1.35. The Shawcross Review suggested that referrers to Prevent, and to a lesser extent Channel Panels, have been focusing unduly on people of a type who are statistically unlikely to become terrorist offenders.[60] It is true that the terrorism statistics

[59] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, suggested some possible reasons for this at §§4.37-4.44, including that "*disinformation about Prevent, particularly the narrative that Prevent intends to harm Muslim communities*" has been effective in its twin objectives of inhibiting Prevent referrals of and by Muslims, and driving down the proportion of individuals with Islamist-related risks who consent to participate in Channel (which are below average: see fn 205, below).

[60] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023. He said at §§1.8 that the low proportion of Prevent referrals that concerned Islamism (22% in 2020-21) "*suggests a loss of focus and failure to identify warning signs*", and that "*[v]ulnerable people who do not necessarily pose a terrorism risk are being referred to Prevent to access other types of much-needed support*".

(though lagging indicators) continue to be dominated by Islamist and (to a lesser extent) extreme right-wing ideologies:

(a) Those in custody for terrorism-related offences in June 2024 were 63% Islamist, 29% extreme right-wing and 9% other.

(b) 67% of terrorist attacks in the period 2018-2023 were Islamist, and most if not all of the remainder were extreme right-wing.

Shawcross observed that he knew of no terrorist attacks in the UK perpetrated by MUU assailants, and concluded that "*[by] including MUU within Prevent's remit, a large number of referrals are made of individuals who are of doubtful relevance to the national counter-terrorism strategy.*"[61]

1.36. These observations are entirely valid if the aims of Channel are defined purely in terms of combatting the ideologies that can lead to terrorism,[62] and if it is additionally assumed that motivations such as school massacre fixation and Incel subculture are not ideologies (or at least, not terrorist ideologies).[63] Followed logically through, they lead to the conclusion that while the murderer of Sir David Amess was (as all would agree) a proper subject for Prevent, the perpetrator of the Southport killings was not.

1.37. Others have taken a more inclusive position, in the spirit of the 2019 letter referred to at 1.29-1.30, above. They emphasise that not all pathways to terrorism are characterised by a fixed ideology, and that the characteristics that can point a subject to terrorism can also lead to other forms of extreme violence.[64] In their view, AMR was a proper subject for Prevent despite the fact that he lacked any clear terrorist ideology.

1.38. The combined (though opposing) impacts of the Shawcross Review and the Southport attack have generated a degree of confusion about the proper scope of Prevent, which needs urgently to be resolved and to which I return at 5.4-5.29, below.

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[61] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §§ 4.51, 4.59.

[62] Though this is debatable: while the first objective of Prevent (1.2, above) is specifically limited to the *ideological* causes of terrorism, the same limitation does not apply to the second objective, under which Channel sits. This is clear also from the Prevent Duty Guidance (2023), §36-38.

[63] That was Shawcross's view: Independent Review of Prevent, HC 1072, February 2023, §§ 4.53 and 4.55. Others have argued that, for example, school massacre fixation and incel ideas can class as ideologies: see 5.19, below.

[64] For concrete examples of this see 5.5, below.

SHARING, RETENTION AND USE OF DATA

1.39. When deciding whether to ***share data*** relating to people referred to Prevent, practitioners are subject to the normal requirements of data protection legislation. Lawful bases for sharing confidential data, other than consent, include the prevention of serious harm to the public, the investigation or prevention of terrorism and serious crime, and the safeguarding of the subject's health, safety and welfare.[65] Relevant professional guidelines confirm that duties to co-operate with requests for relevant information may arise in such circumstances.[66]

1.40. As to ***retention***, Channel data is stored for six years following the completion of the 12-month review. CTP may retain data for longer if there is a policing purpose for doing so. Prevent referral data is retained by CTP for 6 years after the point of closure, but the Home Office has no access to this unless the case entered Channel. These policies were revisited in the light of the Shawcross Review, which suggested that shorter retention periods would build confidence in making referrals.[67] It was jointly concluded that the risks associated with reducing data periods outweighed the likely benefits.[68]

1.41. The role of CTP within Prevent has led some to claim that the ***use of Prevent data*** by public authorities can create a permanent stain on a person's record. This is one of the factors behind the allegations of "*stigma*" that underlie many of the criticisms of Prevent.

1.42. Whilst such arguments deserve careful consideration, it is important that they proceed on the basis of facts. The consent form for Channel includes a reminder that information provided by the subject may be disclosed when it is legal, necessary and proportionate to do so. This could be the case if, for example, a conversation with an Intervention Provider were to trigger a safeguarding threshold or require another person to be notified in the interests of their own safety or that of others. Local police can tell that a person is an active Channel subject if that person comes

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[65] See Channel Duty Guidance (2023) at §§92-99 and Annex A (Information Commissioner's Office guidance on lawful basis).

[66] See, e.g., General Medical Council, "Confidentiality: good practice in handling medical information", 2017, §§50-72. I return to the issue of information-sharing at 6.27-6.34, below.

[67] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, Recommendation 18: "*Counter Terrorism Police should investigate removing referral data for cases that did not make it to Channel, categorised as requiring 'no further action', after three years instead of the current six. This ought to build confidence in making referrals.*"

[68] As the High Court (citing a senior CTP officer) pointed out in *R (II) v Commissioner of the Metropolitan Police* [2020] EWHC 2528 (Admin), "*Radicalisation is a process, not an event and so it has to be considered over time. Intelligence and information held by the police (or indeed the security services) is often fragmentary, contradictory and difficult to interpret. It is rare that a snapshot of information taken at one moment in time provides the complete picture.*" Nonetheless, there may (as in that case) be countervailing factors which render the continued retention of personal data unjustified.

to their attention in connection with possible criminality, understandably since it might put that criminality in a different light. However, consistently with the status of Channel as a voluntary safeguarding programme, current or past participation does not show up on checks (e.g. DBS checks) and should normally have no bearing on a person's education or career prospects, including in the public service.

1.43. Internal Reviews conducted by CTP and the intelligence agencies after the multiple terrorist attacks of 2017 recommended that:

> *"More Prevent and Channel data should be shared with MI5 where appropriate and necessary, in the interest of national security."*[69]

1.44. Though I cannot give details in a public document, that conclusion of the Internal Reviews (which I had a part in assessing) is an unsurprising one. Part of MI5's mission is to defend the UK against terrorism. Given that the aim of Prevent is to stop people becoming terrorists or supporting terrorism, and to support the rehabilitation and disengagement of those already involved in terrorism, it would not be realistic to expect Prevent and Pursue to operate in isolation from each other. Accordingly, information available to Prevent can be shared with MI5 in order to protect national security, though only subject to strict legal requirements and insofar as it is necessary and proportionate to do so. To ensure compliance with its obligations, MI5 is subject to the oversight of the Investigatory Powers Commissioner (a senior Judge), as well as to Parliament's Intelligence and Security Committee and the jurisdiction of the Investigatory Powers Tribunal.

LIMITATIONS OF PREVENT

1.45. It would be absurd to expect a programme such as Prevent to be able to find and neutralise the threat from all potential terrorists. Terrorist attacks in western countries are thankfully rare, certainly by comparison to other types of serious violent crime, yet their perpetrators do not conform to a single type. They have different personal motivations and range from apparently respectable professionals to religious obsessives, violent criminals, manipulators, loners, attention-seekers, grievance-mongers and hangers-on.

1.46. People who are liable to commit acts of terrorism are ***difficult to identify***:

(a) The Channel system relies on referrals, which are inevitably patchy: individuals not at school may have only occasional contact with bodies subject

[69] Quoted by the Intelligence and Security Committee of Parliament in "The 2017 Attacks: What needs to change?", HC 1694 November 2018, §251.

to the Prevent Duty, and even those who are subject to it are unlikely to be in a position to understand the details of the subject's online life.[70]

(b) The risk in relation to almost any individual is remote: only a tiny proportion of those referred to Prevent will go on to engage in terrorism, and only hindsight can reveal their identities.

(c) Even where terrorism has a clear and consistent ideological basis (as in the case of the classic al-Qaeda or IS-inspired cell), ideologues may be outnumbered by those drawn in by criminal links, personal resentments or bonds of friendship and family.[71]

(d) The currently widespread model of a lone actor contemplating a low-tech but deadly attack, radicalised online or motivated by a confused or unstable ideology, may present few if any opportunities for detection – particularly if the person is no longer in full-time education.

(e) There are, in any event, limits in any free society on the powers of the state to surveil and constrain individuals who have committed no crime and may well never do so. Those limits are dictated by law, but also by the tendency of harsh measures to be counter-productive. The more comprehensive the interventions of the state, the higher the number of false positives that a programme such as Channel will throw up. The more coercive those interventions, the greater the resentment among communities who may feel (or be encouraged to feel) that their members are being victimised.[72]

1.47. A person who is correctly identified as on a path to radicalisation can be very ***difficult to divert*** from it. They can also fall back into their old ways after an apparently successful intervention, as demonstrated by the substantial number of attackers who in recent years have passed through Prevent.[73] Thus:

(a) Many Channel interventions require the subject's ***consent***: a state of affairs which most practitioners to whom I spoke saw as essential to its functioning and acceptance, but which allows potential subjects to refuse their co-operation to a range of supportive interventions.[74]

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[70] I return to this issue at 6.3-6.18, below.

[71] See Nesser, fn 52, above.

[72] Divisive figures such as Anjem Choudary and 'Tommy Robinson' have voiced crude but mutually supportive narratives to the effect that Muslims and white Britons respectively are existentially threatened by the other.

[73] See fn 15, above.

[74] See further fn 205 and 6.35-6.42, below.

(b) Deradicalisation, disengagement and diversion can be ***hard to achieve***. It is possible that the right Intervention Provider or the right support plan will have the desired effect, but this can never be guaranteed.

(c) Dishonest self-presentation or "***disguised compliance***", compounded by optimism bias on the part of Intervention Provider or Channel Panel, can enable residual radicalisation to be under-estimated or not noticed.[75]

(d) Where ***other complex needs*** are present, those needs may for practical reasons need to be given priority over attempts at mentoring or deradicalisation.[76]

1.48. Prevent, in other words, can be expected neither to identify all potential future terrorists nor to divert all those who have been identified. That does not mean that Prevent is ineffective, though its effectiveness may be hard to evaluate (1.49-1.53, below). Still less does it mean that time and effort expended on seeking to improve the functioning of Prevent is wasted. Even marginal improvements to its operation have the capacity to avoid widespread trauma and save lives.[77]

EFFECTIVENESS OF PREVENT

1.49. There is a fundamental problem in the way of assessing the effectiveness of Prevent.

(a) ***Prevent's successes*** – individuals who were helped by its intervention to leave the path to terrorism – ***are unknowable***.[78] Their lives continue free of further contact with the counter-terrorism system. Whether it would have been otherwise, but for Prevent, can in most cases be little more than speculation.

(b) ***Prevent's failures***, on the other hand, ***are widely publicised***. Since a completed terrorist attack was by definition not prevented, it will always be tempting for Ministers, parliamentarians and commentators to blame the strategy whose objective it was to stop them – whether the perpetrators were on Prevent's radar or not.

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[75] The phrase "*dishonesty in self-presentation*", used by the Chief Coroner in the Fishmonger's Hall inquest (§§ 82-86), is more apposite in the Channel context , where a subject is not required to "*comply*" with anything. However "*disguised compliance*" has taken root and is used in this Report to avoid confusion.

[76] I witnessed a number of cases in Channel Panels in which it was wished to introduce an Intervention Provider to engage on ideology but other problems (mental health, family crisis, alcoholism) were so acute that this could not yet be attempted.

[77] See, by analogy, my comments on the work of MI5 and CTP in D. Anderson, Attacks in London and Manchester (2017), §§5.20-5.28.

[78] Unless they are willing to acknowledge their experience, and to credit Prevent for their change in situation or attitudes: fn 80, below.

1.50. To this fundamental problem of assessment must be added two particular methodological difficulties.

(a) To impute a causal impact to Prevent on any scientific basis would require control groups (or counter-factual groups) of similar individuals who did not receive Prevent interventions. There are difficult ***practical and ethical issues*** in devising such control groups.

(b) As illustrated by both the cases under review, a 2-3 year time frame is insufficient to gauge the success of Prevent.[79] Conclusions about the sustained impact of Prevent programmes would require ***long-term studies***, which are demanding of both time and resources.

1.51. It is beyond dispute that Channel can be effective in diverting some people from a pathway into terrorism.[80] Of the hundreds of people exiting Channel in any given year, the great majority are assessed as posing no further radicalisation concerns. There is much anecdotal evidence of cases in which a Channel intervention has been decisive. Four such anonymised examples from recent years, which the Review team has verified from police and Home Office files and/or by speaking to some of the Intervention Providers concerned, are at **Annex 4** to this Report.

1.52. Of course, not all recorded improvements will be real, permanent and attributable to Channel. Cases of disguised compliance are well-evidenced;[81] and there may be nervousness about publicising "*success stories*" in case they turn out to be illusory, or in case initial success is followed by a disastrous relapse. Previous studies of Prevent and Channel have highlighted difficulties in establishing effectiveness of targeting, metrics for reduction in the risk of radicalisation, long-term impacts of Channel participation and value for money.

1.53. Of considerable significance, therefore, is the independent national evaluation of the effectiveness of Channel, currently under way: see 4.71-4.72, below.

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[79] The murder of Sir David Amess came more than 5 years after AHA's last contact with Prevent, and the Southport attack more than 3 years after AMR's last contact.

[80] I have myself spoken to individuals for whom an intervention has been a decisive step away from a future that could have been fatally destructive of themselves and others. An interview with one such person ('Marco'), and his Intervention Provider Nick Daines, was broadcast at the start of the BBC Radio 4 programme Understanding Prevent (2017).

[81] See 1.47(c), above. Such cases include Ahmed Hassan (Parson's Green, 2017), Usman Khan (Fishmonger's Hall, 2019) and AHA.

HUMAN RIGHTS AND DISCRIMINATION

1.54. Prevent has long been characterised by some individuals and groups as an attack on the practice of Islam, or on civil liberties more generally. Such critiques take their cue from Prevent's original focus on the ideological pathway to Islamist terrorism. Frequent themes of these narratives are the secrecy attending Prevent, its targeting of non-violent expressions of faith, its disproportionate impact on Muslims, the stigma attaching to a Prevent referral, the retention and sharing of private data and information (including on children), the chilling effect on free speech (particularly in educational settings), and the corrosive effect of the Prevent Duty on trust in teachers, medical staff and others.[82] Many of these reports call for an end to Prevent, or at least for its radical reform (for example, by the removal of the Prevent Duty). While welcoming in principle the idea of independent review (and indeed providing helpful input to this Review), many of the groups responsible for these reports refused to engage with Lord Carlile or with the Shawcross Review.[83]

1.55. This strongly critical narrative has spread beyond the NGOs and academics who chiefly promote it. UN bodies, in particular, have picked up on allegations of discrimination. Thus:

(a) A UN Special Rapporteur observed in 2017 that by "*dividing, stigmatizing and alienating segments of the population*", Prevent is having "the opposite of its intended effect".[84]

(b) In 2019, another UN Special Rapporteur feared discriminatory application of the Prevent Duty by "*teachers, professors, nurses and doctors*", and called on the government to "*urgently confront the exclusionary, divisive and discriminatory environments its policies are generating*".[85]

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[82] See, among others, A. Singh, "Eroding Trust: the UK's Prevent Counter-Extremism Strategy in Health and Education" (Open Society Justice Initiative, 2016); Hil Aked, False Positives: the Prevent counter-extremism duty in healthcare (Medact, 2020); "Preventing Safeguarding: the Prevent strategy and children's rights" (Child Rights International Network, 2022); John Holmwood and Layla Aitlhadj, "The People's Review of Prevent" (Prevent Watch, 2022); Amnesty International, "This is the Thought Police: the Prevent duty and its chilling effect on human rights" (2023); Open Rights Group, "Prevent and the Pre-Crime State: how unaccountable data-sharing is harming a generation" (2024); Rights and Security International, "Caught in the Web: 'Prevent' databases and the policing of children" (2025). I have had the opportunity to meet many of the authors of these documents, before or during the preparation of this Report.

[83] There have even been calls for the Shawcross Report to be "*withdrawn*": "A Response to the Shawcross Report" (Prevent Watch, 2023).

[84] UN Special Rapporteur on the rights to freedom of assembly and of association, "-up mission to the UK" (2017), §§ 6-14.

[85] UN Special Rapporteur on contemporary forms of racism, racial discrimination, xenophobia and related intolerance, Visit to the United Kingdom (2019), §48.

(c) The UN Committee on the Rights of the Child deplored in 2023 the "*targeting of certain groups of children in counter-terrorism measures*", and suggested that Prevent referrals constitute "*discriminatory, stigmatizing and racially based measures on children belonging to minority groups*".[86]

(d) The UN Committee on the Elimination of Racial Discrimination called in 2024 for Prevent to be revised "*with a view to eliminating any discriminatory and disproportionate impact on the human rights and fundamental freedoms of members of ethnic and ethno-religious minorities, including children*", and for the Prevent Duty to be withdrawn.[87]

1.56. There have also been many critical stories in UK media over the years, mostly about supposedly misguided or absurd referrals, though these appear to be less frequent and less hostile than they were.[88] Some of these stories are true;[89] one of the best-known turned out to be highly misleading, though not before it had been repeated by news outlets around the world.[90]

1.57. By the middle of the last decade, mistrust of Prevent had reached the political mainstream. The Mayor of Greater Manchester described it as "*today's equivalent of internment in Northern Ireland – a policy felt to be highly discriminatory against one section of the community*" and as "*so toxic now that I think it's got to go*".[91] Parliament's Home Affairs Select Committee noted that "*the families of those who had travelled to Daesh*" had not called for Prevent to be scrapped, but recommended that "*the now toxic name 'Prevent'*" be abandoned and replaced with "*the more inclusive title of Engage*".[92]

1.58. It would be dangerous and misguided to take all the underlying criticisms of Prevent at face value:

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[86] UN Committee on the Rights of the Child, "Concluding observations on the combined sixth and seventh periodic reports of the United Kingdom of Great Britain and Northern Ireland" (2023), §26.

[87] UN Committee on the Elimination of Racial Discrimination, "Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland" (2024), §34.

[88] A selection of such stories, from between 2016 and 2021, is referenced in W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, fn 81.

[89] For example, the "*toy gun*" story featured in the BBC Radio 4 programme Understanding Prevent.

[90] D Prior, "BBC criticised by Lancashire Police for 'terrorist house' story", Prolific North, 22 January 2016.

[91] F. Perraudin, "Andy Burnham calls for 'toxic' Prevent strategy to be scrapped", The Guardian, 9 June 2016. Having setting up a Commission after the Manchester Arena attack to consider how to tackle hateful extremism, social exclusion and radicalisation, Burnham defended Prevent in 2018 as "*the right mechanism*" but pointed to continued high levels of distrust.

[92] Home Affairs Select Committee, "Radicalisation: the counter-narrative and identifying the tipping point", HC 135, July 2016, §§ 11, 56. In my own written evidence to the Committee, I agreed that Prevent was "*controversial to British Muslims*" but not that it was "*broken*", "*the biggest spying programme in Britain in modern times*", or "*an affront to civil liberties*".

(a) Many of them seem to be generated within a largely closed system, with hostile NGOs, UN reports and academics frequently referencing one another and not always giving the impression of striving for balance.[93]

(b) Allegations that Muslims are being unfairly targeted by teachers, nurses, doctors, police and Prevent practitioners are hard to reconcile with current statistics for Prevent referrals.[94]

(c) Accusations of discrimination do not resonate with my own observations on the ground, which (though limited by the nature and duration of my task) have overwhelmingly been of fair-minded public servants, doing their best to obtain consensual interventions for troubled and potentially dangerous people irrespective of their background.

It should also be remembered that among other safeguards, independent courts are available to adjudicate on credible accusations of systemic discrimination, and that they have shown themselves willing to do so even in the sensitive area of counter-terrorism.[95]

1.59. Independent research into the views of British Muslims, funded by a charitable trust and published in 2020, produced some notable results:[96]

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[93] This is more than just a criticism of Prevent's critics. Greater transparency and cooperation from the Home Office (directly or via the Independent Prevent Commissioner) could usefully open up the debate, not least in exposing more of Prevent to informed scrutiny and in demystifying "*secrets*" which, to those not privy to them, may be wrongly but understandably assumed to be sinister. Compare the public debate on state surveillance, the quality of which was significantly improved by a step-change in transparency (D. Anderson, Independent Review of the Investigatory Powers Act 2016, 2023, §§ 10.13-10.15); and see further 6.19-6.26, below.

[94] As noted above, concerns relating to Islamist ideology were registered in 13% of Prevent referrals in 2023-24. Though that is twice the proportion of Muslims in the UK population (6.5% in 2021), it is comfortably exceeded by the proportion of Islamist-inspired attacks in the terrorism statistics (1.35, above). The Shawcross Review suggested that Prevent does not do enough to combat Islamist extremism, particularly of the non-violent type, while capturing, by contrast, "*mildly controversial or provocative forms of mainstream, right-wing leaning commentary that have no meaningful connection to terrorism or radicalisation*": Independent Review of Prevent, HC 1072, February 2023, §1.5.

[95] Two notable examples are *A and others v Secretary of State for the Home Department* [2004] UKHL 56 (in which a power to detain suspected foreign terrorists was declared arbitrary and disproportionate because it did not apply to British citizens), and Appl. 4158/05 *Gillan and Quinton v UK* (ECtHR, 12.1.2010), in which the risk of discriminatory use of the no-suspicion stop and search power in s44 of the Terrorism Act 2000 against Black and Asian persons was a factor in causing the power to be declared in violation of the European Convention of Human Rights. Legal challenges to particular aspects of Prevent have also been brought and enjoyed some limited success, though not on discrimination grounds: see *R (Butt) v Secretary of State for the Home Department* [2019] EWCA (Civ) 256 [158]-[177] (challenge to the Higher Education Prevent Duty Guidance); *R (II) v Commissioner of Police of the Metropolis* [2020] EWHC (Admin) 2528 (retention of personal data).

[96] Listening to British Muslims: policing, extremism and Prevent, Crest, 2020. The polling of 1,000 British Muslims and 1,000 non-Muslims was accompanied for a qualitative perspective by 12 focus groups of Muslims in towns and cities across England, Scotland and Wales. An advisory group (Sunder Katwala, Akeela Ahmed MBE, Qari Asim MBE and Dilwar Hussain) provided feedback throughout the project.

(a) Similar levels of British Muslims (63%) as the wider public (67%) reported that they were very worried or fairly worried about the threat of Islamist extremism.

(b) A majority of British Muslims (56%) had not heard of the Prevent programme: though when offered a neutral explanation of it, 80% of British Muslims offered either unqualified (47%) or qualified (33%) support, compared to 85% of the wider population.

(c) "Police and security services" (34%) and "national government" (32%) were the second and third most popular answers given by British Muslims to the question "Who should be involved in preventing extremism and terrorism before it happens?", behind only "religious groups" and ahead of schools, councils, charities and community groups.[97]

The survey authors concluded that their results were "*very difficult to reconcile with the dominant, polarising narratives, which argue that the Prevent programme is a 'toxic brand' mistrusted by British Muslims and, alternatively, that British Muslims are 'in denial' about Islamist extremism and 'need to do more' about it*".

1.60. All that said, it must be acknowledged that Channel operates in a highly sensitive space; that it was initially designed and funded with Islamist extremism in mind; and that mistrust of it (whether objectively justified or not) has the potential both impede the effectiveness of Prevent and to chill the exercise of expressive and associative freedoms.[98] It is not surprising therefore that Prevent commands attention not only from opportunists wishing to stir up grievance, whose activities can only be deprecated,[99] but from anyone alert to the dangers of discrimination, particularly against minority groups. The (no doubt varied) motivations of its opponents cannot excuse Prevent from the obligation to justify itself to the public.

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[97] The survey authors noted however that both figures were substantially lower than those for the population as a whole (50% and 46%).

[98] Once again, however, the chill effect is easy to exaggerate. See 4.16-4.17 below (Higher Education) and J. Busher, T. Choudhury, P. Thomas and G. Harris, "What the Prevent duty means for school and colleges in England: an analysis of educationalists' experience", 2017.

[99] The Shawcross Review referred in this respect to "*a concerted campaign by some, including a number of Islamist groups, to undermine and deligitimise Prevent*", including by portraying it as "*a thinly veiled means of persecuting Muslims*": Independent Review of Prevent, HC 1072, February 2023, §§ 1.12, 6.247-6.267. The unacceptable harassment and victimisation of Muslims working within counter-extremism, including Prevent, was detailed by Liam Duffy in "The No True Muslim Fallacy: How Muslims are intimidated and marginalised for supporting counter-extremism initiatives" (Civitas, 2019).

PREVENT AND COUNTER-EXTREMISM

1.61. A long-debated issue is the relationship between Prevent and the countering of non-violent extremism.

1.62. The Prevent Duty sensibly requires education and health professionals to be alert not only to violent extremism but to non-violent extremism, including (reasonably enough) "*certain divisive or intolerant narratives which can reasonably be linked to terrorism*".[100]

1.63. Prevent is however not the appropriate vehicle for a comprehensive strategy to counter extremism in its various manifestations. It has been persuasively argued that

> *"these realms of unpalatable speech, beliefs or behaviour beyond violent action would be better situated within policies relating to communities and education rather than counterterrorism*",[101]

and that

> "*Taking a securitised approach to a societal problem which affects larger cohorts or even whole communities will be ineffective and arguably counter-productive*."[102]

1.64. Despite the efforts of successive Commissioners for Countering Extremism since 2018, government policy on counter-extremism has been described as confused, unbounded by legislation and beset by imprecise and contradictory definitions.[103] The latest definition, applicable from March 2024 in England, defines extremism as

> *"the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to (1) negate or destroy the fundamental rights and freedoms of others; or (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or (3) intentionally create a permissive environment for others to achieve the results in (1) and (2)."*

That definition sits alongside engagement principles which will be used by government departments to ensure that they are not inadvertently providing a

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[100] Prevent Duty Guidance (2023), §§ 141 and 211.

[101] C. Walker, "Counter-Terrorism and Counter-Extremism: the UK Policy Spirals" [2018] Public Law 725-747, 746.

[102] S. Khan, Societal Threats and Declining Democratic Resilience: The New Extremism Landscape (Crest Insights, 2024), p 65.

[103] See C. Walker, "Extremism and the UK Policy Spiral", ICCT 2024. I have cautioned that "*just because extremism is a word does not mean that it is a useful legal concept*": D. Anderson, "Extremism and the Law", Middle Temple 2019.

platform, funding or legitimacy to individuals, groups or organisations who attempt to advance extremist ideologies. However "*extremism*" is not an ingredient in any criminal offence, and does not appear in the statute book.[104]

1.65. Dame Sara Khan has commented that work on social cohesion and extremism threats is not being delivered strategically or effectively, and recommended "*a comprehensive extremism, cohesion and resilience analytical framework and assessment capability*".[105]

INTERNATIONAL COMPARATORS

1.66. While exact comparisons are difficult, all Western countries face the problem of people being drawn into terrorism (and terrorism-like crime), and many have devised Prevent-type strategies to address the problem. Three of the best-regarded, outside the UK, are Germany, the Netherlands and New Zealand.

1.67. **Annex 5** to this Report summarises various features of the terrorism prevention strategies that operate in those countries.[106] It focuses on a number of issues often debated in connection with Prevent including primary (community) prevention; the scope of Prevent (or width of the "*front door*"); community outreach; the use of mainstream services; and the apparent absence in those countries of a "*prevent Prevent*" tendency similar to that which has long existed in the UK. First-hand study could assist in drawing out more useful lessons from overseas.

[104] For a judicial discussion of extremism, in the course of which Haddon-Cave J said at [117] "*What is 'extreme' is, by definition, something which is not 'moderate'*", see *Shakeel Begg v BBC* [2016] EWHC 2688 (QB)).

[105] S. Khan, Societal Threats and Declining Democratic Resilience: The New Extremism Landscape (Crest Insights, 2024), pp 68, 70; see also M Comerford and H Rose, Beyond Definitions: the need for a comprehensive human rights-based UK extremism policy strategy, ISD 2024.

[106] It was researched and written for the Review by Daniel Hooton, who has experience of comparative work in this area.

2. ALI HARBI ALI

THE MURDER OF SIR DAVID AMESS

2.1. AHA was born in London in February 1996, the son of Muslim immigrants from Somalia. His father, who left the family home when AHA was young, is reported to have been a senior official in Somalia who was involved in campaigns against the terrorist group al-Shabaab while working for the Prime Minister.[107]

2.2. On 15 October 2021, when AHA was 25 and living in London, the long-serving Conservative MP Sir David Amess was holding a constituency surgery at Belfairs Methodist Church in Leigh-on-Sea in Essex, part of his Southend West constituency.[108] Shortly after noon, having made an appointment by pretending to live in the constituency, AHA entered the small office that Sir David was using and after a brief conversation stabbed him repeatedly with a 12-inch knife. Before police arrived to arrest him, he said:

> "*I want him dead. I want every Parliament Minister who signed up for the bombing of Syria who agreed to the Iraqi war to die*."

He also expressed a wish to be killed and to "*be a hero*". Despite the best efforts of paramedics and police, and the arrival of the Helicopter Emergency Medical Service, Sir David was pronounced dead at the scene at 1.10 pm.

2.3. This was the third time since the Irish Republican murders of the late 20th century[109] that a terrorist had attempted to assassinate a Member of Parliament. The Labour MP Stephen Timms was fortunate to survive when he was stabbed during a constituency surgery in May 2010 by Roshonara Choudhry, a 21-year-old British student who had been inspired by the recorded sermons of an al-Qaeda recruiter, and who was herself praised by AHA in police interview. In June 2016 the Labour MP Jo Cox was shot and stabbed multiple times while on her way to a constituency surgery by Thomas Mair, a 53-year-old neo-Nazi who was convicted of her murder.

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[107] A. Mohdin, V. Dodd and D. Sabbagh, "Father of suspect in David Amess killing 'worked on anti-extremism projects'", The Guardian, 18 October 2021.

[108] It was an agreed fact at trial that "*After the terrorist murder of Jo Cox MP, Sir David Amess held many constituency surgeries at a location that had various security measures in place. Sir David was aware the public had not seen him during the Covid pandemic and had a strong desire to get out into his community and be accessible as possible. As a result, many constituency surgeries were held in churches. The location of the surgeries was usually advertised on Twitter a few days in advance.*"

[109] Members of the INLA or Provisional IRA killed Airey Neave MP in 1979, Robert Bradford MP in 1981, Sir Anthony Berry MP in 1984 and Ian Gow MP in 1990. Previous generations of Irish Republicans murdered Lord Frederick Cavendish, Chief Secretary for Ireland, in 1882 and Sir Henry Wilson MP in 1922.

2.4. AHA was a 'lone actor' terrorist who, like many others during the heyday of Islamic State, was inspired – though not directed – by that malign organisation.

2.5. As AHA told police in interview on the day after the attack, his radicalisation had begun in 2014 – the year of his referral to Prevent. He was initially attracted by the activities of the Syrian rebels and by the coming together of Muslims to fight the brutality and tyranny of President Assad, then later by the "*theological and state-building aspects*" of Islamic State and what he called the "*truthfulness*" of its propaganda.

2.6. An initial intention of travelling to Syria gradually gave way to a plan to assassinate one of the numerous Members of Parliament who had voted to bomb the Islamic State in Syria in 2015. AHA had purchased the knife that he eventually used to kill Sir David Amess in 2016. He viewed Islamic State videos on how to carry out a stabbing attack. He said in evidence at his trial that he had started to write a note of justification for his proposed actions in 2019. His activity slowed during the pandemic, but numerous reconnaissance trips took place in the spring and summer of 2021, including to the Houses of Parliament, to a constituency surgery of Mike Freer MP and to the London address of Michael Gove MP. AHA had identified Sir David Amess as his target by 27 September.

2.7. AHA had no previous convictions or cautions for any offence. He was tried at the Old Bailey in March-April 2022 after a not guilty plea. An attempt to argue that he was acting to defend innocent Muslims in Syria and around the world was ruled not to be a permissible defence. He was unanimously convicted by the jury of murder and of engaging in conduct in preparation of terrorist acts.[110] Sentencing him, HHJ Sweeney said that his attack "*struck at the heart of our democracy*".[111] AHA was given a whole life order, meaning that save in exceptional compassionate circumstances, he will never be released from prison. There was no appeal.

THE PREVENT LEARNING REVIEW

2.8. On 8 February 2022, a Prevent Learning Review (or **PLR**) was submitted to the Home Office and CTP.[112] The Independent Reviewer was Gary Dunnagan, a former

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[110] As to the ingredients of terrorism (fn 4, above), AHA accepted that he intended to influence the government but not that he intended to advance a religious or ideological cause. On the latter point, the jury must have disagreed since they convicted him.

[111] All these details are taken from Sweeney J's sentencing remarks of 13 April 2022.

[112] Prevent Learning Review: Ali Harbi Ali. Prevent Learning Reviews are reviews of Prevent case management. Following the murder of Sir David Amess, the Home Office, CTP and others committed to undertaking Prevent Learning Reviews where terrorism offences and incidents of serious violence are committed by people with a Prevent history, to identify national learning and drive system improvement. Internal reviews and learning workshops may additionally be conducted by CTP, the Home Office or others outside the Prevent Learning Review framework.

Detective Superintendent and Head of Prevent in the North West, and a Senior Lecturer in Counter-Terrorism at the University of Central Lancashire. A lightly redacted version of his Review was published by the Home Office on 12 February 2025.[113]

2.9. The purpose of the Prevent Learning Review, as set out in its terms of reference, was to review AHA's history with Prevent between 2014 and 2016 and to "*identify effective practice, organisational learning opportunities and highlight any further areas for development*".

2.10. The Independent Reviewer pointed out that his review took place over seven years after AHA's referral to Prevent, and that

> "*there is no one document which provides clarity in terms of timelines, decisions, the rationale for those decisions or actions taken whether in relation to the Prevent process or that of Channel.*"[114]

He remarked that individuals had already moved on or retired, and that "*establishing all elements of the process and the associated decisions has been problematic*". Unsurprisingly, the further passage of time has not resolved those problems.

