IN THE INDEPENDENT SOUTHPORT INQUIRY

THIRD WITNESS STATEMENT OF
DEPUTY ASSISTANT COMMISSIONER VICTORIA EVANS
SENIOR NATIONAL COORDINATOR FOR PREVENT AND PURSUE

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1. I make this witness statement on behalf of the Counter Terrorism Policing Headquarters (CTPHQ) at the request of the Inquiry Legal Team. This is my third statement, and it addresses questions asked by the Inquiry through a rule 9 request. The reference number for my first witness statement is [CTPHQ000006] and the second is [CTPHQ000153].

2. I make this statement from documents and information within my personal knowledge; information provided to me by colleagues within CTP; and my own knowledge and experience of the functions and operations of CTP. My role within CTP is one of strategic leadership, for specific detail regarding the direct operational delivery of Prevent at a tactical level I am reliant on content provided to me by colleagues working in those relevant teams.

3. None of the following information requires any correction to be made to the evidence I have given previously. This document provides additional detail on the following topics:

    (i) The adequacy of the Prevent and Pursue systems for managing the risk from violence fixated individuals, and the effectiveness of these systems in identifying, assessing and managing the risk posed by them.
    (ii) The extent to which the Prevent system is integrated within wider safeguarding systems and mental health services.

(iii) The extent to which interventions used across the Prevent and Pursue systems reduce the risk to the public from VFIs and the barriers that exist to delivering them.

(iv) Whether management systems within the Counter Terrorism system have lessons for good management of VFIs.

(v) The effectiveness of current laws and systems within Counter Terrorism, for identifying, monitoring and disrupting the activities of VFIs and reducing the harm caused by online spaces which promote extreme violence.

My role and background

4. Since 5 May 2024, I have been the Senior National Coordinator for Prevent and Pursue. I took over this role from former Deputy Assistant Commissioner ('DAC') Tim Jacques, who had been in post since July 2022. Prior to that the role was held by then DAC Dean Haydon since May 2018. I explain my role in further detail when describing the Counter Terrorism Policing (CTP) network in the section below.

5. Before joining CTP, I was an Assistant Chief Constable (ACC) for Cambridgeshire Constabulary for four years, and before that a temporary ACC within Dyfed-Powys Police. I have 25 years of policing experience in a range of areas including response policing, investigation, serious and organised crime, and covert policing. Immediately prior to taking on my current role, I was the National Police Chiefs' Council's lead on the implementation of the Volume Two (Emergency Response) recommendations of the Manchester Arena Inquiry.

The CTP network

6. The CTP network is a collaboration of specialist teams working within police forces across the country, in partnership with the UK Intelligence Community (UKIC), His Majesty's Government (HMG), local communities, His Majesty's Prison and Probation Service, and other partners, to deliver the UK Counter Terrorism Strategy, CONTEST. Simply stated, this strategy aims to reduce the threat of terrorism to the UK, its citizens, and its interests.

7. First developed in 2003, the CONTEST strategy has undergone numerous periodic reviews, most recently in 2023. It is structured around four main pillars, commonly referred to as "the four Ps", each with a particular focus and objective:

   (i) Prevent - preventing individuals from becoming terrorists or supporting terrorism;

   (ii) Pursue - disrupting active terrorist plots, threats and activities;

   (iii) Protect - strengthening the UK's defences against terrorist attacks; and

   (iv) Prepare – mitigating the impact of any terrorist incidents.

8. To deliver the CONTEST strategy, officers and staff within the CTP network work collaboratively across nine regional Counter Terrorism Units (CTUs) and Counter Terrorism Intelligence Units (CTIUs) in England and Wales, with a headquarters function (CTPHQ) hosted by the Metropolitan Police Service (MPS) in London. Regional units outside London are hosted by a "lead force" and operate under a collaboration agreement. In London, the MPS Counter Terrorism Command, CTP London (formally SO15), fulfils the regional CTU role.

9. The CTP collaboration agreement, established pursuant to section 22A Police Act 1996, establishes CTPHQ and underpins its national coordination responsibilities across England and Wales. CTP is therefore a legally established collaborative network rather than a single legal body, and CTPHQ is best understood as a coordinating feature of that network.

10. Each CTU/CTIU is led by a detective chief superintendent, detective superintendent, or a suitably experienced member of police staff of equivalent seniority. The majority of Counter Terrorism Policing (CTP) operational resources are held within the regional CTUs, which are responsible and accountable for the day-to-day management of CT casework. CTIUs have a narrower set of resources and work in coordination with neighbouring CTUs.

11. While CTPHQ is hosted by the Metropolitan Police Service (MPS), it consists of officers and staff from across the regions, including both permanent members and individuals seconded from their home forces. CTPHQ provides national oversight

of the CTP network and operates under the command of the MPS Assistant Commissioner of Specialist Operations (ACSO) currently held by Assistant Commissioner Laurance Taylor and the Director General of CTP.

12. Operational accountability lies with the Chief Constables of the relevant region. CTPHQ holds a strategic leadership and coordination role but does not possess directive powers or take over operational command of a local investigation or response. However, as SNC, I am responsibility for assuming national strategic command; 1. following an attack in any region or 2. a high threat operation with the possibility of imminent public threat. Once the threat is averted, or there is no continuing threat, I relinquish national strategic command.

13. CTPHQ supports regional CTUs and CTIUs in the implementation and assurance of common systems, policies, and procedures through effective communication and collaboration. In addition to its policy responsibilities, CTPHQ may facilitate the sharing of CTP resources across the network to provide additional capacity or specialist capability in regions experiencing heightened demand. Within CTPHQ there are a number of capability leads at the rank of Chief Superintendent with strategic responsibilities for thematics including Interventions (Prevent and Nominal Management), Investigations and Intelligence, as well as other functions such as Protect & Prepare. With regards to Investigation and Intelligence this role has been previously provided by two regional Detective Chief Superintendents in addition to their CTU responsibilities, however this role is now transferring to a dedicated post within CTPHQ leaving the relevant CTU leads to provide leadership for their geographical area, rather than asking them to additionally provide thematic direction and leadership. There are a range of governance mechanisms designed to ensure effective national coordination, notably the National Capability Board, and the Prevent and Pursue Board; through which senior representatives from the regions meet regularly.

14. In my capacity as SNC for Prevent and Pursue, I lead on coordinating the CTP network's resources in these areas. My counterpart, DAC Jon Savell, leads the CTP network's response to the remaining CONTEST areas in his capacity as the SNC for Protect and Prepare.

15. In respect of all areas of the CONTEST strategy, CTPHQ continually seeks to enhance the network's capabilities to reduce the risk posed by terrorism. Learning is drawn from a variety of sources, including, but not limited to, academic research, internal and external reviews of major incidents, and relevant recommendations from assurance bodies, inquests and public inquiries.

Definitions

16. CTPHQ recognises the T1D - Cabinet Office Body working definition of Violence Fixated Individuals (VFIs) which is "*fascination with extreme violence and intent to inflict extreme violence, where ideology is not the primary driver*" but does not use the definition operationally. This definition is referenced in CTPHQ's Non-Ideological Extreme Violence (NIEV) and Violence Fixated Individuals – Executive Summary document [VE/19] CTPHQ000171

17. In terms of practical application, CTPHQ uses the definition "*fascination with extreme violence or mass-casualty attacks*" (FEVMCA) to identify a subset of VFIs who are potentially vulnerable to being drawn into terrorism and hence relevant for consideration under the statutory frameworks of the Prevent duty for inclusion within the Prevent programme. This definition was first outlined in the standalone interim FEVMCA policy [VE/14] CTPNW000016 which was implemented after the Southport attack but has now been incorporated into the new Prevent Standard Operating Procedure (SOP) published in May 2026 [VE/20] CTPHQ000410. The SOP now defines these "Fascination Cases" as cases where an individual "does not have an identifiable terrorist/extremist ideology but evidence of a fascination in committing an extreme violence or mass casualty attack, the consequences of which may have no specific racial, religious, or political motivation". Within Pursue work there is no formal definition, however CTP assesses and on occasion adopts investigations in which the ideological nature is unclear or as yet unknown, referencing the uncertainty at a particular time as to whether an incident is terrorist in nature or not. This is not unusual in CT investigations which may start with unclear or unknown motivations at the beginning of a case and are often resolved to be traditional ideology-based investigations following further work.

18. CTP will always prioritise the safety of the public and the rights of individuals under Article 2 of the Human Rights Act 1998. This means that on occasion where it is necessary to protect life or respond to imminent threat, CTP may take on or retain responsibility for an investigation/activity outside of its core role where it is best placed to ensure individual or public safety is maintained. This may be because CTP have the best understanding of the risk due to previous involvement, where the complexity or scale of the risk means CTP is best placed to address it, or where the concerns are so immediate it would be unsafe to hand responsibility to another agency. On other occasions CTP may provide support to front line policing, meaning responsibility for managing the risk sits with that police force but CTP provides additional expertise or resource, for example with forensics, interviewing, or large-scale witness enquiries.

