

Witness Name: CATHRYN ELLSMORE

Exhibits: [CE2/01 - CE2/18]

Dated: 28/11/2025

THE SOUTHPORT INQUIRY

SECOND WITNESS STATEMENT OF CATHRYN ELLSMORE

I, Cathryn Ellsmore, a Director in the Homeland Security Group (HSG) in the Home Office, will say as follows: -

INTRODUCTION

1. I make this statement further to my witness statement dated 25 September 2025 **[CE2/01 - HOM000078]** and my oral evidence to the Southport Inquiry on 13 October 2025. At the time I made my first witness statement and gave evidence to the Inquiry, I was Director of Prevent in HSG, a post I had held since 1 April 2025. My first witness statement at paragraph 1 contains details of my professional background up to that point. On 1 November 2025, I was appointed Director for State Threats and Cyber in HSG. Going forward, the work of the Prevent Directorate (which is summarised at paragraph 22 of my first witness statement) will fall to the recently formed Counter-Terrorism Directorate, led by Jonathan Emmett, who now has overarching responsibility for Prevent in his role as Counter-Terrorism Director. Given that the work I summarise below was commissioned or carried out during my time as Director of Prevent, I am the appropriate person to provide this supplementary witness statement.
2. This further witness statement is prepared at the request of the Inquiry Chair, to provide an update on changes and ongoing work regarding several policy areas addressed in my first witness statement and during my oral evidence, namely Prevent, wider measures connected with violence fixated individuals (VFIs), online harms and biological toxins. As with my first witness statement, for policy areas other than Prevent I am dependent on input from colleagues in the relevant teams for the content within this statement. My colleague Nicholas Hunt will also provide a second witness statement that addresses

changes and ongoing work in respect of the issues raised in the course of Phase 1 of the Inquiry in connection with offensive weapons.

3. I have provided the Inquiry with updated statistics for Prevent, some of which have become available since my oral evidence. Before addressing the issues about which I have been asked to update the Inquiry, it may be useful to set out here some headlines from the set of data on Prevent referrals in the year 2024/2025 [CE2/02 - HOM000203] together with the Official Statistics Release 'Individuals referred to and supported through the Prevent Programme, April 2024 to March 2025' which was published on 6 November 2025 [CE2/03 - HOM000205].

2024-2025 Prevent statistics

4. In terms of the total number of referrals, this has increased from 6,922 in 2023/2024 to 8,778 in 2024/25 (a 27% increase) [CE2/02 - HOM000203 – see Table 1, row 6 (– Individuals referred to and supported through the Prevent Programme April 2025 - March 2025: data tables)]; [CE2/03 - HOM000205 – see figure 1 (Individuals referred to and supported through the Prevent Programme April 2025 - March 2025, GOV.UK page)]. The total number of referrals for children has increased from 3,918 in 2023/2024 [CE2/04 - HOM000170 – see Table 4, rows 7-9] to 4,715 (a 20% increase) [CE2/02 - HOM000203 – see Table 4, rows 7-9].
5. Table 6 of [CE2/02 - HOM000203] shows the type of concern for those referred, discussed at a Channel panel and adopted as a Channel case. There were 5,810 referrals for concerns where no ideology is identified or the ideology is unclear: this includes the categories 'fascination with extreme violence or mass casualty attacks (where no other ideology)'; 'multiple ideologies (with no dominant ideology)'; 'no ideology - other susceptibility to radicalisation identified'; 'no ideology identified' (rows 13-16, column H).
 - a) 710 of the 5,810 (12%) referrals for unclear/no ideology cases were passed on to and discussed at a Channel panel (rows 26-29 + rows 38-41, column H).
 - b) 560 of the 5,810 (10%) referrals for unclear/no ideology cases were adopted by Channel panels (rows 26-29, column H).
 - c) Of those 560 adopted by Channel panels, 315 individuals consented to receive support. Therefore 5% of referrals with unclear/no ideology' type of concern categories ultimately received support through Channel (315 of the 5,810).

6. Table 19 of **[CE2/02 - HOM000203]** breaks down the type of concern and age group for those referred, discussed at a Channel panel and adopted as a Channel case. This shows the following:
- a) 4,715 of the 8,778 (54%) Prevent referrals in 2024/2025 were for children (rows 7-9, column P).
 - b) 3,359 of the 4,715 (71%) Prevent referrals for children were in the categories used for cases where no ideology is identified or the ideology is unclear (i.e. this is how many children there were in the group described in paragraph 5 above) (rows 7-9, columns J-M).
 - c) 1,000 of the 4,715 (21%) Prevent referrals for children were discussed at Channel (rows 19-21, 30-32, column P).
 - d) 862 of the 4,715 (18%) Prevent referrals for children were adopted by Channel panels (rows 19-21, column P)
 - e) 461 of the 3,359 (14%) Prevent referrals for children in the categories used for cases where no ideology is identified, or the ideology is unclear were discussed at Channel (rows 19-21, 30-32, columns J-M).
 - f) 368 of the 3,359 (11%) Prevent referrals for children in the categories used for cases where no ideology is identified, or the ideology is unclear were adopted by Channel (rows 19-21, column J-M).
7. While individuals (both adults and children) referred for concerns related to 'fascination with extreme violence or mass casualty attacks (where no other ideology)' made up 5% of all referrals in the year 2024-25 (469 out of 8,778), they represented 9% of all cases adopted by Channel (126 out of 1,472) **[CE2/02 - HOM000203 – see Table 6 rows 13 and 26 column H]**.
8. What can be seen by examining referrals by month is that there was a notable increase in referrals in August 2024 immediately following the Southport attack, and a further sharp increase in January to March 2025, coinciding with AR's trial and sentencing **[CE2/02 - HOM000203 – Table 6 row 6 column G]**. There was also an increase in referrals in that quarter where the concern was the category 'fascination with extreme violence or mass casualty attacks (where no other ideology)', rising by 240% compared with the previous quarter (from 82 to 279) **[CE2/02 - HOM000203 – Table 6 row 13 columns F-G]**.

1. PREVENT – CONFIRMATION OF ACTIONS AND TIMELINES

Context

9. The terrible actions of AR raise a fundamental question as to whether Prevent is the right process to identify and manage the risk posed by individuals like AR who appear to be fascinated and/or fixated with extreme violence, but for whom there is no clear evidence of an ideological driver. The actions and decisions taken in connection with AR when he was referred to Prevent also highlight areas where Prevent required updating and improving, some of which had been addressed by the time of my first statement, but some of which was ongoing. In this section of my witness statement, I provide an update both about the work that has been completed and that which is being undertaken in connection with Prevent. This section also responds to the Inquiry's request for further detail on how the Home Office is ensuring that Prevent practitioners and Counter-Terrorism Case Officers (CTCOs) are equipped to assess cases involving neurodivergence and mental ill health, and that the issue of ideology is being appropriately balanced in training and guidance.