2.11. The Independent Reviewer had access to such case notes as were held by the Police, the Home Office and the Local Authority, to the guidance in force at the time, to a written statement from AHA's School Principal, to written answers from CTP to 32 questions posed by the Independent Reviewer, and to the written and/or visual records of interviews in which two individuals involved in the case (the Channel Panel chair and the Intervention Provider) answered questions that the Independent Reviewer had supplied. A written statement from the original referrer was also obtained. In addition, the Independent Reviewer had the benefit of a workshop on 2 February 2022 in which experienced practitioners and officials discussed and road-tested his observations.

2.12. The Independent Reviewer found, in summary, that:

(a) The making of a referral by the school, and the initial handling of the case,[115] reflected good practice.

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[113] The purpose of the redactions was to protect individuals and the interests of national security, and reflect the fact that when first prepared, the Prevent Learning Review (like that prepared in AMR's case) was not intended for publication. I note that at least one of the decision-makers interviewed for the purposes of the PLR was informed during the interview that there was no intention of making the PLR public.

[114] Prevent Learning Review: Ali Harbi Ali, p.9.

[115] In particular the deconfliction, the home visit, the decision by CTP to refer to Channel and the appointment by the Channel Panel of an Intervention Provider: see 2.22-2.28, below.

(b) The case was however closed without addressing AHA's issues. This was a consequence in particular of defective assessment (leading to a prioritisation of symptoms over underlying problems), poor communication with the Intervention Provider and a failure to keep in contact with the original referrer.

The specific observations and recommendations of the Prevent Learning Review are considered at 2.46-2.58 below, together with the question of whether the problems identified by the Independent Reviewer have been satisfactorily addressed.

FURTHER INFORMATION

2.13. I requested permission from CTP in early May to speak to the CTCO in the case, together with a representative from FIMU and the CTCO's supervisor. I was told that the CTCO was the only officer with first-hand experience of AHA's Prevent referral whom CTP was (after significant efforts) able to locate. Though I did not have the power to compel the CTCO to attend an interview, the CTCO voluntarily agreed to attend a meeting in London, for the purpose of answering questions. That meeting was held on 5 June 2025, with the Independent Reviewer and a senior CTP officer also present. Consent was granted on the condition that no recording of the meeting be made (though a note was allowed), and that no information from it be shared without the express consent of CTP.

2.14. I have also been assisted in understanding the processes in place at the time by Tony Jenkyn, the Independent Reviewer in AMR's case and a long-standing expert in Channel policy, guidance and training. He developed a number of Prevent national training modules from 2015 onwards and has extensive experience of CTP's systems, processes and training and how they have evolved over the past decade. He considered what we were told by the CTCO about the systems and processes in place to be generally fair and accurate, and has provided me with further information which is drawn on in footnotes to this and the following section.

2.15. The CTCO claimed to have no recollection of AHA's case, even after reading the Prevent Learning Review, but did have a vivid recollection of the period in the autumn of 2014 when the Prevent referral was first made. The CTCO had come into Counter Terrorism Command from traffic policing earlier that year and had received training that the CTCO described as woeful. London terrorists (including "Jihadi John" and his fellow "Beatles") were dominating the news following a series of beheadings of journalists and aid workers in Syria. The London CTCO teams, which the CTCO described as mostly inexperienced, were overworked and highly stressed with an average of 25 referrals per person, some holding 30 or 40. Only one

member of the CTCO's team had training in open-source checks.[116] The new Case Management Information System (**CMIS**), the precursor of the PCMT, was described as highly bureaucratic and beset with bugs. According to Tony Jenkyn, proficiency in it was achievable, but required better training than was usually available.[117]

2.16. The CTCO described the Croydon Channel Panel as forward-thinking, and praised it for being willing to involve the local Multi-Agency Safeguarding Hub (**MASH**)[118] and for securing the attendance of social services, nursing, welfare and occasionally mental health at Panel meetings. While *"some teachers knew the benefit of Prevent"*, education settings in Croydon were said to be reluctant to engage. That was reflected in the scarcity of Prevent referrals from schools.[119] Education was not normally represented at Channel Panels.

2.17. The involvement of Intervention Providers might be suggested by CTCOs, or by the supervisor with whom the CTCO went through each of their cases at weekly meetings. If approved by a Channel Panel, the tasking would often be performed by a police officer acting as Intervention Provider Coordinator. The CTCO's practice at the time was to call the proposed Intervention Provider to see if they had availability, then go to meet them in person rather than use *"an open email system"*. The CTCO did not recall any tasking form, or standard practice.[120] There were cases where 6 or even 12 sessions with an Intervention Provider took place. The decision in AHA's case not to proceed to a second session would have been taken through the Channel Panel, *"not necessarily on our recommendation"*.[121]

2.18. I am grateful to the CTCO for agreeing to submit to questioning from the Independent Reviewer and me. As well as the background above, the CTCO gave useful explanations of some of the procedures and acronyms that featured in the

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[116] According to Tony Jenkyn, the use of open-source checks in Prevent was *"in its infancy"* in 2014.

[117] Training in CMIS was delivered by an IT technician without knowledge of Prevent, who trained trainers in a single day to train staff. Different regions used CMIS in different ways (or in the case of Scotland, not at all). Few officers were competent on CMIS at the time; CMIS was not used consistently and workarounds were often employed.

[118] A Multi-Agency Safeguarding Hub (MASH) is a team of professionals from various statutory agencies working together to safeguard children at risk. Some MASHs also have responsibility for adults at risk. A MASH aims to improve information sharing and decision-making to identify and address potential risks early, ensuring timely and appropriate interventions. It will not generally provide direct case management, but rather act as a central point for screening, information gathering, and coordinating responses. MASH is not a statutory body. Some areas of England and Wales have equivalent bodies referred to by other names. MASH is not present in Scotland: see fn 285, below.

[119] The introduction of the Prevent Duty in 2015, followed by Ofsted adding Prevent into their inspection regime, subsequently increased the volume of referrals from schools.

[120] A tasking form did in fact exist: see 2.27-2.28, below.

[121] A different emphasis was provided by the Channel Panel Chair, who indicated that Channel Panels (which had no statutory footing at the time) were strongly influenced by the CTCO and had no direct engagement with Intervention Providers.

contemporary record. I have made use of some of those explanations below. The CTCO reiterated however that they had no recollection of AHA's case, which obviously limits the value of their evidence.

AHA'S PREVENT HISTORY

2.19. AHA's contact with Prevent between October 2014 and December 2016 is detailed in the Prevent Learning Review. The narrative summary below is informed by the background provided by the CTCO and Tony Jenkyn and taken from my own reading of the documentary record, the interviews conducted in 2021-22 with the Channel Chair and the Intervention Provider, relevant witness statements that were prepared for AHA's trial (including the statement of the police officers who interviewed AHA after his arrest and the teacher who had referred AHA to Prevent in 2021), and the file prepared for the Coroner.[122]

Radicalisation and referral

2.20. In sixth form at his school in Croydon (Riddlesdown Collegiate), teachers described AHA as a happy, polite young man, "*a very good student with the right attitude*", never threatening or aggressive and with aspirations to become a doctor. However his performance and attendance dropped off, and his appearance and attitude began to change during 2013-14 which should have been his last year at school. There were signs, particularly in hindsight, that he was becoming radicalised.

2.21. AHA was allowed back to school in September 2014, at the age of 18, to repeat the year and retake his A level examinations. His attendance was however sporadic. He refused to engage with female staff and informed staff that he did not wish to live among non-believers. After speaking both to him and to his mother, the school made a Prevent referral (of which a detailed summary but not the original survives) on 17 October 2014.

Initial checks

2.22. Initial FIMU deconfliction checks revealed that AHA was not known to police or MI5.[123] In addition, no mental health concerns were reported, and AHA was not known to Social Services. On 4 November 2014, CTP decided to refer AHA to Channel. Two Prevent officers made a home visit on 6 November to obtain AHA's consent to engage with an Intervention Provider, which was granted.[124] Asked

[122] I also requested a transcript of AHA's trial, which it did not prove possible to obtain in time for the publication of this Report.

[123] Prevent Learning Review: Ali Harbi Ali, p.11.

[124] There was at the time no national policy to record home visits in a set format; training followed in 2015 on

about current affairs, AHA was critical of drone strikes and Guantanamo Bay, but referred to Islamic State as "*a joke for killing Muslims and the journalist in the name of Islam*", and described the terrorist murder of Lee Rigby in London[125] as "*crazy and not the Muslim way*". His later police interview and evidence at trial suggest that he was telling the officers what he thought would reassure them or put them off the scent.[126]

Adoption by Channel

2.23. A police-only meeting on 10 November 2014 asked whether a discussion at school had been agreed as part of the intervention, though there is no sign that this was followed up.[127] The same meeting identified a suitable Intervention Provider and AHA was formally adopted by Channel on 13 November, enabling the release of funds for subsequent contacts with him.

2.24. The initial VAF, completed on 20 November, assessed AHA's overall vulnerability in terms of ideological engagement as '*partially present*' but found no intent or capability.[128] No signs of radicalisation were noted, but it was proposed that an Intervention Provider be engaged for up to five sessions in order to deal with suggestions by AHA that music and interest on student loans were haram (forbidden).

2.25. After what turned out to be his only meeting with the Intervention Provider (below), AHA's case was reviewed at six Channel Panel meetings between December 2014 and April 2015. A request was made on 23 January 2015 by the Detective Inspector responsible for the Prevent Team in Croydon for an open-source check of AHA's social media, but there is no evidence that this was ever performed. Minutes of a Channel Panel on 8 January referred to a rapid decline in school performance but added that "*the main problem seems to be home life*", referring to an issue at home and to AHA having to take responsibility for his siblings. His school was said to have "*taken him back*". AHA was "*assessed as low-risk*" and though an "*action plan*" was recorded on CMIS to have started on 19 November, there was no evidence that a support package or support plan was ever put together for him, as guidance indicated even at the time should have been done.[129]

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what to look for when conducting home visits. A detailed note was taken in this case.

[125] Fusilier Lee Rigby was brutally murdered near Woolwich barracks on 22 May 2013 by two Muslim converts, Michael Adebolaje and Michael Adebolawe.

[126] For "*disguised compliance*" see 1.47(c), above.

[127] Prevent Learning Review: Ali Harbi Ali, pp.19-20.

[128] There was at the time no specific training on the VAF: an extract from applicable (2012) guidance is set out in Prevent Learning Review: Ali Harbi Ali, pp.16-17.

[129] Prevent Learning Review: Ali Harbi Ali, p.18.

Involvement of the Intervention Provider

2.26. An Intervention Provider was tasked in November 2014 to meet AHA.[130] The Intervention Provider recalled in 2022 that this happened by phone, and though reference is made on CMIS to a Tasking Agreement being completed and emailed to the Intervention Provider,[131] no such agreement was produced to the Prevent Learning Review.

2.27. When this Review was at an advanced stage, on 25 June 2025, a copy of the Tasking Agreement was sent to me from the Home Office. An accompanying email showed that the Intervention Provider had sent it to the Home Office in October 2021, presumably for use in the Prevent Learning Review, but the Home Office informed me that it had been overlooked. I told the Home Office that I considered this a significant matter, and asked that checks be made to ensure that no further sources of relevant evidence had been disregarded. The Home Office responded with an assurance that it has conducted a thorough search and that no additional information has been detected. CTP was unable to supply a copy of the Tasking Agreement, so it is only thanks to the Intervention Provider that I was able to see a copy.

2.28. The Tasking Agreement was dated 20 November 2014. The *"commissioning authority"* was *"SO15 Channel"* (i.e. CTP in London) and the signatories were named as the CTCO and the Intervention Provider. It was based on a template, with an agreed programme schedule filled in. The programme schedule required the Intervention Provider:

(a) to conduct 7 mentoring sessions of 1 hour's duration, at £50 p.h.

(b) to provide 3 reports on the subject's progress, at £50 each,

(c) to attend "2x professional meetings with the commissioning authority after each as required",[132] at £50 p.h. for each meeting.

According to the tasking agreement, the Intervention Provider *"shall try to the best of their ability to keep to the above programme schedule and will keep the*

[130] Intervention Providers were a fairly scarce resource: Tony Jenkyn estimates that there were around 40 nationwide in 2014.

[131] Tony Jenkyn confirmed to me that there was at the time a standard Intervention Provider commissioning document containing a tasking agreement, and that he had seen completed examples of such agreements as early as 2014. He was proved correct when the tasking agreement came to light (see 2.27, below).

[132] The drafting is unclear, but no meetings were held in any event.

commissioning authority aware of developments if this does not prove to be possible".

2.29. The Intervention Provider arranged by phone to see AHA for a coffee at a McDonalds in Croydon on a Saturday afternoon, 17 January 2015. This was unusual: the Intervention Provider explained in an interview given for the purposes of the Prevent Learning Review in December 2021 that they would normally have preferred to meet AHA in school to "*get a better context*", but were working full time during the week. Confirming the report of 19 January 2015[133] that AHA was a "*pleasant and informed young man*" and that the issues in relation to music and the payment of interest had been dealt with,[134] the Intervention Provider added in the 2022 interview that AHA "*made it very easy for me*" and that the discussion was not broadened into other aspects of AHA's ideology or beliefs. The report of 19 January 2019 does however record that "*AA does not agree with extremis [sic] especially ISIS and AQ*" and that "*He has no grievances against the west or other faiths or groups".*

2.30. A second VAF was completed on 20 January, commenting that while AHA's overall vulnerability remained partially present, "*this is ongoing and being explored with the IP*". The Intervention Provider in the report of 19 January 2015 had indeed suggested "*possibly one more session for clarification*", and an email from the CTCO (not available to the Prevent Learning Review, but provided to me with the Tasking Agreement on 25 June 2025) enquired at about that time:

> "*He seems to be a great person, are you still all right as part of the tasking to do a PHSE lesson at his school, do you think it is worth it?*"

No response from the Intervention Provider to this tentative enquiry is recorded.

2.31. The Intervention Provider explained in interview that the first session was generally an ice-breaker, that they were "*careful not to go heavy with people at the first .. because they can then stop engaging with us*" and that "*a second session is always good*". They had not wished however to be seen as pushing for extra money and considered that it was "*not my place to say*" whether a further session was required. Ultimately, the Intervention Provider accepted what they described as a decision taken by others that no further meetings were required. There is some support for this version of events in a police entry on the CMIS dated 13 February ("*it was agreed that the one session should be enough, I will arrange for a closing IP*

[133] There was at the time no standard guidance on the preparation of Intervention Providers' reports: see further 4.51, below.

[134] The Intervention Provider's note of the 17 January meeting state that these were areas on which AHA "*wanted clarification*". In the absence of more detailed information about the tasking, it is uncertain how far the salience of these issues in the discussion was prompted by the tasking or by AHA himself.

report to the [sic] exit the case"). In any event, no more meetings between AHA and the Intervention Provider took place.[135]

2.32. Comments made by AHA in police interview after his arrest in 2021 and at trial imply that he had been deceiving them.[136] The Intervention Provider suggested in interview for the Prevent Learning Review that a second or third session would have been needed to "*understand theologically if they're willing to lie*", and that the possibility of fabrication was less likely to be exposed at the first, "*icebreaker*" session. In the meantime, the Intervention Provider drew attention to the fact that AHA had no apparent difficulty with meeting in a venue where background music was playing, and other patrons were eating non-halal food. As the Intervention Provider recognised, these were ways of testing the strength of AHA's beliefs without having to rely solely on his veracity. They did not however have any direct bearing on whether he was being radicalised into terrorism.

2.33. A number of attempts to contact the Intervention Provider are recorded on CMIS between January and June 2015. The minutes of a Channel Panel meeting on 12 March, and further CMIS entries between March and June, suggest that police continued to await further input, and emailed the Intervention Provider more than once to say so. Judging from the reference to an agreement that one session was enough, the further input awaited may have been nothing more than the closing report referred to on 13 February. There was some possible confusion about this, however, since the Intervention Provider was said in the 12 March minutes to be "*dealing with a couple of points around [AHA's] faith*".

2.34. There is no record of any closing report having been provided.[137] Since neither the police nor the Intervention Provider were able to provide a fuller record, save for an email of 21 April from the Sergeant supervising the CTCO to the Intervention Provider asking for an update, it is possible to conclude only that communications between police and the Intervention Provider were inadequate. The CTCO was prepared to accept at our meeting on 5 June 2025, having read the Prevent Learning Review, that it was "*probably fair*" to say that there was miscommunication, and that the exchanges petered out.

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[135] Tony Jenkyn commented to me from his own experience at the time that an Intervention Provider "*could only hope to build some bridges*" in the first session, and that at least five sessions were normally provided.

[136] AHA is reported to have said at trial "*I just knew to nod my head and say yes and they would leave me alone afterwards and they did*": I. Lyons, C. Turner and C. Roway, "'Prevent is failing, say terror experts after murderer Ali Harbi Ali deceived officials", The Telegraph, 11 April 2022.

[137] Since the sole meeting had been already been the subject of a report, it is not clear what more could have been added in any event by a closing report.

2.35. The root of the problem was that neither the CTCO nor the Intervention Provider pressed for further mentoring sessions with AHA to be held. The Intervention Provider had been lukewarm on the subject after the first meeting with AHA. The Intervention Provider was also heavily committed workwise, and claimed to have been reluctant to appear greedy by requesting more sessions (though this has limited credibility, given the existence of a contract for the provision of 7 sessions). Neither would it appear that the need for more sessions was pressed at the Channel Panel, which was the ultimate decision-maker, though neither the Chair nor the CTCO could remember why this was.

2.36. It is perplexing that both the Intervention Provider and the CTCO considered a single meeting to be adequate. There was a binding agreement for 7 sessions to be provided, which neither the Intervention Provider nor the Police should have felt any compunction about fulfilling. Though the Intervention Provider felt the first meeting had gone well, they described such meetings as icebreakers, and acknowledged in interview that a second or third session would often be necessary in order to determine whether a subject was "*willing to lie*". Yet the Intervention Provider suggested that at most one more meeting might be required, and despite some desultory discussion of a session at AHA's school, the CTCO appears to have advised the Channel Panel that not even that was necessary. Neither did the Channel Panel itself push back, as it might usefully have done, though I acknowledge that only the CTCO had contact with the Intervention Provider, and that it was common practice at the time for a Channel Panel to be steered by the CTCO in decisions of this kind.

2.37. Communications between the CTCO and Intervention Provider during the first half of 2015 were plainly unsatisfactory. The principal error, however, was the failure of both CTCO and Intervention Provider to press for the further engagement that had been agreed to, that AHA was (for the time being at least) prepared to offer and that might have addressed his radicalisation.

2.38. Whether such further engagement would have had any decisive effect can only be a matter of speculation, given AHA's developing ideological convictions, his admitted willingness to lie to his interlocutors and his apparent plausibility in doing so. But fatalism on this score is not appropriate. The mechanisms of Prevent had operated successfully from the referral by AHA's school to the point of securing AHA's consent to mentoring. It is clear that more could have been done, and should have been done, to engage with him ideologically when the chance was presented to do so.

Exit from Channel

2.39. Successive Channel Panels in March and April 2015 referred to the terrorism risk from AHA as *"very low"*. It was decided at the 2 April meeting to exit AHA from Channel but refer him to a local CT Intelligence Officer for *"a watching brief over any CT threat that emerges"*,[138] and conduct the usual 6 and 12 month reviews of cases exited from Channel.

2.40. At the 23 April Channel Panel meeting it was noted that AHA was back in school, family issues had been resolved and *"If the IP is happy, AA will be exited form [sic] Channel"*. No information was available to the Prevent Learning Review on the reason for this decision, or evidencing the conclusions regarding AHA's return to school or his family's situation. It is possible that (as the CTCO suggested to me) requests could have been made by the Chair of the Panel, or that the information could have been volunteered by the representative from the MASH, who is recorded as having been present at the Channel Panel on 23 April.

2.41. On 5 June, confirmation from the Intervention Provider was still being sought. The date of exit from Channel is not recorded.

Post-Channel Reviews

2.42. There is no record of precisely when the case was closed to Channel, or of any 6-month review, which was the responsibility of the Police Prevent team for Croydon, being performed as it should have been.[139] A 12-month review was added to the record on 17 December 2016, stating that *"IIP and ISR check shows nothing of CT concern"*.[140] Reference was made to a male believed to be AHA claiming to have been detained by store staff because he was wearing Islamic dress.[141] No further details are recorded.

2.43. That 12-month review was the end of Prevent's involvement with AHA.

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[138] The CTCO explained to me that a watching brief would involve weekly or twice weekly checks for police activity (e.g. arrest, stop and search) or intelligence, to run until closure. It did not involve putting the subject on a watchlist unless (for example) he or she was assessed to be actively seeking to leave e.g. for Syria. The CTCO described a watching brief as not standard, but as their usual practice. Tony Jenkyn believes it to have been a local policy in the Metropolitan Police area.

[139] The CTCO referred in this context to the CMIS system, which was supposed to prompt a 6-month review but was unreliable and depended on accurate inputs which could be challenging given some of its peculiarities (e.g. functioning on US-style rather than British-style date formats).

[140] The acronyms refer to the Integrated Information Platform, which should have recorded any interaction with police, and to a system which picks up intelligence leads.

[141] Had police responded to a complaint of this kind from AHA by attending the scene, their response would have been separately logged. No record of such a response was referred to.

The period 2016-2021

2.44. No further Prevent referral by any other individual or body (including City, University of London where AHA enrolled on a radiography degree course between 2015 and 2016) was recorded in the 7-year period between October 2014 and the murder of Sir David Amess in October 2021. This was, plainly, just as significant an issue as the mishandling of a Prevent referral made almost 7 years before the attack. We know by his own admission that AHA was a terrorist sympathiser throughout this period, and that he was in possession of a knife purchased in 2016 with a political assassination in mind.

2.45. Neither the Independent Reviewer nor I have had access to any material relating to the period 2016-2021, which falls outside my terms of reference as it did that of the Prevent Learning Review. However, in March 2025 the Home Secretary announced that there would be a further review. The identity of the reviewer, and the scope of this review, remain to be announced. It is to this review that the Amess family, and others, must look for some account of the period leading up to the attack, and an examination of whether opportunities were missed to refer AHA to Prevent once again.

FAILINGS IDENTIFIED BY THE INDEPENDENT REVIEWER

2.46. The Prevent Learning Review identified six issues with AHA's Prevent interaction, and concluded that five of them had been satisfactorily resolved by changes to law, policy or guidance by the time of publication in February 2022.[142] Summarising a detailed comparison between the guidance available in 2014-15 and the up-to-date position, the Independent Reviewer commented:

> *"The difference is like night and day. The changes are marked, there is a depth … and granularity in the new policies which show a professionalisation of the whole process for both [Prevent Case Management] and Channel which were lacking in earlier iterations."*

Having performed essentially the same exercise as the Independent Reviewer, and checked his analysis with Tony Jenkyn who has particular expertise in the processes and training current at the time, I agree.

2.47. The reasoning set out in the Prevent Learning Review is extensive.[143] In short summary:

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[142] One of them, the VAF, was found not to have been resolved but was addressed subsequently: see 2.55-2.66 and 4.24-4.29, below.

[143] Prevent Learning Review: Ali Harbi Ali, pp. 27-34.

(a) ***The assessment was off-beam***, focussing on certain aspects of AHA's belief system (student loans, music) rather than his underlying vulnerability or susceptibility to terrorism. The DIF and the Gateway Assessment should, if correctly applied, have encouraged a focus on the underlying problems rather than just certain symptoms of them.

(b) ***Clear records were lacking, as were reasons for decisions.*** At the time the guidance was not clear on what was required. By 2022, the guidance relating to the DIF, the PCMT and the recording of Channel meetings provided for a clear process and for decisions to be reasoned and auditable.

(c) ***Channel over-relied on police***: CTP (as the only agency with full-time Prevent capability) was the dominant decision-maker, with limited input from other partners who were present at Channel Panel meetings. By 2022 the Prevent Duty and Channel Duty had been legislated for, and terrorism-related vulnerabilities were held by the Panel.

(d) ***The referrer was not involved***: The referrer clearly had much to offer but was not involved in the Channel Panel. The Independent Reviewer noted that a referrer from education (or, I would add, the school safeguarding lead) is now expected to attend Channel Panel, to hear updates and provide their own.[144]

(e) ***Poor contacts with the Intervention Provider***: The interactions with the Intervention Provider were plainly inadequate, from tasking to later communications with police. Training, oversight and management of Intervention Providers had greatly improved by 2022, and it was generally agreed by those operating in the field that such casual and uninformed interactions could not be repeated.

2.48. I have reviewed these assessments and concur in the opinion of the Independent Reviewer both as to the failings evident in this case and the improvements that had been effected by 2022. Training, process and guidance cannot exclude the possibility of operational sloppiness or poor judgement; but they can materially reduce the chance of human failings such as those which were evident in this case.

[144] I tested this point with a dozen or so Channel Chairs in June 2025, who confirmed unanimously that this is still the case. A referrer will however not always attend a Channel Panel when, for example, the referrer is a family member (when the position may be complex at a personal level) or knows the subject less intimately than a school will generally do.

FURTHER RECOMMENDATIONS OF THE INDEPENDENT REVIEWER

2.49. The Independent Reviewer identified a number of additional issues, with the help of the Workshop referred to above, which were "*not necessarily points of failure in the [AHA] case*" but which he thought worth mentioning for consideration by policy makers and those responsible for business assurance.[145] They led him to make four recommendations,[146] which I have discussed with him and with a range of officials and practitioners in the light of changes to Prevent made since 2022.

2.50. I consider that each of these issues has been addressed in a broadly positive way, though as Prevent continues to evolve, that process continues. The Independent Reviewer's recommendations, and the steps taken to address them, may be summarised as follows.

Recommendation 1: Referral Process

2.51. The Independent Reviewer noted that there were numerous different approaches, both in terms of the forms used for referrals and the making of decisions about who should be referred onwards. He recommended that consistency be applied across the country and that all referrals are made to the police in the first instance, allowing deconfliction to take place. He also suggested that consideration should be given to applying the Welsh model of referrals across the country, whereby referrals are automatically submitted both to CTP and to local authorities. In line with this consideration should be given to reviewing the online "*front door*" process to Prevent. An explanation of how a Prevent referral is handled and access to a standard national referral form via gov.uk could be considered.

2.52. In relation to this recommendation, I would note as follows:

(a) The National Referral Form was first published on gov.uk in June 2022, and was most recently updated on 29 May 2025.[147] It is accompanied by simple and accessible advice on how to spot the signs of radicalisation, what to do if you are worried about someone and what happens when a person is referred to Prevent. Its use remains non-mandatory, but this is unavoidable given that some referrers (e.g. friends and family) are in a delicate position and it would be counter-productive to decline a referral or require it to be resubmitted because the correct form was not used. Some local authorities, perhaps influenced by negative perceptions of Prevent in their areas, are tailoring the form to their own purposes. One obvious improvement would be

[145] Prevent Learning Review: Ali Harbi Ali, pp. 34-35.
[146] *Ibid.*, pp. 4-5.
[147] Home Office, Get help for radicalisation concerns.

to make the National Referral Form capable of completion online, which I understand is in train.

(b) The "*Welsh model*" of simultaneous referrals to CTP and MASH operates in different ways even across Wales.[148] Neither is it unique to Wales: equivalent processes are also used in parts of England and Scotland. Its obvious advantages rely on good lines of communication; if, for example, after a simultaneous referral MASH is unaware of intelligence development being performed by CTP, it could approach a subject and place someone at risk or jeopardise an ongoing investigation. See further at 5.40(c), below.

(c) Strengthened quality assurance, and the assurance of all local authorities' performance against benchmarks, was introduced in 2022. These processes are intended to ensure that local authorities are delivering their statutory Prevent Duty in line with the guidance and are meeting the eight benchmarks that Prevent delivery is measured against.[149] Data relating to training is published, broken down by courses, sectors, countries and regions.[150]

(d) Broader considerations relating to the Prevent "*front door*" are addressed at 5.30-5.41, below.

Recommendation 2: Deconfliction and FIMU

2.53. The Independent Reviewer noted the added value that FIMU assessment can provide when it comes to decision making. He recommended that consideration should be given to looking at minimum process standards, identification of best-practice, and sharing of this across the CTP Network.

2.54. In relation to this recommendation, CTP told me that:

(a) Training for FIMU staff on Prevent has been reviewed to ensure a full current understanding of Prevent delivery, and regular training refreshers are delivered as part of continued professional development. Where training is deemed to be inadequate then the appropriate courses are built and delivered.

(b) Regional FIMUs (though not in Scotland) were engaged with as part of the Prevent Business Assurance Review, commissioned in 2024 by CTPHQ

[148] I was told in June 2025 by CTP in Wales that "*dual piping*" exists in its purest form in the Gwent force area. In North Wales and South Wales, separate forms have to be submitted to police and local authorities, which can be cumbersome. In Dyfed/Powys a single form is triaged in MASH before being forwarded to Prevent, which may cause delays.

[149] Prevent Duty Toolkit for local authorities, 2024.

[150] Prevent Duty training, Service Performance.

Prevent. An improvement plan will be developed from the findings. A cross-policy working group has been established to tackle inconsistencies and regional teams are producing quarterly reports detailing the effectiveness of this process.[151]

The implementation of these initiatives will need to be kept under review.

Recommendation 3: Review of VAF

2.55. The Independent Reviewer considered that the VAF, which was the tool used for identifying an individual's vulnerability to radicalisation, was "*problematic*" and outdated, and that rather than doing the job it was designed for, it

> "*serves as a retrospective recording process which is completed by practitioners because they have to*".

He recommended that the Home Office commit to a full review of the VAF process with the aim of providing a system that better connects with the work of Channel Panels and support plans.

2.56. Such a review has taken place, and with effect from September 2024, the VAF has been replaced by a new Prevent Assessment Framework (**PAF**), developed as part of a joint project between the Counter Terrorism Assessment and Rehabilitation Centre (**CTARC**), the Home Office and CTP. It replaces both the DIF and the VAF, and aims to provide a streamlined framework for assessing and supporting decision-making processes at each stage of an individual's journey through the Prevent process. Every user of the PAF must complete a 1-day, accredited pass/fail training course. The PAF is considered in more detail at 4.24 to 4.29, below.

Recommendation 4: Data Retention

2.57. The Independent Reviewer responded without enthusiasm to a proposal by the College of Policing that Prevent data on the PCMT should be held for only 5 years. He noted that while the PCMT had advantages in bringing relevant data into one place, the deletion of such data after 5 years would make future Prevent Learning Reviews impossible in cases (such as AHA's case) in which a serious incident post-dated the subject's involvement with Prevent by a longer interval.

2.58. Data retention periods were fully reviewed in 2023, in response to another recommendation by the Shawcross Review that the relevant periods should be

[151] See **Annex 6** under Recommendation 2.

reduced.[152] As noted at 1.40 above, a joint decision was taken by the Home Office and CT Policing to set retention review periods at 6 years, or 6 years after the 12-month review for Channel and PLP cases. This is underpinned by a policy documenting the suite of checks to be conducted before a deletion decision can be taken. It provides guidance that should these checks identify a policing purpose to retain the individual's data, it should be retained for a further 6 years before review.

CORONER'S INVESTIGATION AND INQUEST

2.59. The inquest into Sir David Amess's death was opened by Lincoln Brookes, Senior Coroner for Essex, on 27 October 2021. It was adjourned, as the law requires, when AHA was charged with murder. After AHA's conviction, the Senior Coroner determined on 23 June 2022 not to resume his investigation, which accorded with the Amess family's wishes at the time. Having seen the Prevent Learning Review in March 2024, the Amess family invited the Senior Coroner to reconsider whether to resume the inquest. The Senior Coroner agreed to reconsider, but decided on 31 July 2024, giving detailed written reasons, that there was insufficient reason to resume the inquest.[153]

2.60. The Senior Coroner summarised the Prevent Learning Review, noting that it had not investigated any possible causative link between the Prevent failings and Sir David's death, and indeed had nothing to say about the State's knowledge after 2016 of any threat that AHA might have posed. Having spoken to CT officers in May 2022, he had no evidence that AHA was or should have been on CTP's radar in the period leading up to the killing, and indeed was told that AHA had deliberately "*gone dark*".

2.61. The Senior Coroner recorded that he had seen no information to support the proposition that "*had the Prevent process or other counter terrorism oversight continued beyond December 2016 then the perpetrator's plans could have been identified and intercepted and the outcome possibly would have been different*".[154] In the absence of any failure (or arguable failure) by the State to prevent Sir David's murder, neither this nor any other reason advanced were sufficient grounds to resume the inquest which, as the Senior Coroner noted, was "*not a surrogate public inquiry*".[155] His decision of 31 July 2024 was not appealed.

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[152] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, Recommendation 18.

[153] The Death of Sir David Amess – Decision on Resumption of the Coronial Investigation and Inquest, 31 July 2024.

[154] *Ibid.*, §§ 55-65.

[155] *Ibid.*, §§ 83-84, citing *R (Morahan) v West London Assistant Coroner* [2022] EWCA Civ 1410.

CONTACT WITH THE AMESS FAMILY

2.62. During the preparation of this Report I have had the privilege of meeting (at their request) some of the close family of Sir David Amess, together with their legal representatives and a number of their many friends both inside and outside politics. They are understandably determined to extract as much learning as possible from the tragedy that has afflicted them. Though the family would undoubtedly have preferred to see a public inquiry with powers to compel evidence, they engaged constructively with my work and indeed sent me a long list of questions arising out of the Prevent Learning Review which I have done my best, with the help of the Independent Reviewer, to pursue with the authorities (where relevant) and to answer.

2.63. The almost sacred importance of the open constituency surgery for our representative system of politics was a point strongly pressed on me by Lady Amess and by Anna Firth, Sir David's successor as MP for Southend West and Leigh. The circumstances of Sir David's death, following previous violent and murderous attacks at or near MPs' surgeries (2.3, above), risks lasting damage to this central and inspiring feature of our democratic system.[156] Anything that could sensibly mitigate that risk merits the most careful consideration. That said, I consider that the unhappy story of AHA's engagement with Prevent in the period 2014-2016 has now been squeezed almost dry. I do not recommend that this aspect of the case constitutes sufficient reason on its own for a public inquiry.

CONCLUSIONS

2.64. Though the information available on AHA's case is not complete and likely never will be, the chief lessons to be learned from it appear plainly from what is already known. They were clearly and correctly set out in the Prevent Learning Review. The additional information that I have been able to collect in the course of this Review has been useful in certain respects – notably, for the context provided by the CTCO and for establishing beyond doubt that (as the Home Office omitted to make the Prevent Learning Review aware) multiple mentoring sessions had been commissioned under a written tasking agreement. The picture as a whole is now a little sharper, but unchanged in its essentials.

