Katya,

You asked for feedback on the VFI/non-ideological extreme violence Strategic Issues paper that will inform a Cabinet Secretary-chaired meeting on 9 June, to which NCA have been invited. Thank you for the opportunity to comment. Please see some comments and thoughts on the paper below:

Overarching comments

1. The paper is comprehensive and covers well the main issues connected with VFIs that we as a system are dealing with – thank you. Unfortunately, as the paper recognises, many of the answers/solutions seem a long way off. We think we should flag explicitly that at this late stage in the SR2 process there will be no SR bids that cover specific solutions to the problems identified, meaning resourcing and funding will be a key challenge for tackling the VFI issue. Lots of organisations should be doing more in these areas, and can see elements of the threat they could address. But all are struggling under existing caseloads. We cannot address the seven issues without addressing resources / prioritisation.

The NCA, alongside CTP and NCVPP colleagues are seeking to tackle a broader, but not significantly more numerous, phenomenon than non-ideological extreme violence. This policy analysis is therefore unhelpfully restricted to only one aspect of the online-enabled violence phenomenon we and other operational colleagues have been flagging the NSC, the Diamond Group, the NCA-CTP announcement of the joint taskforce, and the actual work of the taskforce and the fusion cell. It is partly for this reason that the new maturing chapter of the National Control Strategy for SOC refers to this broader phenomenon as Online-Enabled Violence, which we think is a better descriptor than non-ideological extreme violence.

Young people, mainly boys, exposed to the same online radicalisation processes, could become

(a) an ideological/terrorism risk,
(b) a non-ideological VFI, or
(c) engaged in Com-style violence, which tends to be less public,

All are online procuring physical attacks on victims by others, and online coercion to cause victims to harm themselves and family members etc; and where a single offender's victims and harm build up over time rather than all in one go.

In terms of how you describe overlap (your para 6a) please avoid giving the impression the Com offenders and the people thinking about school shootings are necessarily the same people as I am not sure we know that; it's more that we believe the radicalisation process and diversion/prevent options are closely related or the same.

The section (indeed the paper) doesn't include much on international comparisons or lessons: there must be experience we can draw on. We support being quite explicit that we have poor evidence on what works. We have to also face the fact that there might not be something that works, in some/ many cases.

2. We support the way para 31 describes Police Reform – in that in the long term a new National Centre of Policing (NCOP) or merging of some CTP/NCA functions may provide some solutions to tackling VFIs as a cross-system challenge, but that this is indeed a long-term possibility, and shorter and medium term solutions will be needed to improve the HMG response to VFIs.

3. At para 19. ii. it could be worth referencing the 'Expanding Interventions' work by Prevent in HO/HSG and how this was explicitly recommended for prioritisation in the Strategic Security Review (if this is talking about the same thing).

4. On the question of an operational lead for this issue, NCA seniors will want to take a view on any suggestions/recommendations that the NCA should be the operational lead, given tough prioritisation decisions and the pressures on the Agency to focus on other high priority issues like Organised Immigration Crime (more detail below).

5. Along with resources, we need to make it explicit the extent to which any feasible work can address these challenges. Even with significant extra resources, identifying / discovering these threats is difficult, and even with new legislation and preventative interventions, stopping it is very hard. We would have to be clear to Ministers, as with CT, that we cannot stop all of these threats and they have to take a view on their level of risk tolerance. Which also means a bit more on PREPARE (dealing with the consequences).

Operational leads

6. Where para 32 mentions the absence of an operational lead on the national threat picture, and other paras mention no clear law enforcement lead, we should mentioned the work of the Southport Diamond Group, chaired by CTP, which brings together national law enforcement leads (including CTP, NCA, NPCC and others) and is trying to address these challenges (the next one is on 2 June so will have met by the time of the Chloe S-led DG meeting and the Cab Sec meeting).

7. We should also set out that the Silver Group co-led by NCA and CTP has established a Joint Task Force which brings together strategic representatives from NCA, ROCUs, NPCC, CTP, HMG and Ofcom, going some way to answering the challenge posed in section 32(i)b "A single law enforcement agency is named to lead on non-ideological extreme violence" (this is the Project RHYOBASALT work). The Diamond Group structure (and Silver/Bronze structures below) is going some way to try to address these issues but we welcome the wider HMG discussion and focus on it.

8. NCA seniors will want to take a view on any suggestions/recommendations that the NCA should be the operational lead, given tough prioritisation decisions and the pressures on the Agency to focus on other high priority issues like Organised Immigration Crime.