Matters arising from the Prevent Learning Review

10. At paragraph 162 of my first witness statement, I explained that work was ongoing on a number of reforms outlined by the former Home Secretary on 17 December 2024 to address the areas identified in the Prevent Learning Review (PLR). As requested by the Chair, I provide further detail in respect of these matters as follows. It is important to acknowledge that much of what I cover below is work that is done jointly with CTPHQ. As I said in my oral evidence, HSG works very closely (and this has been particularly the case in the last 2-3 years) with CTPHQ to ensure that the policies and processes that govern the delivery of Prevent are consistent and coherent.

a. The end-to-end review of Prevent Thresholds (“the Thresholds Review”)

11. As I set out in my first statement (at paragraph 171), the end-to-end Prevent Thresholds Review concluded in June 2025 [CE2/05 - HOM000090]. It was commissioned, following the PLR, to examine the thresholds for Prevent referrals and whether these were applied consistently across the Prevent system, with the fundamental objective being to ensure that support is offered to people identified as susceptible to radicalisation. The Thresholds Review provides Prevent delivery partners with the evidence base to increase understanding of the challenges, and the clear strategic context needed to support ongoing delivery of the recommendations. The Home Office has circulated the Review to

Government departments and police, and plans to publish the Review on gov.uk in due course.

12. As set out in my first statement (see paragraph 31), the review considered six key Prevent decision making points – or thresholds – where a person’s suitability for Prevent is considered through the life of the Prevent process. The Thresholds Review concluded that whilst the existing Prevent thresholds were appropriate to address current and future threats, they are applied inconsistently. The Thresholds Review identified a number of factors that appeared to cause greater variance of approach, in particular:

- a) **Mental ill health.** Where mental ill health was a factor, both practitioners and frontline professionals were more likely to dismiss or not consider Prevent referrals.
- b) **Ideology.** Practitioners may be too focused on the presence of a terrorist ideology, whereas because Prevent is an early intervention programme it must consider *susceptibility* to terrorist ideology or involvement, rather than being limited to cases where an ideology is evident or has already taken hold.
- c) **Fascination with mass violence.** Relatedly, the review found that practitioners were sometimes unsure whether to refer or progress individuals fascinated with mass violence if they did not see a clear ‘traditional’ extremist ideology.
- d) **Islamist extremist ideology.** The review found frontline staff were less confident in identifying Islamist extremist referrals compared to extreme right threats or other ideologies.
- e) **Prevent’s core purpose.** The review found that some Prevent practitioners, when considering whether to submit a referral or advising on a referral, were focusing on the outcome, whether other safeguarding partners could lead and the ‘benefit’ a Prevent referral would provide, rather than making decisions based on whether the person could be at risk of radicalisation. Prevent’s unique primary function as the only early intervention programme that offers multi-agency terrorism risk management should be remembered.

13. The Thresholds Review made a series of recommendations. I provide an update in respect of the action taken in respect of each of those recommendations here:

- a) **Recommendation 1 (paragraphs 31 to 34 of the review). Define the ‘Key Principles of Prevent’.**

The action required to implement this recommendation has been completed. The Home Office engaged extensively with frontline professionals, Prevent practitioners (including CTP), and relevant central government departments to develop the Key Principles and ensure they are clear and effective for those making and progressing Prevent referrals. This work will help ensure Prevent offers the support to the right individuals and helps to address Recommendation 2 of Lord Anderson's 'Lessons for Prevent' report, that 'Prevent should remain open to individuals falling within the existing category of "fascination with extreme violence or mass casualty attacks"' and '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' [CE2/06 - HOM000079_0133]. The Key Principles have been distributed to frontline professionals and Prevent practitioners to inform their work and the Home Office plans to publish them on GOV.UK in due course. A copy has separately been made available to the Inquiry.

b) Recommendation 2 (paragraphs 35 – 38 of the review). Review the 'notice, check, share' process and guidance.

Work on this recommendation is ongoing. The Home Office has commissioned external consultants, Verian Group, to work with frontline staff to explore how the 'notice, check, share' process is understood and applied by those subject to the Prevent duty, and particularly the 'check' aspect. The consultation will explore opportunities to improve guidance in relation to making effective Prevent referrals. Completion is expected by March 2026. (Please note, this is the same consultation as mentioned in recommendation 4.2).

c) Recommendation 3.1 (paragraphs 39 – 43 of the review). Improve understanding of mental ill health and neurodiversity policy in relation to radicalisation risk.

There are three components to this recommendation: (i) review guidance and training, particularly for CTP, to ensure practitioners feel confident when intervening and supporting vulnerable people; (ii) the Home Office and the Department for Health and Social Care (DHSC) should consider reviewing and strengthening current guidance and advice for frontline professionals to address the concerns that some health professionals reported in connection with Prevent

referrals (stigmatising certain conditions, impact on therapeutic relationships and negative perceptions of Prevent); and (iii) provide greater clarity in guidance for practitioners around mental ill health and/or neurodiversity and radicalisation risks.

All three components of this recommendation were addressed in part by the recent delivery of the Key Principles of Prevent, as they seek to bolster existing guidance on the considerations around mental ill health, neurodiversity, and Prevent.

However, further work is ongoing. For component (i), the Home Office is working closely with CTP to identify opportunities to improve the guidance and training available for CTCOs. This includes an evaluation of the Prevent Assessment Framework (PAF), the assessment tool used by CTCOs and Channel panels to provide tailored assessments of an individual's susceptibilities and protective factors, including mental health and neurodivergence, which I covered in my first statement and oral evidence. The Home Office will also seek to strengthen the guidance available to all Prevent practitioners in future iterations of the Channel Duty Guidance.

For component (ii), the Home Office is working closely with DHSC to review and strengthen the guidance available to their frontline professionals in relation to Prevent referrals and to ensure that the role of Prevent is properly understood. As a result, DHSC is actively disseminating and promoting the Key Principles within the health sector. DHSC is engaging with NHS England to review and revise NHS Prevent training in line with Home Office standards on referral policy, aiming to provide further materials by next summer, with stakeholder workshops planned for January 2026.

For component (iii), we will continue to review whether further guidance, in addition to the Key Principles, is needed for practitioners in this space. Further actions that contribute to this recommendation are also being progressed by the strategic policy review on mental health and neurodivergence (please see paragraph 22 below).

d) **Recommendation 3.2 (paragraph 44 of the review). Explore if additional mental health and neurodiversity provision is possible.**

The capacity of mental health services was said to have a notable impact on Prevent thresholds, with shortage of provision posing a challenge when treatment was an essential part of support and also cited as a factor in repeat referrals.