Changes to Prevent

19. In previous evidence I outlined changes to the Prevent system since July 2024, namely the FEVMCA policy [VE/14], multiple referral policy [VE/17] and Child Centred Policing in Counter Terrorism strategy [VE/18]. CTPNW000016 CTPHQ000010 CTPHQ000022

20. CTP's role within Prevent has not changed since the date of my previous statement. The role of CTP within Prevent is set out within statute under s.26 of the Counter Terrorism and Security Act 2015 (CTSA 2015) namely to give due regard to the need to prevent people from being drawn into terrorism. This is further expanded upon within the statutory Prevent Duty Guidance 2023 [VE/1] CTPHQ000012 which reiterates the role of Prevent as "*to stop people from becoming terrorists or supporting terrorism* [and] *supporting the rehabilitation and disengagement of those already involved in terrorism*" and the newly published Home Office Key Principles of Prevent [VE/21] CTPHQ000411 which says "*Specialist police officers such as Counter Terrorism Case Officers (CTCOs), are responsible for determining whether someone is at risk of radicalisation and should be considered for support through Prevent. Their decisions should be underpinned by the Prevent Assessment Framework and their professional judgement should be informed by regular, relevant training.*"

21. Neither statute, nor government issued statutory guidance relating to Prevent has changed since July 2024, and the core requirements of the Prevent Duty under the

CTSA 2015 and Prevent Duty Guidance require the programme to focus on those individuals who are vulnerable to being drawn into terrorism. In the case of support through Channel, this can only be offered where this statutory test is met.

22. CTP has, since last giving evidence to part 1 of this Inquiry, consolidated the majority of its Prevent related policies and guidance documents into a single document, namely the Prevent Standard Operating Procedure [VE/20], which was launched to practitioners in the CTP Network on the 25 May 2026 via our CTP Policy Library. This document replaces, amongst other documents, the Prevent Policy (2020) [VE/7], the FEVMCA policy [VE/14] and Multiple Referral Policy [VE/17]. CTPHQ000410 CTPHQ000117 CTPNW000016 CTPHQ000010

23. As well as bringing together several previously separate guidance and policy documents into a single place, the new SOP contains several key updates namely:

(i) Placing the National Decision Model (NDM) at the heart of Prevent Case Management.

(ii) Decision-making for Prevent Referral Screen, Susceptibility Assessment and s.36 CTSA 2015 is now more clearly aligned to the NDM and Code of Ethics, helping ensure decisions and their rationale are clearly recorded in Prevent Case Management (PCM).

(iii) Police-Led Partnership (PLP) cohorts clarified: the updated material provides clearer guidance on when Channel may not be appropriate, when PLP should be considered instead, and how different PLP contexts are applied in practice.

(iv) Timings simplified: The 5/20 day timeframes pre S.36 CTSA 2015 have been removed. Decisions must now be made in a timely and proportionate way, based on known risk and available information. The SOP recommends five working days for completion of the Prevent Gateway Assessment triage, as best practice rather than as a mandatory requirement.

(v) Clearer s.36 "reasonable belief" threshold: Defined as vulnerability + terrorism link + credible pathway.

(vi) Clarification of the expectations concerning "disguised compliance", "false compliance", and "insincerity of change".

(vii) Clarification of mental ill health and neurodivergence in relation to Prevent relevance.

(viii) Clarification on language: "must", "should", and the discretion of "may".

24. The Inquiry has previously heard of the requirement for supervisory sign-off before cases involving an extreme fascination with violence are exited, and that control remains in place under the new SOP: multiple referral and Fascination cases require oversight by a Prevent Inspector at case closure from any stage of Prevent Case Management outside Channel, and Police Led Partnership cases closed with risk remaining require the authorisation of the Regional Prevent Coordinator. More broadly, as set out in CTPHQ's update to the Inquiry on the Phase 1 recommendations [VE/23], enhanced supervisory controls were embedded within the Prevent Case Management Tracker (PCMT) from May 2024, including system controls which prevent a case from being closed while actions remain outstanding within activities, support plans or case management plans. Supervisor training has also been strengthened: a defensible decision-making session delivered in summer 2025 has been incorporated into the new Prevent Supervisor Course, which was piloted in November 2025 and has been rolled out nationally since 19 January 2026. As to the impact of these changes, the closed case review exhibited at [VE/24] and the referral statistics summarised in the next section of this statement provide the best currently available evidence, and the effectiveness of the new SOP and training will be formally evaluated through the reviews described in [VE/23], with the impact of the SOP due to be reviewed in November 2026.

CTPHQ000489

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CTPH000489

25. With regards to training CTP does not have a specific VFI related training course, rather elements relevant to VFIs, and specifically to the FEVMCA cohort, are contained throughout the components which make up the overall training package for officers and staff. In particular training on the Prevent Assessment Framework (PAF) covers how various elements of behaviour, including aspects relevant to VFIs, should be considered in terms of assessing and managing an individual's risk of being drawn into terrorism. As described later in this statement, the training remains focused on the effective assessment of vulnerability to being drawn into terrorism as this is the core function that Prevent is charged with undertaking, however training is clear that being vulnerable to being drawn into terrorism does

not require any prior involvement in such activity and cases within the FEVMCA cohort are capable of being considered as such, even where there is an absence of fixed ideology.

26. In my previous statement dated the 24th of November 2025 I provided a more detailed account of the training pathway for CTCOs and Prevent supervisors, and the numbers of individuals trained between April 2024 – November 2025. We have subsequently trained a further 104 individuals between January 2026 and the end of July 2026.

Analysis of VFI related data

27. CTPHQ undertook a piece of analytical work in August 2025 in which a quantitative assessment was undertaken of 1551 possible individuals who matched the T1D - Cabinet Office Body VFI definition. From this pool, 21 individual cases were dip-sampled and categorised into a qualitative dataset and then scored against an in-depth literature review to analyse whether violence fixation was the causal driver of non-ideological extreme violence (NIEV) or one of many factors to be considered. This report CTPHQ000188 [VE/25] made one key judgement with a high confidence rating, namely "*It is highly unlikely that violence fixation, when flagged in isolation, will act as a reliable predictor of an individual's risk of mobilising to non-ideological extreme violence.*"

28. A further three key judgements were made with a moderate confidence rating:

(i) It is likely that the risk factors and warning behaviours exhibited by perpetrators of NIEV are the same as Self-Initiated Terrorists (S-ITs).

(ii) It is likely that grievances developed from negative personal experiences will act as a key driver towards NIEV.

(iii) It is highly likely that a perpetrator of NIEV will adopt misanthropic and nihilistic ideas, however these will play a lesser role in their pathway to violence.

29. These judgements are drawn together in the Non-Ideological Extreme Violence (NIEV) and Violence Fixated Individuals Executive Summary [VE/19]. I summarise its key conclusions here. Based on the compiled data (and noting the

CTPHQ000171

caveats set out in that document, including that data returns were received from 73% of forces), the number of identified VFIs trebled in 2024/25 compared with the previous three years. That increase, which was seen most prominently between January and March 2025, is assessed as likely to be due to increased awareness amongst the public and frontline workers and heightened tensions as a result of the Southport attack and subsequent trial and is assessed as likely to persist into 2025/26. The cohort is heavily weighted towards children: 86% of all cases with an accurate date of birth related to individuals aged 18 or younger at the time of reporting, with a clear peak between 12 and 16 years of age.

30. The assessment also concluded that it is currently highly likely that many of those categorised as VFIs are not being actively managed under a statutory process by police or Prevent, due to those individuals not meeting the statutory requirements required for them to be managed, either due to lack of criminal conviction or not being vulnerable to being drawn into terrorism as required under Prevent legislation, potentially leading to significant un-managed risk. This reflects the central gap discussed throughout this statement: there is at present no identifiable national home for the assessment and management of the risk posed by VFIs who fall outside the statutory boundaries of the Prevent programme. These individuals will however be known to local policing and likely other wider services and could be subject to other non VFI specific prevention and safeguarding activity.

31. Whilst these conclusions are useful for informing future research and analysis it is important to note the limitations of this exercise noting that there was no clearly defined definition beyond the **T1D*** approach referenced above, and this was not a category of data forces were specifically collecting prior to the request. This meant that data returns were dependent on individual force's ability to interrogate these data aspects on their individual crime and intelligence databases and retrospectively match them to the definition provided.

***Cabinet Office Body**

32. The Home Office published its official statistics, 'Individuals referred to and supported through the Prevent Programme, April 2024 to March 2025' [VE/26], on 6 November 2025. This publication notes that "*in the period from 29 July 2024* [immediately post the Southport attack] *to 31 March 2025, there were 6,350 referrals*

CTPHQ000412

made to Prevent. This represents a large increase of 34% (up from 4,722 referrals) compared to the same period in year ending March 2024 and 37% increase (up from 4,647 referrals) compared with the same period in year ending March 2023".

33. The letter of 17 November 2025 from Assistant Commissioner Laurence Taylor, National Lead for Counter Terrorism Policing, to the Chair of the Home Affairs Committee [VE/22] addresses this increase and comments on the nature of these referrals, namely "*So far this FY, child referrals closed as 'Non-CT - referred on' have increased to ~60%. Of that cohort, ~70% were categorised as 'Fascination with Extreme Violence and Mass Casualty Attacks'. Again, this suggests that although we are seeing an increase in potential VFIs being referred in, many of these referrals are not relevant* [to Prevent's statutory thresholds] *and are more appropriately managed by other local partners.*" CTPHQ000209

34. The latest version of the Home Office official statistics published on the 6th of August 2026 [VE/29] shows 10293 referrals relating to 9957 individuals were received in the twelve-month period from 1st of October 2024 to 30th of September 2025. This is an increase of 39% on the previous 12 months (7408 referrals) and the highest ever recorded number of referrals in a 12-month period. This shows the increasing trend of referrals which started in July 2024 has continued and become a longer-term trend of increasing demand for Prevent. The 'no ideology' concern categories accounted for the majority of referrals (5,770 referrals; 56%) whilst fascination with extreme violence or mass casualty attacks (where no other ideology is present) made up 8% (818 referrals). CTPHQ000413

Responses to policy proposals and Ministerial statements

35. A letter from then ACSO, Matt Jukes QPM, on the 26th of January 2025 to the then Home Secretary, Yvette Cooper, sets out several potential policy measures [VE/27]. Paragraph 2 of that letter confirmed that police leaders and the National Crime Agency would also write collectively on the connections between the Southport murders and the wider context of sexual, interpersonal and public violence increasingly legitimised and fuelled online setting out a further series of potential measures. [VE/28]. The majority of the points raised in both letters are considered as a matter of natural consequence of the topics I have been asked to cover within CTPHQ000220 CTPHQ000204

this statement. There are however a small number of topics referenced in the letters which I cover specifically below as they are not relevant to the wider topics covered in this statement.

