COUNTER TERRORISM POLICING

NPCC National Police Chiefs' Council

NCA National Crime Agency

The Rt Hon Yvette Cooper MP
Secretary of State for the
Home Department
Home Office
London

CC Gavin Stephens QPM
ACSO Matt Jukes QPM
DG Graeme Biggar CBE

28th January 2025

Dear Home Secretary,

Proposals for action following Southport trial

1. The horrific actions in Southport last July, and the detail that is now available following the perpetrator's conviction have brought into stark relief and the public consciousness just what can happen when toxic online content is served up to a teenager with mental health issues, who had fallen out of mainstream education, and who was living in the isolation of his home and online life.

2. The shocking consequences of his actions sit at the extreme of trends that we have been highlighting for some years, and which Matt and Graeme have discussed with you in your T1B. These threats and their volume have been growing, and the trajectory is still upwards.

- In a survey of children last year, 5% of 13-17 year olds said they have carried a weapon in the past year. If there are ca. 4m 13-17 year olds in the UK, that is 200,000 as an indicative figure.
- In a similar survey, 70% of 13 –17 year-olds reported seeing real-world acts of violence on social media, with Tik Tok and X being the platforms where violent content was most commonly seen.
- Children now represent more than half of all police reported child sexual abuse offenders. And CSA is becoming both more severe and more normalised online, with offending seen alongside other threats such as cybercrime, fraud, and terrorism. This has been referred to as 'harm hybridisation'.
- An extreme example is in the emergence of the 'Com' networks, an online and international subculture in which cyber criminals, paedophiles, sex offenders, terrorists and violent extremists network, offend, recruit and influence each other. Members are typically young disaffected males under 18 years old.
- Where the victim of online VAWG was aged 10-15, 83% of suspects were aged 10-19. According to the latest Youth Justice data, violence against the person offences have seen the largest increase in proportion of all youth crimes – rising from 21% of youth offences, to 34% in 10 years.
- The number of young people being arrested for terrorism offences is at record levels – almost 20% of arrests made are those under 18. The majority of arrests of minors for terrorism offences involved online activity. 31,347 people have been referred to Prevent since April 2019 - March 2024 with 50% being under the age of 18.

3. We are going to address our part in responding to this phenomenon with determination. That is our collective responsibility, and we will use the stretched resources we have to ensure prevention and enforcement are pursued. Given the scale involved, we need to invest to exploit the technology of automation and AI to turbo-charge our systems and inform front-line decision-making.

4. The broad spectrum of interlocking online challenges we now face poses other challenges. We recognise there is policy work needed to re-consider the definitions of terrorism and extremism. Our operational focus needs to be not just on where the lines are drawn but also on ensuring that we manage across them and nothing falls between the gaps, including better cross organisational understanding of youth pathways into extreme violence, child sexual abuse and related offending.

5. To that end, we intend to develop thinking and costings on two new initiatives (which are consistent with the broad direction of Police Reform):

- We will consider whether there is value in better coordinating or consolidating our approaches to Prevent in relation to online crimes, including terrorism, cyber crime, child sexual abuse and other serious crimes – which are currently at very different levels of maturity.
- We will explore establishing a multi-agency task force, supported by a fusion cell to bring together an all-source intelligence collection capability, including potentially with industry, against this range of increasingly overlapping online threats.

6. You are aware that even with unlimited resources, our discovery, diversion or disruption of these threats can never be total. The response needed lies beyond policing alone. We need to address the supply-side – of susceptible young people and harmful content – or the inevitable consequences will be more violent attacks, more sexual offences committed by children, and more harm to our children. This is no surprise. Over a decade of reports on countering extremism, online harms and youth violence present many recommendations, and helps us to understand the volume and depth of the risk group. These stem from other tragedies – and the consequent inquests, inquiries, and expert reports (inter alia: Khan, Casey, Whittaker, Walney, and Jay). These recommendations are sat ready to activate. They have done so over the last decade, during a period when critical services in health and social care have been degraded, and the online world has become more fundamental to our lives and those of our children.