Work on this recommendation is ongoing. The Home Office is working with DHSC to explore possible options to deliver this recommendation and recognise there may be overlap between Prevent cases and individuals with mental ill health or neurodivergence. The Parliamentary Under-Secretary of State for Patient Safety, Women's Health and Mental Health, Baroness Merron, has accepted an invitation to discuss the issue with the Security Minister, following a briefing with CTP at the Counter Terrorism Operations Centre, and an invitation to the Prevent Ministerial Oversight Board at the end of the year. As with Recommendation 3.1 the Home Office is also seeking to make further progress through the strategic policy review on mental health and neurodiversity (see paragraph 22 below).

e) **Recommendation 4.1 (paragraphs 45 - 48 of the review). Clarify the policy and guidance on ideology, including unclear/no ideology.**

There were two components to this recommendation: (i) clarify that a clear identifiable ideology is not mandatory to make or progress a Prevent referral; (ii) reiterate that it is not essential for frontline professionals to identify an ideology to make a referral to Prevent.

This recommendation of the Thresholds Review overlaps with a key theme of Lord Anderson's recommendations, that Prevent referrals should be considered for people who are fascinated with extreme violence but not motivated by a clear ideology. As Lord Anderson noted, this is effectively the status quo, as persons displaying fascination with extreme violence or mass casualty attacks are considered legitimate subjects for Channel [CE2/06 - HOM000079_0106 - paragraph 5.23].

The work delivered under Recommendation 1 (Key Principles) clearly set out this policy. This has been supported by training updates added to GOV.UK in

October 2025 and will be further strengthened by the planned policy repository (see Recommendation 4.2).

- f) **Recommendation 4.2 (paragraphs 49 - 50 of the review). Prevent should review the training for practitioners and frontline professionals on ideology, with a particular focus on “unclear” or “no ideology” and “Islamist Extremism/Terrorism”.**

The Home Office is working with external consultants, Verian Group, to consult frontline staff on the requirements for Home Office Prevent training products, particularly in relation to cases involving ‘unclear’ or ‘no ideology’ and ‘Islamist Extremism / Terrorism’. Verian Group will deliver an initial report on findings in December 2025. Following that, a second phase of interviews with frontline professionals will start before a final report on Home Office training products is expected to be delivered in March 2026. The Home Office has also consulted with its practitioner network to identify areas where Home Office training can be improved and have commenced a procurement exercise to develop new training. (Please note, this is being undertaken as part of the same consultation as mentioned in recommendation 2).

The Home Office is also engaging more broadly on the current training provision on terrorist ideologies. Both workstreams will help to identify any required changes to improve the current provision on ideology, including the extent to which ideology should be considered when Prevent referrals are made. Work is underway to develop a wider library of training case studies, which will include case studies on ‘no clear ideology’ to provide more clarity and build confidence among frontline professionals making referrals.

The Key Principles of Prevent document which, as I mention above, the Home Office plans to publish on GOV.UK, makes clear that: *‘While ideology is an important consideration, a clear identifiable ideology is not mandatory to make or adopt a Prevent referral. As the Independent Prevent Commissioner noted, ‘adherence to an extreme ideology is in law neither a necessary nor a sufficient condition for entry into Prevent or Channel’. As an early intervention programme, Prevent must consider susceptibility to terrorist ideology or involvement, rather than limiting Prevent to cases where a terrorist ideology has already taken hold. For some people, it might take spending time and building trust with a*

professional before an ideology becomes clear. It is important to consider that emerging movements could evolve to meet the definition of terrorism, and to remain alert to new potential threats.' A set of example case studies and FAQs was circulated to Prevent practitioners with the Key Principles document, both of which also emphasise that an individual can receive support from Prevent if they do not have a clear ideology.

g) Recommendation 5 (paragraphs 51 - 53 of the review). Strengthen how Prevent works with safeguarding and other support services.

There are three components to this recommendation: (i) ensure that Prevent is featured consistently across all key safeguarding policies, training and considerations; (ii) the Key Principles of Prevent should be used to ensure that there is a consistent message underlining that Prevent is the only support programme with the ability to regularly assess and manage the risk from terrorism; and (iii) strengthen the Channel Guidance, including with case studies, to clarify how Channel can work with other established safeguarding programmes (both when working in parallel and when handing over from Prevent).

This cross-system recommendation is in the early stages of planning and development, with pilot projects planned to help understand issues and options. For example, the Home Office is developing a pilot which will enable Channel, Prevent Multi-Agency Panels (the Scottish equivalent of Channel), Police-led Partnerships (PLPs) and the Desistance and Disengagement Programme (DDP) to commission mentors to directly support the family of those engaging with Prevent programmes. The Home Office will also work closely with safeguarding services and are already exploring links with the Department for Education's Families First Programme. See more information in paragraph 18 below.

Lessons from the Prevent Below Thresholds Pilot for referrals not meeting Prevent thresholds (see more information in paragraph 29 below) will also inform direction on the implementation of this recommendation. The pilot entails testing different approaches for formalising handovers from Prevent to other relevant services.

In addition, the Key Principles have clarified that Prevent can work with other safeguarding services and set out the importance of considering wider safeguarding options when Prevent is unsuitable.

h) Recommendation 6 (paragraphs 54 - 59 of the review). Strengthen local, regional and national collaboration with consistent information sharing and best practice, particularly for referral feedback.

There are a number of components to this recommendation: (i) a more consistent approach to sharing referral feedback (between police and those submitting referrals) should be developed (mindful of and proportionate to local risk and resourcing and not as a triage process); (ii) where local training and guidance is tailored by practitioners it is essential that it still aligns with Home Office Prevent policy and terminology (to avoid confusion, ambiguity and inconsistency); (iii) the national referral form must be implemented in all areas; and (iv) to encourage consistency, the Home Office and CTPHQ should consider joint messages when sending communications to their Prevent networks.

The Home Office is in the planning and scoping stage of this recommendation. It is working closely with partners, including CTP, to develop this. This recommendation links to Recommendation 7 as the training and guidance repository will ensure consistent information sharing. Recommendation 7 is expected to be completely implemented by Spring 2026.

i) Recommendation 7 (paragraphs 60 - 62 of the review). Create a guidance / policy repository.

This recommendation has two components: (i) the training, guidance and policy updates should be streamlined and made consistently available on a central repository to ensure that the full range of the Prevent knowledge base is made available for all practitioners, regardless of organisation and agency; and (ii) minimum operational standards should be developed (by the Home Office in collaboration with CTP, the Department for Education, DHSC and other relevant stakeholders).

We are working with Home Office Digital to develop the requirements for a technical solution for a Prevent Practitioner Repository that can be delivered by

Spring 2026. The repository will be accessible by all Prevent practitioners and provide easy, consistent access to up-to-date Prevent policy and guidance, thereby also contributing to Recommendation 4.1. It is intended that it will ensure that the latest policy, guidance and research is available to all practitioners, reducing the reliance on distribution of guidance by email and institutional memory.

The Thresholds Review highlighted that CTCOs would welcome more training on ideology. The Prevent training portal was launched in November 2024 and hosts the Prevent ideology training package. This is available to statutory sector Prevent trainers which includes police. CTCOs will also have access to the guidance repository when this has been developed. The Home Office is engaging with CTP on the CTCO feedback on ideology training as well as the Thresholds review more widely.

b. Broadening the interventions available to people supported by Channel.