36. The first was a consideration of a framework that binds other organisations to participate in timely, comprehensive and candid reviews. This proposal arose from the fact that CTP commissioned an independent review shortly after the Southport attack, looking to learn lessons and amend practice as quickly as possible, however not all agencies appeared to follow in this fashion, which lessened opportunities for multi-agency learning and change across the whole system. To date no such framework has been introduced by government and it is unclear whether, should a similar tragedy happen again, the circumstances with regards to participation with timely cross-agency review activity would be any different.

37. Mr Jukes also suggested challenging the existing constraints on communication within the Criminal Justice System, referencing specifically the ability of police to put information into the public domain post the point of charging an individual. The context for this is the public disorder seen in the days following the Southport attack where misinformation and uninformed speculation about the perpetrator of the attacks and their motivation was shared online, and policing was accused of deliberately withholding information. Since the date of this letter new guidance has been published by the National Police Chiefs' Council (NPCC) regarding the publishing of ethnicity and nationality information when there is a policing purpose to do so. Separately to this CTP is part-way through engagement with a variety of partners, including the Crown Prosecution Service (CPS), Front Line Policing and the Home Office on the approach to be taken with regards to publication of an individual's Prevent history in the event of a serious incident. This work is still ongoing but is expected to complete before the end of the year with new guidance for practitioners working in this space. However, this work is constrained by current contempt of court legislation which is the subject of public consultation by the Law Commission at the current time. Part one of the report on contempt of court laws was published in 2025 with part two expected later this year.

38. Mr Jukes referenced the need for support around online marketplaces to disrupt purchases of knives, sources of poison and 3D printer firearm parts. Part One of the Chair's Inquiry considered these issues in depth and made several recommendations in relation to this which the government has accepted in full. CTPHQ would also note on this topic that the Home Office have funded the launch of the National Knife Crime Centre in April 2026. The Centre supports national policing in identifying and tackling offenders who sell and distribute weapons online. The centre is also supporting forces and CJ partners in training in identifying offences weapons and different aspects of legislation.

39. The letters set out requests for consideration of legislation with regards to targeted public violence and associated legal powers, including making participation in Prevent mandatory, the concept of a Violence Risk Order, and the fact that statutory Multi-Agency Public Protection Arrangements (MAPPA) do not extend to Potentially Dangerous People (PDP) schemes. As referenced later on in this statement, the government is currently committed to bringing in legislation relating to extreme non-ideological violence as soon as possible, and CTP has liaised closely with the Ministry of Justice (MOJ) during their consideration of what new offences may look like. The question of whether a civil order is necessary is considered later in this statement, as is the applicability of MAPPA arrangements to the challenge posed by VFIs.

40. There is then the question of declaration of incidents as terrorist incidents, with Mr Jukes suggesting work to review the effectiveness of the current process to better serve three types of incidents, noted as (i) clearly terrorist, (ii) plainly not terrorist and (iii) ambiguous. A working group under myself has sat since this letter was drafted and these issues were considered. This resulted in the recognition that the declaration of a CT incident is ultimately based on the legal definition under s.1 of Terrorism Act 2000 but that there was a need to ensure clear communication with the public from the outset even where complexity and uncertainty make exact determinations challenging.

41. Part A of the joint letter proposed an accelerated programme of audit and assurance of CTP Prevent, building on an internal assurance exercise commissioned in 2024

and with the agreement of His Majesty's Inspectorate of Constabulary and Fire and Rescue Services and the College of Policing to support the work, to examine (amongst other matters) whether the changes made to policy and training since 2019 and in response to the Southport Prevent Learning Review were complete, sufficient and embedded. The HMIC responded in May 2025 with an inspection of the police response to the public disorder in July and August 2024 and are due to publish their review of safeguarding within CTP later this year. The remaining work was taken forward as the Prevent and Pursue Improvement Review (PPIR). PPIR provided senior coordination and oversight of the significant number of work streams responding to learning from the Southport attack, much of which is discussed throughout my prior statements to this Inquiry as well as this current one.

42. The closed case review undertaken as part of PPIR's work is exhibited at [VE/24]: CTPHQ000188 Prevent cases closed in the twelve-month period following January 2024 were re-evaluated against the interim FEVMCA and multiple referrals policies, and of the 239 cases assessed by the agreed return date, 83 (35%) were recommended for re-opening or further review and returned to the originating region with the reviewing case officer's rationale. The review also recommended that the interim referrals policy be reviewed and replaced with clear, concise and up to date guidance; that recommendation has since been delivered through the new Prevent SOP [VE/20]. CTPHQ000410 PPIR was always considered to be a short-term surge activity structure to support immediate significant change. The oversight and coordination function that PPIR previously provided is now delivered within the Interventions capability within CTPHQ as business as usual under the leadership of a Detective Chief Superintendent, with senior governance provided through the Prevent and Pursue board described in paragraph 12 of this statement.

43. Part C of the joint letter (at its paragraph 32) also described a potential option for an 'interim model' for the core of Prevent: formalising what is already partially the case in practice, namely that Prevent provides a gateway and referral mechanism for concerns around targeted public violence, as an explicit wider 'front door'; developing behind that door a Channel-type response for defined mindsets, informed by an international evidence review by the College of Policing; and seeking

T1D - Cross government ministerial meeting support for a significant hardening of the system of

referral hand-offs, to ensure appropriate prioritisation of those referred on and accountability for the action then taken. I will describe in detail later in this statement the legislative restrictions around Prevent that limit the effectiveness of such an approach. Mr Jukes also highlighted the risks of the Prevent system being overwhelmed with referrals and recent data validates this concern with a long term sustained increase in demand within Prevent referrals. The subsequent Lessons for Prevent report by Lord Anderson explored this idea in greater detail and made subsequent recommendations on this point for government. CTP's current position on Prevent's role in this space is that set out in the letter of 17 November 2025 CTPHQ000209 [VE/22] and later in this statement: Prevent cannot become the default mechanism for managing VFIs who fall below legal Prevent thresholds. The underlying issue which the interim model sought to address, namely the absence of an identifiable place for non-ideological extreme violence to be managed, remains outstanding.

44. Next is the question of whether a duty to report back into Prevent by onward authorities is required. To date no such duty has been placed into statute or guidance, however the Home Office as owners of Prevent, commissioned a below-threshold pilot that looked at what other agencies are doing with onward referrals received which will inform their position on this. That pilot is discussed further in the Interventions and Multi-agency working sections of this statement.

*Cross government ministerial meeting

45. Finally, a number of proposals for the T1D* are noted, several of which have been already discussed above. An additional area referenced is applying government's access to data-science and AI development to support CTP and the Home Office in the triage/prioritisation methodology within Prevent; the use of automation to support multi-agency safeguarding flagging and risk-detection; and determining the evidence-base for new interventions with violence-fixated youth.

46. CTPHQ is carefully considering the applicability of further technology, including artificial intelligence, in its work, this is still at an early stage and is necessarily complex due to the sensitive types of information and intelligence that is considered in this space. Current processes within CTP require professional judgement by practitioners, informed by assessment tools which have been subjected to the

appropriate level of professional academic rigour. CTPHQ is keen to harness technology to support Prevent assessment processes where it is able to in a safe and secure way. Due to the necessary rigour needed to identify, pilot, evaluate and ensure security of these products this work will take time and we do not see the expansion of the use of these approaches in the short term. However, this work continues to ensure all options are explored.

47. As discussed later in this statement, CTP has supported the Home Office in the piloting of new interventions within Prevent, some of which may have applicability to the threat posed by VFIs.

48. With regards to the 16th of July 2025 Ministerial statement on Prevent, CTP welcomed the creation of the office of Independent Prevent Commissioner, then Lord Anderson, now Tim Jacques. CTP also fully accepted the recommendations contained within Lord Anderson's review and began workstreams against those recommendations relevant to CTP in terms of examination of online issues. Further to this CTP also supported the Home Office in its strategic policy review into how Prevent manages people with mental health problems and/or who are neurodivergent, supported pilots that are now running across the country to ensure that where people do not meet Prevent thresholds they receive the support they need from wider services; and supported new practical mentoring interventions for people at risk of radicalisation in Channel, to enable Channel panels to better support individuals where there is no clear ideology.

Identifying, assessing and managing VFIs

49. There is no minimum requirement to be met for a Prevent referral to be made into CTP. The referral pathway is open to both professionals and the public, and it is important that potentially relevant referrals are not lost due to referrers feeling that an individual has not yet met a specified threshold of potential risk or harm. However, it is also important that the Prevent system does not become the default referral pathway for other safeguarding concerns as a result of the fact it is a well know and well-established mechanism, or due to the absence of appropriate mechanisms in other parts of the system. This is because the Prevent system is not designed or resourced to conduct such a wide triage and performing this causes

inevitable delay to its core function. As such policing and other agencies have guidance and training to assist their staff in making good quality referrals when it is both necessary and proportionate to do so. The Home Office takes the lead in ensuring that other external agencies submit good quality referrals, whilst CTP monitors and engages on those made from frontline officers. CTPHQ will highlight to the Home Office thematic issues with poor quality referrals from particular sectors, and in regions CTP leads may raise local themes with their partners to address bespoke matters as well as with their relevant Home Office single point of contact.