2.65. ***At the beginning, Prevent functioned well.*** I commend staff at Riddlesdown Collegiate for referring AHA to Prevent when they did, particularly at a time when

[156] A senior Prevent practitioner to whom I spoke in the West Midlands expressed similarly acute concerns about violent intimidation and harassment of candidates and voters at the last General Election, described by the Lord Chancellor Shabana Mahmood MP as "*an assault on democracy itself*".

– if the CTCO's recollection is correct – many educational institutions in the area were reluctant to engage with Prevent at all. It was plainly right, also, that the case (unlike that of AMR) was promptly adopted into Channel, and that it was considered by the Channel Panel to be of sufficient importance for AHA to be offered an Intervention Provider.

2.66. Those early examples of good practice were followed by ***a long string of failings***.

(a) The teacher who had referred AHA to Prevent, despite their unrivalled knowledge of his development and his susceptibility to terrorism, was absent from the Channel Panel meetings where crucial decisions were taken.

(b) An action plan having been entered on the system, no support plan or package appears to have been prepared or implemented, contrary to guidance.

(c) Though it is not clear exactly how the Intervention Provider's task was explained to them, they seem to have understood the focus as being on religious views which were at best peripheral to concerns about terrorism.

(d) No one insisted on even the single follow-up meeting that the Intervention Provider had suggested as a possibility (perhaps at AHA's school), let alone on the full suite of 7 mentoring sessions, 3 reports and 2 professional meetings that the tasking agreement had specified.

(e) Subsequent communications between police and Intervention Provider were unsatisfactory and inconclusive.

(f) The 6-month review required by guidance was not conducted at all.

2.67. It is clear that at the time, Prevent and Channel were more primitive instruments than they are now. Some of the failings that I have identified (for example, the non-attendance of referrers at Channel Panels) were standard practice at the time. Many have already been addressed by systemic improvements, for example to identification of risk, case management, record-keeping and training.

2.68. It is also true that even if none of these errors had been made, and even if AHA's exposure to Channel had been prolonged, there can be no assurance that Prevent would have been successful in identifying the full extent of AHA's slide into a terrorist mindset, let alone preventing a crime committed several years later. The Chief Coroner was (with respect) plainly right so to conclude.

2.69. All that said, the systemic faults and human errors identified above cannot be denied and should not be minimised. Given the horrific aftermath, they fully merit the careful consideration that they have received both from the Independent Reviewer and in this Report. The murder of Sir David Amess has already been a spur for specific and useful improvements to Prevent. After considering in Chapter 3 the case of AMR, in Chapters 4-6 I address some further recent changes, some that are in progress, and some possible future directions of travel.

3. AXEL RUDAKUBANA

THE SOUTHPORT ATTACK

3.1. Axel Rudakubana (AMR) was born in Wales in August 2006, the son of Christian immigrants from Rwanda. He lived with both parents and his brother in Banks, a large village in Lancashire. On the morning of 29 July 2024, nine days before his 18th birthday, he walked into a Taylor Swift-themed yoga and dance workshop in nearby Southport, armed with a large kitchen knife. The event was attended by 26 girls aged between 6 and 11. In his mind, as the sentencing judge found, was the intention to murder as many of them as he physically could. The violence was shocking, and its severity a matter of public record. In the course of some 15 minutes AMR inflicted fatal wounds on Bebe King (aged 6), Elsie Dot Stancombe (aged 7) and Alice da Silva Aguiar (aged 9). He seriously injured eight more girls, together with two adults who tried to stop him. Many others present were traumatised by their experience.

3.2. Files on his computer at the home where AMR lived with his parents showed a long-standing preoccupation with violent killing and genocide, and clear evidence of a settled intention to carry out mass killing. Police also found that he had prepared Ricin pulp, in quantities which if it had been purified could have provided hundreds of fatal doses. An al-Qaeda training manual in AMR's possession provided technical instruction both on the preparation of Ricin and on how to use a knife to kill. The sentencing Judge found that he had planned for some time to kill as many people as he could, and that if he had not used the knife, he would in time have been likely to use the Ricin.[157]

3.3. AMR entered a guilty plea on the first day of his trial. The police had not declared a terrorist incident after the attack, and AMR was not sentenced as a terrorist because there was no evidence that his purpose was to advance a political, religious, racial or ideological cause.[158] His culpability was however described by the Judge as *"equivalent in its seriousness to terrorist murders".* His sentence requires him to serve a minimum term in custody of 52 years.[159]

3.4. The stabbings were followed by some of the worst rioting seen in the UK for many years, extending to numerous towns and cities and fuelled in part by false statements circulating online that the attacker was Muslim and an asylum-seeker.

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[157] Sentencing remarks of Mr Justice Goose, Liverpool Crown Court, 27 January 2025. The sentence was subject to technical adjustment on 4 February.

[158] AMR's conviction for possessing information of a kind likely to be useful to a person committing or preparing an act of terrorism (the al-Qaeda training manual, in a version published by the US Air Force with brief analytical commentary) was an offence under section 58 of the Terrorism Act 2000, but one for which a terrorist motive did not have to be established.

[159] A whole life order could not be imposed because AMR was under 18 at the time of the attack.

Subsequent reporting of the discovery of the ricin, of the al-Qaeda training manual and of his previous referrals to Prevent generated additional hateful commentary, notably on Telegram and X.

3.5. AMR had been referred to Prevent three times in 2019-2021, when he was in his early teens. Each time, CTP decided at the Gateway Assessment not to progress the case to information-gathering, with the result that his case was never considered by a Channel Panel for adoption into Channel.[160] The third referral was closed in May 2021, more than three years before the Southport attack of 29 July 2024.

THE SCOPE OF THIS CHAPTER

3.6. This chapter concerns AMR's interactions with Prevent and the lessons to be drawn from them.[161] But for the reasons which I now explain, it should not be seen as the last word on the subject. Rather, it is a bridge between two other Reports:

(a) the ***Prevent Learning Review*** submitted to the Home Office on 4 September 2024 by Tony Jenkyn, a former police officer and a long-standing expert in Channel policy, guidance and training;[162] and

(b) the ***Southport Inquiry***, a public inquiry led by the retired Court of Appeal Judge, Rt. Hon. Sir Adrian Fulford PC, which held its first evidence sessions in Liverpool on 8-9 July 2025.

3.7. Phase 1 of the Southport Inquiry will establish a definitive account of the events leading up to the Southport attack, review the decision-making and information-sharing by local services and agencies which interacted with AMR prior to the attack (including but not limited to those responsible for Prevent), and make any required recommendations for improvements. A final report on Phase 1 is to be provided if feasible by "*the end of 2025 or early 2026*".[163]

3.8. The overlap between this Review and the Southport Inquiry is acknowledged in my terms of reference. Both are tasked with examining AMR's interactions with Prevent, and drawing any lessons from them. I visited Manchester, Southport and Preston in April 2025 and spoke to Home Office representatives, Intervention Providers, CTP, local police, local authorities and educators. There are however ***three important differences between this Review and the Southport Inquiry***:

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[160] The first referral was however transferred to a PLP, before being closed without any support plan or intervention.

[161] As required by my terms of reference: Post-Southport review into Prevent and Axel Rudakubana: terms of reference, §§ 5-8.

[162] Prevent Learning Review, Southport attack, published in February 2025.

[163] Terms of Reference for the Independent Southport Inquiry, 7 April 2025.

(a) The Southport Inquiry is not time limited, as is this Review, to a two-year period long before the attacks took place.

(b) The scope of the Southport Inquiry extends to all AMR's numerous dealings with agencies, rather than just his brief and inconclusive exposures to Prevent.

(c) Unlike the Prevent Learning Review and this Review, the Southport Inquiry has powers to compel the production of material and the giving of evidence.

For all these reasons, the Southport Inquiry is better placed than I am to see AMR's Prevent interactions in the context of both his full circumstances in 2019-2021 and events in the subsequent three years. That broader perspective will undoubtedly be reflected in its conclusions and recommendations.

3.9. My own terms of reference invite me to take the Prevent Learning Review of August 2024 as a starting point, noting its gaps and limitations, and to identify whether further learning regarding the specific handling of the case is needed.

3.10. The gaps and limitations in the Prevent Learning Review (which are not the responsibility of the Independent Reviewer) fall into three categories, as follows:

(a) Gaps in the ***documentary record*** to which the Independent Reviewer had access, including the 13 items that he identified in his Prevent Learning Review as having been requested and not supplied.[164]

(b) The lack of a full picture of ***involvement by other agencies*** in AMR's life, either during the period 2019-21 or at other times.[165]

(c) The lack of ***written and oral evidence*** from those operationally involved within CTP: notably a representative of the FIMU, the CTCO who considered all three Prevent referrals, and the CTCO's two Supervisors. None of these individuals had been made available by for interview by Tony Jenkyn (on CPS advice, in view of the ongoing prosecution).[166]

3.11. After consulting Sir Adrian Fulford I decided to leave further evidence-gathering for the Southport Inquiry. My reasons were as follows:

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[164] Prevent Learning Review, Southport attack, February 2025, pp. 47-48.

[165] I had mixed success in obtaining the outline of such a picture during the currency of this Review.

[166] I made a formal request on 21 February to interview each of those individuals, and identified some of the specific questions which I would have wished to put to each of them. That request was taken under consideration by CTP in the North West. In early May, given the imminence and anticipated speed of operation of the Southport Inquiry, I withdrew my request for interviews and provided my intended questions instead to the Southport Inquiry in case they could be useful.

(a) The Southport Inquiry is the more appropriate vehicle for such questioning, bearing in mind its broader, multi-agency perspective, its longer time-frame and its power to compel evidence and documents to be provided.

(b) It would have been undesirable from a legal, practical and human standpoint to subject the individuals concerned to repeated rounds of questioning within a short period.

(c) This Review can still perform a useful function in relation to AMR's case by explaining how the recommendations of the Prevent Learning Review have been implemented, and by drawing attention to some further issues arising, whether for the Southport Inquiry, the permanent Prevent Commissioner or the government.

AMR'S PREVENT HISTORY

3.12. Between 2019 and 2021, when he was aged 13 and 14, AMR was referred three times to Prevent. On each occasion, the CTCO at the Gateway Assessment decided not to progress the case to the information-gathering stage. Since AMR was never considered for adoption into Channel, there was no opportunity for a support plan or Intervention Provider to be assigned to him by a Channel Panel.

3.13. The following summary of AMR's Prevent involvement is taken from the Prevent Learning Review, the PCMT and the underlying primary sources, where available. I have seen everything that was available to the Independent Reviewer and most of the documents that were requested by but not provided to him.[167] These documents fill some gaps but add only in limited respects to his narrative or analysis.

The first referral

3.14. The first and most substantial referral was made on 5 December 2019 by a teacher at Acorns School, the Pupil Referral Unit in Ormskirk which AMR had attended since his exclusion from Range High School in Formby several weeks earlier. It was noted in the referral that AMR had admitted to bringing a knife into Range High School on 10 occasions to "*stab someone*", though this had not been confirmed by Range High School. Concerns were expressed in the referral about web searches for US school shootings during a lesson at Acorns on 15 November 2019, and several instances of graphic comments about violence. No "*radical influence*" was noted on the CMIS,

[167] As recorded in Annex B to his Prevent Learning Review. Documents available neither to the Independent Reviewer nor to this Review include the list of inappropriate searches conducted by AMR, and the results of device examination and open-source research.

but the prompt for ideology was responded to with the entry *"School Massacre Ideology"*.[168]

3.15. It was noted that a referral had been made around the time of AMR's exclusion from Range High School to Child and Adolescent Mental Health Services (**CAMHS**). He was placed on a waiting list for an Autism Spectrum Disorder (**ASD** or autism) assessment, and a referral to a MASH appears to have been considered in early December, though no referral was identified.

3.16. On 11 December 2019, just 6 days after the referral and prior to the assessment by FIMU, AMR was arrested on assault and weapons charges, which he admitted in police interview. He had visited Range High School, where he claimed (and indeed had once reported to Childline) that he had been bullied. He was carrying a hockey stick, with which he assaulted one pupil, and had a knife in his rucksack. He was given police bail on the following day, on condition that he did not visit his former or current school, and did not contact two named individuals.

3.17. On 13 December a Joint Assessment Team (or **JAT**)[169] assessment recorded the outcome that

> *"preference would be for continuance and recommend Dovetail team and Channel Panel are sighted with regards safe-guarding and AR vulnerabilities going forward"*.

That comment was reflected in the PCMT on 16 December:

> *"This has been returned from the JAT for a prevent referral to be inputted onto the pcm tracker and referral to channel/dovetail"*.[170]

The JAT assessment, like that of FIMU, is not intended to be determinative of whether a referral to Prevent is made. It is noteworthy however that the JAT assessor recommended referral to Channel whereas the CTCO and the Supervisor, as will be seen, did not. The CTCO and Supervisor have responsibility for the final decision as to whether or not an individual is referred to Channel. The JAT document referred directly to AMR's arrest and assault.

3.18. Lancashire FIMU had conducted research checks by 17 December and categorised the case on or before 20 December as RADO outcome (6) (*"no CT concern"*).[171]

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[168] This is consistent with policy as contained in the Home Office / CTP letter of June 2019: 1.29-1.30, above.
[169] A joint triage team containing members of CTP and MI5.
[170] Dovetail, which was active across the North West region at the time, is described at 1.19-1.22, above.
[171] For FIMU and the RADO system, see 1.11(c)(1) above.

3.19. On 17 December the case was discussed at a Daily Management Meeting, chaired by a senior ranking officer from CTP. The case was allocated to a CTCO within the Lancashire Prevent team.

3.20. Also on 17 December, for reasons unrelated to Prevent, a Strategy Meeting (of the kind usually convened by Children's Social Care) was attended by the CTCO as well as representatives from Mental Health, Police Early Action, Education and Merseyside Police.[172] AMR was reported to have told a police officer that "*he had taken the hockey stick to hit the victim with and that he was going to use the knife to finish him off and he was not worried about the prison sentence*". Reference was made to the position of AMR's parents. AMR was reported to be adhering to his bail conditions, to be receiving counselling every two weeks at his parents' expense, and to be subject to an investigation under section 47 of the Children Act 1989 to ascertain whether he was suffering, or likely to suffer, significant harm.[173] An urgent mental health assessment was decided on. CTP agreed to visit AMR, and a visit was arranged for the following week.

3.21. On around 20 December 2019 the Gateway Assessment was made by the CTCO. It was noted that

> "*The subject has been researching school shootings on the internet and has been talking about stabbing people, he has also stated that the terrorist attack on the MEN [Manchester Arena] was a good thing.*"

The CTCO noted that it was "*not clear if he has an ideology*", that "*[t]he subject requires a Mental Health and ASD assessment to fully understand his triggers*". Further reference was also made to the position of AMR's parents. The information regarding comments about the Manchester Arena attack was not fed back into the JAT.

3.22. The CTCO's recommendation at Gateway Assessment was to move AMR into PLP, not Channel, and the Supervisor agreed. The Supervisor noted that AMR needed to be spoken to in order to clarify his ideology and address the potential risk and threat that he may pose, and his vulnerability to radicalisation. The Supervisor concluded that once the necessary information had been obtained

> "*if appropriate Channel will be considered*".

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[172] Both Lancashire and Merseyside police were involved because AMR lived in Lancashire but Range High School and Acorns School were in the Merseyside police area.

[173] Where a local authority has reasonable cause to suspect that this is so in the case of a child who is subject to an emergency protection order or under police protection, section 47 requires it to decide whether action is needed to safeguard or promote the child's welfare.

There are indications on the face of the PCMT that the PLP route may have been chosen, at least in part, because of an (erroneous) belief that a transfer to PLP was necessary for the subject to be spoken to. It was also suggested to me that CTP may have been motivated to keep control of the case because of their greater flexibility over the holiday period, the next scheduled Channel Panel not being until the end of January.[174]

3.23. A decision was recorded on 23 December 2019 to refer the case to a Vulnerability Support Hub (or **VSH**). The Manchester VSH has no record of such a referral being made. Vulnerability Support Hubs existed within CTP in Manchester, West Midlands and London. Precursors of the Clinical Consultancy Service,[175] they were developed by CTP to promote understanding of mental ill health.

3.24. Home visits were made to AMR's house on 31 December 2019 (when officers were asked to return on a later date) and on 3 January 2020, when AMR was interviewed by two police officers about his internet searches and his carrying of weapons into school. AMR did not display any extremist views or ideology, and it was noted that the violence intended on 11 December had been directed at specific individuals. The CTCO did not feel that there were any CT/DE concerns at that stage,[176] but noted that "*the subject is extremely vulnerable and needs support from other agencies that are already in place*".

3.25. On 6 January 2020 a further Strategy Meeting took place. A CAMHS assessment had found no mental health illness but that autism was apparent and that a diagnosis was required urgently. A forensic CAMHS appointment was due on 21 January. The school felt that pupils and teachers would be at risk if AMR returned to school, given comments he had made previously about getting teachers murdered. Social care agreed to conduct a continuing assessment and to apply for a Special Educational Needs and Disability (**SEND**) assessment. No charging decision had yet been made over the 11 December assault, and AMR's devices were still being examined. His internet search history on the school system was yet to be provided.

3.26. On 8 January 2020 the PCMT recorded an assessment by FIMU that the case could be closed to Prevent as there were no "*CT/DE concerns*" and the relevant agencies were supporting AMR.

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[174] The Home Office and Lancashire County Council however pointed out to me that Channel Panels can be stood up at short notice to accommodate any urgent case or referral. This was apparent from the 2015 Channel Duty Guidance (§67), and made more explicit in the 2020 Channel Duty Guidance (§100).

[175] See 4.45-4.50, below.

[176] "*CT/DE*" is a shorthand reference to two terms formerly in widespread use within UK counter-terrorism: "*international counter-terrorism*" (normally meaning Islamist *terrorism*, whether at home or abroad) and "*domestic extremism*" (principally encompassing what is now thought of as extreme right-wing terrorism). See further D. Anderson, Attacks in London and Manchester (2017), fn 44.

3.27. On 15 January 2020 the case was moved from PLP to Pending Closure, with the following rationale:

> *"No CT/DE concerns. There are clear vulnerabilities that need support but agencies are already in place. The case will be closed pending any further information from the devices or internet search history or a rereferral".*

Agencies had been advised to re-refer to Prevent should they have concerns in the future, or if any relevant information were found from his school internet history or his devices.

3.28. On 31 January 2020 the case was recorded on the PCMT as moving from pending closure to closed, stating:

> *"There is no CT/DE concerns although AMR is extremely vulnerable."*

No record was entered of whether information had been received from AMR's devices, or the school had provided the internet search history.

3.29. On 15 May 2020, despite the case having been closed, the PCMT records that the CTCO referred the case for open-source checks. The outcome of that referral was not recorded.

3.30. On 3 August 2020, the 6-month post-closure review was conducted. Checks were recorded as having been made on the Police National Computer and on Connect (a system of databases operated by Lancashire Police that records crimes, investigations and intelligence). No further information or concerns were recorded.

3.31. On 15 January 2021, the 12-month post-closure review was conducted. Checks were once again made on the Police National Computer and Connect, and once again no further information or concerns were recorded. The PCMT records that a 24-month review was due on 15 January 2022: such a review was not provided for in national guidance and was not carried out. Two further Prevent referrals had been received by then.

The second referral

3.32. The second referral was made on 1 January 2021, again by the designated safeguarding lead at Acorns School. A pupil there had alerted a teacher to social media posts from AMR containing two screenshots from a website dating from 2011. The safeguarding lead noted (correctly, so far as I can judge) that there was nothing strikingly dangerous in this, but that *"it contains some details regarding Colonel Gadaffi [sic], which might raise some potential radicalisation concerns".*

3.33. On 8 February 2021 the referral was recorded on PCMT. AMR's surname had been spelled correctly on the referral to police, but was mis-spelled on the PCMT. The CTCO was the same person who had considered the first referral, and was therefore assumed by the Independent Reviewer to know that this was a repeat referral.

3.34. On 9 February 2021 the CTCO asked the DSL at Range High School whether there were other concerns save for those articulated in the referral, and was told that there were not. The CTCO recorded:

> *"The new intelligence does not meet the thresholds for adoption at Channel and does not suggest he holds any extremist ideology. This case is suitable for closure."*

3.35. On 15 February 2021, FIMU's assessment was once again recorded as "non CT/DE" (RADO 6), and the prompt for ideology was responded to by the entry that no ideology was evident at this stage. The case was moved from Gateway Assessment to pending closure, with no record of additional lines of enquiry having been pursued such as obtaining a list of internet searches from the school, or speaking directly to the pupil who reported the concerns, the referrer and AMR's parents. Neither was information recorded on the PCMT relating to AMR's complex needs.

3.36. On 17 February 2021 the case was closed to Prevent. The CTCO's Supervisor noted that *"there is a lack of information in all areas"* and that *"I am unable to see any previous referral into Prevent on the PCMT"*, but concluded that no further safeguarding appeared to be required and that the case could be closed immediately.

3.37. Post-closure reviews have never been required for cases that are referred neither to Channel nor to PLP. A 6-month review of the second referral was however conducted on 23 August 2021, after the third referral. It came up with no new reporting or updates.

The third referral

3.38. The third referral was emailed to Lancashire Police on 22 April 2021, once again by the safeguarding lead at Acorns School. AMR had been observed with internet tabs open during a lesson, showing a search for London Bridge, and was reported to have a passionate interest in the Israel/Palestine conflict, MI5 and the IRA. The teacher welcomed his interest in history and politics but warned of radicalisation and emphasised the need to seek balanced views. AMR responded that *"there are always two sides to a story"* and, when reminded not to do anything that promotes violence in any way, *"nodded as though he understood"*.

3.39. The referral was recorded on the PCMT on 26 April. It was noted on the DIF that vulnerability was present but "*no ideology or CT risk*". AMR's surname was once again spelled incorrectly, this time in a different way. It was however recognised by FIMU and the CTCO (who was once again the same person) that this was a repeat referral.

3.40. The referral is described (supposedly by FIMU) as a possible knee-jerk reaction to advice given to the school that they could re-refer if they had further concerns. It was commented that the strong views expressed on current affairs might have been influenced by AMR's autism diagnosis, and noted that his educational needs were being met and that he was waiting for an Educational, Health and Care Plan (**EHCP**).[177] Once again, the FIMU assessment was RADO 6.

3.41. On 29 April checks were recorded on the PCMT and it was noted that AMR had had no other police contact save for the incident on 11 December 2019. The case was moved from FIMU assessment to Gateway Assessment, recording:

> "*This has been assessed by FIMU as non-CT/DE and vulnerabilities will be addressed by the EHCP.*"

3.42. On 7 May 2021, the Supervisor commented "I do not believe based upon the information that this subject is at risk of radicalisation", that "subject has sufficient support in place", and that the CTCO should "upload PGA and look to close".

3.43. The Gateway Assessment was performed on the same day by the CTCO, and recommended closure. The prompts for grievances, engagement, ideology, capability and intent were responded to with the entry "*not evident at this stage*". It was concluded that the referral "*does not highlight any new concerns*".

3.44. On 10 May 2021 the Supervisor agreed with the CTCO's assessment and recommendation to close the case immediately, noting that "*there are no extreme views or concerns of a CT/DE rhetoric*" and that AMR's displayed "*critical thinking skills demonstrating he has considered different viewpoints and information*" and that on the basis of the information provided there was no current risk of radicalisation.

3.45. Following usual procedure when a case had been referred neither to Channel nor to PLP, there was no post-closure review of the third referral though, as noted above, the second referral was reviewed on 23 August 2021.

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[177] An EHCP is created by local authority, health and social care and local education authority to support a child's needs. ECHPs are concerned with learning and safeguarding and can address a wide variety of needs, but they have nothing to do with counter-terrorism.

THE PREVENT LEARNING REVIEW

3.46. The Independent Reviewer considered that there had been a high level of compliance by Prevent officers with process, timescales and the policy that was in place at the time, but questioned what were described as "*subjective decisions*".

3.47. The conclusion to the Prevent Learning Review identified six main themes requiring further attention, some of them in qualified terms which reflect the Independent Reviewer's lack of direct access to the operational decision-makers within CTP:

(a) ***Potential over-reliance on FIMU assessments*** (which were prepared with Pursue criteria in mind, with the result that something deemed not "*CT relevant*" could still be Prevent relevant). This could have led to "*pre-empting or influencing of decision making within Prevent by both CTCO and their supervisors*".[178]

(b) ***Possible over-emphasis on the lack of ideology***, at the expense of AMR's susceptibility. The Independent Reviewer referred to (and appended to the Prevent Learning Review) the joint Home Office/CTP letter of 2019, setting out their joint position on managing "*individuals with unclear, mixed or unstable ideologies*".[179] The DIF current at the time also identified a "*particular fascination*" with mass killings, including school massacres, as of concern for Prevent.

(c) ***Lines of enquiry not completed*** (notably device downloads, school browser history and open-source checks) before key outcome decisions were made.[180]

(d) ***Potential risk from repeat referrals***, which should have warranted increased scrutiny.

(e) ***Home Office lacked access to the pre-Channel Panel elements of the PCMT***, reducing its ability to conduct research and analysis into repeat referrals.

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[178] Underlying the Independent Reviewer's concern may have been a sense, mentioned to me by a number of practitioners, that Prevent is widely seen as the poor relation of the CONTEST strategy, with a small fraction of the resources devoted to Pursue.

[179] See 1.29-1.30, above. The then current DIF also identified a "*particular fascination*" with mass killings, including school massacres, as of concern for Prevent.

[180] The accuracy of the Independent Reviewer's observation is not accepted by CTP North West.

(f) ***Use of a PLP to enable a visit to AMR to take place was unnecessary***, as the policy allowed visits (exceptionally) to take place during the Gateway Assessment process, if appropriate.

The Prevent Learning Review also suggested some areas for future review, including whether the statutory threshold for a decision to refer to Channel should be lowered from "*reasonable grounds to believe*" to "*reasonable grounds to suspect*".[181]

PREVENT LEARNING REVIEW RECOMMENDATIONS

3.48. The Prevent Learning Review concluded with 14 recommendations, one of them in five parts. Most concern detailed matters of process, guidance, training and information-sharing. They were prompted however by a concern to improve what the Reviewer considered to be various weaknesses revealed by his Review, including visits to individuals, obtaining and recording internet search results, the treatment of children and those with conditions such as autism, PLP case management, the completion of outstanding queries prior to closure and multiple referrals.[182]

Business Assurance Exercise

3.49. In order to address and respond to the recommendations in the Prevent Learning Review, CTP Headquarters conducted an extraordinary Business Assurance exercise between October and December 2024. This major exercise covered the whole of England and Wales, and focused on the recommendations of the Prevent Learning Review under three themes: the interface between Prevent and intelligence; guidance and processes; and PLP processes. It had two stages:

(a) a quantitative (data-gathering) approach, involving the completion of a region-specific questionnaire by Regional Prevent Coordinators (**RPCs**), and a targeted review of randomly selected case studies (35 cases per region), focused on the three themes; and

(b) a qualitative (consultation) approach, involving in-person consultation sessions in each region with CTCOs, Supervisors, Inspectors and FIMUs.

These tasks were in addition to work which had been commissioned in 2023 to ensure a more consistent approach to the management of Prevent information and

[181] See 1.11(c)(3), above.

[182] Some of the recommendations are lengthy and rather than reproduce them here in full, the reader is directed to Prevent Learning Review, Southport attack, February 2025, pp 36-38.

intelligence through FIMUs nationally, and to the circulation in 2024 of test case scenarios to all CTP Prevent regions to understand regional variance in a number of areas of Prevent case work.

3.50. Having reviewed the findings of the Business Assurance exercise, I sat around a table at New Scotland Yard with CTP and the Independent Reviewer to analyse in detail his 14 recommendations and CTP's response to them. CTP followed up in late June with a lengthy "Recommendations Update" which explains precisely how each of the Independent Reviewer's recommendations has been responded to, in the broader context of the Business Assurance exercise. The Home Office appended an update of its own.

3.51. The Recommendations Update is at **Annex 6** to this Report, and gives an idea of the ambition of the Business Assurance exercise across a wide range of subject areas. In that context it demonstrates that:

(a) Consideration has been given to each of the Independent Reviewer's recommendations.

(b) Most have been accepted in one form or another.

(c) Some aspects of implementation have been paused pending a decision on the treatment of violence-fascinated individuals (**VFIs**).[183]

(d) Others (relating, for example, to the design and implementation of various guides, training courses and policies, or the conduct of further reviews) are currently in progress,[184] or, in the case of the possible strengthening of CTCO guidance where internet usage, search history or other online activity is relevant, to be commenced later in 2025.[185]

An Action Plan provided to me on 27 June 2025 records the various actions to be taken, and their status as complete or incomplete.

3.52. The thinking of CTPHQ did not align with that of the Independent Reviewer in every respect, even when his recommendations are described as having been accepted. For example:

(a) The Independent Reviewer wished to see a change to the policy where visiting an individual during the initial assessment is by exception only

[183] See **Annex 6** under Recommendations 1, 8, 9(i), 9(ii), 9(iii), 9(iv), 9(v).
[184] See **Annex 6** under Recommendations 2, 3, 5, 7, 8, 9(i), 9(ii), 10, 11, 12, 13,14.
[185] See **Annex 6** under Recommendation 4.

(Recommendation 2); CTPHQ prefers to focus on the encouragement of contact visits at the later, information-gathering stage.

(b) The Independent Reviewer asked for a policy to be considered whereby cases involving children and/or complex needs should be routinely referred to Channel unless immediate closure was the chosen option, or the CT risks were deemed too high for Channel (Recommendation 5). CTPHQ prefers to trust to the PAF as a tool to identify the persons who require to be progressed through to Channel, without adding presumptions based on age or needs.

(c) The Independent Reviewer inclined towards a data inputting standards manual and accompanying policy, as exists in some other, non-Prevent policing contexts (Recommendation 14). The National Business Assurance Process found no areas of concern relating to data standards, and CTPHQ preferred to proceed by way of enhancement to the PCMT and revised training.

3.53. I make no criticism of CTPHQ for not conforming in every respect to the letter or spirit of the Independent Reviewer's recommendations. Those recommendations were produced in just a few weeks, immediately after the Southport attack, and without the benefit of the full Business Assurance exercise that informed CTPHQ's response. While some material differences of opinion remain between CTPHQ and the Independent Reviewer, which it is not for me to arbitrate, I am satisfied that CTPHQ has addressed both the Recommendations and the underlying issues in a thorough and responsible manner. Any final audit of CTP's response must await full implementation (including the production of guidance and training materials) which, as noted above, is in many important respects still in progress.

3.54. The sole recommendation of the Independent Reviewer that is marked in **Annex 6** as "*refused*" is his Recommendation 6:

> *"Full access to the current PCMT system is restricted to police only. While the Home Office has limited access, this should be reviewed, enabling scrutiny at all levels of Prevent delivery as part of quality and business assurance processes. This access will enable studies to be conducted of all parts of the process which will inform changes in policy and guidance and be able to hold key stakeholders to account."*

That recommendation reflects a long-standing debate between CTP and the Home Office. I return to this subject at 4.22-4.23 and at 6.32-6.34, below.

FURTHER POINTS FOR INVESTIGATION

3.55. A number of other specific learning points were identified through a CTPHQ organisational learning process. In most cases, their significance or otherwise will depend on factual investigations – in particular, formal interviews with individuals from schools, CTP, local police and others. Accordingly, I repeat these only as possible areas for enquiry, not as statements of fact.

(a) There may have been possible opportunities for ***earlier Prevent referrals***, either from the Range School or from Acorns School which made the first Prevent referral three weeks after the search for school shootings on 15 November 2019.

(b) There appears to be no record of ***device downloads*** obtained after the arrest on 11 December 2019 being requested by the CTCO from local police. It is also said that there may have been issues relating to AMR's ***school browser history*** and the conduct of ***open source*** checks, though this will once again be a matter for evidence.[186]

(c) The ***timing of the referral*** was noted: the designated safeguarding lead first made contact with Lancashire police on 5 December 2019 and submitted the referral form on 10 December. It was registered, after deconfliction and intelligence checks, on 16 December 2019.

(d) It is necessary to ascertain who knew about ***the assault that occasioned AMR's arrest*** on 11 December 2019, and whether it was taken into account as was plainly appropriate.

(e) There may have been a failure of the CTCO to resubmit the intelligence for reassessment by FIMU, despite noting the intelligence on the PCMT.

(f) Local police did not submit ***a further Prevent referral***, as they could have done following the arrest on 11 December 2019.[187]

(g) The case was ***referred to the PLP rather than to Channel,*** which it was speculated within the organisational learning process may have been influenced by a reluctance to proceed to information-gathering because of

[186] This was the third of the main themes identified by the Independent Reviewer (3.47(c) above) but in view of the known unknowns did not feature in his specific recommendations.

[187] I note that the assault took place in the Merseyside area, where local police may not have been aware of the Prevent referral in Lancashire.

local-authority control of the process under Dovetail, or by wrongly applying the section 36 test[188] at the Gateway Assessment.

(h) There appears to have been no follow-through of the decision to refer the case to a VSH, taken on 23 December 2019.

(i) There was said to be ***undue emphasis on the contact visit***, which had taken place in the presence of protective parents who had been willing to excuse AMR's behaviour, and in which AMR's comments were apparently taken at face value.

(j) The process identified a ***failure to detect inconsistencies and dishonesty ("disguised compliance")***, when AMR made statements which there was good evidence to doubt.[189]

3.56. It will be for the Southport Inquiry to consider the significance of these matters on the basis of evidence from practitioners and in the broader context of its review.

CONCLUSION

Referrals to Prevent

3.57. Acorns School, which repeatedly referred AMR to Prevent as a young teenager, is to be commended for doing so. AMR did not show signs of subscribing to any single established terrorist ideology, and was already receiving attention from a number of other agencies. But his anger, his aggressive behaviour, his strong interest in violent killings and his stated approval of the Manchester Arena attack – together with the important gaps in the intelligence picture – plainly made the case a suitable one to be considered by Prevent.