14. As set out in my first statement (paragraphs 162-163), in order to reflect the increasingly diverse drivers of radicalisation, the Home Office is exploring options to support at risk individuals in addition to ideological mentoring, such as practical mentoring, psychological advice for intervention providers, family interventions and cyber skills. These areas of intervention were scoped after consultation with frontline professionals, including Channel Chairs and Regional Prevent Coordinators, who identified areas where there were possible gaps in service provision. I have provided the Inquiry with the paper which summarised the results of this consultation.

Intervention Providers

15. I mentioned in my oral evidence the work done to broaden the range of Intervention Providers available within Prevent, in order to ensure the availability of those with an appropriate skill-set and experience to assist with VFIs who have no clear ideology [13 October 2025 DAY 22/23/19 - 24/5]. The Home Office conducts due diligence checks on all Intervention Providers at the point of recruitment and as a minimum on an annual basis thereafter, with the option for additional checks should a concern be raised. These checks consist of reviews of social media outputs and other public platforms with the aim of ensuring the authenticity of views presented throughout the recruitment process, as well as flagging any views of potential concern to the Home Office. For these checks, any new traces are put forward to either the Security Minister or Director Prevent / Director Counter-

Terrorism as appropriate for a decision, depending on the assessment. These checks are connected to Recommendation 29 of the Shawcross Review [CE2/07 - HOM000071_0164], although they were implemented before its publication. Additionally, to further strengthen due diligence, processes are in place to ensure the Home Office is made aware of any relevant Intervention Provider interactions with police or law enforcement, allowing them to take any decisions required in relation to this.

Practical Mentoring Pilot

16. A six-month pilot enabling Channel panels, PLPs and, in Scotland, Prevent Multi-Agency Panels (PMAP), to commission a practical mentoring service commenced on 1 August 2025. Practical mentors will be able to provide support to individuals in a range of areas, such as training, education, employment, critical thinking and building effective protective factors, often through family or other positive social relationships. This support can be provided to all individuals including those with less defined ideologies or no identified ideology. It was previously only available to assist the overarching risk management of individuals who had been involved in terrorism or terrorism-related activity on the DDP to support with their reintegration back into society. For those receiving support via Channel, panels were able to access wider support services within the community when identified and needed. However, for those being released from a prison sentence for TACT or TACT related offences and receiving support via the DDP, it was identified that a bespoke package of practical support was additionally needed to enable that transition back into local communities, develop positive protective factors including by helping individuals to look for accommodation, source employment and seek education opportunities.

Psychological advisory service for Home Office-approved intervention providers

17. Before the end of this year, the Home Office intends to commence a pilot for an advisory service for Home Office-approved Intervention Providers working across Prevent programmes in England and Wales, with Scotland to follow, to be able to consult a psychologist for case specific advice. Clinical psychologists will provide case-specific strategies and advice on effective approaches, identify challenges and suggest appropriate methods of engagement for supporting someone with mental ill health or neurodiversity conditions. This support is intended to make intervention sessions more effective by providing approaches that are tailored to the specific needs of each case, as recommended in the mental health and neurodiversity strategic policy review (see paragraph 22 below). The pilot will run to the end of March 2026, followed by a full evaluation to determine feasibility and future improvements.

Piloting the provision of family intervention support

18. A further pilot is in development, with the intention of commencing by the end of this year, which will enable Channel, PMAP, PLPs and DDP to commission mentors directly to support the family of those engaging with Prevent programmes in Scotland, England and Wales. The mentors will provide support and guidance to families to help understand what their relative is experiencing and how to offer protective support to strengthen resilience and reduce radicalisation risks. Support may involve, for example, online safety advice and family mediation depending on the needs of the family.
19. Further links with the Department for Education's Families First Programme are also being explored to assess the opportunity to additionally provide interventions to families of children in receipt of Channel support.

Online support

20. The Cyber Choices programme is a nationally coordinated initiative led by the National Crime Agency and delivered through Cyber Prevent teams within Regional Organised Crime Units and Local Police Force Cyber Teams. Following a limited regional offer for Channel Panels across the North-East this has now been developed as a full nationwide offer from 17 November 2025. Its purpose is to support individuals in making informed decisions about their use of technology and to encourage the legal application of cyber skills. The programme aims to clarify the distinction between lawful and unlawful cyber activity, promote awareness of the Computer Misuse Act 1990, and foster engagement with positive, legitimate opportunities in the cyber sector.
21. Together with the family intervention offer, individuals (and their families) can make more informed choices about online activity and therefore build resilience to radicalisation.

c. Strategic Policy review on neurodivergence and mental ill health.

22. As I explained in my oral evidence [13 October 2025 DAY 22/70/17 - 71/11], the Home Office has completed the first stage of a strategic policy review to identify and deliver improvements in how individuals referred to Prevent who are neurodivergent or suffer from mental ill health are supported and managed, and the review has two other phases to go.

23. The first stage involved a substantive literature review of over 90 documents on Prevent, mental health, and neurodiversity, in addition to discussions with policy and delivery teams, analysts and subject matter experts from across Government and external stakeholders.
24. The review recognised that there is no causal link between mental ill health or neurodivergence and radicalisation risk. Rather, mental ill health or neurodivergence should be considered as contextual factors, meaning that risk needs to be assessed on an individual basis and support plans should be tailored to the individual. It is important that practitioners have the skills and confidence to support people with mental ill health issues or who are neurodivergent, including by being able to provide tailored, considered interactions. The review recognised that there needed to be a stronger evidence base to understand 'what works' when providing interventions for this cohort.
25. The review identified some key areas for improvements in relation to the role of mental ill health and neurodiversity in Prevent. For example, the review found that some frontline professionals subject to the Prevent Duty are less likely to make a Prevent referral, and that referrals are sometimes rejected, when mental ill health concerns exist or if the individual is already receiving support from another service (this confirms a similar finding made in the Thresholds Review, as noted above). There is a general lack of confidence on the relationship between mental ill health, neurodiversity and radicalisation risk, and uncertainty around how to best support these individuals. The review also identified a shortage of provision from mainstream mental health and neurodiversity services, and inconsistency in provision and approach depending on local area and age.
26. The review made several high-level recommendations to begin addressing these areas. This includes improving understanding of mental health and neurodiversity in relation to radicalisation risk, and how these factors should be considered when making or progressing a referral to Prevent. The recent delivery of the Key Principles of Prevent began to address this by highlighting that a referral should always be made where a radicalisation concern exists, including when the person has mental health concerns or is neurodivergent. Additionally, the review recommended that the Home Office should ensure that appropriate training and resources are available to Prevent practitioners to encourage a consistent approach and improve confidence in supporting these individuals. This includes a focus on tailored risk assessments and support plans.

