

9<sup>th</sup> December 2019

**Attn Chris Felton**

Prevent Independent Review

Home Office

Email: [indpreventreview@homeoffice.gov.uk](mailto:indpreventreview@homeoffice.gov.uk)

Dear Mr Felton,

We write jointly on behalf of our under-signed organisations.<sup>1</sup> We write in anticipation of the deadline for the call for evidence of the Independent Review of Prevent, on 9 December 2019. Our organisations will not be completing the online question form that comprises the Independent Review's Call for Evidence.

We have all called and campaigned for a fully independent review of Prevent as the best way to ensure that the widespread and serious concerns about the Strategy and its implementation are addressed. However, we do not believe that a review headed by Lord Carlile can provide an independent review of Prevent. Lord Carlile's appointment is the subject of a legal challenge by Rights Watch (UK) and his appointment has been widely criticised. Lord Carlile has a record of vocally and publicly dismissing those advancing criticisms of Prevent. He has stated on the record that he supports the Prevent Strategy, that calls for a review by organisations like the undersigned are based on fictitious or bogus evidence, and that a review is unnecessary. Moreover, we do not believe Lord Carlile can be seen to be independent by the communities who must trust the Review in order to engage with it, such that they consider it can deliver fair, rigorous and impartial recommendations, precisely because of his institutional involvement and his personal lobbying in favour of Prevent.

Our concerns about the nature of the Review have been reinforced by the narrow Terms of Reference (ToR) it has adopted. The ToR state that the Review will focus on the present delivery of Prevent rather than past delivery or past decisions regarding the prevent strategy; this inappropriately limits the scope of engagement of the Review. Evidence of past delivery is vital to understand how and why those issues arose, and how they can be avoided in the future, as well as to explain the current crisis of trust in Government policy in this area. The ToR also invite the Reviewer to examine Prevent against its own stated aims, taking the Strategy's underpinning logic, remit and evidence base at face value. Nor do the ToR expressly include examination of the human rights or other impacts of Prevent on individuals and communities.

The inadequacy of the Review process is also underlined by the current call for evidence. The online questionnaire asks only one question relating to criticism of Prevent. Responses to all questions are limited to answers of no more than 2000 characters. The questionnaire only allows the submission of three additional documents, but states that the Review may not be able to read all the documents.

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<sup>1</sup> For the avoidance of doubt, Rights Watch (UK) states its position below in accordance with its ongoing litigation in respect of the Home Secretary and everything in this letter is without prejudice to its position in that proceeding.

# LIBERTY



The evidence of the harms and concerns relating to Prevent is well-documented and publicly available and we have been drawing on it for some years. In the attached **annex** we have listed some of the evidence that is already in the public domain. A detailed examination of that evidence should be the Review's starting point.