50. Following deconfliction of a referral, CTP will complete the Prevent Gateway Assessment (PGA) [VE/16] CTPHQ000009 to assess whether there are reasonable grounds to suspect that the individual referred is vulnerable to being drawn into terrorism. If that is the case then the referral will proceed to the information gathering stage. The Prevent SOP [VE/20] CTPHQ000410 provides detailed guidance on the meanings of the terms 'suspicion', 'vulnerability' and 'reasonableness'. Whilst the Prevent Referral Screen (PRS) tool (contained within [VE/16]) CTPHQ000009 assists CTCOs in this space, the decision is ultimately one of professional judgement which must be made on the full circumstances of the individual case.

51. Following multi-agency information gathering a further assessment is undertaken under s.36 of the Counter Terrorism and Security Act 2015 to determine whether there are reasonable grounds to believe the individual is vulnerable to being drawn into terrorism. Again, the SOP [VE/20] CTPHQ000410 provides detail on the meaning of the relevant terms and details clearly that the test is vulnerability to being drawn into terrorism, rather than a requirement for any prior involvement in such activity. A case can only proceed into management under Channel or Police Led Partnerships if this test is met.

52. There is no established test set out in Channel Duty Guidance [VE/2] CTPHQ000123 or elsewhere as to when a Channel Panel will or will not accept a referral. One key established area is that of consent and where consent is not given by an individual or their legal guardian then the case cannot be accepted or remain within Channel. CTP does not

have strategic responsibility for Channel Panels and the guidance setting out their functions and processes is owned by the Home Office.

53. Where a case meets the s.36 CTSA 2015 threshold but is unsuitable for Channel it will be managed within a Police Led Partnership (PLP). No further test or threshold is required to be met. The Prevent SOP [VE/20] CTPHQ000410 outlines the minimum standards required for management of PLP cases dependent on the reasons for the case being in PLP.

54. The thresholds of reasonable grounds to suspect, and reasonable grounds to believe that a referred individual is vulnerable to being drawn into terrorism should be applied consistently across all of CTP in England and Wales. This is covered in nationally delivered training as part of the National Interventions Foundation Programmes (NIFP), guidance within the Prevent SOP [VE/20] CTPHQ000410 and being supported by use of the PAF as the consistent tool for the screening and assessment of referrals [VE/16] CTPHQ000009. CTPHQ has undertaken exercises using example referrals to test consistency across regions on these decision points showing strong consistency with only 2% of example cases recorded as being closed prematurely. As to the relative weight given to ideological indicators, behavioural indicators and evidence of capability when these thresholds are applied: no fixed weighting is prescribed. Consistent with the Home Office Key Principles of Prevent [VE/21] CTPHQ000411, while ideology is an important consideration, a clear identifiable ideology is neither necessary nor sufficient for a referral to progress, and no single factor is mandated. Ideological indicators, behavioural indicators (including indicators of escalating violence) and evidence of capability are all considered within the PAF and weighed through the professional judgement of the CTCO on the full circumstances of the individual case, always through the statutory lens of whether the individual is vulnerable to being drawn into terrorism.

55. Whilst all of these tools and policies are created to assist with consistent decision making, ultimately all decisions made in policing and safeguarding are considering a unique set of circumstances and the frameworks support professional judgement of the officer/staff member making the decision. As such total consistency is unlikely to ever be achieved when dealing with complex multi-faceted referrals.

56. It is only CTCOs and Prevent Supervisors who have a decision making role in terms of assessment within Prevent. Whilst Fixed Intelligence Management Unit (FIMU) staff will deconflict referrals to ensure they are not relevant to other parts of CTP, they play no role in deciding whether cases meet the relevant tests for onward consideration and management within Prevent. Both the Prevent SOP [VE/20] and CTPHQ000410 the National Standards of Intelligence Management (NSIM) Annex B [CTPHQ000044] are clear that referrals intended for Prevent should reach Prevent except for a limited set of clearly set out circumstances relevant to wider CT policing.

57. It is important to note that the statutory bounding of Prevent, as a Counter Terrorism programme, has remained unchanged since 2015 and CTP is required to operate within those statutory limits. As such this means that CTCOs can only consider cases in terms of an individual's vulnerability to being drawn into terrorism, regardless of the nature of the risk that they pose. This is a statutory requirement and any broadening or other change to the relevant legislation is a matter for government.

58. This means that behaviours and indicators relating to violence with no ideological link or aspect are considered in terms of how they might make an individual vulnerable to being drawn into terrorism, regardless of whether they are static or escalating in nature. When deciding whether a case is suitable to be managed within Prevent where there are no signs of ideological belief, the issue to be considered by the CTCO is whether those factors pushing that individual into violence (or any other factors present) could also make them vulnerable to being drawn into terrorism.

59. Cases where there is a clear risk of violence, but no evidence of an individual being vulnerable to being drawn into terrorism are highly unlikely to meet the legal requirements to be managed in Prevent. Such cases are referred to the most appropriate other agency with an explanation of the identified risk, and why it is not being managed within the Prevent system. In some cases, wider policing will be the most appropriate agency for the case to be referred to, but it may be that another

agency such as social care, education or mental health services is better placed to assist.

60. CTP's position on Prevent's role in addressing the VFI threat is outlined in the letter from Assistant Commissioner Laurence Taylor (National Lead for CTP) to the Home Affairs Committee dated the 17th of November 2025 [VE/22], specifically that "[w]*hile Prevent plays a crucial role in addressing vulnerability to radicalisation, it is not a counter-extremism programme and it must not become the default mechanism for managing extremists or violence-fixated individuals ('VFIs') who fall below legal Prevent thresholds.*"

CTPHQ000209

61. This letter outlines (i) the extraordinary demand caused by the significant increase in referrals (ii) the high number of referrals which demonstrate genuine but non CT concerns and (iii) that Prevent should be focused on the critical challenge of identifying individuals vulnerable to radicalisation. Notwithstanding these matters, when in doubt, especially for referrals from friends and family, CTP would always prefer for a referral to be made rather than risk it being disregarded.

62. CTPHQ made a similar point in its closing statement to part one of this Inquiry, namely that "[w]*e recognise, however, that many Violently Fixated Individuals [VFIs] may have an interest in committing crimes that, however appalling, do not constitute acts of "terrorism"; and therefore to include them within Prevent and wider Counter Terrorism systems may be detrimental to those referred individuals and to the system's ability to tackle the core threats it is intended to address.*"

63. CTPHQ stands by the above position. To expand, Prevent has clear statutory boundaries and so cannot, without legislative change, be the place where all risks of serious or extreme violence can be addressed. As identified in the Phase 1 report, numerous individuals have a known or suspected susceptibility to act violently, but they cannot individually each be made the subject of Prevent intervention. For CTPHQ the risk remains that the current position, whereby there is no identifiable place for non-ideological extreme violence to be addressed, means that referrals will continue to remain high with Prevent acting more as a routing and triaging service for this type of harm, rather than concentrating on its primary task of preventing individuals being drawn into terrorism. The risks for the Prevent system here are

significant, the sheer volume of referrals requires that CTCOs spend time referring cases on to other safeguarding functions, rather than assessing and managing risk in cases where there is a vulnerability to being drawn into terrorism.

64. In CTPHQ's view, Prevent has never sought to draw referrals relating to the broader set of VFI individuals, rather we have sought to equip our staff, through policy, guidance and training, to identify those individuals whose fascination with extreme violence or mass casualty attacks make them vulnerable to being drawn into terrorism. CTP recognises this is a subset of the wider VFI population, but it is the cohort which Prevent can manage within the statutory limits set out by legislation. It is CTPHQ's view that updates to policy and guidance since July 2024 have better equipped staff to identify relevant cases for Prevent and appropriately signpost risk to other agencies where cases cannot be managed within Prevent. The work ongoing to ensure training and guidance are as effective as possible is detailed within our response to the Inquiry relating to Phase 1 recommendations [VE/23]. **CTPHQ000489**

65. It is still the case that there is no overall national strategy for the identification, assessment and management of VFIs. As such, where the Prevent programme identifies individuals who are potentially violent but who fall outside the statutory bounds of the programme, it remains unclear to CTP to what extent those cases are taken on and managed once they are referred on outside of Prevent. There is often no centralised function to refer such cases to, as such multiple referrals may be made to different agencies which heightens the risk that factors are considered on an individual agency basis, rather than collectively which could lead to the overall level of risk not being appropriately understood. A related definitional gap was identified **CTPHQ000188** in CTPHQ's qualitative assessment [VE/25], which recommended that the VFI definition be given clearer parameters as to what is meant by violence fixation, in particular so that violence fixation is separated from the (often co-existing) consumption of violent content. This operational clarity will be required irrespective of where VFI's are assessed and managed in the future.

66. Whilst work such as the below threshold pilot has given us insight into how other agencies approach management of risk which falls outside of Prevent in a small number of specified cases, CTP is neither resourced for, nor possessing of the

required statutory levers to meaningfully oversee the work of other agencies managing risk outside of CT systems.

67. Following the closure of a Prevent case there will be different outcomes in terms of ongoing monitoring depending on what stage a case was closed. In all cases there will be a retained record of the referral on the Prevent Case Management Tracker (PCMT). In the event of future referrals or CT related intelligence submitted to a FIMU this will identify to both FIMU assessors and CTCOs that there is a previous Prevent footprint. This will allow CTCOs to identify cases where there have been multiple referrals. Cases closed at Channel or PLP will receive 6 and 12 month post closure reviews where a check is made of any new information that may have come to light which may require further consideration. Any information that suggests a named individual may still be susceptible to radicalisation or otherwise vulnerable to being drawn into any terrorism related offending (violent or non-violent) would be sufficient for consideration of further management during these reviews.