27. To drive the review's recommendations forward, the Home Office has set up internal and external cross-government/partner steering groups to deliver the recommendations and provide strategic direction. So far, the Home Office, in partnership with the Psychological Services Group (His Majesty's Prison and Probation Services), is soon to commence a new service for psychologists to provide tailored advice to Intervention Providers when they are supporting individuals with neurodivergence or mental ill-health (as detailed in paragraph 9 of the strategic policy review on neurodivergence and mental health and outlined above). Alongside support from CTP's Clinical Consultancy Service (CCS), this will ensure Prevent practitioners, including CTCOs, are better equipped to assess and support these individuals. In order to better understand what works to support people with mental ill health or who are neurodivergent, as well to understand their challenges, we facilitated several sessions with Prevent practitioners on mental health and neurodivergence. The outputs of these sessions have been collated and will be issued to practitioners, along with advice and resources, in the new year to help strengthen our approach and build practitioners' confidence. This work also contributes to Recommendation 3.2 of the Thresholds Review, and the Home Office will be liaising with DHSC and across Government to identify further opportunities for improvement.

28. To improve understanding of the complex relationships between mental health and neurodiversity and radicalisation, as well as how best to support people with mental ill health or who are neurodivergent, the Home Office is commissioning research in collaboration with CTP which will have unique access to the Clinical Consultancy Service's primary Prevent data. The initial report is scheduled for March 2026. Improvements have also been made to the way in which the Prevent Case Management Tracker records mental ill health and neurodiversity. Those improvements provide new opportunities to analyse further the relationships between these factors and radicalisation. This work contributes to Recommendation 3.1 of the Thresholds Review and will feed into strengthened policy and guidance for Prevent practitioners.

d. The Prevent Below Thresholds Pilot for referrals not meeting Prevent thresholds

29. As set out in my first statement (paragraph 176), in 2025 Prevent has conducted 'Prevent Below Thresholds Pilots' in nine local authority areas to provide additional assurance where cases do not progress through the Prevent process but are signposted to other non-Prevent mainstream services for support. First announced in a Written Ministerial Statement (Preventing Radicalisation) [CE2/08- HOM000083] on 17 December 2024, the then Home Secretary Rt Hon Yvette Cooper informed Parliament that Prevent would

strengthen the approach to monitoring and oversight of referrals that do not meet Prevent thresholds.

30. This statement was due, in part, as a response to the annual Prevent statistics, which highlighted cases that were exited from Prevent and signposted elsewhere but gave limited evidence as to the handover process from Prevent to other services. Prevent statistics focused on the high proportion of Prevent referrals that were deemed not suitable for consideration by Channel and signposted to alternative services for support (4,514 or 65% of Prevent referrals in the year ending March 2024) **[CE2/04 - HOM000170 – Prevent referral data 2023-2024, see Table 2 row 8]**, or were signposted for support following discussion at a Channel Panel, but not adopted (272 or 4% in the year ending March 2024) **[CE2/04 - HOM000170, see Table 2 row 30]**.
31. As I explained in my oral evidence, the Prevent Below Thresholds Pilot entails testing different approaches for formalising handovers from Prevent to our statutory partners, including social care, mental health services and local police. This has involved what I have described as almost 'mini' Channel panels that are having a multi-agency discussion around these cases and then determining who the lead professional should be to 'own the risk to the public' posed by an individual who is no longer open to Prevent, and the support that should be provided in those cases. It will ordinarily be the local police force which owns the public protection risk, and the involvement of local police within the pilots is a means of ensuring local police forces are made aware of, and can assess, risk in cases where a concern about violence has been noted.
32. The Prevent Below Thresholds Pilot is now operating in nine areas in England and Wales: Cardiff, Derby, Durham, Leicester, North Yorkshire, Sheffield, Stoke-on-Trent, Warwickshire and Worcestershire. It aims to test the viability of multi-agency oversight of referrals which do not meet the Prevent threshold. The pilot was initially intended to run for six months beginning in March 2025 but was recently extended to conclude in March 2026 to allow more time to identify learning.
33. The Prevent Below Thresholds Pilot Panels (Pilot Panels) are delivering to agreed terms of reference. Those terms of reference stipulate pilot scope, minimum requirements, deliverables, and membership, but the local authorities have local discretion and flexibility with how panels are structured.

34. The Prevent Below Thresholds Pilot has been limited to focusing on only those high risk cases where individuals have been identified as posing a risk of violence or having a concerning interest in mass violence.
35. Pilot areas have taken broadly similar approaches to the assurance process applied to relevant cases. The assurance typically involves a multi-agency meeting, where cases not meeting the Prevent threshold are presented to the panel by CTP. That multi-agency meeting is chaired by the local authority and draws on practitioners from frontline local policing, the health system (including mental health services), and social care. These statutory partners usually seek to ensure that the individual has been effectively referred to the most appropriate mainstream service for support and consider what other services might be available to provide support. Once partners are satisfied that the appropriate support is being provided by other services the case is discussed at least once more within the next three months to conduct an assurance check-in. In those cases where there is more significant risk or complexity, panels have been revisiting cases more frequently, before they are closed. The check-in process also provides Pilot Panels with the opportunity to consider whether Prevent risks have subsequently developed and a further Prevent referral should be made.
36. The Prevent Below Thresholds Pilot is currently being evaluated by Homeland Security Analysis & Insight (HSAI), a unit which brings together economists, statisticians, operational and social researchers, intelligence analysts and others to assess its implementation across all nine areas and to understand whether the pilot has achieved its aims. Monitoring data is collected from areas on a monthly basis which will inform the evaluation findings. In addition, towards the end of the pilot HSAI will conduct qualitative interviews with stakeholders involved in the pilot's design and delivery.
37. To capture early insights, HSAI has recently undertaken a light-touch interim review of the monitoring documentation received from Prevent Below Thresholds Pilot Panels held between April and June 2025. The interim review also included gathering evidence from a small number of stakeholders to understand early reflections on the pilot's initial implementation. Given the limited scope of this review, the early findings are not representative and may be subject to change upon completion of the final, full evaluation at the end of the pilot. Therefore, findings must be interpreted with caution.
38. All individuals discussed by the panels at this point were already known to other mainstream services prior to their referral into Prevent. They were typically closed by CTP

or not adopted by Channel due to lack of counter-terrorism concerns, including an absence of ideological drivers for behaviour.