7. Examples where we will need Government's support are listed in the annex. Immediate steps that you might consider include:

- Convening a Ministerial group – equivalent to our joint taskforce - to consider risk management, public communication and action across these areas, including the focus needed in education, health, and science and technology.
- Seeking the support of Government's Chief Scientific Advisor Community to identify the scale, causes and connections between these threats and their actors.
- To address the causes and cures of online harms, working with DSIT to press the tech industry for a step change in impact, OFCOM to accelerate implementation of OSA and Illegal Harms Code, and identifying a joined up approach to the most problematic platforms.

8. We look forward to continuing to work with you on these issues, and related issues that arose from the Southport attack, such as the handling of intelligence around community tensions and public disorder, which we have not covered here.

9. This letter has been prepared with the support of and contributions from Sir Mark Rowley, Commissioner of the Metropolitan Police Service, and Sir Andy Marsh of the College of Policing, who are copied in.

Yours sincerely,

Signature

Matt Jukes QPM, National Lead for CT Policing

Signature

Gavin Stephens QPM, Chair of the NPCC

Signature

Graeme Biggar CBE, Director General NCA

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ANNEX – PROPOSALS

The Government has emphasised the need to take action now, where it can, without needing to wait for the recommendations of the announced Inquiry. We welcome that commitment. To support action, we have individually and collectively proposed a number of areas that would be worthy of progression, they are included here in this annex. Some of these proposals are for policing to pursue, others require government leadership.

We have written to you as a law enforcement partnership, because we recognise that our next steps require us to progress action together and coalesce around:

a) the importance of a **wider framing of the problems and risks**;
b) an appreciation of the **connection of causes** leading to violence including in particular the impact of violent content online to the lives of children and isolation from society; and
c) the opportunities to address a multitude of 'missions' with the right **strategic interventions taken together** and across all public bodies.

In taking these next steps, we need to be clear internally and with the public that we cannot stop everything and we need to address the question of scope, as well as of course the limits of system gearing. We have a task to arrive at absolute clarity in respect of the scope of intentions, so as to strike the right balance between hyper-focus on child violence rather than just terrorism, which is helpful but possibly not sufficiently broad, and covering the entire spectrum of harm which manifests in other ways, like child sexual exploitation, online VAWG, serious violent crime, ransomware/hacking, self-harm and suicide.

Wider framing of problems and risks

As we look across the problem set, the trends and statistics are striking. These are listed in the cover letter.

There is of course more data from health and education, as examples, which would help to form a wider understanding. The need for a better collective understanding of the problem set is likely obvious. We do not need to wait for the Inquiry to recommend that connections between partnerships need to be strengthened, or that we need more training and information sharing. These are given, and areas where enactment of law could strengthen partnerships and information sharing, with for example a duty to cooperate with candour and pace in reviews after adverse incidents.

With the scale however of much of what we are dealing with, which may be beyond human interactions alone, we may need to look at automation and industry support to accelerate progress. Set scientific, industry and Government minds to the task of using automation to 'join the dots' – the task that no human system has proved capable of executing.

*Cross government ministerial meeting

We ought to acknowledge the scale of this challenge, and make the choices required to either describe and tolerate risks, or to apply mitigation to them. T1D* T1D

T1D

Connection of causes

The toxic online environment is a particularly concerning catalyst, affecting the health and the safety of our young people, including their exposure as perpetrators and victims of crime, and the societal and individual cost. This is a driver for partnership with industry on their interventions to remove the prioritisation of harmful content, and to detect harmful behaviour. We should use the Online Safety Act, as is, and build out from it a world-class accountability framework for platforms operating in the UK, at the same time as recognising their

growth potential. But still, absolutely clear, go harder and faster. We should address E2E encryption, force safer algorithms, and drive expectations of take-downs. Build stronger international coalitions to support this. We should make a virtue of this in the UK's aspiration to be a leading, AI-driven economy. And convene industry to talk about these issues with industry and Government. There is much to do.