68. Further to this where cases meet the s.36 CTSA threshold an operational information safeguarding marker is placed on the Police National Computer (PNC) and replicated to the Law Enforcement Data Service (LEDS). A CTCO Supervisor may now authorise the early application of a marker where risk escalates before the s.36 decision point; this authorisation previously sat at Inspector level. Marker retention is informed by both risk and proportionality. The safeguarding marker would signal to other law enforcement professionals when making a check on the PNC or LEDS that a Prevent footprint existed.

69. Where cases are closed to Prevent and non-terrorist related risk highlighted to other agencies, Prevent has no further role in that case either under statute or policy. Where after closure relevant information is received by CTP that suggests an individual may still be vulnerable to being drawn into terrorism this will be treated as a further referral and will be subject to assessment under the appropriate policy. It is important to understand that Prevent will always refer and highlight non-terrorist risk to the relevant agencies for their own assessment processes.

70. Consent remains a vital part of effective case management within the Prevent programme. The nature of Prevent's work is making someone less vulnerable to

being drawn into terrorism which predominantly requires addressing their mindset. This is extremely challenging to do with an individual who does not consent to work with the programme. In the case of children, who make up the majority of the VFI cohort, the consent in issue will usually be that of a parent or guardian, and the withholding or withdrawal of parental consent has the same effect on Channel management as a refusal by the individual themselves. Where consent is withdrawn this results in cases moving away from Channel into PLP and often removes the ability to use supportive mechanisms such as intervention providers as we cannot mandate attendance or engagement. Such cases can then require more disruptive approaches from policing which often addresses acute risk in the short term but may not lead to long term reduction in vulnerability to being drawn into terrorism. A key objective for cases within PLP is working with the individual on the reasons why they do not consent, trying to overcome these issues, and where possible move the case into Channel management. Practitioners must also be alert to consent which is given insincerely or is manipulated, for example where apparent cooperation masks continuing risk: the SOP's provisions on false and disguised compliance and insincerity of change CTPHQ000410 [VE/20] require CTCOs not to treat apparent cooperation as evidence of reduced risk without corroboration, to test and verify accounts, and to record suspicions of dishonesty on the PCMT. The scale of the consent issue is apparent from the published statistics CTPHQ000413 [VE/29]: of adopted Channel cases in the year ending end of September 2025 where consent status was specified, 56% (969) consented to receive Channel panel support and 44% (759) did not.

71. As the owners of the Prevent system it is a matter for government to decide whether it should remain a voluntary programme or not. Whilst there are some clear challenges regarding consent detailed above, there are potential risks from removing the consent aspect and requiring engagement. Specifically, the potential for a reduction in referrals from family and friends, if the programme is felt to be coercive or aligned to criminal justice. As detailed in my previous statement there are misconceptions about the implications of a referral to Prevent amongst some sections of the public and the introduction of mandatory engagement and/or sanctions for non-engagement may further these misconceptions, particularly if there is a perception that the referrer is potentially labelling a young person as a terrorist.

72. There is also the consideration of the sanction for non-engagement and whether this would be criminal in nature, which could criminalise young people within what is a prevention/pre-criminal justice framework, including those who did not consent but were highly unlikely to move towards any violent act, terrorist or otherwise. Similarly, a mandated requirement would be likely to require an appeal clause in order to be considered fair, possibly involving the courts or another overseeing function which could risk Prevent practitioners spending excessive time on statutory appeal processes in non-consent cases rather than managing or mitigating risk. Overall, the issue of consent within Prevent is a complex one with significant impacts on its effectiveness. Any change to whether Prevent remains a consent-based programme or not will have both intended and unintended consequences which require careful consideration.

Neurodivergence and mental ill health

73. CTP has created a specific training course relating to neurodiversity. This course is a mandatory part of training for both practitioners and supervisors in Prevent. This training covers autism specifically as one of the five key conditions considered within the foundations courses and looks at how conditions may be evident within CT casework. This course was piloted in November 2023 and fully rolled out in April 2024.

74. Training on the Clinical Consultancy Service (CCS) is also delivered as part of the NIFP in module 4. This has been the case since the CCS began in April 2024 and is reinforced through a training method known as "Hydra (an advanced and immersive practical training exercise, which requires participants to make and justify decisions in relation to a detailed but fictional case). The Prevent Hydra involves a case relating to neurodiversity and requiring consideration for CCS referral. Finally, CTPHQ000410 the new Prevent SOP [VE/20] has a CCS specific Annex setting out clearly the requirement to consider a referral.

75. Neurodiversity and complex needs are a key feature within the Prevent Assessment CTPHQ000009 Framework (PAF) [VE/16], requiring the CTCO to assess whether they are present at both the Prevent Referral Screen and Susceptibility Assessment stages, ensuring

they are taken account of when making decisions as to reasonable grounds to suspect or believe that there is vulnerability to being drawn into terrorism. The new Prevent SOP [VE/20] CTPHQ000410 also features guidance on the interaction between neurodiversity and mental ill health and risk within Prevent, namely "… *may become relevant where they exacerbate relevant susceptibility, risk of exploitation, grievance, fixation, judgement, capability, engagement with extremist material, or risk of harm, or where they aggravate an existing Prevent-relevant concern. The presence of mental ill-health or neurodivergence does not prove or disprove suitability for Channel or PMAP, and decisions must be based on the s.36(3) CTSA threshold rather than diagnosis alone. Also, where Prevent-relevant concerns are present, they must not be dismissed solely because they appear connected to mental ill-health or neurodivergence*". (PMAP is the Prevent Multi-Agency Panel, the equivalent of Channel in Scotland.) The most recent published statistics [VE/29] CTPHQ000413 give an indication of scale: in the year ending September 2025, 42% of cases discussed at Channel Prevent (899 of 2,159) had at least one mental health or neurodivergence condition recorded, with Autistic Spectrum Disorder the most frequently recorded condition (18% of all referrals; 1,833).

76. The level of training provided within policing is designed to ensure officers and staff have sufficient understanding to identify the possible risks and make the necessary arrangements, rather than develop them into medical or mental health experts. CTP will always be reliant on partners in the NHS, social care and other relevant organisations for their expertise in these areas, in terms of assessment, diagnosis, treatment and advice/guidance as to the impact on risk factors within CT casework.

77. With regards to pathways for information sharing, requests for support and onward referral in relation to neurodivergence and mental ill health, whilst these will be individual and unique within each local authority area, in the experience of CTPHQ these are well mapped, understood and used. The challenge is where the individual concerned is not unwell enough to meet thresholds for intervention or support to be offered by these other agencies, where the risk posed does not meet the criteria for prioritisation in those agencies or where the wait for such support is significant. Whilst health services are subject to the Prevent duty under s.26 CTSA 2015, most services do not interpret that duty as mandating prioritisation of Prevent cases for health support above other needs and as such this support is often triaged against a

wider range of other cases, and only accessible where it meets clinical thresholds. This is a complex area and whilst not one CTPHQ is equipped to comment on in any detail it does highlight the challenge agencies encounter when having to make prioritisation judgements across many varying presentations of risk, and when balancing risk to both individuals and the wider public.

Interventions

78. As a law enforcement collaboration CTP is predominantly reliant on other agencies for supportive or therapeutic intervention support. CTP has primarily used law enforcement intervention effectively in cases where risk has escalated where there are reasonable grounds to suspect that criminal offences have been committed. There are examples of CTP using law enforcement powers to arrest and charge individuals with an alternative offence, where they planned an attack but had no terrorist ideology. This gives a clear example of the point I made earlier in this statement at paragraphs 16 and 17 regarding investigations where it is initially unclear what the motivation for an attack is, and where CTP will act to protect the public from a serious threat, regardless of whether it is terrorist in nature or not.

79. CTP has supported the Home Office in their pilots relating to family mentors, practical mentors within Prevent, and the below threshold pilots. None of these pilots are specific to the issue of VFIs although all have potential application in those cases. With the exception of the below threshold pilots all of these are new interventions which have not yet generated enough data to assess them in terms of their success/effectiveness, both within the FEVMCA and wider Prevent cohorts. In terms of the below threshold pilot whilst CTP recognises the value the pilot provides in terms of adding an element of structure to risk management in this space, we note concerns that such a pilot may not be nationally scalable, and we question whether the CT system is the right one to be overseeing risk management of non-CT concerns. In addition to these pilots, the Clinical Consultancy Service described earlier in this statement provides clinical advisory support to practitioners in individual cases, including on how neurodivergence or mental ill health may bear on risk; it is an established national service rather than a pilot, and the new SOP

contains a dedicated Annex setting out clearly the requirement to consider a referral to it.

Multi-agency working

80. The primary agencies that CTP engages with in relation to identification and management of the FEVMCA cohort are the same as those when dealing with ideologically related risk, namely health services, education, children and adult social care and front line policing.

81. CTP can only comment on the effectiveness of VFI management within the management of the FEVMCA cohort, as this is the only cohort of which CTP has experience. Such cases where suitable for Prevent as they meet the statutory test, are managed through Channel or PLPs under the processes previously outlined in evidence. CTPHQ's view is that coordination, management and ownership in this space is effective as the processes, legal responsibilities and data sharing requirements are clearly established in statute under the CTSA 2015 and CTP is the clear identifiable lead agency for managing terrorist risk in such cases. Where other agencies deliver support functions and interventions as part of risk reduction and safeguarding under either Channel or PLPs those agencies retain responsibility for effective delivery. CTP cannot say how effectively these same agencies monitor, manage and own VFI cases where they are not suitable for Channel or PLP.