39. Generally, partners reported positively on the initial set-up and delivery of the pilot. Benefits have included well-attended panels by multi-agency partners, detailed discussions of each case, a good understanding of individuals' history of engagement with mainstream services and an identification of potential gaps in support, with clear partner actions. Some Panel Chairs have also noted the benefit of understanding which cases are being signposted out of Prevent pre-Channel, as this information was not necessarily being provided to the local authority prior to the pilot.
40. Challenges have included the speed at which the pilot was set up, which initially led to some confusion about the purpose and focus of the pilots, though this was quickly resolved. The Pilot Panels have also experienced very low referral throughput, of typically between 1-2 new cases per month, per panel; this is partly because the pilot has focused on individuals posing a risk of violence or having a concerning interest in mass violence. A re-affirmation of existing policy with regard to the Prevent relevance in some cases of individuals with no clear ideology but a fascination with extreme violence or mass casualty attacks and the introduction of additional assurance measures by CTPHQ in Spring 2025 may also have meant that more individuals in this category were being discussed and adopted by Channel Panels, reducing the number of referrals to the Pilot Panels. Some Panels did not have new cases or reviews to carry out and discussed ongoing updates related to existing cases. The Pilot Panels have also relied on partner goodwill, rather than a statutory duty, set against a backdrop of a significant increase in referrals and Channel caseload. That reliance may mean partner input could decline over time if demands increase. For some areas, there has been a lack of representation of key partners, such as mental health and frontline policing, at some of the Panels.
41. Full evaluation findings will be delivered in early 2026. The Home Office expects the findings from the pilot to inform strengthened policy and practice to ensure that individuals who are not considered appropriate for Prevent but where there is some concern about a risk of violence are being supported by other services. This is subject to discussion and agreement with key partners, including CTP.

2. VIOLENCE FIXATED INDIVIDUALS

Overview

42. Although the risk posed by individuals fascinated with extreme violence who are not driven by ideology has for some time been part of the work of Prevent, the Southport attack brought clarity to, and focus on, the need to consider further measures to address the risks posed by these individuals. The Inquiry has asked for further detail on measures under consideration to address individuals with a fascination with violence but no clear ideological driver, and any work being undertaken in relation to civil orders or other alternatives to prosecutions.
43. Broadly, the Government's objectives for managing and reducing the risks posed by violence fixated individuals has aimed to:
- a) reduce the cohort of those who potentially pose a risk of extreme violence by preventing vulnerabilities occurring;
 - b) better address vulnerabilities once they have been identified and at an early stage;
 - c) provide effective interventions for those individuals at risk of committing acts of extreme violence;
 - d) consider longer-term reform to provide adequate assurance of risk management in VFI cases;
 - e) reduce exposure of vulnerable individuals, especially children, to both online content and online communities which can motivate them to violence, terrorist or otherwise.
44. Delivering on these objectives cuts across the policy remits of a number of government departments, in particular the HO, Department for Education (DfE), DHSC, Ministry of Justice (MoJ) and the Department for Science, Innovation and Technology (DSIT). It also relies heavily on the work of operational partners, especially the police.
45. Following the conclusion of the Southport criminal proceedings, a temporary cross-government team was established comprising officials from HO, DfE, MoJ, MHCLG and operational partners. This team conducted work between February and September 2025.
46. This section of my statement has been prepared in consultation with relevant government departments and reflects, in outline and non-exhaustively, work being carried out across government. It is intended to summarise the work that has been completed and which remains ongoing that relates directly to VFIs. It does not cover wider or more general work being done in departments or by operational partners that may have a bearing on VFIs.

47. The Inquiry will be key to examining the need for long-term reform, in Phase 1 but particularly in Phase 2. While not pre-empting the conclusions of the Inquiry, it remains important that the Government undertakes work to better understand the threat, consider how to respond and act now to reduce risk where it can. As set out below (point e), existing systems focus on safeguarding and support services. Changes to address the risk from VFIs needs to be undertaken alongside wider initiatives to improve local service capacity and capability to address the prioritised needs of all individuals. The Home Office anticipates that Phase 2 of the Inquiry will help guide Government thinking in this space. This work to date has included developing and co-ordinating:

- a) Public commitments made by Ministers following the Southport criminal proceedings including establishing the public inquiry.
- b) Engaging with the Independent Reviewer of Terrorism Legislation to prompt a rapid review of terrorism definitions and laws. This recommended considering a new offence of acts preparatory to a mass casualty attack, which the Government has accepted should be taken forward, although timing is to be agreed.
- c) Analytical work across government and operational partners to understand better the number, trajectory, characteristics and risk factors of VFIs. These conclusions can be used to support local services to identify the VFI cohort.
- d) A mapping exercise of the existing systems that could be relevant to managing VFI risk across youth services, children's social care, health and neurodevelopment conditions services, youth justice services, crime prevention and counter-terrorism. The landscape is complex and it has taken time to understand the way different systems operate, both nationally and locally, but was a necessary precursor to considering broader reform (see paragraph 51, below).
- e) Work with departments and local services to promote ongoing prioritisation of Prevent referrals that require support from local services such as health, youth justice or social care, where an individual poses a risk to others. One of the challenges in progressing this has been that wider safeguarding and mental health services frameworks are focused on managing risk *to* a child, not *from* a child. This is a theme that has also emerged strongly from the Inquiry evidence.
- f) Initial scoping and engagement with stakeholders of a broader safeguarding and violence prevention gateway that is capable of effectively managing VFI risk. I deal with this in more detail below.

- g) Consideration of additional measures to reduce VFI risk including guidance to practitioners about ongoing threat assessment, review of civil orders and an online detection capability.

Prevent and VFIs

48. Much of the work (of both CTP and Home Office) in connection with Prevent, which I have covered above and in my first witness statement, is relevant to these objectives. For example:

- a) CTPHQ's updated Multiple Referrals policy **[CE2/09 - HOM000095]** and Fascination with Extreme Violence and Mass Casualty Attacks: Interim Referrals Policy **[CE2/10 - CTPNW000016]**, implemented in March 2025 and kept under review, should increase the likelihood both of identifying VFIs and retaining them within the Prevent/Channel process, and therefore increase the likelihood of individuals being offered support and interventions through Channel.
- b) The recommendations from the Thresholds Review detailed above, in particular around cases where there is no ideology or the ideology is not clear will support work on VFIs in the Prevent system, with additional guidance on the Key Principles of Prevent and updated training packages providing clarity on Prevent's role in supporting VFIs where they are susceptible to radicalisation.
- c) The Prevent Below Thresholds Pilot will provide a greater level of assurance for the management of individuals who are referred to Prevent but are not referred to Channel, some of whom may include those at risk of falling into the VFI cohort.

Broader safeguarding and violence protection system

49. The objective of broader reform to better manage VFI risk for which cohort there is no single responsible agency is one of Lord Anderson's key themes in his July 2025 report **[CE2/06 - HOM000079]**. Lord Anderson recommended that Prevent could function better if it was connected to a broader safeguarding and violence protection system, and discussed the possibility of an integrated scheme, or "big front door" for safeguarding and violence referrals which Prevent would sit behind, along with other multi-agency safeguarding and risk management processes.

50. As I said in my evidence this is both an important recommendation and a challenging one **[13 October 2025 DAY 22/73/21 - 74/3]**. Lord Anderson has identified a number of advantages that such a system would include, with a particular focus on the advantages

for Prevent, and also recognises some of the significant implementation challenges (see paragraphs 5.3-5.40 of his report).