Police Gateway Assessment

3.58. At the Prevent Gateway Assessment which took place following the first referral and the violent assault, it seems clear that the case should have been sent to the local authority Channel Co-ordinator (who was responsible for this under Dovetail) for referral on to the information-gathering stage and then possible adoption into Channel. Though mindful of the dangers of hindsight, I am reminded that this view

[188] A test of reasonable ground for belief: see 1.11(c)(4), above.

[189] For example, when interviewed about the assault AMR stated that he had no intention to use the knife, yet he had also told a police officer that he was going to use the knife to finish a victim off after hitting him with a hockey stick; and when he denied looking at inappropriate content online, AMR several times attributed it either to a misunderstanding or to teachers unfairly targeting him.

was also taken at the time of the JAT (3.17, above). Prior to 2020, the criterion for closure at Gateway Assessment stage, as expressed in National Foundation Course material and guidance notes, was *"reasonable grounds to believe that there are no Prevent concerns"*.[190] It is hard to see how this could have been satisfied on the known facts of AMR's case. Though there was no specific reference to MUU ideology in the 2015 Prevent Duty guidance, the suitability of Channel for individuals lacking a clear ideology was evident both from the terms of the DIF current at the time and from the June 2019 letter, which I am told had been circulated to Prevent practitioners.[191]

3.59. A number of possible factors have been identified, by the Independent Reviewer and/or the CTP organisational learning process, as having potentially contributed to the failure to progress into information-gathering. These include:

(a) ***excessive reliance on the conclusions of FIMU***, which should not have been allowed to dictate decisions about Prevent;

(b) a possible ***over-emphasis on AMR's lack of ideology***; and

(c) an apparent ***failure to exhaust all sources of evidence*** (in particular digital evidence) before coming to a decision; and

(d) a ***desire to avoid the local-authority led Dovetail process*** and use the police-led partnership instead (under which home visits were conducted, but no further action was taken).

The Southport Inquiry will wish to explore these possibilities in evidence.

3.60. Having observed input from the two multi-disciplinary Strategy Meetings of 17 December and 6 January,[192] the CTP decision-makers may perhaps have taken the pragmatic view that nothing was to be gained by consulting those same agencies via the Prevent information-gathering process.[193] Responsibility for information-gathering however sat under Dovetail with the Local Authority rather than with CTP. By diverting the case to PLP after the initial assessment stage, despite it appearing to pass the Gateway Assessment threshold, the Local Authority was denied the opportunity to exercise its proper function under the terms of the Dovetail pilot.

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[190] The current threshold test at Gateway Assessment (*"a reasonable suspicion of a Prevent issue, however minor"*) was introduced in the 2020 CTCO Guide.

[191] I have no direct evidence as to whether the 2019 letter had been seen by the CTCO and their Supervisors.

[192] These meetings were attended by Children's Social Care, Mental Health, Merseyside Police, Police Early Action and Education as well as Prevent, but not by the Channel Co-ordinator responsible for Dovetail.

[193] See the entry for 15 January: 3.27, above.

3.61. The second and third referrals were less compelling in their own right, but the case has been strongly made that insufficient scrutiny was given to the cumulation of evidence that was by then available.

Potential Involvement of Channel

3.62. A harder question to answer is whether, if the case had proceeded to information-gathering as I consider would have been appropriate, it would (or should) have been decided to refer it to Channel for possible adoption by a Channel Panel. The section 36 threshold,[194] applicable at that stage, is higher than the Gateway Assessment threshold, and as noted above it is not certain that intelligence-gathering would have added significantly to the picture as it appeared from FIMU and from the Strategy Meetings.

3.63. Some practitioners I spoke to were of the view that there was sufficient evidence even by the time of the Gateway Assessment to satisfy the section 36 test. That is consistent with the view expressed in the JAT assessment in AMR's case (3.17, above) and was also the position of the Independent Reviewer, who said:

> *"there were sufficient concerns with the 1st referral to warrant the case … being referred to Channel, especially in the light of the condoning of the [Manchester Arena] attack."*

I incline to agree. As the Independent Reviewer pointed out, paraphrasing section 36, *"there is no need to prove a definitive terrorism connection for Channel, only [to believe] that the individual is potentially at risk of being drawn into terrorism."*

3.64. I spoke to some police officers, however, who did not accept that AMR's case (at least in the absence of stronger evidence of ideology) was necessarily appropriate for Channel. Their logic is effectively that of the Shawcross Review, which said (after AMR's referrals, but before the Southport attack):

> *"… I am forced to raise the question of whether it makes sense to refer to Prevent individuals who have no clear ideology, given that acts of violence committed by such people would not be regarded as terrorist in nature"*

and which expressed the view that *"MUU can be too liberally interpreted and applied"*.[195] The general thrust of the Shawcross Review runs counter to the idea that individuals such as AMR are appropriate subjects for Prevent.

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[194] Counter-Terrorism and Security Act 2015, section 36(3): *"reasonable grounds to believe that the individual is vulnerable to being drawn into terrorism"*.

[195] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §§ 4.57 and 4.59.

3.65. It is also fair to point out that:

(a) in the year when AMR was first referred, only 4% of Prevent referrals in England and Wales with MUU ideologies (127 out of 3,203) were adopted into Channel;[196] and that

(b) The North West saw the highest number of MUU cases adopted into Channel in that year (28, from 401 referrals), as well as the highest proportion adopted into Channel (7%).[197] The region was thus by no means a laggard – if anything, the reverse.

3.66. Statistics are no guide to the outcome of a particular case, all of which must turn on their own facts. Experienced practitioners told me that relatively few MUU referrals are likely to have presented such acute concerns as AMR's, and it may well be that those concerns would have increased with the benefit of an information-gathering stage. However, the fact must be faced that only 1 in 25 MUU referrals were adopted into Channel at the time (1 in 14 in the North West). Even if a different decision had been made at the Gateway Assessment and the case had progressed into information-sharing, there can be no certainty, in the light of practice at the time, that AMR's case would have been one of them.

3.67. Looking further into a hypothetical future, it is unknown whether AMR's parents would have consented to any Channel intervention, and what the nature of such an intervention might have been. A Support Plan could have built on the activities of the various agencies already involved with AMR. It is also possible that an Intervention Provider would have been allocated, perhaps with special knowledge and experience of autism. A number of experienced Intervention Providers suggested to me that this could have been valuable. Whether such guidance, if obtained, would have diverted AMR from the disastrous path on which he had embarked must however remain a matter of the purest speculation.

Learning Points

3.68. With the benefit of hindsight, one central fact stands out. AMR's school presented CTP with three opportunities to progress towards Channel a troubled young teenager who was already showing signs both of an interest in terrorism and of the disturbed and violent characteristics that would lead him, several years later, to murder three young children in horrific circumstances. None of those opportunities was taken – with the result that AMR, though he was once placed in a PLP and

[196] Home Office, Individuals referred to and supported through the Prevent programme, 2019-2020, p.12.
[197] *Ibid.*, Annex A (Prevent Statistics), 2019-2020, Table 13. The North West was the only entire region in which the Dovetail pilot was in place.

appears to have engaged with a range of other agencies throughout, was never offered the Intervention Provider that he might have had if he had been referred to and then adopted into Channel. Indeed he was not even referred on for information-gathering, as had been recommended by the JAT assessor and as I believe he should have been (3.17 and 3.58, above).

3.69. Matters of individual fault are not for this Report to determine. The specific decision-making of relevant personnel needs to be judged against the standards, guidance and practice of the time; on the basis of facts that have not yet been definitively found; and after giving those most closely involved – the FIMU, the CTCO, the Supervisors and others – the opportunity which they have not so far had to be heard. These are matters for the Southport Inquiry.

3.70. What can be said is the chances of future poor decisions can be reduced by improvements to standards, guidance and process; that CTP has addressed many of the weaknesses identified by the Independent Reviewer; and that its Business Assurance exercise has launched a wide-ranging series of changes which, if dispassionately evaluated and wisely implemented, have the potential in conjunction with other recent developments to make a material difference.

3.71. A number of specific learning points have been identified, by the Independent Reviewer and others. The Southport Inquiry is in a good position to resolve outstanding issues of fact and to assess the progress that has been made. Whilst improved processes, guidance and training cannot eliminate poor exercises of human judgement, they can at least make them less likely in future.

3.72. Finally, connected at least with the story of AMR's Prevent referrals is a policy issue of considerable importance for the future: whether individuals such as AMR who adhere to no particular ideology but pose a danger of extreme violence should in principle be eligible for Prevent, or some Prevent-equivalent programme. I return to that issue at 5.4-5.29, below.

4. RECENT DEVELOPMENTS

INTRODUCTION

4.1. Previous chapters have outlined the principal features of the Channel programme for early intervention as they have evolved since the introduction of the Prevent Duty in 2015 (Chapter 1), and assessed the specific measures taken, or planned, to implement the recommendations of the AHA (Chapter 2) and AMR (Chapter 3) Prevent Learning Reviews.

4.2. This chapter fills a gap, as required by my terms of reference, by outlining and where possible evaluating a number of other changes to Channel that have been initiated recently, many of them over the past 12 months. Some of these changes are the culmination of long-standing workstreams; some implement recommendations in the Shawcross Review;[198] and others were prompted or given additional urgency by the Southport attack of July 2024. I have also taken the opportunity in this chapter to summarise my impression of modern practice in areas such as training and local delivery.

4.3. The position is reviewed under a number of thematic headings: Prevent Duty, Prevent Thresholds, Case Management, Monitoring/Evaluation and Complaints. As to the Business Assurance process initiated by CTP in late 2024, I refer to 3.49-3.54, above, and **Annex 6** to this Report.

4.4. All the changes referenced in this chapter are well-intentioned and appropriate. They are testament to the energy that has gone into maintaining and improving the system for Prevent interventions. They evidence a strong commitment on the part of both the Home Office and CTP, not least in the wake of the Southport attack, to making the Channel system as fair and effective as it can be. However various tensions remain; and with many actions still under way or needing a longer period of implementation before they can be properly assessed, it is not possible to pass judgement on all of them.

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[198] The Government's Response, published on the same day as the Shawcross Review, accepted all 34 of its recommendations. Progress on those recommendations was detailed in the government's One year on Progress Report (2024), which described implementation as complete in save for four on which it was in progress: revision of the Prevent Duty (no. 6), a new training and induction package for all working in counter-extremism and counter-terrorism (no. 22), training on appropriate referral decisions (no. 24), and a review of Prevent-related staffing and training in prisons (no. 27). As of June 2025, progress on nos. 22, 24 and 27 was described as complete. Progress on no. 6 awaits a legislative opportunity.

PREVENT THRESHOLDS

4.5. Different thresholds apply at the various decision-making points that are reached as a Prevent referral progresses through the system from referral through Gateway Assessment to Channel Panel referral, acceptance and eventually case closure.[199] The central statutory threshold is the section 36 requirement that a person may be referred to a Channel Panel "*only if there are reasonable grounds to believe that the individual is vulnerable to being drawn into terrorism*". The threshold is naturally lower for frontline professionals considering whether to make a referral: they are expected to "*consider whether they believe the person they are concerned about may be on a pathway that could lead to terrorism*", and are advised that "*it is far better to receive referrals which turn out not to be of concern than for someone who genuinely needs support to be missed*".[200]

Threshold Review

4.6. An end-to-end review of Prevent thresholds was concluded by the Home Office in May 2025. This aimed to identify whether current thresholds are appropriate and whether and how they might change to meet evolving risks and threats. The Threshold Review was a thorough exercise, basing itself on quantitative and qualitative data.[201] I was kept in close touch with its progress. At the time of writing, its conclusions had not been published.

4.7. Whether or not the thresholds require alteration, there are clearly significant areas of uncertainty among professionals and Prevent practitioners regarding such matters as the relevance of mental ill-health in making a referral, the understanding of Islamist extremism, and the distinction between *having* a terrorist ideology and being *susceptible* to one. Many people I spoke to had been shaken by public commentary on Prevent's operation, and were confused by fluctuating messages concerning the importance or otherwise of focusing on ideology.

4.8. The Southport attack in July 2024, and publicity about AMR's contact with Prevent after his guilty plea in January 2025, led to an understandable rise in anxiety surrounding risk identification and thresholds in schools.[202] CTP officers in a number of regions, including the North West, told me of a culture of defensive or "*better*

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[199] See 1.11-1.14, above.

[200] Prevent Duty Guidance (England and Wales), 2023, §§ 40, 44.

[201] Inputs were gathered from focus groups and written evidence. Participants included police, local authorities, health, education and the Scottish Government.

[202] Referrals to Prevent from education settings constituted 40% of total referrals in 2023-24. This has steadily increased, with referrals from education 33% of the total in 2020. Referral figures for 2024-25 have not yet been published.

safe than sorry" referrals, some of them falling below any reasonable threshold. This has undoubtedly had an impact on referral volumes in 2025. Others I spoke to felt that numbers referred to Prevent and adopted into Channel were swollen by concerns about sparse resources in mainstream safeguarding, or poor understanding of what Prevent/Channel is for.

4.9. The Threshold Review is a welcome and timely exercise, with the potential to improve the quality of decision-making at every stage of the Channel system.

Disparity of Treatment

4.10. The Shawcross Review concluded that:

> "*the Islamist threat is severely under-represented in Prevent referrals and cases adopted at Channel*",

and recommended that

> "*The Home Office should investigate whether there is an imbalance, or a disparity, in thresholds applied to Islamist and Extreme Right Wing Channel cases, and if so why.*"

4.11. Shawcross also considered that "*Islamist referrals*" tended to be of individuals "*much further along the trajectory towards violence*" than was the case with Extreme-Right Wing referrals which presented more of a "*passive risk*".[203] He attributed this to a variety of factors, including difficulties in identifying Islamism; fears of being accused of being racist, anti-Muslim or culturally insensitive; and anti-Prevent advocacy, which may drive down the numbers who agree to participate in Channel.

4.12. The Home Office responded by undertaking two analyses. These analyses sought to understand, respectively, whether there was a disparity in the way ERWT and Islamist Extremism cases were handled (a) when referrals were first received and assessed by police and (b) when they progressed to the Channel discussion and decision stage.[204]

4.13. The ***quantitative analysis*** of data for Prevent referrals in England and Wales from 2018-19 to 2021-22 suggested that Islamist referrals were more likely than Extreme Right Wing referrals to leave the process prior to Channel Panel, slightly more likely to be escalated to Pursue, and more likely to be transferred to PLPs. This is consistent with the observation of the Shawcross Review that the original referring bodies

[203] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §4.37 and Recommendation 20.
[204] Independent Review of Prevent – One year on progress report (2024), p.27.

were waiting longer for a situation to develop or become more pronounced in Islamist than in Extreme Right Wing cases. Other possible causes are lower risk tolerance on the part of the police, and/or a lower rate of willingness among Islamist subjects to consent to Channel interventions. I have indeed been shown evidence, not previously published, of lower consent rates for Islamist subjects of Channel than for others.[205]

4.14. I heard suggestions from a number of quarters that there were particular factors inhibiting Islamist referrals to Prevent. I was told in several parts of the country that referrals from Muslim majority schools were rare, and from Islamic faith schools practically unknown – perhaps reflecting suspicions of Prevent among some Muslims. It is likely also that some non-Muslims working in institutions subject to the Prevent Duty are worried about being perceived as racist or causing community tension. Further analysis might usefully be done, on the basis of more up-to-date referral data.

4.15. The ***qualitative analysis*** was of Channel Panel minutes, case notes, VAF reports and other case information of a sample of 51 cases referred in 2021-22 across three regions. It found no evidence of different thresholds being applied to cases at the Channel Panel stage, and no evidence that Islamist cases discussed at Panel present a more active risk than Extreme Right Wing cases discussed at Panel. The sample was however small and regionally selective, and more recent data is now available. This aspect also would benefit from further work.

PREVENT DUTY

Application to Higher Education

4.16. Prevent referrals from higher education forums in particular remain at an extremely low level; a total of 65 in 2022-23.[206] In response to the Shawcross Review's finding that the Department for Education (**DfE**) should counter the anti-Prevent narratives on university campuses, DfE closed their resulting action in 2024 with this conclusion '*A pilot Student Union engagement group on Prevent met. DfE are considering whether it will be replicated regionally*.' There appears to have been no formal evaluation of this pilot. It is not being replicated, and no other DfE engagement with the student body is planned. Instead, the Office for Students will remain the conduit for any specific issues and complaints which are raised.

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[205] Consent rates ranged in 2023-24 from 62% for the "*Islamist concern*" cohort to 72% for "*vulnerability present but no ideology or CT risk*", 73% for the extreme right-wing, and 83% for the "*school massacre ideation*" cohort.

[206] Office for Students, Prevent monitoring, June 2024, p.4.

4.17. The provisions of the Higher Education (Freedom of Speech) Act 2023, applicable in England only, were paused by the incoming government following the 2024 General Election. A review finished in December 2024. The government has opted to commence much of the legislation, and to seek to repeal and amend some provisions via a future legislative vehicle.[207] Key provisions commenced include the duty on Higher Education providers to secure freedom of speech for students, staff and visiting speakers, and greater protections for academic staff who might discuss controversial views. These provisions will be in force from 1 August 2025. The OfS has published detailed guidance for providers on their free speech duties, including with reference to the Prevent Duty. DfE expects to publish External Speaker Guidance, which it believes those running higher education bodies are keen to receive. A publication date for this guidance has not yet been confirmed.[208]

4.18. CTP in Wales pointed out to me that there is no FE/HE Prevent Coordinator appointed by the Welsh Government. In their view this leaves a significant gap in terms of their ability to engage at a strategic level. Welsh Government officials indicated that they did not feel the issue could be resolved without attention to contextual issues, particularly funding. The Shawcross Review drew attention to this issue in Scotland as well as Wales.[209]

Expansion of the Prevent Duty

4.19. Immigration and asylum teams, and job centres, were recommended for inclusion in the statutory Prevent Duty by the Shawcross Review in 2023.[210] The government reported in 2024 that it had opted not to do this, but instead to create a voluntary agreement for those agencies to join in with Prevent activity. That is still subject to further review and (if eventually confirmed) a suitable legislative opportunity. The block to immigration and asylum coming under the duty was explained to me as largely a practical one; that the Home Secretary cannot be accountable to herself and therefore the mechanism would not function. The Department for Work and Pensions is still considering its position regarding Job Centres. It is currently running pilots to train staff on Prevent but has not to date indicated any plan to make changes.

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[207] A new complaints system will be amended; the government is seeking a legislative vehicle at the earliest opportunity to do this. DfE will seek to repeal the direct duties on students' unions and the tort.

[208] In advance of this guidance, the Office for Students published data in June 2025 indicating that while in 2023-24 some 30 events and speakers had conditions placed on them for Prevent-related reasons, 1410 events and speakers had conditions placed on them for non-Prevent reasons. This is against a background of 42,440 events and external speakers approved by universities and colleges in the same year. The Office for Students also published new guidance on free speech.

[209] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §§ 6.168, 6.180.

[210] *Ibid.*, Recommendation 8.

4.20. Subsequent to the Shawcross Review, there have also been conversations about extending the Prevent Duty to other bodies, such as the Armed Forces. However, this appears to have foundered on the same issue as the immigration considerations, regarding accountability on the part of one Secretary of State to another.

CASE MANAGEMENT

Deconfliction and FIMU

4.21. Ongoing developments in relation to the deconfliction process and the role of FIMU are summarised at 2.53-2.54 and 3.47(a), above. There is no service level agreement or consistent national standard governing the function of FIMU in relation to Prevent, and a number of questions about coordination and working arrangements between FIMU and CTP Prevent teams remain outstanding.[211]

Prevent Case Management Tracker (PCMT)

4.22. Since May 2024, data on Channel cases in England and Wales has been recorded on the latest iteration of the PCMT (see 1.13 above), developed between the Home Office and Counter-Terrorism Policing.[212] Since its introduction in 2018, the function of the PCMT has been to make Channel case management systematic, effective and auditable. The PCMT now combines not only Channel but the whole of Prevent case management, including police-led (PLP) cases, into one system.

4.23. The PCMT is hosted by CTP, with the Home Office having access only to data post-dating a section 36 decision to refer to a Channel Panel. There is long-standing controversy over the issue of wider Home Office access to pre-section 36 data, to which I return at 6.32-6.34, below.[213]

Prevent Assessment Framework

4.24. The launch of the PAF in September 2024 as a single-source assessment tool followed extensive design and testing by the Counter-Terrorism Assessment and Rehabilitation Centre (**CTARC**), which sits within the Ministry of Justice and focuses on assessing and rehabilitating offenders at risk of radicalisation and terrorist activities.[214] The PAF has been tailored more specifically to Prevent than its

[211] See, further, **Annex 6** under Recommendations 8 and 9.
[212] The CMIS was not rolled out in Scotland. Adoption of the PCMT is under discussion there.
[213] See also 3.54, above.
[214] The CTARC team used case-based evidence from previous Channel and wider Prevent cases, refining an assessment to make it suitable for those at risk of being involved in or supporting terrorism (the VAF had been developed for those who were already convicted offenders). Consultation with assessment

predecessor the VAF,[215] in direct response to the recommendations of the AHA Prevent Learning Review.[216] Only CTP will have access to full, completed PAF forms. The susceptibility assessment within the form will then be shared with Channel partners ahead of meetings, including a RAG rating generated by the PCMT system.

4.25. Early-stage evaluation has shown significant fluctuation between different practitioner judgements on a range of factors included in the tool. CTARC set this within an expected range given its newness. The team expects familiarity to create organic improvements in consistency, and in training for CTCOs this will be an area of focus.[217] At the same time, CTARC wants to foster a sense that the professional judgement and curiosity of an individual practitioner remain important. Striking this balance is also expected to help in the process of 6 and 12-month case reviews; something in which there is currently mixed levels of confidence.

4.26. The PAF is designed to make CTCOs think, rather than adopt a tick-box approach. CTCOs are encouraged to feel ownership of the assessment review process, given their access to the most up to date information. This may involve overriding the previous judgement of colleagues, even supervisors.

4.27. Numerous academic references accompany the PAF guidance, but the acid test of the PAF will be whether it is suited to its frontline use. Some CTP officers were enthusiastic about the new tool; others (particularly in London) expressed misgivings. A straw poll of several dozen Channel Chairs indicated general satisfaction. I heard doubts from one Local Authority about whether the police are sufficiently well versed in risk assessments conducted by other agencies, particularly related to children and to mental health.[218]

4.28. Formal evaluation of PAF is expected to continue throughout 2025-26; this will include observed behaviour as well as soliciting views. It is hoped that the tool itself will not need to be amended in the near future, but accompanying guidance and training will respond to feedback. The PAF is a central element of Prevent, and the permanent Prevent Commissioner will want to keep a close eye on this process.

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professionals and frontline practitioners has been extensive.

[215] The PAF replaces precursor tools in the Dynamic Investigation Framework (DIF), used by police, and the Vulnerability Assessment Frameworks (VAF), which has origins in HMPPS. See 1.11-1.12, above, for how the PAF is used at various stages of triaging and assessing risk upon receipt of a referral.

[216] See Recommendation 3 of the AHA Prevent Learning Review, 2025, pp. 4-5.

[217] From June 2024, CTCOs have been required to complete mandatory training on the assessment of Prevent referrals. CTCOs must attend an assessed training day to become familiar with the PAF, how to use it to assess CT risk and vulnerabilities, and how it fits into current processes. During the training day, attendees are assessed after testing as either Ready or Not Yet Ready to complete a PAF for live cases. Attendees cannot access any referrals until the training assessment has been successfully completed.

[218] This includes the Common Assessment Framework (**CAF**) – the process most routinely used by teachers, safeguarding leads and social workers to identify children's needs and support them. See further 5.40(c), below.

4.29. A still more recent advance is the integration of the PCMT and the PAF, which went live in March 2025. This is seen as a positive development by both CTP and the Home Office, making compliance (for example with the 6-month and 12-month review requirements) more reliable. The capture and extraction of data for sharing, analysis and insight should also be more efficient.[219]

Repeat Referrals

4.30. Repeat referrals are subject to an updated CTP policy issued in March 2025. This requires Inspector-level sign-off for repeat referrals that were not progressed for Prevent case management. The intention is that a repeat referral should now prompt consideration of escalated risk.[220]

4.31. There remains scepticism on the part of the Home Office that this is happening consistently. Both CTP and CTARC felt that the introduction of the PAF and its integration with the PCMT would improve compliance with this. That only happened in April 2025 and thus requires further monitoring – which, if it is to be performed by the Home Office, will require the sharing of all PCMT information with them by CTP. The new policy will be subject to further review this summer.

4.32. I heard two further challenges to police approval of repeat referrals, both relating to matters of institutional practice:

(a) that non-police partners and practitioners making a referral are unlikely to question a rejected referral, believing that the police must know best; and

(b) that CTP transparency is poor in this area and reasons for a rejection are not routinely shared back to referring partners. This point was made to me both by non-police practitioners and local police, though CTP pointed to difficulties inherent in communicating a Pursue outcome, which militate against a duty to communicate outcomes in all cases.

Training

4.33. A considerable array of training exists to make people familiar with aspects of radicalisation and Prevent. This continues to expand.

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[219] This step builds directly on recommendations 3, 7, 10 and 14 of the AMR Prevent Learning Review, 2025, pp.36-38. Scotland is not currently on the PCMT, so a different approach will be required.

[220] The Multiple Referrals Policy includes the need to get more senior sign-off (an Inspector), and to take into account whether the referrer was a parent/carer, and whether the referrer (and individual) are part of a marginalised group usually less likely to interact with the police.

4.34. Training varies from 20-40 minute basic courses for education and health professionals through to day-long immersive training and workshops. There are online training modules for Prevent and Channel, mandated training for Channel (in Scotland, PMAP) chairs, and bespoke training for individual Channel Panels and PMAPs as a group. Agencies tend to develop bespoke materials for their own organisation, but there is significant cross-referencing to national, overarching guidance and resources created by other organisations. There is also some joint training; my deputy Suzanne Jacob attended a day of simulated Channel Panels, aimed at helping participants get familiar with the process and the likely role of their colleagues.

4.35. Channel Chairs and their deputies are required to complete training on delivering Channel locally within six months of starting their roles.[221] Also mandatory is training for Intervention Providers, which is discussed at 4.51, below.

4.36. Core training authored by the Home Office, for example on the Prevent Duty, was commended to the Review team by a number of frontline practitioners. There is also widespread use of Home Office-authored online resources. Requests for in-person training far outstrip what central government or local specialists can currently provide. "*Ideology modules*" are intended by the Home Office to be delivered face-to-face. However, one local Prevent Coordinator noted that they were being offered online in their area, which was considered insufficient to build frontline confidence.

4.37. A number of mandated courses for CTCOs now exist, including a Prevent foundation course and courses on the PCMT, PAF and initial visits. In relation to CTP training, there is some concern among national strategic leads that local teams have prioritised community relationships and management of the Prevent brand, rather than skills focused on identifying, investigating and managing risk. Others felt however that since the London and Manchester attacks of 2017, they had put the emphasis back on analytical, investigative capability. All FIMU officers are now expected to complete a Prevent awareness session on Prevent procedure.

Local Delivery

4.38. Since 2022-23, the Home Office has funded only the authorities deemed to have the highest threat.[222] It maintains a network of Prevent advisers in each region and devolved administrations. This regional network mirrors the geographic coverage of police counter-terrorism units, as does the DfE's Prevent Coordinator network. Local authorities which had recently lost their dedicated Prevent funding noted the

[221] Channel Duty Guidance, §176.
[222] The method for defining this 'highest threat' category is set out at 1.4, above.

difficulties this had caused. Others were apprehensive about the impact if the same should happen to them, particularly on the coordination and administration which is paid for by dedicated Prevent funding.

4.39. Substantial ***local delivery assurance*** work has been added by the Home Office to Prevent over the last ten years, the last five in particular. The Channel Monitoring Group conducted observations based on quantitative analysis from CMIS data, supplemented by dip sampling and observations in October 2020. Panel improvement plans started to be implemented in 2021.[223] In addition, the Home Office works with all local authority Prevent Leads in England and Wales to complete a Prevent assurance exercise annually against seven of the eight Prevent Duty benchmarks. An assurance of the eighth benchmark, Channel, is subject to a separate process (i.e. the Channel Annual Assurance Statement). A similar process is being implemented in Scotland to put it on a similar footing to England and Wales.[224]

4.40. Overall, the level of oversight exercised by the Home Office is unusual. However, officials themselves feel that they are better able to develop a *picture* of delivery than assure the *effectiveness* of that delivery. Some 15 local authorities – the majority of them in London – have not to date submitted benchmarking data. Data for 2024-25 is expected to be more complete, but there is still significant regional variation.

4.41. There is evidence that the Security Threat Check (a process recommended by the Shawcross Review to improve proportionality and ensure that Prevent work is focused on terrorism reduction)[225] is being incorporated into national work, for example by the Home Office and RICU. I was not able to verify whether it is having the same impact locally, where the Security Threat Check is also supposed to be taken into account by those working on strategic aspects of Prevent.[226]

4.42. I heard repeatedly that adoptions into Channel had increased in number since the Southport attack (though not so rapidly as referrals), and heard of some Panels now meeting two or even three times a month to try and keep up with demand. Former and current Channel Panel Chairs indicated to me the difficulty of maintaining quality at scale; others talked about reducing the duration of case discussions from

[223] There are also forms of peer support in operation, with Channel Chairs meeting regularly, for example to guide each other, offer peer observation, deep dive on individual cases, share resources and look at process when cases are transferred between local authorities.

[224] Prevent Scotland Duty Guidance was refreshed in 2024, reflecting practice and language of the 2023 Channel Duty Guidance. PMAP Duty Guidance will be published later this year and will be similarly aligned.

[225] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §6.12 and Recommendation 12.

[226] See Prevent Duty Guidance (2023), §§ 32, 121, 126.

the recommended 30 minutes down to 20 and even, at one Channel Panel I attended in the North West, 10. Nobody who had curtailed conversations in this way felt it was the best way to run the meeting, but they felt pressurised by the volume of cases and the availability of partner organisations.

4.43. In some parts of the UK, referral rates are lower and meetings less frequent. In those areas, Chairs are conscious of their relative lack of familiarity with the process and welcome opportunities for face-to-face training. There is also an appetite for more feedback from central policymakers, for example data on local compliance rates with national training and how this compares to other areas.

4.44. Suzanne Jacob and I observed four online Channel Panels[227] in different parts of the country, each of them handling a variety of cases. We also attended two meetings of regional Panel chairs and a national conference attended by over 100 Panel chairs. Our observations were as follows:

(a) Confidentiality and information sharing protocols were carefully adhered to. Each Panel member (and observer) had signed a confidentiality agreement before joining. Professionals invited to speak about one case were not given entry to the rest of the meeting.

(b) Timekeeping was a preoccupation for each Panel Chair, with the Chair of one meeting making frequent reference to staying on track or getting behind.

(c) The content of cases varied, but even in those cases where adherence to an ideology was identified, there was a high prevalence of mental health problems, family dysfunction and abuse, poor physical health on the part of one or more family members, a high degree of reliance (including by very young individuals) on their online world, awkward fit with traditional educational settings, and abusive, absent or non-compliant fathers or other male carers with whom professionals were struggling or reluctant to engage.

(d) At one Panel there was frustration about the non-attendance of relevant social workers and education professionals for a particular case, which was pointed out as a persistent problem. This was, however, the exception, with core Channel agencies, and attendees relevant to particular cases, usually present.

[227] Guidance states a preference for in-person or hybrid meetings, but we observed the online format, giving equal prominence to each participant, to be perfectly efficient and effective at each meeting that we attended.

(e) There was a consistent focus on proportionality, with Panel members testing their judgement about retaining or closing a case.

The Clinical Consultancy Service

4.45. The Clinical Consultancy Service (**CCS**), which went live in April 2024 after a 6-year pilot, aims to improve health outcomes for people who are already subject to CTP interventions, and so to enhance the protection of the public from terrorism. It co-locates security-cleared forensic psychiatrists, clinical psychologists, mental health nurses and social workers, many with a background in prisons or secure hospitals, with CTP in London, Birmingham and Manchester.[228] Both a CT concern and a mental health concern (most commonly neurodivergence or schizophrenia) are required for its involvement. Most of its cases come from Prevent, and around 20% from Pursue.[229]

4.46. Prevent referrals are normally accepted by the CCS only after a section 36 decision, unless it is clear that the case will be adopted and there are urgent mental health priorities requiring early intervention. Some referrals come from cases already in Channel or PLP.

4.47. As for example with psychiatrists working in the parole process, there is no face-to-face contact with patients, no therapeutic work and no requirement for their consent. The CCS may however (with the patient's knowledge) seek information from NHS services or social care, and share it on a need-to-know basis with CTP if the patient consents or there are other legally valid reasons for overriding the normal duty of confidentiality. It may also share CTP information with health providers, for example to highlight an urgent risk posed by a Channel subject.

4.48. Clinicians may assist for example by securing an assessment from a health trust, informing a CTCO's judgement or supporting the CTCO attending a Channel Panel. They rarely attend Channel Panels themselves, despite having a more specialist skillset than the health professional who does attend. I met a number of clinicians working for CCS and was struck by their strong conviction that their work was worthwhile.

4.49. The involvement of health professionals in the Prevent system is controversial for some academics, researchers and activists, who claim that the CCS involves health practitioners in surveillance, in breach of good practice or ethical guidelines, and

[228] The CCS evolved from Vulnerability Support Hubs (known before 2017 as Mental Health Hubs) in the same three locations: see 3.23, above. The services provided by these hubs can be delivered remotely and are not limited to their home regions.

[229] The CCS is funded by CTP until April 2026. The source and level of funding after that point is currently not confirmed.

may influence medication regimes or trigger involuntary detentions under the Mental Health Act.[230] I attended a conference in the West Midlands at which such criticisms were strongly advanced in an apparent attempt to dissuade medical professionals from engaging with the CCS. Continued openness about the CCS and its workings, and independent review including (if so advised) by the permanent Prevent Commissioner, is the best way to allow such criticisms to be evaluated and answered.

4.50. A further criticism of the CCS is that it is not subject to oversight by usual health governance. Health professionals within the CCS are however subject to oversight by their own professional bodies, and the North London Foundation Trust, which coordinates CCS activity, is itself subject to oversight.