Interventions

In considering these issues we can envisage an approach in three parts, namely (1) tackling the causation / threat itself; (2) identifying the individuals affected; (3) managing those individuals once identified. With this approach in mind and the need for balanced scope, we group the need for firm proposals and action taken to address:

1. The **partnership interventions and changes** that are required to address cumulative risks around an individual that are beyond law enforcement's reach;
2. The horrific and **toxic online environment** that is easily accessible to children and in particular, maximising our detection and discovery of online activity T1B/T1C, the responsibility of tech companies and the enforcement of the Online Safety Act;
3. **How children coming to the attention of the state should be responded to**, in particular identification and ownership of risk, and consistency of application of state instruments across the country; and
4. The **Prevent system's efficacy** against the predominant features of its casework, and wider provisions for individuals referred to Prevent who are not suitable for Channel support but do require some form of risk management;

Sufficient funding and long-term resourcing is of course a critical success factor, as any decision around thresholds (for example) comes with it significant resource requirements. In the immediate term, we will progress where possible the proposals contained here, including via the forming of an operational Diamond Group.

Wider intervention and change

1. **A cross-departmental Chief Scientific Advisors commission** with all the relevant CSA pooling sector knowledge, on cohort and potential evidence-based solutions, with the intention of supporting proposals to enhance our ability to identify risk amongst volume.

2. **Consideration of policing's end-to-end review of the online sale of knives.** The review prepared by Commander Stephen Clayman will report soon and holds highly relevant NPCC recommendations to prevent the sale and delivery of knives to under-18s, and measures to prevent the sales of knives listed as prohibited offensive weapons.

3. **Considerations around the importance of educational establishments in harm reduction**. Notably, school absence, in particular those children disproportionately excluded from schools who are neurodivergent. Accessible material for all primary, secondary, further and high education establishments to raise awareness of, for example, stalking and prevention.

4. **The immediate commencement of phase 1 of the National Centre for VAWG and Public Protection**, work of which is already ongoing to develop enhanced processes around the identification of high harm offenders and Online Harms (learning from work undertaken through the child sexual abuse function) with intelligence that crosses over between CT, SOC and Public protection.

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Horrific online environment

5. **Government accelerating the implementation of Online Safety Act enforcement**, and ensuring its impact is felt across the entirety of the sector, in order to drive real change. Hardening our posture, pace and assertiveness in pursuing online safety, including how best to tackle online radicalisation and content which may result in violent mindsets, whether founded in terrorist ideologically or not, alongside online radicalisation that is terrorist in nature or intent. We need to push OFCOM to enforce as firmly as the OSA allows (for example, they have the power to access the tech companies' algorithms but have not yet used it), and for DSIT to consider where new legislation is needed.

6. **The Online Safety Act stopped short of violent ideologies. A second iteration of an Online Safety Bill could address that.** Online violence against women and girls (VAWG) is widespread. Endless sites actively encourage extreme sexual and physical violence towards women and girls, which can be accessed by anyone, at any age, with ease. **Any position that such material is *'harmful but lawful'* is not tenable.** Whilst police are not censors, there is precedent for how police can tackle this with Big Tech. The normalisation and desensitisation of children and young people towards sexual and physical violence is endemic.

7.

8. T1B

9.

10. As long as such online material remains *'awful but lawful'* there is no incentive or purpose for this of course, as we cannot act on it. A recalibration could include all facets of **child abuse/violence also and cater for all the toxic, mixed ideologies that do not otherwise fall into the usual catch of CT or T1 actors** due to a lack of a clear political or ideological aim that defines terror groups.

11. There is then the question of how to *'pull through'* those who pose the greatest risk whether to themselves or others, between policing and partners at a local level and on a nationwide scale. Current

MASH processes run the risk of delays in assessment due to volume. A tendency towards single agency ownership and an inability to track through to meaningful outcomes that can be demonstrably shown to mitigate risk. Some **exploratory work to use AI to sift the volumes** would be useful with the right algorithms in place to help focus this effort and prioritise and accelerate the highest risk.

12. There is an offering on **Cyber Prevent** (Cyber Choices) T2E. It is much smaller and less sophisticated than CT Prevent. We should ensure we have a tiered offering that is able to address the variety of crimes that our children are being radicalised into.