82. CTPHQ would be supportive of a single shared multi-agency risk assessment tool. The opportunity to enshrine shared language around identification, assessment and management of risk would be of benefit to both the CT system, and wider safeguarding systems, leading to shared understanding on threat, risk and relevant thresholds. The challenge in such an assessment would be to keep it sufficiently flexible and agile given the wide variation in the types of threat, risk and vulnerabilities presented, and the responsibilities and needs between agencies. A single assessment which covered all the areas required by every agency involved in management could quickly become overwhelming, cumbersome and difficult to complete and raises questions as to which agency would be best placed to complete it in the first place. An alternative could be a modular approach where there is a

simpler core assessment which is shared, with effective 'bolt-on' modules where required for specific needs, e.g. where other complexities are present. To be truly effective, any such assessment would need to be evidence based, nationally consistent, set out in a legal duty/on a statutory footing to ensure compliance, and may require national technology to ensure different agencies were connected.

83. CTPHQ expects its Prevent practitioners to share information with other agencies where a relevant risk has been identified that cannot be addressed within CTP. This CTPHQ000410 is outlined in the Prevent SOP [VE/20] and can occur at multiple stages during Prevent case management, at initial referral, information gathering, case management during Channel and at closure. The challenge in VFI cases is that there is not one single organisation with primary responsibility for this type of risk and the agency being shared with will depend on the risk identified. Often there are multiple risks or vulnerabilities identified simultaneously which require sharing with multiple agencies. As CTP does not oversee, and cannot mandate the application of other agency thresholds, all that practitioners can do is share the relevant risk. Whether the individual agency responds to that risk with the appropriate prioritisation is a matter for them, and where sharing of information happens at the point of closure CTP is not in a position to require updates as to progress from any agency shared with, outside of the below threshold pilot work. This is not Prevent seeking to hand over risk or avoid responsibility, rather it is a reality of the role of Prevent as a CT programme, requiring, that when there is no longer a vulnerability to being drawn into terrorism, the case must be closed and any other vulnerabilities and risks still remaining must be passed to the wider system for action. Where there is a clear and imminent risk to life there are clear processes in place for CTP and wider policing to act to ensure public safety.

84. One of the strengths of the current Prevent approach is that there is always an identifiable lead agency, in terms of CTP owning terrorist-related risk. This gives clarity and certainty to partners involved in managing Prevent cases. Replicating that single lead ownership model for VFIs with another agency would have similar advantages, with a single agency taking the lead for case management, with clear routes for escalation when risk begins to increase. Where there are challenges however is where there is misalignment between ownership of risk, and ownership

of the tools required to affect that risk. In the example of Prevent whilst CTP owns terrorist risk management, it does not own the majority of interventions required to address it, with ownership of those sitting with the Home Office, Health Services, Education and Social Care in the majority of cases. Here the Prevent duty under s.26 CTSA 2015 provides a statutory method by which CTP can leverage those interventions and partnerships.

85. Law enforcement is often an attractive choice of a lead/responsible/duty owner for high risk cases due to agency experience, and powers for arrest and detention to be used in the most critical of cases. However when considering early intervention and diversion it is often a very different set of interventions that are required which law enforcement do not possess and must either rely on partners to provide against their own thresholds, or in some critical circumstances pay for commissioned services from those partners to guarantee delivery, for example CTP Wales paying for private autism specialists to work with individuals referred into Prevent in order for them to effectively discharge their duties in relation to managing risk where other agencies do not have the capability or capacity to respond.

86. Lord Anderson's Lessons for Prevent report contains within it the concept of a "big front door" model. This would involve referrals currently being sent to Prevent instead being routed to a mainstream multi-agency safeguarding forum. Prevent would be retained in its entirety 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.

87. CTPHQ is supportive of the concept of a big front door, which is centrally owned and allows for a range of referrals given the intersecting nature of threats and how vulnerabilities can feature across a number of different risk areas such as the Com network, child sexual exploitation, child sexual abuse, Prevent, VFI and general safeguarding. However, as Lord Anderson highlights in his report Prevent should not be the front door but would be one of the many strands of support that sits behind it. Prevent SMEs could be part of the multi-agency front door team, ensuring CT relevant risks are appropriately triaged and sent to the right part of the system. The success of a big front door would need it to be properly invested in and resourced, with a clear accountable owner and legislation to provide a duty for all

relevant agencies to co-operate and support managing risk. Whilst CTPHQ are supportive of this concept it is not without risk, most notably that the strengthening of connections between Prevent and other safeguarding functions cannot be at the expense of well-established and effective connections between Prevent and the wider CT system. I discuss this in more depth in the following paragraphs.

88. Regardless of whether the "front door" model is implemented or not there is still the issue of ownership/duty holder for VFI cases. One possible route to identify the most appropriate duty holder might be to first identify the most effective interventions in the VFI space and then work backwards towards the agency that owns and delivers those interventions to ensure that those charged with managing the risk can lever the tools to do so. Whilst no single agency at the current time has all the required expertise in the VFI space, CTPHQ believes such expertise has the potential to be codified, taught and embedded.

89. CTP does not consider that Prevent/Channel would be the appropriate duty holder for VFIs at this time, due to the fact that Prevent remains a counter terrorism programme, bounded by statute and guidance which requires all activity to be undertaken through the lens of an individual's vulnerability to being drawn into terrorism. Whilst that remains the case Prevent cannot effectively fulfil a role for the broader cohort of all VFIs, being limited to those who are vulnerable to being drawn into terrorism. For similar reasons, CTPHQ does not consider that the role of duty holder for cases falling below Prevent thresholds could appropriately be fulfilled by a CTP officer as this would dilute their ability to respond to their core responsibilities to address terrorism and national security matters and, as explained above in relation to law enforcement more generally, would not own or control the early intervention tools that such cases require. If, notwithstanding these concerns, a policing duty holder were preferred, CTPHQ's view is that the role would need to sit within wider policing rather than CTP, and to be held at a level of seniority sufficient to convene and hold to account multi-agency partners.

90. It is of course possible to change legislation and amend the Prevent duty to include serious violence, which is clearly a consideration for government, however CTP would note a considerable number of risks associated with amending one part of the CT system, without attention to the rest. An expansion of Prevent's remit

without wider consideration of the impact on the rest of the CT system would have the effect of pulling the long running and well established CONTEST model out of shape and complicating and potentially impeding the ability of the CT system to manage threat, communicate internally and operate effectively. CTP's view is that any extension to the responsibilities of the Prevent system would require the relevant resourcing, funding and mirrored legal powers across agencies to be effective.

91. To summarise CTP is supportive of the idea of a duty holder approach for the clarity and consistency it potentially offers but notes several complications and challenges. Namely that VFI-specific risks are wide-ranging and may not sit easily with a single agency across all casework, and that alignment between the owner of the risk and the owner of appropriate interventions to manage that risk may be challenging. If CTP were to be identified as the lead agency for VFIs, this would risk compromising the existing system's ability to manage counter terrorism and national security risks, with untested and potentially unintended consequences.

92. The use of MAPPA also has significant challenges as it is, outside of a few very niche exceptions, a programme for management post-conviction. As such MAPPA does not fit as an early intervention programme. Whilst it may be possible to legislate to change MAPPA's remit, this would carry many of the same risks as considered for CTP, namely pulling an existing process out of shape, with risks to the core work that MAPPA undertakes for convicted offenders. The Potentially Dangerous Persons (PDP) scheme that is referenced as being a place where sub-MAPPA threshold cases can be managed is non statutory in nature, with NPCC guidance noting the lack of specific risk assessment for PDPs and the fact the relevant legislative framework for MAPPA management under the Criminal Justice Act 2003 does not extend to this programme. In effect where PDP schemes exist, they try to mirror MAPPA frameworks but without the statutory framework that compels multi-agency working and information sharing. As PDPs are not statutory there are potentially areas where this function does not exist, for example London does not have a PDP scheme.

93. The Multi-Agency Safeguarding Hub (MASH) is a possible option. MASH has several disadvantages in that, whilst the safeguarding approaches governing MASH operation with regards to young people are underpinned by the Working Together to Safeguard Children statutory guidance, the MASH itself is non statutory, and does not work consistently across the country. For example, MASHs may differ as to whether they cover both adult and children's cases. It is also primarily an information sharing approach, not a case management process. MASHs rarely return to cases once they have assessed them and shared them with the appropriate agencies. As with Prevent and MAPPA, MASH could be amended, statutorily or otherwise to include an enduring case management function. This would be a large-scale change and would fundamentally change the nature of the MASH to the extent where it could almost be considered to be a new function or structure. It is hard not to draw the conclusion from the consideration of the above that a new multi-agency structure may be necessary for the management of VFIs due to the challenges outlined.

94. The Serious Violence Duty under the Police, Crime, Sentencing and Courts act 2022 may represent one statutory mechanism which could be adapted for use in this risk area. Currently the duty requires specified authorities for a local government area to work together and plan to prevent and reduce serious violence, including identifying the kinds of serious violence that occur in the area, the causes of that violence (so far as it is possible to do so), and to prepare and implement a strategy for preventing, and reducing serious violence in the area. Currently the duty requires working together at the strategic level, rather than the creation of mechanisms for directly managing specific individuals, however, it is a matter for government as to whether it might wish to expand this duty to specifically require partnership management of VFIs and similar individuals.