Intervention Providers

4.51. Training for Intervention Providers began in 2019. Report writing and personal safety awareness were made mandatory immediately, and there have been additions over the years to the available catalogue of products. For those working with individuals under 18, Level 2 Child Safeguarding is required. Mandatory courses are funded by the Home Office. However, attendance at broader professionalisation training (where, for example, a range of specialist topics are covered) remains voluntary. Participation in those courses is promoted as a professional development opportunity and not fully funded by the Home Office.

4.52. There is a growing understanding of fluid ideologies and motivations in Prevent development. In that context some Home Office officials suggested to me that this optional approach to training may not keep pace with the reality of the cohort they interact with. I did however meet dedicated and curious Intervention Providers who regularly access not only products such as RICU briefings but the sort of social media output that they know their Prevent subjects are encountering.

4.53. The Shawcross Review recommended that due diligence processes for Intervention Providers should be increased; this has happened since he reported in 2023.[231] Intervention Providers are all now required to hold basic security clearance and to have been DBS checked (though not to undergo regular police and social media checks, unless relevant information is self-disclosed). However, there is still an element of subjectivity in whether someone is deemed acceptable to perform the role.

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[230] See e.g. C. Heath-Kelly, Unhealthy Liaisons: NHS Collaboration with the Counter Terrorism Clinical Consultancy Service (Medact, 2024).

[231] Recommendations 9 and 25: see Independent Review of Prevent: One year on progress report.

4.54. In other safeguarding, rehabilitation and desistance programmes, such as those for substance misuse, child protection or domestic abuse, practitioners are trained to identify and resist the risk of disguised compliance.[232] There is however little specific training on disguised compliance for Intervention Providers (or CTCOs, or Panel members), notwithstanding the importance and difficulty of the subject. ***This seems to be an obvious gap, which I hope will be filled.***

4.55. Channel Intervention Providers have been diversifying, and need to continue doing so. As individuals with a defined ideology form a diminishing cohort in Channel, there is increasing demand for more holistic, practical mentoring. The persistent difficulty of attracting suitable specialists in Islamist Extremism was also raised with the Review team. There is said to be a particular shortage of Intervention Providers in Wales and Scotland. Where Intervention Providers are asked to travel longer distances to provide support, costs and inefficiencies increase. There are also risks in relying too heavily on a small number of individuals with whom CTP Prevent leads or Channel Chairs have built good working relationships.

4.56. The Home Office is currently considering additions to its range of Intervention Providers, focusing on neurodiversity, online safety and family support. These are things that any Intervention Provider could only benefit by understanding. Channel Chairs and participants had mixed views about this, however, with some questioning whether creating more tools risked a further rise in inappropriate referrals to Channel because it is seen as a route to access scarce resources.

Routes to Intervention

4.57. The Routes to Intervention project, which follows the completion of a pilot involving minors only, went live across England and Wales in January 2025 and will follow in Scotland at the end of July. It enables individuals to receive support within Channel at the same time as undergoing criminal justice interventions such as overt investigation or post-conviction activity. As noted at 1.16, above, Channel intervention may therefore be possible, for example, in the period between charge and trial for a non-violent terrorism offence.

4.58. Similarly flexible approaches are used in other safeguarding practice, for example to manage the risks in domestic abuse cases, and have proved fruitful.[233] Suzanne Jacob and I observed two Routes to Intervention cases being discussed in Channel Panels, and were satisfied in both cases that it was being appropriately used. The Intervention Provider was present on the calls and we observed good co-ordination between the Intervention Provider, the CTCO and other Panel members.

[232] See 1.47(c), above, and NSPCC Learning, Disguised compliance: learning from case reviews (March 2025).
[233] University of Bristol evaluation of The Drive Project, February 2020.

4.59. Concerns identified in practitioner workshops were that Intervention Providers will be unwilling to get or stay involved in a process if they feel pressurised to form part of an investigation, and (conversely) that Intervention Providers will consider themselves to have an investigatory role and overstep. Attempts have been made to cover these points in guidance (and by making it clear to Intervention Providers that they have the choice not to be involved in Routes to Intervention cases). The project will need however to remain under careful review.

Case Closure

4.60. There is no formal cut-off point for an Intervention Provider to work with an individual. Intervention Providers are not timebound in the same way as many state services (for example mental health provision) and can use professional judgement about an individual's progress. Channel Chairs receive Intervention Provider reports and make a judgement based on precedence, relative risk, and input from partners.[234]

4.61. There is still low confidence in whether localised case closure processes within Channel have been sufficiently tightened up, despite increased emphasis in Channel guidance issued in 2023[235] and new CTP policy issued in March 2025.[236] In particular, the Review team heard concerns from a number of agencies that not enough in-person reappraisal is done (with the individual and/or the original referrer) alongside a desk-based exercise, that the appointment of a (post-Channel) lead professional is not happening in all cases, or is poorly coordinated, and that the potential to send a closure letter to the subject is not widely known about or considered routinely. Similar concerns were raised about the process of 6-month and 12-month reviews when cases remain open. CTP indicates that it will keep this under review over the remainder of 2025, and will provide updated guidance if needed both in the CTCO Guide and in new training for Supervisors.

Below Thresholds Pilot

4.62. A further pilot aims to assess the feasibility and value of a new multi-agency approach to handing off cases that are referred out of Prevent (at Gateway Assessment or when not adopted into Channel) but that continue to carry safeguarding or public protection risks that require support. While there are services (e.g. Children's and Adult Social Care) that can support those who do not meet Prevent thresholds, their availability is not consistent and the pilot seeks to

[234] While no formal cut off point exists, Channel Chairs and members in London reported that only 6 sessions with an IP would be approved by CTP unless there were exceptional circumstances.
[235] Channel Duty Guidance: Protecting people susceptible to radicalisation, 2023, §§81-85.
[236] Building on previous policies from 2020 and the CTCO Guide 2024.

test approaches that could ensure the management of any residual risk by services outside Prevent. It is running from March-September 2025 in 9 pilot sites, with a possibility of extension.

4.63. Participants in the pilot felt it was a logical step but had significant concerns about the speed at which the pilot had been set up and the lack of guidance and structure which currently accompanies it.[237] As with DfE Working Together statutory guidance, MASH is not named within the terms of reference for this pilot. Neither are Violence Reduction Units or other existing systems such as Early Help.[238] This means that local areas are trying to work out their own method of applying the principles and goals of the pilot. Throughput of cases is currently very low; consideration is being given to the feasibility of adjusting the threshold in areas where no cases are being presented.

4.64. Despite these challenges, the existence of the pilot and the premise of having a clear, coordinated route in/out of Prevent which fits seamlessly with mainstream social policy foundations, enhanced skills, and resources, at least indicates a helpful direction of travel to which I revert at 5.30-5.44, below.

MONITORING AND EVALUATION

4.65. The machinery is substantial within government and key agencies to oversee performance within the CONTEST strategy as a whole.[239] It far outstrips the monitoring and management applied to many other high priority parts of crime, security and policing.[240] However, by the Home Office's own admission there is a lack of data and evidence about what actually works in terms of counter radicalisation and intervention, even after almost 20 years of Channel and 10 years of the Prevent Duty. A set of Home Office slides states *'In 2022/23, 90% of individuals left Channel with their radicalisation risk reduced'* but the Home Office was unable to identify for me where this data comes from.

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[237] They noted, for example, that Terms of Reference for the pilot had only been disseminated after the Home Office timetable stipulated that the pilot should have begun. This Terms of Reference document was still incomplete, including on issues like the amount of funding being provided.

[238] Early Help is a system of support, provided under statutory guidance, which aims to assist families with a child under 18 as soon as problems emerge. Some early help support is described as targeted early help, and is provided to children and families who are identified by practitioners to have multiple or complex needs requiring a specialist and/or multi-agency response but where statutory intervention is not needed.

[239] The Home Office has, for example, a whole unit dedicated to CONTEST performance, and significant analytical staffing to underpin both routine performance measurement and bespoke commissions on project and programme evaluation.

[240] See for example the rebuke by the National Audit Office on the limited extent to which the government can identify what works to tackle violence against women and girls, considered a priority area for at least a decade Value for money: Tackling Violence against Women and Girls, January 2025.

4.66. One of the challenges for any prevention work is to prove a mid-long-term impact, not just a snapshot assessment of progress at case closure. Some of the specific review work itemised below is designed to address this, but it is still not expected that these evaluations will be able to capture longitudinal impact. Processes exist to identify activity of renewed intelligence interest conducted by persons who were once subjects of interest to MI5, using targeted data exploitation and other automated techniques. This highlights small numbers of potentially dangerous individuals whose cases merit further examination.[241] No such processes are applied to former subjects of Prevent, understandably given the different nature of the concerns in issue.

4.67. ***Prevent Learning Reviews*** were initially established by the Home Office and CTP as a vehicle for identifying any immediate internal post-incident learning. They are not intended to duplicate statutory review processes, and (as in the case of both the AHA and AMR Prevent Learning Reviews, now published in lightly redacted form) were not intended for external dissemination. Following the Southport attack, there is an attempt to create a Prevent Learning Review framework which still provides a rapid and dynamic opportunity for learning, but which is inclusive of more than CTP and the Home Office as participant organisations. The oversight of how this is developed and implemented will be for the permanent Prevent Commissioner.

4.68. A new internal ***police assurance process*** began in 2022 to assess records after an incident, looking for previous police contact with an individual to identify trends in high harm incidents (homicide, suicide) by individuals referred to Prevent. This process continues as part of CTP business assurance. Assurance officers currently only have access to material on the PCMT to draw conclusions; it is still to be decided whether in future they should also have access to local police systems, which vary across the 43 police forces in England and Wales.

4.69. The ***Desistance and Disengagement Programme*** (1.3, above) was independently evaluated in a report commissioned from RAND Europe and delivered in 2023. The report was an answer to criticism that DDP was being run without an established evidence base.[242] Out of a sample of 38 DDP cases during the evaluation period (April 2018 to March 2020), 39% were found to have made progress towards rejecting extremist beliefs, and 58% made positive changes relating to their attitude and/or motivation, including showing pro-social beliefs, improved resilience and demonstrating a motivation to change.[243]

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[241] D. Anderson, Attacks in London and Manchester, December 2017, §§ 3.38-3.42; Implementation Stock-Take, June 2019, Chapter 6.

[242] HM Inspectorate of Probation, Extremism and Terrorism (2021).

[243] The evaluation made 36 recommendations for improvement but concluded overall that *'the DDP generally appears to be running effectively and as intended'*. Recommendations were grouped into seven

4.70. Home Office efforts since 2023 have focused on a quality assurance framework. and on mandating a report writing course that has been in place since 2019 for DDP Intervention Providers. It is plain that the current strain on the prison estate, its management, and the probation service, will all be putting DDP as well as other interventions in and after prison under significant pressure.

4.71. Of greater significance for the focus of this Review is the ongoing ***independent evaluation of Channel***. This vital initiative aims to identify the costs and benefits of Channel, for whom and in what circumstances it works, and how its processes can be improved. PMAP in Scotland is also in scope. Commissioned by the Home Office, this major exercise is being conducted by Ipsos UK and University College London, with support from HSAI, and co-led by Professor Paul Gill.

4.72. The proposed outcome evaluation is thorough and will draw on a range of sources including PCMT data and case files, a survey of Channel practitioners and interviews with Channel subjects, Channel Panels and Intervention Providers. It has been delayed by factors including the validation of measuring instruments and issues of consent, and its success will depend in significant part on achieving adequate response rates. A preliminary report is due by the end of 2025, and a final report by the end of 2026.

4.73. Ipsos has also been commissioned to report to the Home Office on whether three local delivery ***'Level 1' projects***[244] delivered by the voluntary sector are achieving their objectives (impact) and being delivered as planned (process). Among the factors that I would expect to be considered will be the difficulty of making people resilient to radicalisation during a short intervention, and on a more positive note the potential of such projects to increase the understanding of risk, and the value of connecting individuals both to their peer group and to influential older people who can widen perspectives and raise aspirations and provide a counterweight to influences encountered online.

COMPLAINTS

4.74. The final recommendation of the Shawcross Review was for the creation of a new standards and compliance unit. StaCU was duly created and given a high-calibre staff but not the "*proper process and procedure*" that Shawcross had recommended.[245] Though mentioned in the Prevent Duty Guidance,[246] StaCU has

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workstreams picked up by the DDP Steering Group, including efforts to improve Intervention Provider training and support, strengthening case management and delivery, and developing information sharing and referral to onward/external support.

[244] Level 1 projects are those that receive the most Prevent funding.

[245] W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, Recommendation 34, p.162.

[246] Prevent Duty Guidance, 2023, fn 24.

no statutory backing or coercive powers. It can neither impose sanctions nor mandate action. It has not yet reached a formal adjudication on any complaint submitted to it, and would have no power to enforce such an adjudication if it did.

4.75. Complaints have been relatively few, and there are no signs that StaCU has been instrumental in improving perceptions of Prevent. In its first year of operation there were 55 complaints; around half (often relating to the content of training materials) were judged to need substantive investigation, with the balance appearing too trivial to merit it.[247]

4.76. Without the authority to compel cooperation or enforce a verdict, the utility of StaCU is severely limited. It has supported complainants (for example, with guidance on form-filling) and coordinated with other bodies, some of which have their own, well-established complaints mechanisms.

4.77. The first test of StaCU's authority is coming as it escalates three complaints into a single first inquiry. This was approved for further investigation by the Security Minister in March 2025. It remains to be seen whether and how far the statutory bodies involved will cooperate with the inquiry, and with what result.

4.78. The Secretary of State has power to direct an authority subject to the Prevent Duty to perform that duty.[248] Theoretically that might provide a route to the enforcement of a StaCU decision, but there appears to be little confidence that it would be used in any but the most exceptional circumstances.

4.79. The permanent Prevent Commissioner is due to take over the leadership of StaCU from the Commission for Countering Extremism when appointed.[249] Consideration will no doubt be given to the future of StaCU, and in particular to the question of whether it requires statutory powers if it is to perform the function that the Shawcross Review envisaged for it.

Recommendation 1

The utility of the Standards and Complaints Unit should be assessed, along with the question of whether it requires statutory powers in order to be an effective complaints mechanism.

[247] Standards and Compliance Unit Annual Report: 2024 to 2025, April 2025.
[248] Counter-Terrorism and Sentencing Act 2015, section 30.
[249] Independent Prevent Commissioner Appointment Details, February 2025, §11.

5. THE FUTURE SHAPE OF PREVENT

INTRODUCTION

5.1. My terms of reference invite me, having examined the implementation of the Prevent Learning Reviews and the further changes made to Prevent over recent years, to

> "*identify remaining gaps or shortcomings that require further improvement and assure action to address them*".

5.2. The particular purpose of that invitation was spelled out by the Home Secretary, who tasked me when announcing my appointment:

> *"to identify what changes are needed to make sure serious cases are not missed, particularly where there is mixed and unclear ideology"*

(emphasis added).[250]

5.3. Taking my cue from that comment, I address in this chapter the future shape of Prevent. Two distinct questions present themselves:

(a) Should Prevent accommodate ***violence-fascinated individuals*** who lack a clear, identifiable ideology?

(b) Would Prevent be better as part of a general violence reduction strategy?

The first of those questions requires an urgent answer. The second is an issue for the medium to long term. I address them in turn.

VIOLENCE-FASCINATED INDIVIDUALS

5.4. The key question, given new intensity by the Southport attack,[251] is whether the Prevent Duty and Channel should be treated as applicable to individuals who are at risk of committing extreme violence but not motivated by a clear ideology. Such people are commonly known (and referred to here for convenience) as violence-fascinated individuals (**VFIs**).[252] This cohort is currently categorised under

[250] Home Office, Independent Prevent Commissioner, 14 February 2025.

[251] There have been many other attacks by violence-fascinated individuals, often indistinguishable in their severity from acts of terrorism: some examples are footnoted to 1.6 above, and others are at 5.5, below.

[252] The adjective "*violence-fixated*" was previously used. CTP told me that it has fallen out of favour as possibly implying a degree of psychological obsession that sets the bar too high for the purposes of Prevent.

the PCMT as "*Fascination with extreme violence or mass-casualty attacks*".[253] Persons of this nature have been treated by CTP as "*Prevent Relevant*" since 2019, though there has been significant inconsistency over how they are progressed through the system.[254]

5.5. The danger posed by such persons is by no means confined to the circumstances of the Southport attack. In a recent report the Independent Reviewer of Terrorism Legislation, Jonathan Hall KC, listed 10 lone actor cases involving the use or threat of extreme violence, which shared some features of the Southport case but were not prosecuted as terrorism.[255] They included:

(a) ***Danyal Hussein***, who murdered two sisters in a Wembley park in 2020 as part of a 'sacrifice' to help him win the lottery. He had previously been adopted into Channel after accessing far-right material on a school computer, and had a long-standing interest in mythology, Satanism and the occult.

(b) ***Jake Davison***, who shot and killed five people in Plymouth in 2021 before killing himself. His mother had contacted Prevent about him some years earlier; he was obsessed with firearms and had looked up posts about incel culture in the hours before the attack.

(c) ***Emal Al Swealmeen***, who detonated an explosive device outside Liverpool Women's Hospital in 2021. He was an asylum-seeker who had twice had his claim rejected by the Home Office. A police investigation speculated that the attack was most likely a result of Al Swealmeen's "*grievance against the British state for failing to accept his asylum change compounded by his mental ill health*" but concluded that the intended target of the attack was "*unclear*".[256]

(d) ***Damon Smith***, who left a rucksack containing a viable bomb on a London tube train in 2016, after researching an al-Qaeda article on bomb-making. Smith had previously been a Christian altar boy but professed an interest in Islam and said that he read the Koran and sometimes prayed. He also had a fascination with Islamic terrorism and mass murders, and created YouTube

[253] For the evolution of these categories, see 1.29-1.32, above. Prior to 2024, subjects within this cohort were captured under the "*School Massacre Ideology*" category. The DIF referred to "*fascination with mass-killings or school massacres*" between early 2019 and 2024.

[254] See 1.30-1.34, above.

[255] J. Hall, Independent Review on Classification of Extreme Violence Used in Southport Attack on 29 July 2024, March 2025, Annex 2.

[256] The Independent Reviewer suggested on this basis that had Al Swealmeen lived, the case would not have been prosecuted as terrorism.

videos in which he used computer games to recreate real-life mass killings.[257]

5.6. Should such persons be the concern of Prevent? The question is of urgent importance because, as I observed during the currency of this Review, there has been considerable uncertainty on this point among potential referrers and practitioners, unsurprisingly given first the Shawcross Review and then the reaction to the Southport attack.

5.7. An interim policy was issued by the Home Office in March 2025, together with interim operational policy changes from CTP. Under the interim policy, referrals categorised as "*fascination with extreme violence or mass casualty attacks*" should normally be admitted through the Gateway Assessment into information-gathering; a contact visit is required prior to closure at the section 36 stage; and referral closure prior to Channel must be endorsed by the Regional Prevent Coordinator. As of early July 2025, the interim policy was in the process of review by CTP.

5.8. To answer the question on a more permanent basis requires consideration of the nature of the threat, current practice and the legal position.

Nature of the threat

5.9. While terrorism is often presented as a uniquely serious threat, crimes falling outside its definition can bear many of its hallmarks: grievances reinforced in online echo chambers, victims chosen at random or for their shock value, extreme or mass violence, desire for notoriety or revenge.[258] Such crimes may be, in the words of the Judge who sentenced AMR, "*equivalent in [their] seriousness*" to terrorist murders. Indeed without a full evidential picture, it can be hard to assess whether such crimes constitute terrorism or not. Some of the risk factors, including social isolation, mental ill-health and the widespread availability of violent and extremist content online, appear to be on a steadily worsening trajectory.

5.10. As long ago as 1996, in a report which became a blueprint for modern counter-terrorism law, Lord Lloyd (a serving Law Lord) concluded his brief review of the terrorist threat with a prophetic observation:

[257] The other cases detailed by the Independent Reviewer were the Northallerton teenagers Thomas Wyllie and Alex Bolland, Ben Moynihan, Anwar Driouich, Kyle Davies, Derrick Bird and Thomas Huang. Some additional examples of persons known to Prevent whose subsequent offences did not class as terrorism are given at fn 16, above.

[258] The desire for notoriety may indeed impel attackers not motivated by an ideological cause deliberately to imitate the *modus operandi* of a classic terrorist attack.

> *"Most significantly of all, perhaps, there are indications that some individuals with fanatical leanings or personal grievances are increasingly attracted to terrorist methods. This may come to represent the greatest threat of all, in the longer term."*[259]

Lloyd's words are echoed, almost 30 years later, not only in Whitehall briefings (which judge the threat from violence-fascinated individuals to be a growing one) but in dozens if not hundreds of conversations I have had with teachers, CSOs, Channel Panel chairs, local authorities and police.

5.11. What Lloyd called "*fanatical leanings*", often fuelled by family trauma or "*personal grievances*", are swiftly inflamed by geopolitical events and the malign algorithms of social media into an unpredictable mash-up of resentment, rage, rigid certainties and normalised violence. Lone actors are fed by virtual communities. Extreme brutality is absorbed from any available source. Extremist content intersects in unpredictable ways. Conspiracy theories are promoted by the governments of hostile states, and by the citizens of friendly ones. Male-on-female attacks are motivated in often unknowable proportions by violent pornography, normalised misogyny, incel ideology, family dynamics and personal rejection.[260] Unformed young minds experiment with fragments of ideology packaged as video clips or slogans; the boy drawing Nazi symbols on his arm may soon afterwards be found shouting sectarian slogans, refusing to interact with female teachers or posing as a suicide bomber.[261]

5.12. The importance of this trend is evident not just to those working in Prevent ("*the canary in the coalmine*") but also to those concerned with activity which has already crossed the terrorism threshold. MI5's Director General, Ken McCallum, said in his public assessment of the threat in October 2024:

> *"Straightforward labels like "Islamist terrorism" or "extreme right wing" don't fully reflect the dizzying range of beliefs and ideologies we see. We're encountering more volatile would-be terrorists with only a tenuous grasp of the ideologies they profess to follow. People viewing both extreme right wing and Islamist extremist instructional material, along with other bits of online hatred, conspiracy theories and disinformation. … [I]t's harder these days for my investigators and their police counterparts to quickly and definitively*

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[259] Rt Hon Lord Lloyd of Berwick, "Inquiry into Legislation against Terrorism", Cm 3420, October 1996, §1.24. Lloyd's proposals were largely enacted in the Terrorism Act 2000.

[260] Many of these themes feature in the fictional 2025 Netflix series Adolescence. The series has increased adult awareness but seemed behind the curve to a CSO representative conducting school outreach around the country, who commented to me: "*Youth are buying Airbnbs from the proceeds of money muling … creating horrible AI porn. They will not wait around while adults learn about incels and become social media literate*". "*We are probably bitter and twisted*", she added, "*but this is an epidemic.*"

[261] For this phenomenon, and some of its implications, see M. Comerford and S. Havlicek, Mainstreamed Extremism and the Future of Prevention (Institute for Strategic Dialogue, 2021).

determine whether an act of violence is ideologically motivated or driven by another factor like mental health."[262]

His words echoed Christopher Wray, Director of the FBI, who referred to a "*salad bar of ideologies*" in evidence given to a US Senate Committee in 2020.[263]

Current practice

5.13. Prevent Guidance has for several years acknowledged potentially dangerous persons without a fixed ideology, including those with mixed, unstable and unclear ideologies and those who have an obsessive interest in mass violence, as proper targets for the Prevent Duty and as potential subjects for Channel.[264]

5.14. Notwithstanding the Shawcross Review's Recommendation 15 that "*referrals should have an identifiable ideological element*", and the acceptance of his recommendations by the last government, this requirement is not present in guidance[265] and the position on the ground does not appear to have much changed. That is evident both from the current (post-Shawcross) categorisations,[266] and from the significant representation of people without traditional terrorist ideologies in referrals and cases adopted into Channel, including those who are now categorised as displaying "*fascination with extreme violence or mass casualty attacks*".[267]

5.15. This position was manageable in the past, with referrals and adoptions into Channel running at a fairly consistent rate between 2015 and 2024.[268] But referrals in 2025 are said to have risen markedly, and a smaller but still material increase has been observed in adoptions into Channel. While it may be that this will prove to be a spike rather than a more permanent shift, as has been the case after some other

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[262] MI5, "Director General Ken McCallum gives latest threat update", 8 October 2024.

[263] Wray said: "I think trying to put a lot of these things into nice, neat, clean buckets is a bit of a challenge because one of the things that we see more and more in the counterterrorism space is people who assemble together in some kind of mish-mash, a bunch of different ideologies. We sometimes refer to it as almost like a '*salad bar of ideologies*', a little bit of this, a little bit of that, and what they are really about is the violence."

[264] See 1.29-1.34, above. See for example the 2019 letter cited at 1.30 above, which expressly acknowledges both categories as suitable for Channel.

[265] See, e.g., Prevent Duty Guidance (2023) §§ 40, 44: "*There is no single model of a person's radicalisation journey …there may be times when the precise ideological driver is not clear*"

[266] See 1.32, above. They include "*multiple ideologies (with no dominant ideology)*"; "*fascination with extreme violence or mass casualty attacks (where no other ideology)*" and even "*no ideology – other susceptibility to radicalisation identified*".

[267] 1.33, above. For example, persons with "*conflicted ideology*" made up 18% of both Prevent referrals and Channel adoptions in 2023-24; and the figures for "*vulnerability but no ideology or CT risk*" were 36% and 6% respectively. Some real-life case studies are at **Annex 4** to this Report.

[268] See fn 48, above.

well-publicised incidents, this cannot be taken for granted and indeed it would be prudent to assume some permanent upward shift from pre-2025 levels.

5.16. This development has placed some Channel Panels under strain, as noted at 4.42, above. CTP, which owns the front end of the process, is concerned by the increase in volume. It points to the traditionally ideological focus of Prevent, and suggests that to blur that focus could impact on intelligence functions, triage and operational delivery, risking delay, squeezing resources and even diluting its ability to detect and tackle "*genuine terrorist threats*". A solution has been suggested under which the lead management of VFIs would sit below and distinct from Prevent in a new, standalone system.

Legal position

5.17. The Prevent Duty focuses on the need to prevent people from being drawn into *terrorism.*[269] The test for referring a case to a Channel Panel similarly requires reasonable grounds to believe that an individual is vulnerable to being drawn into *terrorism*.[270] Terrorism, in turn, requires a purpose to advance a political, religious, racial or ideological cause.[271]

5.18. Conceived as part of the CONTEST strategy, the scope of Prevent is limited by the definition of terrorism. Prevent has long been troubled by uncertainty over whether a potential subject risks being drawn into "*terrorism*" or into some other form of extreme violence for which Prevent was not strictly designed.[272]

5.19. The legal eligibility of VFIs for Channel has never been tested in court, but might, depending on the facts of an individual case, be established in a number of ways:

(a) Some types of violence fascination might qualify as ideologies in their own right,[273] or blend into adjacent ideologies.[274]

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[269] Or, in the proposed revision to Counter-Terrorism and Security Act 2015, s26(1) recommended by the Shawcross Review (Recommendation 6) and accepted in principle by the government, "*to prevent people from becoming terrorists or supporting terrorism".*

[270] This is the test in Counter-Terrorism and Security Act 2015, s36(3).The Shawcross Review Recommendation 2, already adopted in non-statutory guidance, favours "*susceptible*" over "*vulnerable*".

[271] Terrorism Act 2000, s1(1)(c).

[272] See, e.g., the decision after AMR's second referral to Prevent that in the absence of "*extremist ideology*" his case should be closed ([3.35 and 3.48(b)], above).

[273] The Columbine school shootings by Eric Harris and Dylan Klebold in April 1999 have spawned a worldwide "Fandom" and inspired over 50 other attacks. Some attackers have described the Columbine shooters as champions of "*the nobodies*", or "*martyrs*". Russia, which has been particularly badly affected by such attacks, is reported to have designated the online "*Columbine movement"* as a terrorist group. See D. Cullen, The Columbine-Killers Fan Club, The Atlantic, 19 April 2024.

[274] On the possible blending of ideological and nihilistic motivations, see Terror without ideology? The rise of nihilistic violence, Institute for Strategic Dialogue, May 2025.

(b) Even a mindset which is predominantly non-ideological may include an ideological cause as one of its elements.[275]

(c) A person with such a fixation or ideation might, depending on the facts, reasonably be considered vulnerable (or susceptible) in the future to other ideologies that fall unambiguously within the definition of terrorism.[276]

(d) There might be other, non-ideological reasons why the person is vulnerable or susceptible to being drawn into terrorism, given that many arrive at terrorism through non-ideological routes including loyalty to criminal associates, friends or family members (1.27(b), above).

5.20. A change to the law so as to locate VFIs unambiguously within the scope of Prevent would put the position beyond doubt. One way of doing this – an expansion of the definition of terrorism – was briefly considered after Southport, at the request of the Home Secretary, but advised against by Jonathan Hall KC, on the ground that it would have broader and undesirable consequences.[277]

5.21. A more tailored approach would be to amend legislation to clarify what will often be the case anyway: that VFIs fall within the scope of Prevent and Channel. The opportunity should be taken at the same time to consider whether as may well be the case there are criminal precursor provisions (e.g. Terrorism Act 2006 s5 – preparation of terrorist acts) that could usefully be translated into new offences applicable in the context of mass violence falling outside the definition of terrorism.[278]

5.22. To include VFIs within the scope of the Prevent Duty in circumstances where it is not obvious that they are susceptible to becoming terrorists or supporting terrorism might be argued to open up a distinction between the scope of Prevent and Pursue, and thus to question the coherence of CONTEST. That objection seems to me however to have little force. Because Prevent operates upstream of any terrorist offence, it is of necessity broader in its scope than Pursue. And just as the UK's counter-terrorism apparatus prides itself on its agility in adjusting to new types of attack, so those charged with preventing those attacks need the flexibility to adjust to changing blends of motivation such as those revealed in the examples at 5.5, above.

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[275] A non-trivial ideological purpose is likely to be sufficient to satisfy the definition of terrorism, even if it is subsidiary to non-ideological motivations: J. Hall, Independent Review on Classification of Extreme Violence Used in Southport Attack on 29 July 2024, March 2025, §2.8.

[276] A number of convicted terrorists have shown prior interest in school massacres.

[277] J. Hall, Independent Review on Classification of Extreme Violence Used in Southport Attack on 29 July 2024, March 2025, ch.4.

[278] As recommended by Jonathan Hall KC: *ibid.*, §§ 5.27, 5.30.

Conclusion

5.23. The arguments in favour of what is effectively the status quo (and the current interim policy position: 5.7, above), under which persons displaying "*fascination with extreme violence or mass casualty attacks*" are considered legitimate subjects for Channel – are in my view strong ones. In particular:

(a) The ***modus operandi*** of such attacks, and ***characteristics of the attackers***[279] bear strong similarities to those which are familiar from lone operator terrorist attacks.

(b) Attacks by such people have the potential not only to kill vulnerable victims, but to ***create fear and unrest*** on a scale comparable to that generated by terrorism.[280]

(c) AMR's story demonstrates that ***Channel can reach such people***; indeed had it been clearer that this was its proper function, it would have been more likely to have done so.

(d) Above all, ideologies, fascinations and ideations are in the mind: ***it can be hard to tell one from the other***, and not only in the immediate aftermath of a Prevent referral.[281] Experience shows that whether an individual has a single fixed ideology, a simple violence fascination or something in between may remain obscure, even (in the case of a completed attack) up to the point of trial or beyond.[282]

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[279] E.g. social isolation, personal grievances, desire for status and notoriety (often in online communities) and fascination with violence. A higher than average proportion of VFIs (as also of lone actor terrorists) have been noted as having mental ill-health and/or neurodivergence, though I have learned that these conditions can increase, decrease or be unrelated to the likelihood of a person being involved in violent activities.

[280] This was certainly the case for the Southport attack – though where the terrorism label cannot be attached to a crime, the publicity which fuels fear and unrest often falls off dramatically. As I once put it, "*The terror label – evocative as it is – risks distorting anything to which it is attached by its sheer emotional power*": D. Anderson, "Shielding the Compass: How to fight terrorism without distorting the law" [2013] 3 EHRLR 233-246.

[281] A point made by Ken McCallum of MI5 in the passage quoted at 5.12, above. Online "*mindset*" material that an individual may have downloaded is an unreliable guide, since it often discloses different and even contradictory ideologies and because the individual's interest in the material may not have been principally ideological: see J. Hall, Independent Review on Classification of Extreme Violence Used in Southport Attack on 29 July 2024, March 2025, §§ 3.1-3.6.

[282] A case in point is AMR: he came to the attention of Prevent after he expressed approval of the Manchester Arena attacks (1st referral) and was found researching the London Bridge attack (3rd referral); he was found to have downloaded the al-Qaeda training manual and manufactured ricin; yet he was not found to have a terrorist ideology.

5.24. I do not underestimate the difficulties to which CTP has drawn attention. They are symptoms of a broader issue, well understood across UK counter-terrorism: the need for an apparatus designed for an age of slow radicalisation and highly-planned Islamist cells to adapt to a more diverse threat environment, focused in particular on lone operators, where the boundary between terrorist and non-terrorist extreme violence is imprecise and mobile. But we expect other safeguarding resources, and other aspects of the CONTEST strategy, to be capable of responding to fluctuating volumes and types of demand. Resourcing issues are real; but the VFI threat is serious and needs to be properly resourced, whether it is routed through Prevent or not.

5.25. There is a balance to strike between on the one hand encouraging those who may be reluctant to refer appropriate cases to Prevent, and on the other hand discouraging weak referrals. Restricting or amending the categories identified at 1.32, above, would not address any perceived issue of over-referral since these categories are assigned later rather than being selected by the initial referrer. It is sought instead to seek discipline in referrals by a combination of training, the *"notice check share"* process required of referrers (which includes strong encouragement to check with colleagues) and the prompts for specific information in the National Referral Form. I note also that a compulsory dual referral process for Prevent (2.51-2.52, above) would trigger full engagement from Local Authority teams at an early stage; and that those operating Team Around the School (5.39(a), below) spoke to its advantages as a method of thoroughly road-testing potential Prevent referrals before they were made.

5.26. I have discussed the alternative suggestion of a bespoke standalone system, sitting below Prevent, to deal with VFIs (5.16, above). It does not answer the points made at 5.23, above – in particular, the impossibility of telling, at the stage of a Prevent referral, whether a case belongs in one system rather than the other. I assume also, given the potential danger posed by VFIs, that any new standalone system would have to provide access to equivalently tailored support and intervention to that provided under Prevent – no doubt from many of the same people who deal with Prevent cases, sitting on similar Panels and considering similar interventions and disposals.