Multi-agency adoption and management, outside Prevent

13. **Government to consider how best to hold non-CT frameworks and agencies to account in how they undertake their duties to support these cohorts.** Accountability is often easier to do in a national Prevent setting than it might be for the hand-off of cases into local services and safeguarding mechanisms, where it is harder to track cases and outcomes, and models may differ across the network. We need to work with partners to better understand how this can be done, and who should monitor the effectiveness of non-CT intervention signposted away from Prevent. Multi agency work within the Government Pathfinder areas could be used to support pilots of this approach and Multi agency safeguarding hubs should be strengthened and legislated for ensuring consistent sharing of information and assessment of risk across agencies. The introduction of multi agency child protection teams within the Children's Wellbeing and Schools Bill should explicitly identify ways in which Prevent intersects with the assessment and response to Risk. The single unique identifier for children needs expanding to incorporate all agencies and assist information sharing through enhanced AI and digital capability.

14. **Develop a 'what works' evidence base for interventions** where there is no identified ideology, but the individual in question presents a risk of harm. There will be data already in existence that we may want to consider as part of this, including data from pilots and local multi-agency support programmes which are already underway and achieving positive outcomes (for example, harm reduction hubs). It may be that this work features in or provides the evidence base for the Youth Futures Programme currently being progressed by your officials.

15. **Pilot a safeguarding body** (with a view to making it a consistent, national offer if successful) to sit below Channel and absorb high risk non-CT casework, either through referrals/signposting, or active programme-led mentorship and direct intervention. And consider the Prevent approach with a statutory duty to ensure agencies are legally obligated to participate and provide clear accountability, structure and roles.

16. **Pilot Prevent staff being stationed in multi-agency services** such as Multi-Agency Safeguarding Hubs, Youth Offending Teams, or Child Protection Conferences for a set period of time with a view to supporting their response to high-risk youths

17. **A duty on other government departments and local authorities, NHS, and other relevant safeguarding agencies** to report back on outcomes, where an individual is referred out of Prevent. This would include collecting data to satisfy us that subjects of concern who do not hit Prevent thresholds are getting the interventions they require. In December 2024, the HS announced her intention to undertake pilots beginning at the end of this month, to test new approaches to monitoring cases that are transferred away from Prevent and into other services. T1B/T1C

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NCA National Crime Agency

T1B/T1C

18. **Provide support to non-CT services** (for example frontline police, health, education or local authorities) to take ownership of management of high-risk children and young adults who do not meet the statutory test for Prevent support. This would include ensuring local police and relevant agencies have access to the information and data they need to provide sufficient support.

19. **Improve guidance to Local Safeguarding Partnerships** to ensure serious and extreme violence is identified as a safeguarding issue and treated with urgency and adequate resource. Working Together should be strengthened to ensure these harms and vulnerabilities are recognised and responded to by all partners.

20. **Improve the collection, collation and sharing of data** to enable multi-agency partnership working. Not least and as an indicative example, to acknowledge how local safeguarding partnerships collect information on the most violent young people in their locality, and data on repeat missing persons, referrals to Prevent and missing from school.

21. **Provide updated Government and/or College of Policing national guidance and training to police and other frontline services (health, education, LAs, etc) on the management of high-risk youths.** This should also include the sharing of good practice from successful regional initiatives and pilots. There is a further role here for the new National Centre for tackling VAWG and Public Protection, who will provide enhanced support for policing and partners and enhance our understanding and response to VAWG and public protection offending, including the role of online content.

22. **Consistency in the understanding, and tolerance of, risk across the partnerships, and clear and definitive ownership for the support and management or risk.** There exists the hazard, of several different multi-agency forums each identifying different forms of youth vulnerability (eg MASH, MACE, Gangs Multi agency Panels, IOM) but with the risk that these compartmentalised approaches see high risk nominals that do not fit their specific criteria *'fall through the cracks'*. There is some work ahead with groups like 'StudyBugs' which seeks to harness the problem of truancy for instance, but these are isolated and nascent at present. **A single, threat agnostic forum for child violence** would have merit, but would need to be carefully assessed for Equality Impact to support those children and young people with chronic mental ill health and/or neurodivergent conditions.