95. In terms of installing and maintaining an appropriate culture of ownership and management of risk, CTPHQ's view is that this comes from alignment of ownership with the tools for management. In CTP's experience, Prevent shares information onwards with other agencies at the point of closure not because it does not want to manage the risk, but because CTP, as primarily a law enforcement agency, does not own the mechanisms by which that risk can be addressed. These tools can either be

accessed directly (e.g. where the agency owns the interventions, so mental health could own risk around mental health because it has the ability to assess and treat such conditions) or where statutory arrangements guarantee support and partnership to make those tools available as if the owning agency had control of them (e.g. within a well-functioning MAPPA partnership). Where agencies do not own the tools to address risk and do not have abilities, through statute or otherwise, to leverage them, there is little that agency can do beyond highlighting the risk to the agency which does own the relevant intervention. One means of addressing this, if a lead or duty agency for VFIs is recommended, is a corresponding duty on other agencies to cooperate with it, or to work towards the same outcome, as discussed below.

96. In terms of placing Prevent staff within other multi-agency services, the effectiveness of this will depend on the structure of any associated pilot and the specifics of the role of Prevent within those services. Where Prevent is undertaking additional responsibilities and duties around wider safeguarding CTPHQ would expect that greater resourcing would need to be placed into Prevent to maintain existing service levels, and in the absence of additional funding that could require the reallocation of staff from elsewhere within CTP with potential consequences for effective delivery in those areas. Where Prevent is fulfilling the same role but leveraging the opportunity for greater partnership working by being based within other agencies premises, there is less requirement for additional resources. CTP can envisage a future role where Prevent SMEs may be based, physically or virtually, in a multi-agency setting to support initial triage of referrals. This would require careful exploration to understand the impact and consequences of such an approach. We would want to take care in establishing these news ways of working to ensure there is no detriment to Prevent's current integration within the existing CT system.

97. CTPHQ broadly considers that existing information sharing legislation and protocols are sufficient to allow for sharing of information regarding VFIs although some challenges remain in some individual cases. Whilst the information sharing landscape is complex, set out as it is across different pieces of legislation, CTPHQ considers that the framework is sufficient to allow for the sharing of information between agencies where risk exists, terrorist related, safeguarding related or

otherwise. Where issues arise locally it is often because different agencies, or parts of agencies, interpret legislation in different ways which can sometimes mean a different view as to what should be shared. CTPHQ considers that it is not the threshold for sharing information that is the most problematic aspect, rather it is an agreed collective understanding of the thresholds, and the thresholds that are applied within agencies that generate an active response to a risk.

98. The only space in which CTPHQ has encountered specific and limiting challenges with sharing VFI related information is in a single task relating to a historic review **CTPHQ000188** of potential VFI cases [VE/24]. Here we were asked by government to reshare details of potential VFI cases we had shared previously with relevant agencies as a bulk undertaking so those agencies could reconsider any activity undertaken. Relevant legislation meant that there was no lawful purpose to reshare personal information about individuals sometime later without a new justification for doing so. Instead, we had to reassess each of those historic cases again, including updating intelligence checks, to ascertain whether grounds (new or otherwise) still existed to justify resharing (even though we had previously shared such information). This meant a considerable undertaking which resulted in a challenging decision around whether to invest Prevent staff time in historic cases that had previously been risk assessed and considered against Prevent statutory thresholds, or in new cases being referred at a time of high demand. It should be noted this was an unusual tasking, and not an issue that had been encountered previously or since and would not normally interfere with sharing as part of day-to-day business as usual within normal case management. This task does however highlight that those parts of the systems which these cases had previously been referred to have no way of accurately identifying cases which had been referred from prevent to them through their own systems and networks.

99. The Inquiry may wish to consider whether, if a recommendation is made about a lead or duty agency relating to VFIs, that a similar requirement is made to both MAPPA and Prevent in terms of either a duty to cooperate or duty to work towards the same outcome as the lead/duty agency for those other agencies involved. This will benefit the lead/duty agency in being able to leverage such tools and

interventions as are necessary to manage the risk, regardless of which agency owns them.

100. CTPHQ is confident that those engaged in Prevent case management are able to identify relevant stakeholders to share information about VFIs. Local partnerships via Channel and PLPs are well established, and the Home Office is supportive in ensuring local authorities maintain good links in with CTP in regions. As highlighted previously, the challenge is often not in the sharing of the information, rather it is whether that information meets the required threshold of the agency shared with to generate any onward intervention or activity and the inability of CTP to practically oversee and maintain ongoing monitoring of cases where there is assessed to no longer be any vulnerability to being drawn into terrorism.

101. CTPHQ has codified and clarified the requirements for information sharing on closure within the new Prevent SOP in chapter 28 [VE/20]. The SOP specifically references the following agencies as a non-exhaustive list of those to be considered where risk is identified:

CTPHQ000410

(i) adult social care;
(ii) housing services;
(iii) children's services;
(iv) other policing teams;
(v) mental health services;
(vi) education safeguarding leads;
(vii) Child and Adolescent Mental Health Services (CAMHS);
(viii) other relevant statutory or support services.

102. In many cases this will include the original referrer. The most recent Prevent statistics [VE/29] show signposting onwards to other agencies in 61% of cases deemed as not suitable for channel.

CTPHQ000413

Online Environment

103. Anecdotally we are seeing a large rise in online content that is indicative of individuals fixated on extreme violence with no clear ideological drivers. Without government level intervention, access to this type of material is unlikely to change.

104. Operational observations include:

(i) Many pages use material as 'click bait' to bring traffic to their pages. Groups that have nothing to do with violence may use the material to entice viewers away from mainstream platforms to alternative online communities.

(ii) Anonymity appears to give users 'courage' to vocalise thoughts/fantasies and behave in a way that is different to real world interactions.

(iii) The drive by Internet Service Providers (ISPs) for privacy and anonymity can make it harder for law enforcement to assess risk posed. Whilst not a novel problem, this is likely to make identification and accurate assessment of terrorist threat more challenging in the online environment.

(iv) As is well known (and confirmed by operational experience) the algorithm and recommendation systems used by online platforms leads to individuals being fed increasing amounts of the same or similar material. This applies in all areas including in relation to extreme content.

105. On the 23rd of July 2025, ahead of the school summer holidays, I issued a joint press release alongside the Director General of MI5 and NCA Threat Director warning parents of the risks posed in the online environment. I highlighted some of the issues referenced above, specifically *"Counter Terrorism Policing and the National Crime Agency are increasingly seeing children being routinely exposed to the most serious harmful online content. This includes sexual violence; self-harm and suicide content; extreme gore; animal cruelty; indecent images of children; and terrorist content. This bombardment of online harms can quickly become normalised. Worryingly, some of the children who come to the attention of CTP and the NCA are completely desensitised to extreme and obscene content."* On the same topic the DG of MI5 stated *""In a few short clicks, young people can be speaking to dangerous radicalising terrorists online, consuming violent and extremist content. Terrorists who understand online culture are using slick propaganda to pull young people down a dangerous and potentially life-changing path."* CTPHQ000414

106. CTP's online activity primarily focuses on identifying terrorism related offending including content which breaches terrorism legislation. During the course of this work, case workers routinely encounter material assessed to be within the broader violent and harmful content space, including content that may be of interest to violence fixated individuals. A key challenge for case workers is distinguishing between individuals whose online behaviour may indicate a pathway to violence and those with a general interest in violent content, particularly in the early stages where intent is unclear.

107. Assessing harmful online material in isolation is often difficult, as content may include irony, satire, internet culture, mixed ideologies, or ambiguous extremist themes. As a result, greater weight is typically placed where there are clearer indicators such as terrorism related offences, explicit threats, attack planning, and other identifiable risk markers when assessing real-world harm.

108. Whilst there is a reasonable capability to identify more overt signs of mobilisation or attack planning, detecting individuals at the earliest stages of radicalisation, fixation, or grievance development solely through the posting of violent and harmful content remains challenging. Without additional contextual information or behavioural indicators, it can be difficult to differentiate between an individual with a fixation on violent material and one who intends to progress towards real-world offending. As such, identification is generally stronger where an individual moves beyond content consumption or sharing and begins to display more explicit indicators of intent, capability-building, or attack planning.

109. Each CTU/CTIU has Prevent practitioners who are trained in open-source internet investigation which allows for consideration of online behaviours and activities as part of assessment and case management. Sharing the specifics of how this works in practice is likely to reduce the effectiveness of this technique and assist those who would wish to avoid or subvert details of their activity.

110. In addition to the above, monitored usage may occur where an individual uses a school or business computer which is monitored, where parents may have installed monitoring software on a home device, or where Police or Probation services have

installed monitoring software as a result of a civil order or licence condition post-conviction.

111. Circumstances where a CTCO may have access to the above would be where a device has been seized as part of a criminal investigation, where a school, business or parent voluntarily provides records of monitored usage or where there is a civil order or licence condition which allows the CTCO to install monitoring software on a device. Such circumstances are rare within Prevent cases and Prevent legislation provides no additional powers for the monitoring of internet usage or seizure of devices for examination, so open source is the most commonly used method of assessing online activity. As such normal policing powers must be used, with clear limitations set out under the Regulation of Investigatory Powers Act 2000 and Investigatory Powers Act 2016 as to surveillance thresholds which would require higher levels of necessity and proportionality alongside additional legal authority.

112. The information obtained from open-source internet investigation, device examination or monitored use, where available, forms part of the assessment carried out under the PAF [VE/16], namely that it should be considered under each of the indicators of concern that make up the assessment.

CTPHQ000009

113. In addition, the relevance of online behaviour is referenced within the Prevent SOP [VE/20] in terms of the s.36 CTSA 2015 decision point, namely its relevance to both 'belief' and the credible pathway to being drawn into terrorism. It is also referenced specifically within the FEVMCA section as one of the key themes of concern to be considered.