5.27. Rather than save time or resources, therefore, it may be that such a system would introduce an additional burden of having to debate, often on the basis of inadequate knowledge, whether a case is better suited to one mechanism rather than the other. That is one of the consequences of allowing bespoke mechanisms for different types of violent crime to proliferate.

5.28. I therefore recommend that Prevent remains open to individuals who do not appear to have a clear ideology but who may have an interest in committing extreme or mass violence.

5.29. In the longer term, the more promising direction of travel may be towards a "*big front door*", focused on the individual rather than the crime type, behind which triage could be performed and the appropriate disposal decided upon. I turn to that theme at 5.30-5.44, below.

Recommendation 2

Prevent should remain open to individuals falling within the existing category of "fascination with extreme violence or mass casualty attacks".

Consistent efforts should be made to improve the quality of referrals and encourage those that are appropriate, including by providing clear and consistent messaging to potential referrers and to Prevent practitioners.

A WIDER VIOLENCE REDUCTION STRATEGY

5.30. I turn now to a proposal, less urgent but more ambitious than the one just discussed, to place Prevent within a comprehensive safeguarding and violence prevention strategy, behind what is sometimes referred to as a big (or wide, or agnostic) front door. I am indebted to my deputy Suzanne Jacob OBE, with her wide experience of safeguarding and multi-agency working, for developing this idea and testing it with many of those to whom we spoke during the Review.

The essence of the proposal

5.31. In an article published earlier this year, it was argued that

> "*Integration of local authority safeguarding boards with Channel boards would ensure that all safeguarding cases are dealt with by a unified body capable of determining the best intervention for a young person. By incorporating Channel into the broader safeguarding system, cases can be triaged to the most appropriate support (i.e. mental health services, social care or counter-radicalisation interventions). In many local authorities, Channel will already be involved with other safeguarding responsibilities; this makes it a natural fit which also guarantees wider safeguarding duties can be effectively cross-pollinated with Prevent's counter-terrorism expertise.*"[283]

[283] Institute for Strategic Dialogue, Failing to Prevent: Lessons from the Southport tragedy, January 2025.

5.32. Under such an arrangement, referrals currently being sent to Prevent could instead be routed to a mainstream multi-agency safeguarding forum. The most suitable existing candidate for this would be MASH or a similar local multi agency forum in England and Wales,[284] and equivalents in Scotland.[285]

5.33. Prevent would be retained in its entirety (including composite parts such as the Prevent Duty, Channel, Intervention Providers, the Clinical Consultancy Service and other bespoke arrangements) but would formally sit behind this front door, still distinct but better connected to a spectrum of responses to other serious problems. CTP would remain involved in triage, but only where appropriate (as to which, see 5.40(c) and fn 295, below), and the allocation of risk would stay as it is now.

5.34. Such a system would acknowledge that while Prevent is an early, upstream intervention in counter-terrorism terms, it is downstream in the context of primary and secondary prevention opportunities for more generalised social problems. Even Channel subjects who adhere to a single, identifiable and fixed ideology tend to lead complex lives in which issues of family breakdown, poor mental and physical health, economic problems and poor social adjustment are highly prevalent, and involvement in non-terrorist crime types is common.

5.35. I found strong support for this concept in the course of the Review, from both supporters and constructively-minded opponents of Prevent. The difficulties and complications should not be underestimated; but there are elements already in the system which could usefully be built upon to make it a reality.

Advantages

5.36. The intended advantages of such a system include the following:

(a) Replacing a complex and overcrowded landscape of multi-agency work designed to offer support and interrupt risks[286] with ***a more coherent and***

[284] Though MASH is largely focused on 0-18 year olds, the most developed MASHs combine adult and children's social care responses in one forum, and have the capacity to deal with vulnerable adults.

[285] The closest equivalent to MASH in Scotland are local authority-led Child Protection and Adule Social Protection processes. A coordinated "*front door*" approach is also evident in the Police Scotland-led Concern Hubs, which make a holistic assessment of protection and wellbeing concerns through research, decision-making and then sharing of relevant information with partners. The Scottish Government is, in addition, adopting the 'Barnahus' approach in Bairns' Hoose - Scottish Barnahus.

[286] It is doubtful whether an accurate and complete map of that landscape even exists. In early 2025, the Cabinet Office commissioned a piece of work from the Home Office and DfE which would map *the full range of police-led and local authority-led multi agency structures and how they expect cases to move through them with minimal friction, time delay and duplication of effort*. This piece of work is likely to highlight the continued proliferation of structures, but I was unable to track down a copy or ascertain whether it was ever completed.

connected scheme whose operating protocols could be written down, tested, exercised and iterated.[287]

(b) ***Liberating Prevent***, as the Shawcross Review wished, from the tendency to be made into a backstop for other social ills.

(c) Providing ***a systematic "step down" process*** back into mainstream interventions if the risk of radicalisation had reduced under Prevent but adverse factors remained which were not related to terrorism.[288]

(d) Helping to ***reduce the stigma*** that some feel about being referred to a place that appears chiefly interested in them as a potential terrorist. Some of the referrals currently being pushed into Prevent would avoid it altogether, and anything that did end up in Prevent would do so only after it had been decided after proper assessment that this was the right option.

5.37. A genuinely integrated system could in addition:

(a) ***improve coordination***, reducing the number of interventions in an individual's and family's life,

(b) afford agencies ***better visibility*** of each other's practice and expertise, and

(c) offer the chance radically to ***streamline performance metrics*** to see a clearer picture of what really works.

Existing models

5.38. In the last 12 months, the government has published a number of measures which suggest an ambition to move to a more integrated system of safeguarding. For example:

(a) The DfE recognises that ***MASH models*** are far from uniform: some MASHs have a full caseworking function, while others are simply a clearing house, pointing people to other services. It plans to set out a more rigorous systemic

[287] It *has* been suggested that the Southport attack *represents 'a failure of coordinated capability […] What failed in Southport was not a lack of referrals, but the failure to connect, comprehend, and cohere'*: M. Maszczynska, "*Rethinking Counter-Terrorism: Beyond Ideology—Violence, Vulnerability, and Deterrence in the Age of Hybrid Threats*", Deterrence Center, February 2025. The Southport Inquiry will express a concluded view.

[288] Rather than the current system of "*handing off*" to alternative structures – a phrase heard repeatedly during this Review – practitioners would be "*handing through*", as part of a coordinated system able to deal confidently with new information or changes in risk.

approach, and standards set at a national level, in the next iteration of Working Together, the statutory guidance on safeguarding. The system might benefit from longstanding disciplines within counter-terrorism, for example Standard Operating Procedures, clear referral pathways, joint manuals, and a dedicated programme of exercising and testing.[289]

(b) A new ***Young Futures team*** has been charged to *'identify and act on the risk young people face of being affected by crime'*. This team has absorbed responsibility for Violence Reduction Units and the Serious Violence Duty. It will also create Young Futures Prevention Partnerships (**YFPPs**) and Panels.[290] In linked work, the DfE will create Young Futures Hubs (located in youth centres or sports venues, and co-locating early support, mental health, coaching and Youth Offending Team expertise).

(c) The ***Children's Wellbeing and Schools Bill*** (which gives DfE an increased role in overseeing standards for multi-agency safeguarding, proposes a Single Unique Identifier for children, and addresses other issues of information-sharing). Plus, the ***Families First Partnership Programme***[291] which aims to promote earlier intervention with a child, adolescent or family which will be more effective, less intrusive, and less expensive.

(d) The Prevent ***Below Thresholds Pilot*** (4.62-4.64, above).

5.39. Examples of a multi-agency approach that can serve as a wraparound for Prevent have also been pioneered locally:

(a) ***Team Around the School*** has been operating in a number of areas, mostly in the north of England, since 2021, and was previously promoted by the government as good practice.[292] It was presented to me at a school in Southport as a genuinely primary prevention approach, through which a school hosts a social work team and regular health practitioner who visits. Together, they are able to provide an immediate source of expertise and

[289] Some similar suggestions have been made recently by the National Police Chiefs Council in MASH Guiding Principles, April 2025.

[290] The criteria for a young person to be referred to a Youth Futures Prevention Panel are expected to be that an individual is aged 11-18 (with some flex at the lower end) and has been named in two or more offences by police in the last 12 months. The offence need not have been violent. Referrals will only be accepted from the police. It was suggested to me that YFPP has the potential to act as a wider front door for violence prevention. However, I am more persuaded that MASH should provide this function, as it is (at its most developed) a more comprehensive site of safeguarding responses for all age groups.

[291] The Families First Partnership (FFP) Guide, DfE, March 2025. Chapter 1 states '*The goal is to prevent the escalation of issues and reduce the need for child protection investigations by offering early intervention*'. The starting point remains intra-familial harm (from parents/carers), but reference is also made to extra-familial harm (from outside the home).

[292] Supporting Families Programme – Team Around the School, 2022.

support where a concern about a child is raised. The structure is a relatively informal one but appears to inspire more trust in both parents and pupils than many statutory interventions, and was said to have assisted both in the formulation of Prevent referrals and in providing a safety net for cases closed to Prevent.

(b) The ***Champions programme*** in Lancashire was created to provide mentors to young people who came to the attention of the Violence Reduction Unit (or **VRU**), with all mentors affiliated to local football clubs. Since 2023, it has had a flexible arrangement with Prevent, providing a step-down opportunity for cases exiting or not appropriate for Channel, and a point of escalation if there are concerns about radicalisation. Champions operates on a voluntary basis, with consent sought from parents for younger children.

I was impressed by what I learned about these programmes, and would encourage their appraisal and (where warranted) their further spread, even in advance of the "*big front door*" model addressed in this section being further considered or pursued.[293]

Challenges

5.40. The challenges in the way of a "*big front door*" are many. For example:

(a) In respect of children, ***amended statutory thresholds*** for adoption into a joint agency response in MASH would be required, so as to ensure that Prevent cases – including those where the chief concern is ideological – satisfy the requirement for automatic information-sharing and multi-agency planning through MASH.[294]

(b) In current multi-agency working, individual practitioners who are inclined to collaborate come up against ***tools, powers, thresholds, performance metrics and culture which disincentivise meaningful joint work***. The necessary change in culture will only come from senior sponsorship throughout government departments and agency leadership.

[293] Team around the School in particular would however fit within a more coherent system if the role of MASH was formalised as suggested, as the routing between all these different bodies would be made explicit.

[294] The threshold for entry into MASH (and therefore joint rather than sole agency consideration) is largely governed by the Children Act 1989. However, even the statutory thresholds that legislation created (notably at Section 17 ("*in need*") and Section 47 ("*likely to suffer serious harm*") are subject to local interpretation. This is highlighted in pages 9 and 28 of recent National Police Chiefs Council guidance on MASH, where there is a repeated call for more robust agreements on thresholds for referral. The relevant legislation with regards to adults is the Care Act 2014, which indicates that information can be shared including to prevent a crime or address risks to the community.

(c) There will be issues ***regarding access by MASHs to sensitive data held by CTP***.[295]

(d) The most developed MASHs, and equivalent bodies, are highly functional. They deal with all age categories, have a robust caseworking system, and enjoy both interoperability and good working relationships between agencies. However, in some areas these features are not present. The ground to make up in ***areas with less developed MASHs***, both structurally and culturally, will seem daunting.

(e) If Prevent is seen to "*belong*" more to a safeguarding system than a security one, ***commitment to Prevent by CT specialist practitioners could be reduced*** – an issue that others have hinted at in the context of the Dovetail pilot.[296]

5.41. While these and accompanying challenges are substantial, they are not insurmountable. Baroness Casey in her most recent review has struck an insistent tone on the need for basic problems like disparity in risk and information-sharing thresholds to be overcome in order to stop repeat patterns of crisis, alarm, action, then a return to the status quo.[297] The right kind of multi-disciplinary team, overseen by a Minister and staffed by officials able to be open-minded, pragmatic and practical, should be able to break this issue down into component parts and find both quick wins and longer-term improvements. As pointed out at 5.38-5.39, above, many helpful pieces of work are already under way.

Conclusions

5.42. Rationalising and integrating existing structures – and looking again at the multitude of legislation and statutory duties that created them – would reduce gaps and duplication. It would also mitigate the risk that Prevent is used as a substitute for mental health, youth work or other forms of mainstream support.

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[295] A former police officer and safeguarding expert proposed that one way of overcoming the problem of sensitive triage would be for staff performing triage within the generalist front door to send a query to CTP once the CAF used within safeguarding had been completed. If priority indicators from the CAF were met, the MASH would be empowered to seek a RAG rating from CTP. This would not constitute a referral. The CTP rating would be taken from current PCMT entry for the individual (if one existed) or from other CTP sources of information and intelligence. A CTP liaison officer could also be located within the MASH for advisory purposes. Sharing a RAG rating in this way would increase the understanding of other agencies without initial disclosure of sensitive information. steps linked to RAG ratings would need to be developed and agreed between CTP, the Home Office and partners.

[296] See 3.59(d) above.

[297] L. Casey, National Audit on Group-based Child Sexual Exploitation and Abuse, Home Office, June 2025, at pp 6, 19, 42, 99, 105, 114-115, 120.

5.43. Existing government plans to change safeguarding and risk management systems will keep them in flux for a number of years. However, the medium-term prospects are for more effective underpinning of specialist responses like Prevent at the mainstream level. Rather than increase the number of multi-agency structures, the government should focus on ensuring that those that already exist are meaningfully integrated sites of joint work. There should be an aim to reduce the rate at which different agencies and structures impinge on a single individual or family's life.

5.44. The following steps would help facilitate the exploration and potential adoption of this idea:

(a) The appointment of a Cabinet Office task force to lead exploratory work, answerable to a senior Cabinet Office Minister and the Cabinet Secretary. That work cannot be done by any single line department.

(b) The mapping footnoted at 5.36(a), above.

(c) A thorough examination of what in the current landscape actually works, with a focus on dealing effectively the first time with an individual about whom there are concerns, rather than providing a series of short-term and category-specific interventions at multiple points.

(d) In parallel, close examination of the best models domestically and internationally, with secondments for knowledgeable current practitioners and former practitioners with recent experience, to identify and integrate the best operational examples.

(e) If approved, a small number of pilot sites with robust evaluation embedded from the start.

(f) A systematic decluttering of overcrowded/conflicting performance metrics.

(g) The removal of tightly ring-fenced funding streams where coordination and streamlining would reduce bureaucracy and increase local flexibility.[298]

(h) Rigorous financial analysis embedded throughout.

[298] The Young Futures team has heard criticisms that funding going into local areas is often piecemeal, complex and burdensome to access. The overall intention across government is for local areas to earn trust and gain entitlement to fewer ringfences. MHCLG is doing some specific work on this. The Young Futures team is exploring with local areas the current funding situation, including the challenges and opportunities for pooled budgets. Any move the government makes in the direction of pooled budgets will usefully go further than those of individual departments.

These activities will cross the lines of devolved and non-devolved matters. The close involvement of policy and operational leads from Scotland and Wales would therefore be required.

Recommendation 3

A Cabinet Office task force should be established to lead exploratory work into the possibility of formally connecting Prevent to a broader safeguarding and violence prevention system.

6. FURTHER ISSUES

6.1 To complete my task of "*identify[ing] remaining gaps or shortcomings that require further improvement*", I touch finally on a number of further issues. I do so under the following headings: The Shift Online, Transparency, Information-Sharing, Requirement of Consent, and Fresh Perspectives.

6.2 On some issues I have arrived at recommendations; others I have flagged for further consideration, mindful that I have served as Interim Commissioner for only a few months, that legal and policy issues are in the course of flux and that it will likely be for others to take this work forward.

THE SHIFT ONLINE

6.3 As the Director General of MI5 said in October 2024:

> *"it's hard to overstate the centrality of the online world in enabling today's threats."*[299]

Yet the complexity of how different individuals engage with the internet, as both consumers and creators of content, poses a fundamental challenge to established analytical frameworks. Approaches that might have been adequate 10 or 20 years ago for understanding organised terrorist activity are insufficient for understanding the digital footprints of self-radicalised individuals, whether Islamist, extreme right-wing or neither, whose online behaviour patterns are increasingly difficult to detect and interpret.

6.4 In a recent book, the Pulitzer Prize-winning journalist James Ball described conspiracy movements and violent online cults as "*digital pathogens*", evolving and mutating without regard to borders, and likened our current predicament to a digital pandemic.[300] As he pointed out, minimising the effects of a real-world pandemic demands a full-spectrum response. The three main elements of that response might be summarised as (a) protective interventions such as vaccination applied to the population at large; (b) public health measures aimed at eliminating the pathogen; and (c) identifying and treating those who are infected.

6.5 An effective response to a digital pandemic – whatever the ideological variant of the virus concerned – requires three analogous elements, none of them sufficient on their own. I would describe them for the purposes of this Report as:

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[299] MI5, "Director General Ken McCallum gives latest threat update", 8 October 2024.

[300] J. Ball, The Other Pandemic: How QAnon contaminated the world (Bloomsbury, 2023), ch.12. See also, e.g., J. Reimer, "The 'Public Health Approach' to Prevention", Institute for Strategic Dialogue, 2023.

(a) ***a resilient population***: promoting community cohesion and qualities such as tolerance, critical thinking and digital literacy;[301]

(b) ***a safer online environment***, which in the current absence of effective self-regulation, even by mainstream platforms such as X, comes down to measures of the limited kind now being ventured in the UK under the Online Safety Act 2023;[302] and

(c) ***attention to those affected***: identifying those who are on a pathway to terrorism and seeking to avoid the worst consequences by diverting them from the influences to which they have been exposed.

6.6 Channel is responsible for the third of those elements. Conceived in an age when radicalisation was largely a real-world affair, its priorities and processes have evolved in a still predominantly off-line context. It seems essential to review what more could be done both to *identify* those at risk of being drawn into terrorism (or equivalent violence) and to *evaluate and address* that risk.

Identification of persons at risk

6.7 The central mechanism by which people are drawn to the attention of Prevent is the Prevent Duty, founded on the real-world interactions of the potential Prevent subject with local authorities, healthcare providers, education, police and criminal justice agencies. The Prevent Duty guidance notes that

> "*the internet has become the 'preferred' avenue for those searching for terrorist propaganda or contacts*",

and records the decline of the previous "*hybrid pathway, involving both online and offline influences*".[303] Yet while the guidance counsels "*limiting the use of permissive online environments*", and requires education settings in particular to assess the risks of online radicalisation,[304] the model for Prevent referrals remains resolutely based on real-world contacts.

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[301] Some work in this area is funded by Prevent; see 4.73, above.

[302] The ideal solution would be for companies to exclude radicalising material from their platforms, but there was little confidence that this could be achieved by purely voluntary means. The Global Internet Forum to Counter Terrorism (**GIFCT**) was intended to prevent terrorists and violent extremists from exploiting digital platforms. However, even before the 2024 US Presidential Election, prominent American platforms were rolling back policies that had reduced the presence of hateful and radicalising content, and laying off teams tasked with maintaining platform integrity: Nora Benavidez, Big Tech Backslide, Free Press, 2023. I encountered low confidence in tech company initiatives that relied on a series of escalating prompts asking users to address their online activity. The government's priorities for online safety were recently set out in its Final Statement of Strategic Priorities for Online Safety (July 2025).

[303] Prevent Duty Guidance, 2023, §29.

[304] *Ibid.*, §§ 83, 162.

6.8 The limitations of this approach are illustrated by AMR's third referral to Prevent, which was prompted by

> *"conversations between AMR and his teacher when [they] saw him with internet tabs open during lessons with 'London Bridge' being visible to the teacher".*[305]

The teacher acted commendably in identifying the tab that could be physically seen to be open, in engaging AMR in conversation and in making a repeat referral. Yet it seems extraordinary that the only aspect of AMR's no doubt extensive online activity that was capable of raising an alarm took place on a school computer, in an offline environment, under the real-world gaze of a teacher.

6.9 Many schools already use filtering and monitoring software on their IT systems which generates alerts when specific keywords are used in searches – for example a specific terrorist organization, extreme content or violent rhetoric.[306] The results of filtering should be shared regularly with the Designated Safeguarding Lead (in Scotland, Child Protection Lead) or Head Teacher.

6.10 Software is generally provided by commercial software vendors on a borough-specific or even school-specific basis, and there is no overarching system to collate information about how they are being activated. However, the NGO Tech against Terrorism suggested to me that such data might usefully be aggregated in anonymised form, to help provide critical intelligence on emerging trends (including risk factors, the assessment of risk and the identification of clusters and escalation) not only within schools but regionally and indeed nationwide.

6.11 It is probable however that most of the online behaviour warranting referral to Prevent, even where school-age children are concerned, does not take place on school computers but at home or on personal devices. It is legitimate to ask whether more could be done to identify individuals in public online spaces who are at risk of being drawn into terrorism. As one interlocutor put it to me:

> *"In a classroom there is a responsible adult. More often than not there is no responsible adult online."*

6.12 There is no obvious candidate upon whom an online Prevent Duty could or should be imposed. The Home Office has looked at options for the pro-active identification of potential Prevent subjects online, based on open-source research of statements

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[305] Prevent Learning Review (AMR), p.31; 3.38, above.

[306] Schools should also use software called the Child Protection Online Management System to record safeguarding data and incidents. These generate alerts and should be taken into account at moments of transition, e.g. when a child is changing school.

made on publicly accessible platforms, but has not as yet found a way to do so that adds significant value to the current offline referral system.

6.13 Other options, not involving public authorities in the search, could also be envisaged. For example:

(a) Tech platforms have a track record of assisting law enforcement in detecting serious crime,[307] and are now under legal duties in the UK relating to illegal content and content harmful to children.[308] It could be worth exploring whether serious and repeated breaches of relevant aspects of their own codes could feed into Prevent.

(b) The opportunity could also be taken to raise awareness of routes by which public-spirited individuals could pick up on behaviour encountered online that meets the threshold. This would require a simple referral process for online reporting to Prevent.[309] If such possibilities came to fruition, they would no doubt put additional strain on the entry point to Prevent, which would have to be managed. That is not however a reason why they should not be explored.

Evaluating and addressing the risk

6.14 Once a person has been referred to Prevent, an early and reliable understanding of their online activity is of the highest importance. Indeed, such an understanding can make all the difference between a marginal Prevent referral and an urgent one. It may also identify behaviour that requires investigation under Pursue.

6.15 In his Prevent Learning Review of AMR's case, Tony Jenkyn recommended that consideration be given to strengthening CTCO guidance so as to mandate open-source research at the initial assessment, partly because of its potentially decisive importance and partly on the basis that FIMUs are relatively well resourced to conduct it.[310] CTP preferred to mandate open-source research at the later, information-gathering stage, where understanding of the individual might be better but where the open-source research would presumably be the responsibility of a busy CTCO, with the help of such resource as they might be able to call on.

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[307] In 2023, hash matching technology used by one social media company alone (Meta) contributed to monthly averages of over 800 arrests of suspected child sex offenders and an estimated 1,200 children being safeguarded from child sexual abuse.

[308] Online Safety Act Explainer, April 2025.

[309] Online activity can of course already form the subject-matter of a Prevent referral; but while the National Referral Form is readily available, it has not thus far been possible even to complete that form online.

[310] Prevent Learning Review (AMR), Recommendation 4.

6.16 I am not satisfied that the necessary tools are in place for addressing internet activity at either stage, or that the necessary priority is being given to it.[311] The Review team heard that police officers handling Prevent cases are often working with rudimentary tools, manually searching the internet for each case. This creates significant inefficiencies. Channel Intervention Providers and youth work specialists were similarly adamant that opportunities are being missed, and despite operational updates and learning products supplied by the Home Office, not all Intervention Providers have the necessary familiarity and confidence with the online experiences of individuals with whom they are working.

6.17 There are signs of useful activity in this space, including:

(a) a joint NCA/CTP chaired taskforce, supported by an intelligence fusion cell, to bring together an all-source intelligence collection capability against a range of increasingly overlapping online threats including terrorism, cybercrime and child sexual abuse.[312] The fusion cell is currently very limited in scope.

(b) CTP's intention, described in **Annex 6** in response to Recommendation 4 of the AMR Prevent Learning Review, to develop a project team to work towards understanding current best practice in searching and locating Prevent subjects online.

(c) A CTP initiative to harness digital capability and tackle online risk by developing and implementing a policy to ensure that Prevent referrals are consistently assessed for online threat indicators, together with training and collaboration.

These initiatives, as well as any further work there may be of the type referred to at 6.12 above, will require close scrutiny as they develop.

6.18 It was suggested to me that:

> "A centralised, consolidated open source intelligence agency responsible for coordinating open source intelligence collection and analysis – including the use of AI across counterterrorism operations could address both the fragmentation of current capabilities and the regulatory uncertainty that hampers effective data use."[313]

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[311] This is once again illustrated by AMR's case, in which, according to both the Prevent Learning Review (3.47(c), above) and the CTP organisational learning process (3.55(b), above), key decisions were made without digital lines of enquiry having been completed, or recorded as completed.

[312] This taskforce has been meeting since March 2025 and has been assessing the current contributions from departments and agencies relating to online threats.

[313] By Adam Hadley CBE of Tech against Terrorism. For use of AI within MASH, see the initiative of Thames Valley and Hampshire Police, noted in the MASH Guiding Principles (April 2025), p. 16.

That seems to me a possibility well worth exploring, or indeed re-exploring, in the context of forthcoming police structural reform and the stated priority to consolidate important national capabilities.

Recommendation 4

All feasible and rights-compliant avenues should be explored as a matter of priority to enable evidence of online activity to be more effectively used:

- ***to gauge risk factors, assess risk, identify clusters and escalation and activate and manage responses;***
- ***to assist in the identification of potential subjects for Prevent; and***
- ***to evaluate and address the risk factors attaching to individuals referred to Prevent.***

TRANSPARENCY

6.19 An element of public trust is essential for the functioning of any police power; but it is especially important in the case of Channel because (unlike, for example, stop and search or CT ports powers) its functioning depends on voluntary cooperation. This has a number of aspects:

(a) ***Teachers, doctors, family members and others*** need to trust Prevent enough to refer individuals to it.

(b) ***Individual subjects and their parents*** (if they are under 18) need to trust it enough to consent to supportive Prevent interventions.

(c) ***Businesses and non-profit organisations*** operating in the community may be reluctant to partner with Prevent if they consider that the community will not approve of what they are doing.

Opponents of Prevent like to place emphasis on its more opaque aspects: I have observed for example attempts to characterise PLPs (as to which, see 6.40, below) as obscure and sinister. Refusals of freedom of information requests, particularly if followed by successful applications to the Information Commissioner, are portrayed as further evidence of an over-secretive Home Office with something to hide.

6.20 Trust can be promoted to a certain extent by the presence of an independent figure such as the Prevent Commissioner, who sees the workings of Prevent from the inside and aims to evaluate them without preconceptions or biases for the benefit of those who do not. But in an age that increasingly mistrusts authority, more is required. If Channel is to be successfully sold as a safeguarding strategy, ***maximum openness needs to be the default***.

6.21 The consensus among Prevent practitioners, police and NGOs is that the level of controversy attaching to Prevent within some Muslim communities, though still substantial in places, is lower than it was 10 years ago. Transparency in the form of publication since 2017 of annual statistics deserves part of the credit for this, particularly as it has shown that only a small proportion of Prevent referrals (13% in 2023-24) relate to concerns about Islamist radicalisation.

6.22 The drumbeat of criticism from NGOs, UN rapporteurs and some academics has however continued.[314] Such genuine concerns as they raise will require careful attention from the permanent Prevent Commissioner and from government. It was put to me that any apparent reduction in controversy may signify not so much that politically aware Muslims are reconciled to Prevent as that they are distracted by other topical issues (notably, events in Gaza and the perceived demonisation of Muslims by senior public figures in some countries). A Muslim community activist who supports Prevent cautioned me not to mistake disengagement with the issue for acceptance, and warned that disengagement carries risks in terms of reduced insight and knowledge.

6.23 Regional Prevent leads attached to the Home Office and Department for Education, as well as specialist Intervention Providers, provide support to local individuals and organisations. This includes surge capacity and support in times of tension or crisis. However, I was told of organisations (e.g. universities) having adopted an institutional position which significantly limits their own ability to keep pace with the changing nature of Prevent, to adequately represent it to their constituents, or to influence its evolution.[315] Some organisations have simply opted out of the system, despite the Prevent Duty.

6.24 Suspicion of state-run safeguarding systems is not unique to Prevent.[316] However, any increased acceptance for Prevent remains fragile, and contingent on continued

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[314] See 1.54-1.58, above, referencing also specific attacks on the Shawcross Review.

[315] The Shawcross Review found that "*anti-Prevent narratives dominate the discourse about Prevent in British universities*", W. Shawcross, Independent Review of Prevent, HC 1072, February 2023, §6.29.

[316] Many of the accusations levelled at Prevent can also be found in criticisms of mainstream safeguarding. A June 2025 evaluation of MASH for DfE notes that parents whose families had been involved with MASH described potential negative outcomes including increased family mistrust in services and distress caused by poor communication or inappropriate timing of interventions; concerns about the way that

openness and dialogue. In other jurisdictions considered during this Review there is little opposition to equivalent programmes to Prevent.[317] I was also left in no doubt by Prevent practitioners that support from Ministers for the principle of Prevent and for those seeking to deliver it is very much appreciated, and that any perception of the reverse is widely seen as demoralising.

Recommendation 5

Public transparency about the structures, systems and statistics of Prevent should be the default position. The Home Office and CTP should adopt a pro-active approach to the release of such information and be ready where possible to publicise the successes of Prevent.

6.25 As Independent Reviewer of Terrorism Legislation, I witnessed the goodwill that was created when CTP brought members of the public into Heathrow Airport to witness the operation in practice of the then controversial ports power in Schedule 7 to the Terrorism Act 2000. I believe that Prevent could perform a similar service by inviting journalists and critics to attend simulated Channel Panels. A vehicle for this already exists in Channel Panel simulation exercises run by the College of Policing, which use Hydra technology. These exercises exist to improve and spread good practice amongst Prevent practitioners.[318]

Recommendation 6

Civil society representatives who are sceptical about Channel or wish to understand it better should be invited to attend simulated Channel Panels organised for training purposes.

6.26 I was surprised to learn from a respected CSO providing school outreach work in a number of big cities that it was not on the mailing list for the RICU reports that are widely circulated, for example to Intervention Providers. They told me they would expect to find this helpful. These reports give useful guidance on the latest trends in radicalisation, at a low level of classification. They could with advantage be sent

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practitioners shared information, particularly "*historic*" data which parents thought was not relevant to their child's current situation; and families feeling under surveillance and excluded from the information-sharing processes that could follow a referral into children's social care.

[317] See **Annex 5**, §15. This is attributed to community outreach (New Zealand), mainstreaming (Netherlands) and a focus on crime prevention, public health and education (Germany). The previous Office of Targeted Violence and Terrorism Prevention in the USA is said to have been overhauled "*due to its controversy among civil liberties and American Muslim organisations*": M. Comerford and S. Havlicek, Mainstreamed Extremism and the Future of Prevention Institute for Strategic Dialogue, 2021, p.9.

[318] Suzanne Jacob attended a day of Hydra-enabled Channel simulation in London (4.34, above), and reported that the Panels closely resembled the real ones that both she and I have observed around the country. The value of these events was also enthusiastically reported to me by Channel Chairs.

also to CSOs operating in the field. It may also be that helpful feedback would start to flow in the other direction.

Recommendation 7

RICU briefings should where possible be circulated when they could be useful to CSOs working in the field.

INFORMATION-SHARING

6.27 The lawful flow of information and intelligence is a critical aspect of joint agency working.[319] I heard or saw a wide range of instances where this could be working better, for a variety of reasons including:

(a) ***Resource constraints and over-caution***: Local Authority Channel Chairs indicated that their local health bodies are, in some cases, still using paper files. One senior law enforcement officer said "*we will remain hamstrung by this being a relatively low priority for the NHS*". Though legal grounds for sharing will often exist (1.39, above), information-sharing in this context can be highly challenging.

(b) ***Lack of knowledge and understanding*** about other agencies' work: Channel Panel simulations clearly show the value to organisations being in a learning environment with practitioners from other agencies. The further promotion of such events, or even making them mandatory for core Channel members, would be worth considering.[320]

(c) ***National security concerns***: DfE wonder if they are currently able to provide a strong enough flow of information back to the Chief Social Worker, Ofsted, Office for Students and education partners. There is no formal or systematic mechanism to declassify discussions or papers or to provide a sub-group forum at lower classification to ensure they are disseminated to the wider Prevent network.

6.28 I saw instances of (non-CT) police Prevent leads not being invited to Channel Panels or local Prevent programme boards. They are also not part of any kind of national network for counterparts in other forces. This seems counterintuitive; while

[319] For relevant legal and professional principles, see 1.39, above.

[320] Precise data is not available but at the moment attendance at these exercises is estimated to be roughly 70% Local Authority, 20% Health and 10% CTP. The low rate of attendance by CTP means some groups within the exercise will not have a CTCO in them, with their ability to learn constrained as a result and likewise for CTP members.

individual case details may be highly sensitive, strategic governance and the flow of strategic information and common learning should be as strong as possible. If frontline and regional lead police officers are unsighted and unable to influence CTP, they will not be able to fulfil their responsibilities.

6.29 There is also consistent, long-term evidence from post-incident reviews (e.g. terrorism and domestic homicides) that more agile information sharing can prevent tragedies.[321] Inadequate information-sharing is often criticised, similarly, in child safeguarding practice reviews and serious case reviews.[322] Inspectorates and oversight bodies have for a long time championed the benefits of putting together a cumulative picture to understand a person's needs most effectively. The government has recently accepted Louise Casey's recommendations regarding the persistent failure to share information which has allowed course of conduct offences such as child sexual exploitation to go unpunished.[323]

6.30 It has been evident during this Review that some individuals and agencies will not share all relevant information even *after* an atrocity has happened. Information sharing should be based on protecting public safety. The current Children's Wellbeing and Schools Bill has a heavy emphasis on increased and improved information sharing, including through the adoption of a Single Unique Identifier for children.[324] This reinforces new guidance published by the Department for Education in 2024, cited approvingly by one strategic policing lead as having unlocked local difficulties with information flows.[325]

6.31 I would note finally, in relation to the issue of data standards, that effective information-sharing is not only about quantity and timeliness, but about the quality of information. There is no room for complacency on this.