51. While some initial scoping has been carried out, this work is at an early stage and is necessarily a longer-term project, taking account of the Inquiry's findings. However, we currently assess there is a good case for reform. The modern threat landscape is evolving and becoming more hybridised. High-harm acts of violence, whether ideologically motivated or not, can be difficult to categorise and individuals who go on to commit lone actor terrorism, mass casualty attacks or grievance-based assaults often share underlying characteristics and behaviours (such as social isolation, mental ill health and online radicalisation). Yet the systems designed to prevent such acts remain siloed with different legal frameworks, referral routes, thresholds, powers and resources.

52. The adequacy of the arrangements for managing the risk from VFIs, and recommendations for improvement, are directly in scope of Phase 2 of the Inquiry and Ministers will want to see the Inquiry's conclusions on this issue before taking final decisions on fundamental reform. In the event of broader reform, significant additional funding is expected to be required which is not currently allocated. The Government will consider this alongside the Inquiry's conclusions in Phase 2.

Other HO work

53. The Home Office has commissioned 51 new multi-agency Young Futures Prevention Partnership Pilots. These pilots will operate at local authority level and bring together a panel of statutory and voluntary sector partners to identify proactively - and refer into support - those children (predominantly aged 10-17 years old) who are vulnerable to being drawn into crime and violence and who may currently be falling through the gaps between services.

54. These pilots aim to build understanding of how to identify effectively this cohort and intervene earlier with them whilst simultaneously supporting thousands of at-risk young people. The intention is that these pilots, by working in close partnership with police, children's services, education and youth justice teams, and aligning with existing programmes and activities, will effectively target and support vulnerable children and young people who might otherwise remain undetected or unsupported.

55. In the first instance, the Home Office has recommended that all pilot Young Futures Panels establish a police-based referral pathway which identifies any children who have been named as a suspect in one or more crimes in the last 12 months but have received no

prosecution or community resolution. Where resource allows, the Home Office has also encouraged the establishment of additional discretionary referral pathways which identify children displaying indicators of increased vulnerability who may benefit from effective, early intervention.

56. All pilot Young Futures Panels were fully operational (e.g. identifying, assessing and supporting children) as of the beginning of November and are currently funded to March 2026.

Civil orders

57. In my first witness statement (paragraphs 183-187) I explained the history and operation of the proposed Youth Diversion Orders (YDOs). As the Inquiry understands, YDOs, if enacted, will assist with the management of individuals who have, on the balance of probabilities, committed a terrorism or terrorism connected offence or been involved in conduct likely to facilitate such an offence by them or another person. In summary, an individual must have engaged in the necessary terrorism-related conduct to be considered for a YDO, which means that it is less directly relevant to VFIs. It should be recognised, however, that there can be overlap between these two cohorts with VFIs potentially crossing the threshold of certain terrorism offences, such as viewing material online that is likely to be useful for a terrorist even if they do not have strong connections to a terrorist ideology.

58. I have been asked by the Inquiry to address any work ongoing in relation to civil orders or other alternatives to prosecutions for VFIs. As I noted in my oral evidence, in recognition that there may be some cases where mandatory restrictions and requirements would support risk management, and acknowledging that an individual has to consent to the interventions offered within Prevent, the Home Office is undertaking a review of relevant civil orders to see whether any existing orders would be suitable for VFI-type cases. The review is ongoing but the following orders have been identified as potentially relevant. The initial view is that none is able to respond to the full spectrum of VFI-type cases.

59. **Youth Diversion Orders (YDOs):** YDOs are designed to intervene early in terrorism-related offending involving young people and divert young people from prosecution where appropriate. The draft legislation allows the police to apply for a YDO for individuals aged 10–21 (12–21 in Scotland). The court must consider both the individual's conduct (they must be assessed, on the balance of probabilities rather than the criminal standard of

proof, to be involved in terrorism-related offending) as well as the risk they pose to the public. The risk threshold was purposefully widened from mitigating terrorist risk and also includes mitigating a risk of serious harm to the public, such as serious violence without ideological drivers. This recognises that, particularly for young people engaging in terrorism-related activity online, operational experience has highlighted that ideological drivers, which are necessary to meet the statutory definition of terrorism, can be less clear-cut. The draft legislation sets out that the court may impose restrictions or requirements on a respondent where these are necessary to mitigate a risk of terrorism or serious harm, such as: internet/device access restrictions; mandatory attendance with relevant services, such as Prevent interventions; and prohibitions on purchasing weapons or precursors. The clauses are currently before Parliament in the Crime and Policing Bill. Any broadening beyond the current scope would need to take account of the differing operational requirements of the VFI cohort and whether or not these would be met by the YDO, the need for proportionality (it will be a criminal offence to breach a YDO), and devolution considerations (for example, YDOs relate to terrorism-related activity and counter terrorism is a reserved matter).

60. **Serious Crime Prevention Orders (SCPOs):** SCPOs (under the Serious Crime Act 2007) are designed to protect the public by preventing, restricting or disrupting involvement in serious crime. In England and Wales, they can be imposed by a Crown Court upon conviction for a series of offences as listed in Schedule 1 of the Serious Crime Act 2007, or by the High Court when there is a reasonable belief that an order would protect the public. SCPOs can impose a wide range of restrictions including: financial (limiting access to bank accounts); communication (limiting contact with certain individuals or access to communication devices); geographic (restricting travel or residence); association (limiting contact with known criminals); and business and employment (limiting involvement in specific businesses or professions). It is worth noting that SCPOs only apply to over 18s, which is likely to be limiting for VFI cases. As with all orders, any amendment beyond the current scope would need to take account of the need for proportionality and of devolution considerations.
61. **Violent Offender Orders (VOOs):** the policy on these is owned by the Ministry of Justice and the relevant legislative provisions contained within the Criminal Justice and Immigration Act 2008. The primary purpose of the order is to protect against the risk of serious violent harm that may be caused by the offender. The order can be imposed on someone aged 18 or over who has been convicted of a violent offence, regardless of

whether they have been sentenced to imprisonment or not. It can also be imposed on someone who has not yet been convicted of committing a violent crime but who is believed to pose a severe risk of harm to others.

62. The review of other potential orders is ongoing but to assist the Inquiry, some relevant considerations are set out below.

- a) **Timing of interventions:** Most orders are only available post-conviction, meaning they cannot be applied early when risk indicators emerge. VFIs often require preventative measures before an offence occurs, which current frameworks do not adequately support.
- b) **Age restrictions:** With the exception of YDOs, addressed above, many orders are designed for adults: under-18s are often excluded or subject to different thresholds. VFIs disproportionately include adolescents, creating a mismatch between risk profile and available tools.
- c) **Scope of conditions:** Existing orders focus on specific behaviours (e.g., knife possession, anti-social behaviour, terrorism-related offending) and conditions are targeted at protecting the public from the specific harm associated with those behaviours. Any restrictions on a person's freedoms (e.g. to travel, communicate or associate with others) need to have a specific purpose. Courts have limited ability to impose positive requirements such as mandatory engagement with mental health or social services. For practical reasons and because breaching conditions may be a criminal offence, monitoring and enforcement options for positive requirements are limited.
- d) **Resource constraints:** There are significant costs associated with applying for and managing civil orders, both for the applicant authority and the courts. No additional funding accompanies expanded use or adaptation of civil orders.