CTPHQ000410

114. CTPHQ would wish to make clear the separation between what is done to assess online activity within Prevent as a programme designed to support individuals to prevent them being drawn into terrorism, and that which is done under other parts of CT Policing such as our investigation and intelligence functions. Whilst these other parts of CTP do undertake some form of intelligence led detection of online harmful behaviour, we would not wish to share the specifics of our methodologies as that would assist those who would seek to avoid or subvert those processes.

115. The sharing of online intelligence with partners is treated the same as any other gathered information. Where such information relates to safeguarding risks which other agencies have a responsibility to assess and/or address the Prevent SOP [VE/20] is clear that this information should be shared with that agency in the usual way.

CTPHQ000410

116. The level of intrusion that policing is permitted to make in examining online usage and what authority is required to allow this are matters for government. CTP is not explicitly requesting additional powers in this space, merely highlighting the difficult balancing act inherent in assessing risk within a scheme designed for voluntary early intervention.

117. Where there is clear terrorist ideology within online material, it is more likely to bring it into scope of legislation and therefore enable an appropriate policing response or increase engagement from ISPs, e.g. through removal/restriction within the UK. This is by nature more challenging with non-ideological violent pathways as it is harder to differentiate real and satirical content. CTPHQ's view is that it would require ISPs to do more in terms of moderation at source to impact the problem at scale; the government would of course need to assess what, if any, impact this had upon the Article 10 rights of online platforms and those who use them.

118. The Online Safety Act 2023 (OSA) represents a positive step towards mitigating access to harmful content by children. It is understood by CTP that the primary mechanism used to protect children from online harm remains through the use of age verification within platforms. It is our view that whilst this may reduce the risk of exposure to some, it is unlikely to deter those with focused intent to access such material.

119. It is clear that VPNs represent a means of circumventing age-related protections on websites by obfuscating a user's location and making them appear to be accessing a site from outside of the UK. Whilst there is anecdotal evidence of VPN use and common sense conclusions can be drawn there is not yet any empirical data available to CTPHQ which indicates to what extent young people may be using VPNs for

this purpose and as such we are unable to offer an assessment at this time to what extent age verification is being interfered with. For the same reason, CTPHQ has no operational evidence base from which to assess the implementation of age verification for the use of VPN software itself, or of other options to prevent VPNs being used to circumvent the age-related protections in the OSA. As a matter of principle, any measure which made circumvention of those protections materially harder would assist in reducing children's exposure to the material described in this statement, but the technical feasibility, proportionality and enforceability of age verification for VPN software are matters on which the government and Ofcom are better placed than CTPHQ to reach a view.

120. Section 70 of the Children's Wellbeing and Schools Act 2026 amends the Online Safety Act by inserting a new section 214, requiring providers of specified internet services to prevent or restrict access by relevant children to those services or to specified functionalities of them. CTPHQ's assessment is that this provision may help to reduce the incidental exposure of children to the online material of concern in the VFI context, including the algorithm-driven exposure described above, and to that extent it is welcome. However, consistent with the view given above in relation to age verification, restrictions on access are unlikely to deter those with a focused intent to access such material, who may turn to VPNs or other means of circumvention. The provision is therefore likely to be of most value in reducing the routine exposure of children generally, rather than in disrupting access by those already fixated on such content.

121. The impact of the OSA is hard to measure through public referrals alone, but there has been no discernible reduction in demand from public referrals to the CT Internet Referral Unit since the OSA came into effect. Accordingly, CTPHQ's view is that the OSA does not at present sufficiently address violent and extreme material which is 'harmful but lawful' and poses concern by and to the public. The changes most likely to make a material difference are those identified above namely legislative change classifying the relevant material as illegal, enabling law enforcement partners to make enforceable requests for its removal and greater moderation at source by service providers. This will require the government to

balance the very real risks to public and national security involved with the right to freedom of expression under Article 10 of the Convention.

122. Finally in this section I will briefly mention Project Rhyobasalt which is a national response to the Com Network threat. The Com network can be defined as: Transnational Virtual Networks (TVN) of criminal actors which engage in a variety of illegal acts to coerce others in furtherance of their own personal gain, development of their infamy, or in furtherance of their ideologies. This activity predominantly occurs online and overlaps with a number of harms including child sexual exploitation, encouragement of self-harm and suicide, and infliction of violence on others. The NPCC, CTP and National Crime Agency (NCA) are all working closely together to address the risk of harm posed by this threat, and some of the approaches being developed may, in time, prove adaptable and relevant to managing the risk posed by the VFI cohort. I am led to believe that colleagues from the NCA will provide more detail to the Inquiry on the specifics of Rhyobasalt in their evidence.

Effectiveness of Current Laws and Systems

123. This statement has already considered systems such as MAPPA, MASH and Prevent with regards to the management of VFIs. One area which has already been identified as a gap is the lack of legislation criminalising the planning of mass casualty attacks where there is no ideological motive, as compared to terrorism legislation which allows for an earlier criminal justice intervention. There are a number of cases dealt with by CTP within the last two years where alternate offences had to be considered despite individuals being at an advanced stage of planning a mass casualty attack, due to a lack of terrorist ideology. CTP is aware the government has already committed to bringing in legislation to address this gap and has been in consultation with the Ministry of Justice on the matter to offer our experiences with these challenges.

124. Another gap potentially exists in relation to preventative civil orders. Whilst there are significant numbers of orders available for post-conviction management such as Serious Crime Prevention Orders (SCPOs) and Criminal Behaviour Orders, these

require a criminal conviction to have already occurred. Youth Diversion Orders (YDOs) are similarly limited for the VFI space as they require proof (to the civil standard) that the individual has committed a terrorist act, a relevant offence with a terrorist connection or engaged in facilitative (to terrorism) conduct. As such the preventative space for civil orders for VFIs remains effectively empty at present.

125. An equivalent mirrored civil order to the YDO for the VFI space would be useful for effective management of risk; placing it on a statutory footing, however, would require careful drafting to ensure that it was useful at a suitably early stage to manage risk prior to an offence being committed, but also that it did not include too wide a series of behaviours beyond the VFI cohort. A simple mirror of existing legislation with the removal of the requirement for the act to be terrorist would result in an order applicable to almost any behaviour, VFI or otherwise. The same consideration is where CTPHQ's answer lies on whether there should be a further ability to restrict or monitor a VFI's access to the internet once a significant threshold is passed concerning the risk they pose to others. As explained earlier in this statement, monitoring software can currently be deployed only in limited circumstances, including where a civil order or licence condition permits it and the current Prevent legislation provides no additional powers in this space. If a preventative civil order of the kind described here were created, conditions restricting internet use, or requiring it to be monitored, could form a valuable part of it in the small number of highest risk cases, subject to judicial oversight and to the tests of necessity and proportionality. Absent such an order, and for the reasons of proportionality and practicality set out in the online environment section above, CTP does not seek a broader administrative power to monitor the internet use of individuals referred to Prevent. CTP's view is that whilst such measures may assist in a small number of individual high risk cases, they will not fix the online environment, that would require a whole societal response involving government, schools, parents and online platform providers.

Improvements and Other Matters

126. CTPHQ has implemented a significant series of improvements to the Prevent programme since the tragic events of the 29th of July 2024. These improvements

have focused on how Prevent assesses and manages risk of individuals who, whilst still vulnerable to being drawn into terrorism, do not appear to subscribe to or support any terrorist ideology. These improvements include changes to our standard operating procedures, our assessment tool, our electronic case management system, our training, as well as approaches such as the below threshold pilot, and access to new forms of interventions. By necessity the focus has been on improving Prevent's operation within its clearly demarcated area of statutory responsibility which means that it is not, nor can it be at the current time, an effective response to the risk posed by VFIs as a whole.

127. CTP recognises the scale of the challenge faced across all agencies in meeting this developing threat. In making clear the challenges, statutory or otherwise, with making Prevent a more generalised violence reduction program CTP is not seeking to make this a problem for others, or to minimise our own responsibilities in this space. Rather CTP recognises that it has a key role to play as part of a much wider multi-agency approach, not just in addressing those individuals who may through their fascination with extreme violence be drawn into terrorism, or require criminal investigation for their activity, but in sharing our expertise and experience with partners, both in policing and beyond, to help them develop effective responses. By doing so CTP can contribute to a whole system response to the VFI challenge, whilst maintaining and strengthening our core function with regards to the prevention of terrorism and terrorist offences. We have and continue to be active participants in the on-going work across government, law enforcement and partner agencies on this issue.

128. Drawing together the improvements identified in this statement which could, in CTPHQ's view, make an effective difference: (i) the creation of an identifiable national home (potentially a new multi-agency structure, sitting behind a 'big front door') for the assessment and management of the risk posed by VFIs who fall outside Prevent's statutory boundaries; (ii) the development of a shared multi-agency risk assessment, potentially on the modular basis described above; (iii) identifying the most effective interventions in the VFI space and working back from them to the agency best placed to hold any duty; (iv) if a lead or duty agency is recommended, a corresponding duty on other agencies, including Prevent and

MAPPA, to cooperate with it or to work towards the same outcome; (v) the legislation to which the government is already committed, criminalising the planning of mass casualty attacks where there is no ideological motive; (vi) exploration of the viability and practical application of a preventative civil order mirroring the Youth Diversion Order for the VFI space, potentially including conditions restricting or monitoring internet use and (vii) greater moderation at source of violent online material by service providers, supported by legislative change where material is currently 'harmful but lawful'.

STATEMENT OF TRUTH

I confirm the contents of this statement are true to the best of my knowledge and belief. I understand proceedings may be brought against anyone who makes, or causes to be made, a document verified by a statement of truth without an honest belief of its truth.

Signed:

Signature

Dated: 7th August 2026