Recommendation 8

Compliance with respective agency mandates to share information should be more closely monitored by their regulators and inspectorates. Consideration should be given to introducing a duty to cooperate with speed and candour in reviews after adverse incidents.

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[321] The UK Caldicott Guardian Council has commented: "*Domestic homicide reviews make depressingly predictable reading, as they indicate that the failure to share crucial information continues to be a significant factor across health and care, despite the introduction of a seventh Caldicott Principle in 2013:* The duty to share information can be as important as the duty to protect patient confidentiality."

[322] Y. Stanley, "Getting the 'front door' right for children and families", Ofsted blog, June 2025.

[323] Government Response to the National Audit on Group-based Child Sexual Exploitation and Abuse report, June 2025, Recommendations 5-7.

[324] Children's Wellbeing and Schools Bill 2024-25, clause 4.

[325] DfE, "Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers, May 2024.

6.32 One further, specific issue relating to the sharing of information is the absence of ***Home Office access to PCMT data*** pre-dating section 36 decisions to refer to Channel.[326] This derives from the fact that CTP is the sole controller of data in the pre-Channel space and PLPs. The following points were pressed on me by the Home Office:

(a) The Home Office has responsibility for overseeing Prevent activity at the local level, issuing guidance and directions to specified authorities, and providing central monitoring for the duty.

(b) To monitor delivery, the Home Office needs to analyse referrals made to Prevent and the changing nature of the cohort that may need access to Prevent programmes. This is said to need individual-level data.

(c) The Home Office also wishes to analyse the vast bank of PAF PRS data, captured prior to the Gateway Assessment, in order to assist its understanding of changing and emerging threats.

(d) at the intelligence assessment stage, it is part of the Home Office's Quality Assurance function to understand why cases do not proceed to Channel and why they go into PLP or are closed. Access to the pre-section 36 data would allow inconsistencies to be identified, and improvements suggested.

6.33 CTP on the other hand emphasised that it had its own analysis team (which I met, just as I met HSAI in the Home Office), and that the pre-section 36 stage was a police responsibility which it would not be appropriate for the Home Office to monitor or be seen to be monitoring. It was said that the Home Office did have access to certain categories of aggregated data, sufficient to meet at least some of the needs that it was asserting. Reference was made to other sensitivities relating in particular to security clearance and the possibility of leaks.

6.34 Both sides advance their opinions in good faith, and on the basis of their technical understanding of the relevant systems. It would not be appropriate for me to seek to arbitrate these differences through the mechanism of a public report; but I urge the Home Office and CTP to resolve them, and to do so on a basis that allows information to be shared, subject to any necessary safeguards, in a manner that allows for the fullest possible analysis in the public interest by both CTP and the Home Office.

[326] See 1.13 and 3.54, above.

Recommendation 9

The Home Office and CTP should resolve the question of Home Office access to PCMT data pre-dating section 36 decisions to refer to Channel, on a basis that allows information to be shared, subject to any necessary safeguards, in a manner that allows for the fullest possible analysis in the public interest by both CTP and the Home Office.

THE REQUIREMENT OF CONSENT

6.35 Some supportive Channel interventions by their nature do not require the consent of the subject (e.g. putting a stop to bullying of the subject at school, or local authority actions pursuant to a safeguarding duty). Others, including attendance at Intervention Provider sessions, are usually assumed to require the cooperation and hence the consent of the subject.

6.36 A minority of the Prevent practitioners with whom I discussed the subject were of the view that there should be a power to make such Channel interventions mandatory.[327] Their reasoning was that consent rates are not as high as might be wished (which is certainly true: see 4.13), and that the individuals who do not consent, or whose parents do not consent, to Prevent interventions may be among those most in need of intervention.

6.37 There are circumstances in which attendance at appointments can be mandated, e.g. with offender managers for those on probation within the criminal justice system, or for those who are subject to executive orders such as Terrorism Prevention and Investigation Measures.[328] The thresholds for those interventions are however markedly higher than for Channel.

6.38 A majority of practitioners that I spoke to were opposed to compulsion, noting that the voluntary nature of Channel was at the heart of the system, and a key element of securing consent to it both from individuals referred to Prevent and from the wider public. It was also said to be the case that an intervention initially refused may be offered again, and sometimes accepted, if circumstances change.

6.39 As a matter of operational practice, an individual's refusal of an Intervention Provider often results in the subject being moved from Channel to PLP; but since

[327] Though this was not a primary focus of this Review, it is indirectly relevant given (for example) the sensitivities expressed by AHA's Intervention Provider about not pressing too hard in initial interview lest consent be withheld for future meetings: 2.31, above.

[328] Terrorism Prevention and Intervention Measures Act 2011, Schedule 1 paragraph 10A.

PLP has no more power than Channel to compel an intervention, this is by no means a complete answer.

6.40 I would add in this context that there is a wider discussion to be had about the role of PLPs in Prevent. A number of Channel Chairs complained to the Review team about lack of transparency, including being excluded from PLP meetings despite this being contrary to guidance. There is a widespread view that the legal basis on which PLPs operate is not sufficiently widely known, and that PLPs needs more formal structure, consistency, guidance, protocols for information-sharing and data-sharing protocols, and more systematic case management. It is also questioned whether the refusal e.g. of an Intervention Provider by a Channel subject should continue to have the effect of automatically moving that person from Channel to PLP. The role of PLPs has recently been reviewed internally, and is currently under discussion between the Home Office and CTP.

6.41 Youth Diversion Orders (or **YDOs**), proposed by the Independent Reviewer of Terrorism Legislation and contained in the Crime and Policing Bill currently before Parliament,[329] will enable the courts to impose measures to reduce terrorist risk and support a person aged 21 or under away from terrorist ideologies, decreasing the risk of further involvement in the criminal justice system. They will not be co-extensive with Prevent, and will be available, on the balance of probabilities, only if the court assesses that there is evidence the young person has committed a terrorism-related offence or has conducted themselves in a way that was likely to facilitate the commission of a terrorism offence. Nonetheless, they present the potential for mandatory interventions in a particular category of cases that could otherwise be considered under Prevent. Indeed it may be that the prospect of a mandatory YDO might focus a subject's mind on the desirability of consenting to a Channel intervention.

6.42 There would be obvious difficulties in removing the requirement of consent for interventions that require the cooperation of the subject. It may be however that the permanent Prevent Commissioner will wish to revisit this issue in the light of any changes to the position of PLPs, experience with Routes to Intervention[330] and the forthcoming introduction of Youth Diversion Orders.

ENHANCING INSIGHT

6.43 Many who work in the Prevent network demonstrate a commendable commitment to new learning and approaches. In that spirit, and after discussion of these points

[329] Crime and Policing Bill: counter-terrorism and national security factsheet, June 2025.
[330] See 4.57-4.59, above.

at least in outline with relevant departments, I make the following final suggestions for perspectives that might offer further information, insight and opportunities:

(a) Methods for ***young people*** to discuss and feed in ideas about Prevent, for which their peers are increasingly the main cohort.[331] This could be delivered through existing programmes such as Vigilant.[332]

(b) Systematising good local examples I saw of ***engagement with parents*** of those referred to Prevent (both minors and adult children). This might include more structured and consistent information, support and opportunities for involvement. This work would also usefully be explicit in addressing the issue of non-compliant, absent and/or dangerous fathers and male carers, a group which featured significantly in Channel Panels observed by the Review team.

(c) Inviting one or more specialists in ***male violence and masculinities*** to peer review core Prevent materials.[333]

(d) Forging links with those who are attempting to tackle the problem that ***Black and mixed heritage boys*** are less likely than others to have been referred for Early Help support before they encounter the criminal justice system.[334] When opportunities for earlier and more supportive interventions have been missed, interventions at the Prevent stage may be more challenging.

Recommendation 10

Consideration should be given to:

- ***finding ways for young people to discuss and feed in ideas about Prevent,***
- ***systematising good local examples of engagement with parents,***

[331] I was told that this was a core function of CPTHQ's CT Advisory Network (CTAN), a stakeholder engagement forum that was wound down in 2023.The Deterrence Center has proposed the '*systematic integration of youth perspectives—both supportive and critical—through meaningful engagement with young people and digital culture experts. Such engagement ensures that safeguarding and intervention frameworks are informed by the realities of youth experience rather than assumptions or stereotypes*': M. Maszczynska, "Rethinking Counter-Terrorism: Beyond Ideology—Violence, Vulnerability, and Deterrence in the Age of Hybrid Threats", Deterrence Center, May 2025.

[332] The Vigilant workshop is delivered by Minus Violence in Kirklees, Manchester, Cardiff and Birmingham.

[333] This is not about specific incel culture, referrals for which make up just 1% of Prevent referrals. Dr Jade Levell analyses how traditional notions of masculinity intersect with vulnerability and violence, including the pressures felt by men who experience domestic abuse in childhood. The rate of domestic abuse experience amongst the Prevent cohort was shown in a 2021 research project (Project Starlight, commissioned by CTP) and was a feature of the Channel Panels observed by the Review team.

[334] HMI Probation Thematic Inspection of the Experiences of Black and Mixed Heritage Boys in the Youth Justice System, HMIP, October 2021. Chapter 2.1.

- *having a specialist in male violence and masculinities peer review core Prevent materials, and*

- *addressing the particular circumstances of Black and mixed heritage boys who are less likely to have been referred for Early Help.*

7. CONCLUSION

7.1 Prevent has implacable enemies and critical friends. Among the accusations levelled at it, from a variety of directions, are that:

(a) It ***lacks teeth*** since engagement is voluntary and engagement rates variable; alternatively, it ***abuses the power of the State*** to harvest data and inhibit free speech.

(b) It is ***too easy on Islamists***; alternatively, it ***stigmatises Muslims***.

(c) By its old-fashioned insistence on ideology or (conversely) its modish interest in those with none, it risks ***focusing on the wrong threat***.

(d) It does not live up to its ambitious name, ***failing to detect potential terrorists*** or, when it does detect them, ***failing to prevent atrocities***.

7.2 Within the ambit of that last criticism fall both the cases under review. Teachers had good reason to refer both AHA and AMR to Prevent – but Prevent did not take its chance to make a difference. I have catalogued the string of failures that, after a promising start, attended AHA's involvement with Prevent. It will be for the Southport Inquiry, whose work is already under way, to reach definitive conclusions in relation to the case of AMR. Whether different decisions might have spared their victims will never be known: both attacks came years later, and many imponderables intervened. But Prevent failed in both cases; and from these failures, lessons must be learned.

7.3 An intensive series of efforts has been made by both the Home Office and CTP to improve the relevant processes, training and guidance. The jury is still out on some of these initiatives, and none of them can substitute for human judgement or remove the possibility of human error. But developments such as the revised PCMT, the Prevent Assessment Framework and the Clinical Consultancy Service – each of which started in 2024 – have the potential to improve in material respects the inner workings of the machine.

7.4 Wider decisions loom on how Prevent can be better tailored to the online world inhabited by so many of its subjects; how best to deal with those whose ideology amounts to little more than a fascination with extreme violence; and whether Prevent should ultimately be embedded in a more general violence reduction strategy. A rigorous independent review is assessing the effectiveness of Channel. In the meantime, there is more that could be done to open up Prevent, both

through internal information-sharing and through the external transparency that could help to banish lingering mistrust.

7.5 It is the function of independent assessors to identify what is bad and seek out what could be better. But when they see constructive attempts to address intractable problems, it is their duty to note that also.

7.6 So I record, finally, how heartening is has been to see local practitioners striving to make the best decisions they can against shifting and uncertain backgrounds; and how moving it can be to hear, directly from former Channel subjects and their relatives, stories of lives turned round by inspiring and resourceful Intervention Providers.

7.7 In view of the determined attempts that have been made in some quarters to portray Prevent as an assault on the peaceful practice of Islam, I would like to add that some of the most committed Prevent practitioners that I have met over the last decade are themselves Muslims. They tend to have thought long and hard about the work, but feel strongly that it is both legitimate and necessary. Given the well-evidenced possibility of backlash (1.60, above), I found this deeply impressive.

7.8 All who have a part in Prevent, whether in our cities, nations or regions, in central or local government, the police, professions, voluntary sector or families, are venturing into sensitive and contested terrain. They do not always get it right – but their aim is to safeguard both the interests of the public and the wayward individuals they seek to reach before things get worse. Their work requires objective and unflinching scrutiny. As human beings they deserve our support – and our thanks.

8. RECOMMENDATIONS

Recommendation 1 (4.79)

The utility of the Standards and Complaints Unit should be assessed, along with the question of whether it requires statutory powers in order to be an effective complaints mechanism.

Recommendation 2 (5.29)

Prevent should remain open to individuals falling within the existing category of "fascination with extreme violence or mass casualty attacks".

Consistent efforts should be made to improve the quality of referrals and encourage those that are appropriate, including by providing clear and consistent messaging to potential referrers and to Prevent practitioners.

Recommendation 3 (5.44)

A Cabinet Office task force should be established to lead exploratory work into the possibility of formally connecting Prevent to a broader safeguarding and violence prevention system.

Recommendation 4 ***(6.18)***

All feasible and rights-compliant avenues should be explored as a matter of priority to enable evidence of online activity to be more effectively used:

- ***to gauge risk factors, assess risk, identify clusters and escalation and activate and manage responses;***
- ***to assist in the identification of potential subjects for Prevent; and***
- ***to evaluate and address the risk factors attaching to individuals referred to Prevent.***

Recommendation 5 (6.24)

Public transparency about the structures, systems and statistics of Prevent should be the default position. The Home Office and CTP should adopt a pro-active approach to the release of such information and be ready where possible to publicise the successes of Prevent.

Recommendation 6 (6.25)

Civil society representatives who are sceptical about Channel or wish to understand it better should be invited to attend simulated Channel Panels organised for training purposes.

Recommendation 7 (6.26)

RICU briefings should where possible be circulated when they could be useful to CSOs working in the field.

Recommendation 8 (6.31)

Compliance with respective agency mandates to share information should be more closely monitored by their regulators and inspectorates. Consideration should be given to introducing a duty to cooperate with speed and candour in reviews after adverse incidents.

Recommendation 9 (6.34)

The Home Office and CTP should resolve the question of Home Office access to PCMT data pre-dating section 36 decisions to refer to Channel, on a basis that allows information to be shared, subject to any necessary safeguards, in a manner that allows for the fullest possible analysis in the public interest by both CTP and the Home Office.

Recommendation 10 (6.43)

Consideration should be given to:

- ***finding ways for young people to discuss and feed in ideas about Prevent,***
- ***systematising good local examples of engagement with parents,***
- ***having a specialist in male violence and masculinities peer review core Prevent materials, and***
- ***addressing the particular circumstances of Black and mixed heritage boys who are less likely to have been referred for Early Help.***

ANNEX 1

LIST OF ACRONYMS

LIST OF ACRONYMS

AHA	Ali Harbi Ali
AI	Artificial intelligence
AMR	Axel Muganwa Rudakubana
ASD	Autism Spectrum Disorder
CAF	Common Assessment Framework
CAMHS	Child and Adolescent Mental Health Services
CCS	Clinical Consultancy Service
CE	Counter-Extremism
CMIS	Case Management Information System
CPIA	Criminal Procedure and Investigations Act 1996
CSO	Civil Society Organisation
CT	Counter-Terrorism
CTARC	Counter Terrorism Assessment & Rehabilitation Centre
CTCO	Counter Terrorism Case Officer (CTP)
CTP	Counter Terrorism Policing
CTPHQ	CTP Headquarters
CTSA	Counter Terrorism and Security Act 2015
DBS	Disclosure and Barring Service
DDP	Desistance and Disengagement Programme
DE	Domestic Extremism
DfE	Department for Education
DIF	Dynamic Investigation Framework
DSL	Designated Safeguarding Lead
EHCP	Educational Health and Care Plan
ERG22 (and ERG22+)	Extremism Risk Guidance
ERWT	Extreme Right-Wing Terrorism
FE/HE	Further Education/Higher Education

FFP	Families First Partnership
FIMU	Fixed Intelligence Management Unit
GIFCT	Global Internet Forum to Counter Terrorism
HO	Home Office
HMPPS	His Majesty's Prison and Probation Service
HSAI	Homeland Security Analysis and Insights team
HSG	Homeland Security Group, part of the Home Office
ICO	Information Commissioner's Office
IIP	Integrated Information Platform
INLA	Irish National Liberation Army
IP	Intervention Provider
IRA	Irish Republican Army
IRTL	Independent Reviewer of Terrorism Legislation
IS	Islamic State
JAT	Joint Assessment Team
JEXU	Joint Extremism Unit
JTAC	Joint Terrorism Analytical Centre
LA	Local Authority
MAPPA	Multi Agency Public Protection Arrangements
MASH	Multi Agency Safeguarding Hub
MHCLG	Ministry of Housing, Communities and Local Government
MUU	Referrals categorised as "Mixed, Unstable or Unclear"
NGO	Non-Governmental Organisation
NRF	National Referral Form
NSG	National Security Group
NSIM	National Standards on Intelligence Management
OSINT	Open-Source Intelligence
PAF	Prevent Assessment Framework
PCMP	Police Case Management Plan

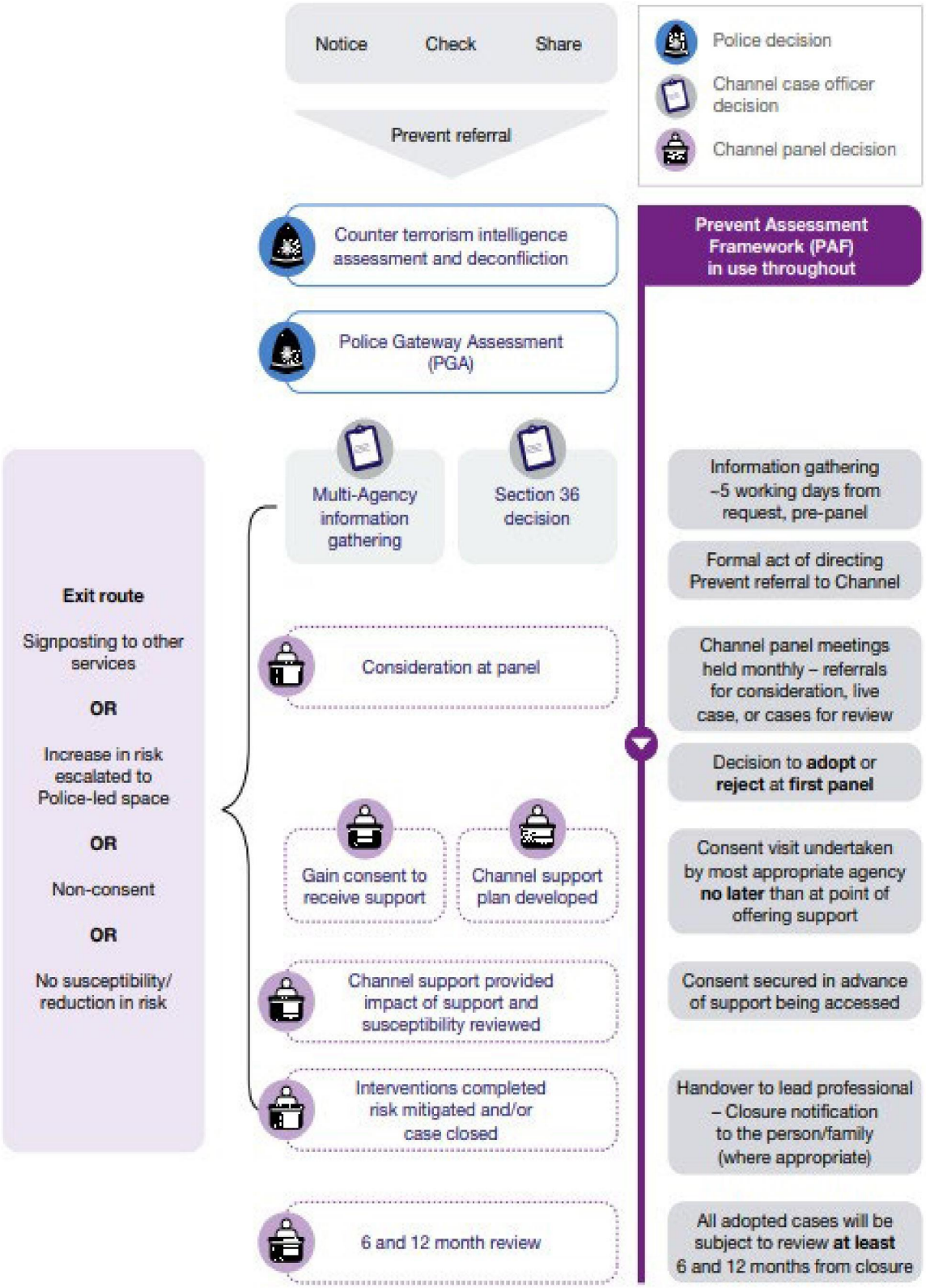
PCMT	Prevent Case Management Tracker
PGA	Police Gateway Assessment
PLP	Police Led Partnership
PLR	Prevent Learning Review
PMAP	Prevent Multi Agency Panel
PNC	Police National Computer
PRS	Prevent Referral Screen
RADO	Receipt Assessment Development Outcome
RAG	Red-Amber-Green
RICU	Research, Information and Communications Unit
RTI	Routes to Intervention
SEND	Special Education Needs and Disabilities
StaCU	Standards and Compliance Unit
TACT	Terrorism Act 2000
TEO	Temporary Exclusion Order
TPIM	Terrorism Prevention and Investigation Measure
UKIC	UK Intelligence Community
VAF	Vulnerability Assessment Framework
VFI	Violence-Fascinated (was Violence-Fixated) Individuals
VRU	Violence Reduction Unit
VSH	Vulnerability Support Hub
XRW	Extreme Right Wing
YDO	Youth Diversion Order
YFPP	Youth Futures Prevention Partnership
YOT	Youth Offending Team

ANNEX 2

DECISION-MAKING FLOWCHART

2023

(from Channel Duty Guidance)
Referenced at 1.14


Notice
Check
Share
Prevent referral
Police decision
Channel case officer decision
Channel panel decision
Counter terrorism intelligence assessment and deconfliction
Police Gateway Assessment (PGA)
Prevent Assessment Framework (PAF) in use throughout
Multi-Agency information gathering
Section 36 decision
Information gathering –5 working days from request, pre-panel
Formal act of directing Prevent referral to Channel
Exit route
Signposting to other services
OR
Increase in risk escalated to Police-led space
OR
Non-consent
OR
No susceptibility/ reduction in risk
Consideration at panel
Channel panel meetings held monthly – referrals for consideration, live case, or cases for review
Decision to adopt or reject at first panel
Gain consent to receive support
Channel support plan developed
Consent visit undertaken by most appropriate agency no later than at point of offering support
Channel support provided impact of support and susceptibility reviewed
Consent secured in advance of support being accessed
Interventions completed risk mitigated and/or case closed
Handover to lead professional – Closure notification to the person/family (where appropriate)
6 and 12 month review
All adopted cases will be subject to review at least 6 and 12 months from closure

ANNEX 3

HOME OFFICE / CTP LETTER

25 JUNE 2019

Referenced at 1.29

Joint letter from HSG and CTPHQ on individuals with mixed, unstable or unclear ideological drivers

OFFICIAL-SENSITIVE

25 June 2019

Sara Skodbo
Director Prevent, RICU and JEXU
OSCT, Home Office

Chief Superintendent Nik Adams
National Coordinator for Prevent
Counter Terrorism Policing Headquarters

Dear Police RPCs, Channel Panel Chairs, Local Authority Prevent Coordinators, Higher and Further Education Prevent Coordinators, Prevent Education Officers, and Health Prevent Coordinators,

We write to you to set out our joint position on managing individuals with unclear, mixed or unstable ideologies, as the National Coordinator of Prevent for CT Policing and Director of Prevent in OSCT.

The changing terrorist threat to the UK is well documented. The shift in scale has been accompanied by a diversification in the nature of the threat, with an increased threat of attacks using less complex methods by small groups or individuals. This has led to a number of stakeholders asking how they should manage individuals with unclear ideological motivations.

In some cases, the ideology is obvious, well embedded and appears to be the primary factor that is drawing an individual towards supporting or engaging in Terrorism Act (TACT) offences. In these circumstances identifying and challenging that ideology is likely to be an essential part of how you would seek to reduce that individual's vulnerability, and the risk posed to themselves and to the public.

However, for an increasing number of individuals being referred to Prevent, ideological drivers can appear mixed, unclear or unstable (from about 700 referrals in 2016-17 to almost 2,000 in 2017-18). Anecdotal evidence suggests that this group commonly present with multiple and complex vulnerabilities (such as criminality, substance misuse, social isolation and poor mental or emotional health, and so on). In such cases it often appears that people are being drawn towards an extremist ideology, group or cause because it seems to provide them with a 'solution' to the other problems in their lives, or an outlet to express problematic and dangerous behaviours that they may have developed.

We have seen many similar and often overlapping Prevent case examples, including individuals who:

- demonstrate an interest in multiple extremist ideologies in parallel, such as Salafist militant jihadism and 'white supremacy'

- switch from one ideology to another over time
- target a 'perceived other' of some kind (perhaps based upon gender or another protected characteristic), but do not otherwise identify with one particular terrorist ideology or cause
- are obsessed with massacre, or extreme or mass violence, without specifically targeting a particular group (e.g. high school shootings)
- may be vulnerable to being drawn into terrorism out of a sense of duty, or a desire for belonging, rather than out of any strongly held beliefs

It may be helpful to recap what differentiates terrorism from other forms of violence. The Terrorism Act 2000 defines terrorism as:

(1) ... the use or threat of action where:

(a) the action falls within subsection (2)

(b) the use or threat is designed to influence the government [or an international governmental organisation] or to intimidate the public or a section of the public and

(c) the use or threat is made for the purpose of advancing a political, religious, racial or ideological cause

(2) Action falls within this subsection if it:

(a) involves serious violence against a person

(b) involves serious damage to property

(c) endangers a person's life, other than that of the person committing the action

(d) creates a serious risk to the health or safety of the public or a section of the public or

(e) is designed seriously to interfere with or seriously to disrupt an electronic system.

(3) The use or threat of action falling within subsection (2) which involves the use of firearms or explosives is terrorism whether or not subsection (1)(b) is satisfied.

Note that the Act does not define or limit what is meant by "political, religious, racial or ideological cause", nor does it restrict "ideological cause" to being political, religious or racial, or to being solely those ideologies held or promoted by proscribed organisations. The Act certainly does not stipulate that a perpetrator has to have a long-standing and deep-seated

belief in the ideology or cause that he or she is ostensibly supporting by committing a TACT offence.

Also, it's worth noting that the "threat" of relevant "action" is technically enough to complete a TACT offence, and that where this "action" involves the "use or threat" of firearms or explosives, there need be no specific intention on the perpetrator's part to "influence" (or intimidate) the government or public.

Some individuals seek to support or enact TACT offences without a clear understanding of the ideology or cause they are ostensibly supporting. Therefore individuals whose ideological motivations are unclear, mixed or unstable, but who demonstrate a connection to, or personal interest in, extremism, terrorism or massacre, should be given the same consideration for support as those whose concerning ideological motivations are more consistent and obvious.

This letter may raise the question of whether we are seeking to expand the remit of Prevent. We are not.

We are providing clarification of our responsibilities in relation to the Terrorism Act, and seeking to ensure that everyone who needs support receives it, and of course to protect the public from the risk of all vulnerable people who are being groomed, coerced or self-propelled towards TACT offences.

In 2017-18, 8% individuals referred to Prevent due to concerns around Islamist extremism or right-wing extremism ultimately received support via Channel. The corresponding figure for individuals referred due to concerns about 'mixed, unstable or unclear' ideologies was less than 1%. While there are likely to be many reasons for this, as we have seen in recent tragic attacks, the motivations of the terrorists responsible sometimes remain unclear even after the event, so we need to pay due regard to this complex issue in order to better protect the public.

We have received a number of questions from across the country about how to manage such individuals. Our guidance in response to these questions is to ensure that people receive the support they need if they are vulnerable to being drawn into any form of terrorism described within the Act.

When it comes to preventing people being drawn into terrorism, our responsibility is to offer interventions and support to all individuals who are at risk, irrespective of whether that risk is being driven by a true belief in an ideological cause or group, or whether an involvement to either of these is being driven by other vulnerabilities and complex needs.

The power of Prevent lies in tackling vulnerability early to prevent future harm. Oversimplifying the assessment of risk to offer support only to those with a very clear or embedded extremist ideology risks missing opportunities to support those with perhaps less obvious, but no less relevant or urgent, vulnerabilities.

Experience has demonstrated that preventing people being drawn into terrorism can be very challenging, often involving complex individual needs that have no simple or single-service answer. We therefore recommend that the content of this letter is discussed within your local

Contest and/or Prevent Boards and within your Channel Panel meetings. We ask you to consider carefully the following:

- Draw on the professional judgement and experience of your colleagues, and ensure those making decisions understand their specialist area in the context of CT risk. This is to ensure individual interventions are considered in the context of their impact on the overall risk;
- do not restrict your preventative work only to individuals associated with the ideologies of formally proscribed organisations;
- consider those individuals who appear to have an interest in multiple, concurrent, and even contradictory extremist ideologies or causes, or who seem to shift from one extremist ideology / cause to another;
- do not necessarily rely on vulnerable individuals to be able to identify, understand or describe with coherence their own ideological motivations as a measure of the risk of being vulnerable to being drawn into terrorism; and,
- consider the possibility of an individual's obsessive interest in public massacres of any kind as a possible signal of vulnerability.

Our teams within CTPHQ and OSCT are happy to discuss any cases where further guidance is required, and we thank you for your continued support and determination to protect vulnerable people and keep our communities safe from terrorism.

Yours sincerely,

Sara Skodbo, OSCT

Nik Adams, CTPHQ

ANNEX 4

CHANNEL CASE STUDIES

JUNE 2025

(supplied by the Home Office)
Referenced at 1.51

CHANNEL CASE STUDIES

This is a collation of four Channel cases with differing ideologies which were referred into Prevent and subsequently adopted into Channel. The cases highlight some of the interventions and decisions that were involved in supporting the subjects and mitigating terrorism concerns, thereby providing a successful exit out of the Channel program.

Mixed Unclear Unstable Ideology

A young adult was referred to Prevent due to ongoing concerns around his researching weapons, home-made bombs and school shootings through the dark web. He had demonstrated a lack of awareness around potential outcomes of acting on these interests. He was known to have a number of dependencies, historic poor mental health which was being successfully managed at the time and was awaiting an Autism Spectrum Condition assessment. The subject was looking to broaden his social inclusion, was aware his dependencies negatively impacted his mental health, and had some existing support locally to find employment.

The subject was adopted into Channel. Through multi-agency discussions on the Channel Panel it was established that although he was an adult his cognitive level was significantly lower, and interventions were modified and adapted to take this into account. An Intervention Provider was commissioned to unpick and challenge the concerns from his referral, particularly around his use of the dark web. One was identified with specialities in mixed, unclear and unstable ideologies and also had similar sporting interests and a background suitable to allow a rapport to be quickly established. Further vulnerabilities were identified during these interventions, with mental health and social care providing additional assistance to address these, while the Intervention Provider gave context and counter narratives to some of the material he had engaged with.

After a number of sessions, the Intervention Provider advised that the risk of radicalisation had been fully explored regarding threat/vulnerability. The right support was now in place for the subject going forward, and a lead professional was now in place. The Panel agreed that while the subject remained a vulnerable and impressionable young person however, the correct agencies were now in place via mental health and social care to continue to support him.

The concerns associated with radicalisation had significantly reduced. As such the subject was closed to Channel with a support strategy in place from key partners to assist with remaining vulnerabilities.

Islamist Extremism

A young male was referred to Prevent following concern around his changing behaviour, having withdrawn from family and friendship groups, a dip in academic performance and having converted to Islam in secret from his family. Multiple sources described him as easily led and not streetwise. The conversion to Islam itself was not of concern; however his engagement with his new faith was increasingly online, he was guarded around peers; and he began travelling to cities around the UK to meet unknown people rather than talking to local Muslims for education around his faith. He began expressing the belief that the Manchester Arena bombing was justified in the context of wider persecution of Muslims around the world, and a family member had heard him talking to someone online asking if they belonged to ISIS.

Following adoption on to the Channel programme, a number of supportive interventions were put in place. An Intervention Provider who had converted to Islam at a similar age to the boy was commissioned to build rapport, guide him, and build his knowledge of Islam. They also explored his engagement with some of the comments that had led to the referral and worked on building his awareness of the potential risks associated with travelling across the country to meet people he'd only conversed with online. Work was done within the family setting, which was strained given the secrecy of his conversion and their concern around negative influences being present at the local mosque. The Intervention Provider talked to the family in order to help them gain a better understanding of the religion, trying to allay any fears or misconceptions they held and assist them in understanding how to better support the subject in his journey.

With time, the Intervention Provider engaged well with the individual. His resilience was worked on, and it became clear he understood that the Manchester Arena bombing and related events went directly against his understanding of Islam. The Intervention Provider helped reframe the boy's relationship with his family, who he accepted might have had protective concerns around his conversion but were broadly supportive, and he re-connected with a group of friends with whom he had lost touch which was also positive. He exited from Channel and upon completion of his studies, his college reported no concerns at all, and that he was now attending university.

Mixed Unclear Unstable Ideology

The subject was an unaccompanied 15-year-old Iranian asylum seeker. Whilst in foster care placement the subject was reported to have exhibited concerning behaviours including an interest in weapons, violence and killing. He made comments which included anti-western themes including "blowing-up England". The subject was believed to be accessing material of concern via his mobile device.

The case had an allocated Social Worker who was involved in the Channel process post-adoption. The Channel process was able to determine some background to the case through

the involvement of the Home Office Immigration Team. Information gathering also determined that the subject had been diagnosed with psychosis and that Child and Adolescent Mental Health Services (CAMHS) were involved with him.

An Intervention Provider was commissioned with the requisite language skills. During the course of subsequent Intervention Provider sessions an insight into the subject's background was established. This uncovered contextual information regarding the subject's need for identity and belonging. Many of the initial concerns regarding an interest in weapons and violence were examined and found to be connected with the subject's previous life in a politically unstable region. It was established that there was an absence of ideological motivation and no apparent intent to cause harm.