23. Learning could be taken from **multi-agency harm-reduction hubs** trialled in some forces, following the College of Policing harm reduction unit model. Further to this, an exploration of opportunities to accelerate diversion and early intervention activities, not just from policing but also from partners. It may be that a standard multi-agency commitment may assist in consistency of diversion/education, acknowledging that would require funding and capacity release across all partners.

24. **Consider the use of Orders which do not require conviction for this cohort.** If potentially dangerous individuals are then identified, current processes tend to be conviction-led and the Orders available (Sexual Harm Prevention Orders, Violent Offender Orders) likewise. Without relevant convictions therefore these tools are not relevant for a child nominal who may be exhibiting alarming behaviours,

but they do not 'fit' MOSOVO[1] criteria. They could potentially fall into a 'Potentially Dangerous Person' profile but policing lacks the Order in our panoply to manage their behaviour effectively without a relevant prior conviction. There is, however, precedent in the form of Sexual Risk Orders which require no conviction per se but can be very effective in constraining the harmful behaviours of those who a court can be convinced pose a risk of sexual violence.

25. A **VRO' ('Violence Risk Order' equivalent)** could enable policing to enforce both prohibitions (e.g. not to approach a school or be unsupervised amongst children) and, ideally, positive obligations (e.g. to attend relevant courses, avail themselves of resettlement/diversionary opportunities etc). Without a legislative toolkit to enforce against those we identify as posing the greatest risk we are left to attempt to manage through co-operation rather than coercion, which can be challenging with the most anti-social, violently oriented, or radicalised children and young people. The demand on force resources would of course need to be taken into account.

26. T1B

The Prevent system's efficacy

27. **A root-and-branch review of the Prevent system** and the programme's efficacy. This would need to look not only at Home Office and police provision, but also at the organisations to which individuals may be referred to by Prevent, should they not be suitable for Channel support, and best practice for referring individuals away from Prevent. It could consider how best to support certain individuals with a propensity for violence, but no identifiable ideology.

28. **An end-to-end review of Prevent thresholds will now be undertaken, as announced by you on 21st January,** and CTP is keen to consider how else Lord David Anderson KC, as interim Prevent Commissioner, can support work to review and enhance Prevent and consider who is best placed to support individuals where mental health and/or neurodivergence is a predominant driving factor. CTP is also **keen for collaboration on additional communications products and clarification to regional Prevent practitioners** on the thresholds for Prevent intake and the needs of external agencies to make informed decisions and effectively manage referrals out of Prevent, following conclusion of the review.

29. **Introduce a whole system duty to undertake rapid, parallel, and then integrated reviews, alongside Prevent following an incident with a Prevent footprint** (policing, care, health, safeguarding etc). At present **this** is all too fractured and too slow, but an integrated equivalent to the Domestic Homicide Review, done at pace to inform learning would be valuable. **A 'Beyond Prevent' review** following an incident with a Prevent footprint could include establishing an assessment of the violence pathway, whether terrorism, or extremism, or neither. We need to understand when, following a relevant incident where an individual may have gone on to harm themselves or others, reviews by other parts of

[1] Managing Sexual or Violent Offenders

the public system are concluded and available, to inform our understanding beyond Prevent and interventions that could mitigate vulnerability and risk in the future.

30. **Greater use of data to identify trends or common traits among Prevent referrals whose risk may be driven by factors outside of having an ideology**, including neurodivergence, specific mental health conditions, extreme interests or additional vulnerability needs presented by those referred.

Recommendations from past public reports, that remain relevant for contributing to whole-system efforts

31. AC Matt Jukes wrote to Sir Matthew Rycroft on 16th January 2025, on the importance of wider wraparound interventions to reduce the risk posed by violent individuals. Attached to the letter was an annex, which listed 52 previous recommendations of relevance from past reports into extremism and cohesion, and his view that the Strategic Security Review needs to make a conscious connection to those wider social policy interventions and frameworks.

32. In addition, there is merit in cross-referencing and reviewing the recommendations from reports such as the Independent Inquiry into the Child Sexual Abuse (Jay, Evans, Frank, Sharpling) and Inquests, including in Molly Russell's death.