63. The Home Office expects to be in a position to discuss the need for, and potential parameters of, any new type of civil order further during Phase 2 of the Inquiry and will carefully consider any Phase 1 conclusions in respect of the necessity of such orders as part of this work.

3. ONLINE HARMS AND PLATFORM ACCOUNTABILITY

64. The Inquiry has asked for a summary of the Government's position on (a) the removal of harmful but non-illegal content such as graphic violence from online platforms; (b)

engagement with platform providers following the joint letter of January 2025 [CE2/11 - HOM000092]; and (c) any further legislative or regulatory proposals under consideration.

a. The removal of harmful but non-illegal content (e.g. graphic violence)

65. Companies in scope of the Online Safety Act 2023 (OSA) are now legally required to implement measures to remove illegal content from their platforms. This includes taking a systems and processes approach to identify, assess and address illegal harms based on a risk assessment. Companies need to have proportionate systems and processes to remove illegal content expeditiously once they become aware of it and the risk of it appearing and spreading should be minimised by effective systems. As set out by DSIT's witness statement [CE2/12 - DSIT000004], duties relating to legal but harmful content in relation to adults were removed from the Act and replaced with the introduction of transparency, accountability and free speech duties.

66. The OSA provides additional protections for children to prevent them from encountering content that is legal, but which poses a material risk of significant harm to children. Children must be prevented from accessing 'Primary Priority Content' (pornography, self-harm, eating disorder and suicide content) and must be given age-appropriate access to 'Priority Content' (bullying, abusive and hateful content, serious violence or injury, dangerous stunts and challenges, and ingestion, inhalation or exposure to harmful substances). The OSA's child safety duties came fully into effect on 25 July 2025, alongside Ofcom's protection of children's codes of practice. Ofcom can now enforce against these duties.

67. The Home Office does not generally seek the removal of legal content but expects companies to enforce their own terms of service appropriately. Officials engage technology companies to aid their understanding of how this type of content can evade moderation and be used to recruit and radicalise individuals, for example, for terrorist purposes.

b. Engagement with platform providers following the joint letter of January 2025

68. As I set out in my first witness statement (paragraph 338), on 24 January 2025, following AR's sentencing, the Home Office and DSIT sent a joint letter to the major social media companies (who were X, Meta, TikTok and Google) repeating a request that specific content accessed by AR be removed. The responses of each of the platforms to that letter have been disclosed to the inquiry (TikTok [CE2/13 - HOM000193]; Meta [CE2/14 - HOM000194]; Google [CE2/15 - HOM000195]; X [CE2/16 - HOM000198]).

69. Following this joint letter, officials and Special Advisers from the Home Office and DSIT met with representatives from Google to discuss the content that AR accessed in the lead up to his attack. Google attended this meeting with legal representation. Google's position was that as they were a search engine, they did not technically "host" any content and therefore were not responsible for its removal. Google representatives also questioned a comment within the letter which stated that the AQ manual accessed by AR was illegal. Google refused to take any further action regarding online versions of the content referenced within the letter. No further engagements with tech companies were held by the Home Office regarding this letter.

c. Any further legislative or regulatory proposals under consideration

70. The Home Office will continue to work with DSIT to monitor closely the implementation and effectiveness of the OSA and remains committed to strengthening legislation if it does not deliver the necessary protections to ensure a safer online environment.

4. CASTOR BEAN REGULATION AND RELATED PURCHASES

71. In my first statement, at paragraph 304, I explained that the Home Office was in the early stages of working to consider the feasibility, potential impacts and proportionality of regulation of the sale of castor beans. The Inquiry has asked for an update on this review.

72. By way of update, the Home Office has been working with relevant trade associations to map the supply chain for castor beans in the horticultural sector. This exercise is still ongoing but early results suggest availability of castor beans in physical retail is either very low or non-existent. Further work will explore the attitudes of online retailers towards castor beans and aims to establish sales volumes, trends, suppliers/distributors and packaging/labelling. The Home Office will update the Inquiry in Phase 2, as this work develops. However, we expect the majority of work to complete in Phase 1 with recommendations going to Ministers next year (2026).

73. The Inquiry has sought input on the question of algorithmic detection of concerning purchase patterns and whether work is being explored in this area by the Home Office. This issue arises both in the context of the purchases AR made related to the manufacture of ricin, and in the context of the purchases of weapons and other items that he made.

74. As set out in my first witness statement, under the Poisons Act 1972 substances that are categorised as regulated or reportable are subject to a reporting regime for suspicious

transactions. As castor beans are neither regulated nor reportable this regime did not arise in connection with AR's purchases, but I provide a brief summary to assist the Inquiry with an overview of the suspicious transaction reporting regime where the obligation applies.

75. Retailers are required to report suspicious transactions involving listed explosives precursors and poisons (regulated and reportable), predominantly in relation to the risk of Home Made Explosives (HMEs) [CE2/17 - HOM000217]. This guidance explains some of the factors that might render a transaction suspicious, which include if a customer is not the retailer's regular type of customer, or if the customer tries to buy a strange combination of products. The Home Office provides guidance to retailers primarily through the "Selling Chemicals Responsibly" campaign, as well as bespoke advice in response to specific queries [CE2/18 - HOM000218].

76. To support the work the Home Office delivers and oversees under the Poisons Act 1972 (regulation and reporting of specified explosive precursors and poisons), it is engaging with retailers to look at voluntary measures which could involve exploring the use of detection algorithms. The Home Office will consider findings of this work alongside the outputs from the castor beans activity.

Suspicious transactions regime

77. Beyond the above work related to the Poisons Act 1972 regime, the Home Office is not looking to develop a wider mandatory suspicious transactions reporting regime – i.e. one that would require items that could be potentially used as weapons to be reported. In relation to such a potential wider reporting regime, it is useful to note the following:

- a) The body identified to receive those mandatory reports would need to be equipped to analyse them in a timely and effective way. There would also need to be a means of monitoring and enforcing compliance by the retailers, and an appropriate sanction on those who fail to report. Equally, the risks of over-reporting as a result of excessive caution would need to be managed.
- b) The regime would need to take account of the time period over which transactions occur, for example analysing one customer's purchases over a 12-month period would require their data to be retained for a year. There would clearly be privacy and data protection implications for all consumers and yet this would not necessarily be picking up on purchases by others in the same

household, or from other retailers (online or in store), or those spread out over a longer period.

- c) If there were such a regime it would require primary legislation as there are no current powers to introduce such requirements by regulations. The Border Security, Immigration and Asylum Bill, currently before Parliament, will if enacted, introduce a new offence of supplying or offering to supply a relevant article in circumstances giving rise to a reasonable suspicion that it will be used to commit any serious offence. However, this will only apply to specific articles and it could not be extended by regulations to all articles of any kind, nor modified to include a reporting duty on suppliers.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signature

Signed

Dated 28 November 2025