9. We need to emphasise the importance of local connection / understanding, which will be critical in identifying and responding to cases (with all the local join up that will be required). We do need a NPCC lead to work with us. On responsibilities, we would suggest to CTP for school shooting / mass casualty (para 27a) and probably NCA for broader online radicalisation (para 27 b). It is not clear how the grievance / misogyny violence (para 27 c) differs from 27 b). The key point is that we need to work together, which is exactly what we have started to do in Project RHYOBASALT in the virtual joint task force

10. Specifically, in terms of ownership, the approach we are pursuing is none of the options in Para 32 (i); this is because those that pose an ideological/terrorism risk, are non-ideological VFI, or engaged in Com-style are fundamentally different communities. The appropriate approach therefore is collegiate and collaborative between the players set out above. The material in para 5 about the Diamond group etc is good supporting material here too.

Definitions and scope.

11. Para 13 says, "at the NSC meeting on T2D VFI risk in March 2025, Ministers agreed that local services should prioritise individuals who represent a clear risk of violence to others across national security, social care, health, education, youth justice and law enforcement systems". Here "a clear risk of violence" is not specifically defined in the paper, so it would be helpful to do that.

a. From the terminology para at para 4 it seems as though the definition by implication means risks of death or injury on a large scale (is this right?). From an NCA perspective we would propose that other types of (smaller scale but nonetheless still very serious and harmful) violence should also be included in this work – for example the exploitation of children, and procuring of violence over the internet, must also be included in this paper alongside those planning public violence. Public violence may be greater scale, but is more likely to be one-off or isolated incidents, whereas other types of offending (like violence against children) are more likely to see multiple incidents/offences, where the scale can still be large but in a different way. We would propose the RHYOBASALT cohort of individuals must therefore be included in this paper as it forms the focus of the Joint Task Force and Fusion Cell, overseen by the NCA-led Silver Group. There is arguably likely to be overlap between individuals focused on serious violence in a private, small-scale setting, and those focused on mass-scale attacks, depending on their possible radicalisation and the paths they take. So, it is important the system considers both, as part of a holistic response, and to capture the increasing overlap in online harms.

b. It is worth mentioning somewhere that the NCA's (annual) National Control Strategy, which is informed by our annual National Strategic Assessment and informs prioritisation of the UK's whole system response to SOC, has this year recommended doing more on Online-Enabled Violence (OEV), which includes VFIs and also includes offenders in 'Com' groups identified under the RHYOBASALT work. The RHYOBASALT cohort can be described as those in the yellow and red sections of the diagram below and will be subject to Secondary and Tertiary Prevention interventions. These will feed into the Primary prevention space which this paper describes. That feed should ensure a holistic response to the totality of the threat.

c. In case useful to have, the definition of 'Com' groups has gone through various iterations and is a subject of discussion of the RHYOBASALT PURSUE Group. The latest iteration is:

'Transnational Virtual Networks (TVN) of criminal actors which engage in a variety of illegal acts in furtherance of their own personal gain, development of their infamy, or in furtherance of their ideologies. The network can broadly be broken down into three identifiable subgroups:

- *SG1: A group operating online primarily involved in extorting minors to commit digital and real-world sex crimes, criminal acts against the person, property & animals; and the promotion of self-harm and suicide: (Sextortion Com)*
- *SG2: A group acting online who hold extremist mind-set who promote a violent Nihilistic world-view encourages damage to property, harm to individuals & potentially acts of terrorism or non ideological violence. (Offline Com)*

- *SG3: A group who have a common purpose to conduct criminal activities that maliciously use digital technologies that target UK commerce/infrastructure by means of Network Intrusions/Ransomware etc. (Cyber Com)'*

12. When examining scope we in policy terms there is a cross Whitehall response required. Youth Diversion Orders in the Crime & Policing Bill are possible example of a new power, crafted in a way which only applies to ideological offences, and where in the future we would be wanting at least to consider up front whether the terrorism tie is necessary & appropriate.

Assessments

*Cabinet Office Body

13. Where para 6 says CO's T1D* are conducting further analytical work and a second assessment update for June, we could also flag that the NCA's National Assessment Centre (NAC) is developing an understanding of 'Com' Groups and a particular focus on developing a better understanding of criminal pathways with a view to developing behaviour change interventions. The NAC are linked-up with T1D* but we should encourage bits of the system to link up too, where they aren't already.

14. Para 7 mentions that T1D have undertaken a one-time assessment of on-ideological extreme violence – please would your team be able to share that? Or should we go directly to T1D?

15. Para 11 – the described task – collecting and collating evidence about VFIs – is primarily a cohort identification and management task (similar to PREVENT and its feed-ins), rather than primarily an assessment task, although there would be value in assessments off the back of the data.