Concurrent support was established via mental health services, social services, education and local CSO provision which provided increased protective factors. Weekly interventions with CAMHS ensured that appropriate medication was being taken. The CSO provided mentoring support to ensure that the subject attended school. The case was closed to Channel following mitigation of the initial concerns.

Mixed Unclear Unstable Ideology

The subject was a school child with special educational needs. A diagnosis of autism was present. Reports from the school indicated that the subject had made remarks in support of ISIS, a proscribed terrorist group. Other remarks were observed which indicated verbal support of terrorism. Behaviours also included making racist remarks, the drawing of swastikas and the research of Nazi ideologies.

The case was presented to a Channel Panel and subsequently adopted. It was acknowledged that the ideological influences in the case were mixed and unclear. An Intervention Provider with experience of autism was commissioned. The Channel Panel also expedited the allocation of a Family Support worker to support the subject and his mother.

During consecutive Intervention Provider sessions, the subject's behaviours and motivations were explored. It was determined that many of the subject's behaviours were not deeply ideologically motivated, but a symptom of his autism. Concurrent support was provided in the form of parental support, the establishment of boundaries regarding the use of the internet, autism support and the ongoing involvement of a Family Support worker.

The Channel Panel assessed that the support plan and objectives had been met and that the intent, engagement and capability factors were no longer present, the case was subsequently closed to Channel, and the person placed on 6 and 12 month reviews with no reported re-occurrence of concerns.

ANNEX 5

INTERNATIONAL COMPARISONS

JUNE 2025

(supplied by Daniel Hooton)
Referenced at 1.67

INTERNATIONAL APPROACHES

Germany, The Netherlands, New Zealand

Relevance

1. Prevent has developed over time to respond, as successive UK governments have viewed best, to an evolving and complex terrorist threat. Equivalent referral mechanisms and broader efforts to prevent and mitigate a threat from terrorism in other countries have similarly been developed in response to their own evolving picture of domestic threats.

2. Across European and 5-Eyes partners, governments and public services are grappling with very similar questions of an evolving ideological landscape and a sharp increase in individuals with a broader fascination in violence and mass atrocity. They also have their own experience of setting up and refining multi-agency frameworks and referral mechanisms and of managing how these function at different levels across their respective countries.

3. The countries highlighted in this annex are presented in full recognition that: (a) there are already various avenues for information sharing and international learning, including those that have helped other countries learn from the UK's experience with Prevent; and (b) different governance, constitutional or institutional arrangements and historical contexts necessarily shape responses that are particular to their setting.[335] These insights are not, therefore, suggestions of transferrable, ready-made approaches for the UK to adopt. They are rather merely an attempt to illustrate how interested persons and public authorities in the UK may look further afield for learning and inspiration as they consider the many possible pathways for developing and strengthening prevention and Prevent in the United Kingdom.

4. This snapshot looks at prevention mechanisms and approaches in Germany, The Netherlands and New Zealand specifically. These countries' approaches are different, as are their historical, institutional and governance contexts. Their inclusion in this overview is based purely on their relevance to some of the core challenges facing Prevent as the UK government considers the various possible future directions for the programme.

Pre-referral community prevention

5. All three countries place a significant emphasis on "primary" prevention. That is, they are all pursuing considerable programming aimed at developing and nurturing community-wide resilience and "protective factors" intended, in part, to prevent instances of radicalisation to

[335] Two examples of existing vehicles for international learning and exchange include the EU's Knowledge Hub on the Prevention of Radicalisation (formerly the Radicalisation Awareness Network), a practitioner-focused network which includes UK partners, and the Christchurch Call, an intergovernmental coalition spear-headed by former New Zealand PM Jacinda Ardern and French President Emmanuel Macron. Multilateral organisations also play a key role and UK participation in the Organization for Security and Co-Operation in Europe (OSCE) is a good example with a dedicated counter terrorism unit. Think tanks such as the UK's Institute for Strategic Dialogue and the International Centre for Counter-Terrorism in The Hague have also made valuable contributions to sharing international learning and facilitating global partnerships.

terrorism in the first place and reduce the burden on referral mechanisms for individual cases of concern or intervention.[336]

6. Although Prevent, especially non-police local delivery, does have some community engagement function, the larger focus is on identifying risk in individuals and understanding if and how an intervention should be delivered.[337] A more generalised prevention approach may be seen as more comparable to a UK social cohesion strategy or its counter extremism efforts.[338] The experiences of Germany, The Netherlands and New Zealand make significantly less distinction between these different agendas, presenting them instead as more of an interdependent continuum, along which generalised prevention efforts mitigate the need for more targeted counter terrorism interventions.

7. Two components of this generalised prevention function feature prominently in these countries' approaches:

   (a) A competitive funding pot for NGO-delivered community programmes intended to meet the priorities of a given funding cycle. New Zealand's fund, which saw three iterations from 2022 to 2025 with an annual budget growing to NZ$1.2m, had both general-population and more targeted ambitions. Its priorities included positive interventions online, building community providers' capacities to work on disengagement of individuals, and building system capability in prevention.[339] New Zealand officials draw attention to efforts not only to develop the fund and the issues it aims to address but also the rigorousness of its evaluation.[340] Some of this approach may be compared to efforts in the UK outside of Prevent proper, such as London's Shared Endeavour Fund, itself subject to increasingly robust evaluations.[341] It is also the case that the kinds of initiatives supported by such funds *are* happening in the UK, for instance on family harms, but led by other sectors and partners.

   (b) A strong role for ministries and departments beyond those responsible for security, characterised by specific initiatives such as Germany's federal programmes *Demokratie leben!* (Living Democracy), led by the Family Ministry, and *Zusammenhalt durch Teilhabe* (Cohesion Through Participation), led by the Interior Ministry.[342] Similarly, myriad

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[336] It would appear important to the relevant initiatives in all three countries that reducing the numbers of actual terrorist cases of concern is not the *primary* objective and that instilling community resilience, social cohesion or democratic values is an important end in and of itself.

[337] Pre-2010, Prevent incorporated some crossover with the community cohesion agenda of the then Department for Communities and Local Government (DCLG).

[338] For more on UK Government policy on social cohesion see House of Lords Library briefing, published 29 November 2024 at https://lordslibrary.parliament.uk/the-importance-of-social-cohesion-and-communities/. See also more on the Commission for Countering Extremism at https://www.gov.uk/government/organisations/commission-for-countering-extremism

[339] Private conversation, 13 May 2025

[340] An evaluation of the third iteration of the fund is due later this year.

[341] Mayor of London, Office for Policing and Crime, *Shared Endeavour Fund: Call Three Evaluation Report*, 2024. https://www.london.gov.uk/sites/default/files/2024-03/SEF%20C3%20Evaluation%20Report_FINAL%20Web.pdf

[342] Benham T. Said and Hazim Fouad, 'Countering Islamist Radicalisation in Germany: A Guide to Germany's Growing Prevention Infrastructure', ICCT Policy Brief, September 2018. https://icct.nl/publication/countering-

programmes in The Netherlands involve substantial contributions from social services, education and healthcare, including through the *National Programme for Liveability and Safety (NPLV)*, *Regional Information and Expertise Centres (RIECs)* and the *"Prevention with Authority" (Preventie met Gezag)* initiative.[343] It may be that there is something for us to learn from such efforts as regards inter-departmental coordination in UK.

8. In New Zealand, the primary multi agency interventions framework for terrorism cases is *He Aranga Ake*.[344] Launched only in late 2022 as a partnership between seven agencies including health, education and social development (but embedded in NZ Police), the programme is in its relative infancy and numbers of individuals currently engaged are reportedly low.[345] Two features in particular set it apart from Channel or other comparable interventions mechanisms: first, that its stated aim is *disengagement* as opposed to *deradicalisation*, meaning that it seeks to move harmful individuals away from unlawful activities but not necessarily to repudiate their extremist views; and second, that individuals can only be referred by one of the seven agencies and not by the public.[346] The public – or other agencies and services not involved in the framework itself – may raise a concern by contacting one of the contributing agencies, usually the police. But to constitute a referral and ultimately be adopted onto *He Aranga Ake*, the individual must be assessed as posing a national security threat.[347] In practice, it therefore operates at a much more 'downstream' level than referrals to Prevent that may or may not subsequently be adopted by Channel or any other framework. With this higher initial threshold for intervention there may be potential risks of not casting the net wide enough. But there are also advantages to the early intervention space in the community: less police domination of prevention functions that other services might be better placed to lead; less sensationalism (and therefore potentially less community pushback) affecting general community-wide prevention efforts by removing the labels and language of "counter terrorism" where there is not an assessed national security threat; and a concentration of resources for personalised interventions on fewer, riskier individuals.

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islamist-radicalisation-germany-guide-germanys-growing-prevention

[343] Dutch National Coordinator for Security and Counterterrorism (NCTV), 'National Counterterrorism Strategy 2022-2026: Preventing and Combatting Terrorism and Violent Extremism', May 2022, p.16. https://english.nctv.nl/documents/publications/2022/06/the-national-counterterrorism-strategy-for-2022-2026/the-national-counterterrorism-strategy-for-2022-2026

[344] See *He Aranga Ake* factsheets published by NZ Department of the Prime Minister and Cabinet at https://www.dpmc.govt.nz/sites/default/files/2022-12/he-aranga-ake.pdf and by NZ Police at https://www.police.govt.nz/sites/default/files/publications/he-aranga-ake-information-sheet-2022.pdf

[345] The seven agencies are Oranga Tamariki; Ministry of Social Development; Education; Corrections; Health; Security Intelligence Service and Police. Source: https://www.police.govt.nz/advice-services/counter-terrorism/he-aranga-ake. Numbers of individuals engaged cannot be published due to concerns that individual cases may be more easily identifiable given overall numbers are low.

[346] For more background here, see https://newsroom.co.nz/2025/04/14/inside-the-police-programme-to-prevent-terrorism-before-it-happens/.

[347] Meeting with Inspector Scott Dunn, Counter-Terrorism Prevention & Capability Manager, National Security Group, New Zealand Police, 05 June 2025

The 'Front Door'

9. The suggestion of a wider, ideologically-agnostic 'front door' is raised in Chapter 5 of this Report is raised as shorthand for a one-stop-shop for referring any and all concerns around violent harms, some of which might be, upon triage, referred onwards to Prevent (and others elsewhere or nowhere). Elsewhere, the front door and the one-stop-shop are more literal – actual premises, giving a physical presence *within* communities to otherwise intangible frameworks.

10. In the Netherlands, the 'Safety House' model has a longstanding precedent as a 'sorting-house' administered by municipalities to receive and triage complex social referrals for individuals across a spectrum of violent and non-violent harms.[348] In Germany, such premises also deliver 'tertiary' prevention – disengagement work, comparable to that under Prevent's DDP component. 'Counselling centres' have been funded by state-level authorities. In some states, including Bavaria, Berlin, Bremen, Hamburg and Hesse, these are led by NGO staff typically with a background in social services, rehabilitation or youth work. In others, such as Baaden-Württemberg and North Rhine-Westphalia, such centres are run by the state itself.[349]

11. Situating a referral mechanism physically in a community presumably has benefits for demystification and awareness raising. It also goes further than the Dovetail pilot in the UK in that it not only positions local authorities – or, in some cases, NGOs – to lead the coordination efforts of a referral or intervention but also to physically house it. Giving such programmes a face could plausibly help to counter some of the community stigma and suspicion Prevent has met with and, to an extent, engendered. It may also pose benefits to effective multi-disciplinary cooperation by providing a meeting and working space for professionals from different services.

12. Looking specifically at police-health cooperation, New Zealand's Fixated Threat Assessment Centre (FTAC) offers an example for managing risk where the nature of the threat eludes easy definition and where terrorism may emerge among the risks only in a minority of cases.[350] The case numbers handled by this model reportedly dwarf those referred to *He Aranga Ake*; when it works well, I was told, it handles and mitigates more risk than any other part of the policing system.[351] While some events do require a rapid police response, police are not the lead agency and instead typically play a support role to a team of experienced clinicians, perhaps better placed than their partners to lead interventions where mental health concerns present in a significant majority of cases. For those that do end up presenting with specific terrorism risks,

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[348] Radicalisation Awareness Network, 'The Dutch Multi-Agency Approach to Rehabilitation of Radicalised Detainees', RAN Conclusion Paper, March 2023, p.2. https://home-affairs.ec.europa.eu/system/files/2024-01/ran_study_visit_dutch_multi-agency_approach_rehabilitation_radicalised_detainees_22-23022023_en.pdf

[349] Benham T. Said and Hazim Fouad, 'Countering Islamist Radicalisation in Germany: A Guide to Germany's Growing Prevention Infrastructure', ICCT Policy Brief, September 2018. https://icct.nl/publication/countering-islamist-radicalisation-germany-guide-germanys-growing-prevention, pp.6-7.

[350] For more on New Zealand's Fixated Threat Assessment Centre, see https://www.health.govt.nz/strategies-initiatives/programmes-and-initiatives/mental-health-addiction-and-suicide-prevention/other-initiatives/the-fixated-threat-assessment-centre

[351] Private conversation, 19 May 2025

cases may in theory be referred directly to *He Aranga Ake*. What was emphasised to me by those with hands-on experience was that, where real terrorist risk was uncovered in cases managed by the FTAC, not featuring the "terrorism" label as the unit's *raison d'être* was an asset. Should the label apply to a case at the outset, Police would be obliged to lead and may not feel best placed to address the array of complex risks and wide spectrum presenting issues and may ultimately miss the opportunity to intervene where risks are genuinely escalating. Recognising these broad, often health-related factors as the starting place instead allows clinicians to review multiple, overlapping risks and work with police to manage them and prevent any direct threats from becoming realised. This does not suggest that every terrorist be treated as a mental health patient, but rather that a person's full range of risks to self and others are understood not least to better identify whether there are actual terrorism risks. The lesson here is not one of creating new structures – after all, the FTAC in New Zealand was originally based on the UK FTAC established in 2006 – but rather about how complex cases where terrorism risks are far from clear enter the system in the first place and how we might develop better multidisciplinary working to triage them.[352]

Community Outreach

13. In a similar vein, New Zealand government officials are keen to draw attention to their community outreach efforts, seen as foundational for re-setting their prevention apparatus in the wake of the 2019 Christchurch attack. The Royal Commission that followed the attack and outlined the way forward for the country's terrorism prevention efforts, was based on an intensive process of outreach and relationship building.[353] It involved a listening exercise with communities – especially those, including women's groups and minorities – considered marginalised or vulnerable. Not only did the exercise assess the fitness of existing arrangements, but – perhaps more fundamentally – officials credit it with building the social licence for their entire prevention apparatus, all of which depends on community buy-in for credibility and therefore viability.

Mainstreaming

14. In all three countries, there is a sizeable focus on using existing strengths in mainstream services – especially social services and youth work. In Germany, organisations like the Violence Prevention Network lead significant tertiary intervention work in prisons.[354] Their professionals and their methodologies are drawn from a decades-long history of violence prevention work led mostly by probation officers. These are not specialist terrorism-focused approaches; they are mainstream, well-tested disengagement programmes to which an evolving understanding of and set of responses to terrorism and violent extremism have been added. Dutch experts point to their own reliance on mainstream services, as well as the prominent role played by municipalities, as being key to the agility of the prevention system, ensuring its ability to adapt

[352] For some early information on the UK FTAC, see 2007 records in Hansard at https://hansard.parliament.uk/commons/2007-06-26/debates/0706279000039/FixatedThreatAssessmentCentre Further background is, to an extent, available in wider academic literature and medical journals.

[353] https://christchurchattack.royalcommission.nz/the-report

[354] https://violence-prevention-network.de/?lang=en

to a changing operation and ideological threat picture. Similarly in New Zealand, the focus on funding NGOs is intended to upskill and equip existing community service providers, not create new ones. One view there is that this is just about adding in protective factors to cover the gaps in their knowledge of terrorist threats and radicalisation processes.[355] In that sense, so this view maintains, the objective of interventions – terrorism-related or otherwise – remains behaviour change and therefore subject to the same learning and evidence base as in other sectors.

The 'prevent Prevent' challenge

15. I have already noted the community outreach (New Zealand) and mainstreaming (The Netherlands) factors that have perhaps somewhat undercut resistance and helped prevention models elsewhere gain public trust and credibility. I do not suggest they are without criticism; they are not. But clearly these countries have avoided anything like the organised opposition and reputational embroilments that Prevent has experienced. Germany has similarly avoided this, though for different but no less valuable and instructive reasons. Both at Federal and State levels, terrorism prevention models and programmes simply do not raise eyebrows in the same way they might in the UK. This is not for lack of disclosure on the part of authorities as to the details and objectives of initiatives; plenty has been published and made available. Instead, the focus on crime prevention, public health and education over and above that on terrorism and extremism simply inspires less sensationalism and special attention as the technical, procedural and complicated reality of social work and criminal justice is made all the more evident to those looking to find scandal. There are wider lessons here around language and communications for Prevent. This could be seen as not only about branding but as reflecting shifts in emphasis and practice.

[355] Private conversation, 13 May 2025

ANNEX 6

SOUTHPORT RECOMMENDATIONS UPDATE

JULY 2025

(supplied by CTP and Home Office)
Referenced at 3.51

Southport Prevent Learning Review

The following document sets out CTPHQ status updates on the recommendations from the Southport Prevent Learning Review. Wider Home Office updates are also provided.
All recommendations were included in a National Business Assurance Process which took place in November 2024 as a direct response to the Southport PLR recommendations. This was an evidence capture exercise to determine whether the 14 recommendations from the PLR were i) isolated to this case, ii) to regional practice in the NW, or iii) an indication of more systematic failures across the wider CTU network.
CTPHQ Interventions will complete a further business assurance exercise on the changes made within these recommendations, no later than 12 months after implementation has concluded. This will ensure changes have been implemented according to policy and guidance and allow for support for regions where required.

Recommendation	CTPHQ Update	Outstanding actions
Recommendation 1: It is recommended that a standardised sharing of information product be considered for national use by all FIMUs when sharing the results of checks conducted for Prevent. This product should be agreed nationally, its use mandated and written into the policy on intelligence.	**Accepted -** This recommendation has been embedded into the new National Prevent Priorities to demonstrate our commitment to improve, under the category *'improve Prevent understanding across CT units'.*	To ensure that: • standardised checks are completed across the regions. • all information gathered is presented to Prevent staff in a clear and concise format. • this information is stored in a standardised way. • all changes made within this recommendation are written into the policy on intelligence and CTCO guidance. Work is expected to commence in August 2025.
Recommendation 2: Further training should be considered regarding the circumstances where visits to individuals during the initial assessment can be conducted. The policy in 2019 and currently remains as visiting by exception, which could make the officers conducting the assessment feel constrained at this stage of the	**Accepted –** Two interim policies have been implemented across CTP Prevent, which encouraged the use of contact visits at specific times of case management. This is not within initial assessment, as per the instruction of this recommendation,	• A review of these policies is currently underway and the findings of this will help shape any further changes to wider policies regarding contact visits. This is expected to be completed by end of July 2025. • To further design and develop training for CTCOs and Supervisors about when and how to conduct

process. A review of how this is framed in the CTCO policy coupled with further training may help CTCOs with regards to the decision to visit an individual at the initial assessment phase, without the need to progress the referral into [Police-led Partnership] PLP to achieve this.	however it does allow for visits to be completed at this stage under exceptional circumstances.	contact visits and provide confidence to speak with Prevent Subjects. This is expected to be ready in Q3 25/26. • To design and implement the new Supervisors course.
Recommendation 3: A review of current training for supervisors should be considered to strengthen that when signing off assessments as complete, all behavioural factors and motivations for behaviours have been captured on the assessments, whether deemed Prevent relevant or not. Current assessments do not include a Prevent 'relevancy' element to factors. The new Prevent Assessment Framework (PAF) goes some way to addressing the Prevent relevancy for each of the susceptibility factors.	**Accepted –** A new Prevent Assessment Framework was rolled out nationwide in September 2024. It streamlines case management and the development of support plans to fully reflect the vulnerabilities, susceptibilities, risks and grievances identified in each case. It also improves police decision-making on Prevent referrals. From June 2024, all CT Police Case Officers are required to complete mandatory training on the assessment of Prevent referrals. Attendees cannot assess any referrals until the training assessment has been successfully completed. This helps to ensure that decision-making on Prevent referrals is rigorous, consistent, and proportionate.	• To roll out new training for Prevent supervisors. The training will feature 'Defensible decision making' for supervisors to guide and support CTCOs to capture and record all susceptibility factors displayed by a subject and provide detailed rationale for decision making. A module on closing cases for supervisors will explore the factors to consider including outstanding enquiries, remaining risk and signposting if not taken to Channel/PLP. The training is expected to be ready in Q3 25/26.
Recommendation 4: Consider whether CTCO guidance could be strengthened where internet usage / search history or other online activity is relevant. This could ensure CTCOs are proactive in obtaining and recording internet search results in order to adequately assess	**Accepted**	• To scope and benchmark minimum checks completed by FIMU at deconfliction for all cases, to ensure consistent checks and support decision making of risk and understanding of any vulnerabilities.

the referral and make sure the information does not remain unknown. However, this will need to be balanced against the limited capabilities for police to conduct intrusive surveillance within the Prevent process. The mandating of open-source research should be considered at the PGA initial assessment.		• To revise policy and guidance in regarding internet usage / search history and implement across the network. Any National position must be achievable by all. This will help to understand regional blockers, and support removing these were possible. Work to be commenced in July 2025 and expected to complete within 6 months.
Recommendation 5: Policy and guidance should be considered whereby referrals involving children and / or complex needs should be routinely referred to Channel unless immediate closure is the chosen option, or the CT risks are deemed too high for Channel.	**Accepted –** Implemented the Prevent Assessment Framework (PAF) across CT Prevent Network. Starred indicators on the PAF are designed to ensure progression of individuals through Prevent Case Management where this is required. Implemented mandatory Neurodiversity Training for all Prevent practitioners.	• To create and implement the Constructive Communication Part 2 Training. This will specifically feature how to engage with children during contact visits and is expected in Q3 for 25/26.
Recommendation 6: Full access to the current PCMT system is restricted to police only. While the Home Office has limited access, this should be reviewed, enabling scrutiny at all levels of Prevent delivery as part of quality and business assurance processes. This access will enable studies to be conducted of all parts of the process which will inform changes in policy and guidance and be able to hold key stakeholders to account.	**Not accepted -** No findings within the rapid business assurance processes support this recommendation or highlight risks within this area. Full access to the PCMT is to remain restricted to policing as per the extensive legal discussions carried out during the enhanced PCMT build.	
Recommendation 7: Each new comment on PCMT should be unique showing the officer has considered their views again.	**Accepted –** New PCMT is structured for officers to consider and record their views at each	• To design a PCMT QA to ensure PCMT data entry standards, check the use of the system

If there is no new information or no further updates then this should be articulated rather than copying a previous entry.	key stage, with the ability to record negative entries. This has significantly reduced the use of repetitive and irrelevant entries. Access to PCMT is now restricted. For new users, PAF training must be completed prior to being able to access the PCMT. This ensures that the network is trained to use both PAF and PCMT. The network undertook refresher PAF and PCMT training in March 2025.	and improve consistency to be completed by the end of 2025. • To work on the revision and implementation of updated CTCO guidance is in train and expected to be completed by end of 2025.
Recommendation 8: It should be considered that Annex B be embedded into the policy on intelligence and not sit as an appendix. The policy should be explicit that it is for Prevent to determine closure once the referral has been handed to Prevent for action and initial assessment. It should be made clear that FIMU should refrain from suggesting Prevent outcomes as this may influence decisions made by CTCOs or support closure prematurely from Prevent.	**Accepted -** This recommendation has been embedded into the new National Prevent Priorities to demonstrate our commitment to improve, under the category *'improve Prevent understanding across CT units'.*	• A project team, consisting of both Prevent and Intel capability, to review current intelligence policy and how Prevent can feature more prominently is anticipated to commence in August 2025. The project team will consider all decisions and actions linked to recommendations 1, 9 (ii), 9 (iii), and 9 (iv), ensuring decisions are deconflicted and interchange as required.
Recommendation 9 **(i):** Consider a terminology change in Prevent management. CTP relevant should be replaced by the term 'Prevent Relevant'. This differentiates it from the term used in the IMU which may have a slightly different meaning.	**Accepted -** These recommendations have been embedded into the new National Prevent Priorities to demonstrate our commitment to improve, under the category *'improve Prevent understanding across CT units'.*	• Project team to consider all points within Recommendation 9 with a view to implement changes required. • To ensure that all relevant changes from other recommendations are embedded into training for Prevent staff and that all changes are captured in training and explained to all practitioners to improve compliance and reduce error.

(ii): Currently Prevent referrals are assessed under general risk assessment outcomes by the FIMUs. Consideration should be given to Prevent having its own outcome specifically which is clearly defined in policy. The current CTCO guidance coupled with the policy on intelligence Annex B guidance defines the roles of CTP Prevent **(iii):**Intelligence policy Annex B appears a little dated and consideration should be given to a review / refresh. e.g. the guidance refers to the purpose of Prevent is to 'protect vulnerable people from being drawn into terrorism' which is not an accurate term to describe Prevent. **(iv):** Training for FIMU staff on Prevent should be reviewed to ensure a full current understanding of Prevent delivery and regular training refreshes delivered as part of continued professional development (CPD). Where training is deemed to be inadequate then the appropriate courses are built and delivered. **(v):** Training for Prevent staff on the intelligence policy / guidance and FIMU delivery should be reviewed and where training is identified as inadequate the appropriate courses created and delivered, and regular training refreshers.		
Recommendation 10: CTCO policy should be reviewed to ensure all outstanding enquiries or information gathering is completed prior to closure.	**Accepted -** This recommendation has been embedded into the new National Prevent Priorities to demonstrate our commitment to improve,	• To implement interim policies which encourage CTCOs to consider all tactical options prior to closure. If not used, justification as to why is required. Policy

	under the category *'Strengthen signposting and multi-agency interventions through Public Protection Panels (PDP) and broader safeguarding routes for non-ideological violent offenders'* All Prevent staff with access to PCMT have completed training.	reviews will measure impact of these tactical options to help shape any future changes required to other policies. This work is expected to complete in July 2025. • The revision and implementation of updated CTCO guidance is in train and expected to be completed by end of 2025. • To roll out new training for Prevent supervisors. The training will feature 'Defensible decision making' for supervisors to guide and support CTCOs to capture and record all susceptibility factors displayed by a subject and provide detailed rationale for decision making. A module on closing cases for supervisors will explore the factors to consider including outstanding enquiries, remaining risk and signposting if not taken to Channel/PLP. The training is expected to be ready in Q3 25/26.
Recommendation 11: Static vulnerabilities can make an individual highly susceptible. Additional training should be considered, for those conducting assessments, on the importance of understanding the impact of static vulnerabilities on altering the risks of radicalisation. Where there are cases of limited engagement and complex needs, such as Autism in this case, then decisions to refer to Channel should be seriously considered. This would enable a professional perspective on the impact of the static vulnerabilities and a multi-agency approach to managing the susceptibility to being drawn into	**Accepted -** All staff have been trained in the use of PAF, which includes a susceptibility assessment. From June 2024, all CT Police Case Officers are required to complete mandatory training on the assessment of Prevent referrals. Revised CTCO guide including guidance and direction regarding those with complex and additional needs has been issued.	

terrorism. This recommendation should be viewed alongside recommendation 5.	Training on Neurodiversity which includes the complex needs of an individual has been delivered. The new joint CT Police-NHS clinical consultancy service (CCS) was launched in April 2024. This provides CT Police case officers with expert advice on individuals in their casework with mental health or neurodiversity needs. The CCS has managed 1200 cases in the last 12 months.	
Recommendation 12: Consideration should be given to reviewing and strengthening the formalised structure of PLP case management in Policy / Guidance, and how this structure can be enforced across the different CTP regions in the country to ensure each PLP Panel meeting is run in a consistent manner. This could include Chairing oversight by a senior ranking officer, recording of those in attendance, minute taking, frequency of meetings, Case Management Plan creation, review of plans and potential for a live review of information placed onto PCMT where appropriate.	**Accepted -** All Prevent staff with access to PCMT have completed training. All case officers with access to live cases have passed the required training.	• A PLP training course is being developed and is expected to be delivered in Q4 25/26. All existing staff will receive training, and the course will then become part of the foundation course. • A standalone online self-led minute taking course for those who need more knowledge and confidence is expected to be delivered before the end of Q2 25/26. • Training to Prevent supervisors, including PLP training, detailing the purpose, how to manage cases using mandatory CMPs, how to chair panels and how to transfer cases to Channel and closure from Prevent is expected to be delivered in Q4 25/26. • Work on the revision and implementation of updated CTCO guidance is in train and expected to be completed by end of 2025.This will include guidance and direction relating to those with complex and additional needs.

		This is expected to be completed by the end of 2025.
Recommendation 13: Considerations should be given to guidance with regards to how repeat referrals are combined with previous ones to reflect the repeat nature. A review of the multiple referral policy addendum should be conducted to consider whether learning points from this review should be included and whether the policy could be strengthened with regards to the actions required to be taken in light of the repeat referral.	**Accepted -** Implemented interim multiple referral policy with more robust decision making involved in the policy. The new policy has been rolled out across the network and CTPHQ have captured learning and risk. Next steps will be to review and establish if any further changes are required.	• To revise and implement updated CTCO guide and update to all Policy, including Policy, Standard Operating Procedure and Guidance for CTCOs and Supervisors with all relevant changes. This will include guidance and direction regarding those with complex and additional needs. This is expected to be completed by the end of 2025.
Recommendation 14: A review of the current PCMT prompt screens should be considered to see if these prompts are sufficient to negate the need for a full data inputting standards manual and policy. If not, a data inputting standards manual should be considered and embedded into policy. Inaccurate recording of data (names, dates of birth and data missing) can lead to previous information not being found by CTCO's assessing a new referral and a potential failure to join the dots between referrals. A policy in this area may make it easier to hold users to account for their inputting standards.	**Accepted -** All staff who have access to PCMT have undergone revised training which covered searching and entry standards. Revisions have been made to prompts for searching, highlighting the need for accurate searching. A reminder to prompt staff to look at all available options to identify their subject now appears when searching for subjects on PCMT.	• To improve the current searching function to give better search results when middle names are involved. • To explore other search work, including merging Subject Search and Individuals by name and creating a link from the current subject to an existing subject, if they are identified as a duplicate to another subject. • Revise and implement updated CTCO guide. Complete review and update to all Policy, including Policy, Standard Operating Procedure and Guidance for CTCOs and Supervisors with all relevant changes from this recommendation. Ensure detail is captured for consistency. This will include guidance and direction regarding those with complex and additional needs. This is expected to be completed by the end of 2025.

Home Office update

Although these recommendations are predominantly for CTPHQ consideration, Homeland Security Group Prevent has been working on several improvements since the tragic Southport attack

Prevent Case Management System (PCMT)

A new joint case management system was launched in May 2024, streamlining Prevent and Channel case management by providing a single, more efficient IT platform to strengthen data recording, analysis and retrieval. With auditable case records it enables the Home Office to conduct robust case assurance and monitoring. The new system was updated further in March 2025 and May 2025 to strengthen analysis functions and the provision of data on trends, gaps and risks in Prevent referrals. The Home Office does not have access to the full range of Prevent data (i.e. pre-Channel (before the Section 36 decision) and data on Police Led Partnerships), which would improve the Home Office's ability to monitor and evaluate Prevent delivery.

Training & ideologies

A new Prevent face-to-face training package launched nationwide in November 2024, following successful pilots since early-2024. This includes a new ideology training course (covering Islamist extremism, extreme right-wing, extreme left-wing, and emerging threats such as incels and 'school massacre'). By March 2025, over 300 trainers across England, Scotland and Wales were delivering the new training packages to frontline staff. Responses in feedback surveys have been positive with 95% of learners reporting a clear understanding of Prevent.

A refreshed list of ideology categories was created in April 2024 for use in the new joint Prevent case management system, accompanied by updated training and guidance for case officers to ensure accurate recording of data and evidence about ideology. In March 2025, the Home Office introduced measures to clarify the policy position and strengthen assurance on two significant issues: repeat referrals and referrals categorised as 'fascination with extreme violence or mass casualty attacks.

Mental health and neurodivergence

In September 2024, the Home Office issued formal advice to frontline staff on assessing and managing the risk from individuals where mental ill-health or neurodivergence is present. It made clear that the presence of mental ill-health should not be a barrier to being risk managed in Prevent.

In December 2024, the Home Secretary announced a strategic policy review to identify and drive improvements in how those referred into Prevent with mental health or neurodiversity needs are supported and managed. This has been undertaken and a report is being prepared for ministers with findings.

Expansion of interventions

In January 2025, the Home Office removed restrictions on Channel panels that prevented those under overt Pursue investigation to be supported. This policy change is in response to the changing profile of those coming through the CT system requiring support and allows a key gap in available provision to be closed.

Evaluation

The Channel evaluation launched in April 2025 and has begun collecting and reviewing data on outcomes for participants of Channel. It has also recently been expanded to PMAP in Scotland. It is consulting practitioners nationally and conducting case studies across five local authorities to review how Channel is being delivered. This is a significant piece of work to improve our understanding of the Channel programme's impact on counter-terrorism outcomes and radicalisation risk. The evaluation will report in late 2026.

The Home Office has commissioned an independent evaluation of three civil society organisation-led projects, which is due to report in summer 2025. The evaluation will draw on the direct experiences of programme beneficiaries, practitioners, and wider stakeholders to provide a robust evidence base on the effectiveness of these programmes and whether they are delivering Prevent objectives.

The recruitment campaign for a permanent Prevent Commissioner is underway. The permanent Prevent Commissioner will monitor the effectiveness of Prevent and assure changes made to the Prevent system.

Ongoing improvements

In December 2024, the Home Secretary outlined reforms to strengthen Prevent, including:

- conducting an end-to-end review of Prevent thresholds, and updating policy and guidance, including on repeat referrals, to ensure they reflect the full range of threats we see today.
- broadening the interventions available to people supported by the Channel early intervention programme. In addition to ideological mentoring, we will seek to reflect the increasingly diverse drivers of radicalisation, by exploring options to support at-risk individuals with cyber skills, family interventions, or practical mentoring.
- strengthening the approach to the monitoring and oversight of referrals that do not meet Prevent thresholds. We have launched a pilot to test new approaches to cases that are transferred to other services to ensure there is proper monitoring and requirements in place.