Yours sincerely,

Yasmine Ahmed  
Executive Director  
Rights Watch UK

Martha Spurrier  
Director  
Liberty

## ANNEX

### *Public evidence raising issues with Prevent*

- **Runnymede Trust *Integration for All* (2019):**
  - o Pointing to evidence that Prevent leads some Muslims to feel they are treated unfairly, stereotyped and excluded and identified this as a key issue for social cohesion in Britain.
- **Prevent Digest (ongoing):**
  - o providing an ongoing rolling digest of evidence chronicling issues with Prevent (<https://www.preventdigest.co.uk/media-digest>).
- **Evidence provided on behalf of MEND and Muslims Women’s Network UK to the July 2 Debate of the Public Bill Committee of the Counter-Terrorism and Border Security Bill (July 2018)**
- **United Nations Special Rapporteur on Racism (2017) End of Mission Statement**
- **United Nations Special Rapporteur on the Rights to Freedom of Association and Peaceful Assembly (2017) Follow-up Mission Report.**
- **Citizen’s Commission on Islam, Participation and Public Life *The Missing Muslims: Unlocking British Muslim Potential for the Benefit of All* (2017) (Chaired by the Rt Hon Dominic Grieve QC MP);**
- **Parliamentary Joint Committee on Human Rights *Free Speech at Universities* (2017):**
  - o Directly considering the impact of Prevent in universities. It noted it received a large amount of evidence that Prevent was having a chilling effect on freedom of expression and religion in Universities.
- **Runnymede Trust *Islamophobia: Still a Challenge for Us All* (2017):**
  - o Noting that it had considered “substantial evidence that ... the current Prevent policy is discriminatory, disproportionate and counterproductive.”
- **Comments from Lord Brian Paddick, former Metropolitan Police Commander, writing in 2017:**
  - o ([https://www.huffingtonpost.co.uk/brian-paddick/manchester-bombing-2017\\_b\\_16856296.html?1496000426&guccounter=2](https://www.huffingtonpost.co.uk/brian-paddick/manchester-bombing-2017_b_16856296.html?1496000426&guccounter=2))
- **House of Commons Library *Implementation of Prevent Strategy Westminster Hall Debate 1 February 2017 Debate Pack* (January 2017):**
  - o Lists numerous instance of media coverage and press releases concerning evidence of problems with Prevent up to 2017.
- **United Nations Committee on the Rights of the Child (2016) Concluding Observations on the fifth periodic report of the United Kingdom of Great Britain and Northern Ireland:**
  - o At C20 and C21 (<http://www.crae.org.uk/media/93148/UK-concluding-observations-2016.pdf>)
- **Committee on the Elimination of Racial Discrimination (2016) Concluding Observations on the twenty-first to twenty-third periodic reports of United Kingdom of Great Britain and Northern Ireland:**
  - o At [18] ([https://tbinternet.ohchr.org/Treaties/CERD/Shared%20Documents/GBR/CERD\\_C\\_GBR\\_CO\\_21-23\\_24985\\_E.pdf](https://tbinternet.ohchr.org/Treaties/CERD/Shared%20Documents/GBR/CERD_C_GBR_CO_21-23_24985_E.pdf))
- **Parliamentary Joint Committee on Human Rights *Counter-Extremism* (2016):**

- With specific oral evidence from Tell MAMA and Faith Matters, the Quilliam Foundation, Christine Abbot and Louise Richardson.
- **House of Commons Home Affairs Select Committee *Radicalisation: the counter-narrative and identifying the tipping point* (2016):**
  - With specific oral evidence from the Muslim Council of Britain, Baroness Warsi, former Minister for Faith and Communities, David Anderson, Former Independent Reviewer of Terrorism Legislation, specific young people affected by Prevent in Bradford, Haras Rafiq of Quilliam Foundation, Averroes, Tell MAMA and Faith Matters, Dr Sarah Marsden of Lancaster University, Raheel Mohammed of Maslaha, Professor Julius Weinberg, Vice-Chancellor of Kingston University and Megan Dunn, then President of the National Union of Students; and
  - Referring to concerns raised by a multi-faith alliance of 26 organisations and individuals raising concerns with Prevent’s alienating effects (including the Jewish Council for Racial Equality, the Muslim Council of Britain and the former police lead for Prevent, Sir Peter Fahy) as well as concerns raised by Former Metropolitan Police Chief Superintendent Dal Babu and the UN Special Rapporteur on the right to freedom of assembly.
- **House of Commons Women and Equalities Committee *Employment Opportunities For Muslim Women in the UK* (2016) at [25].**
- **Rights Watch UK *Preventing Education: Human Rights and UK Counter-Terrorism Policy in Schools* (July 2016):**
  - Drawing on extensive direct evidence with students in schools in Britain, demonstrating how the policy generates fear and is counter-productive and has a serious impact on children’s human rights.
- **Open Society Justice Initiative *Eroding Trust: The UK’s Prevent Counter-Extremism Strategy in Health and Education* (2016):**
  - Report drawn from interviewing 87 people from numerous points of engagement with Prevent in the education and health sectors, as well as across over 9 different locations in the United Kingdom.
- **The Muslim Council of Britain *Impact of Prevent on Muslim Communities: A briefing to the Labour Party on how British Muslim Communities are affected by Counter-Extremism Policies* (2016).**
- **Community and Local Government Select Committee (2010) *Preventing Violent Extremism* (2010) at 3:**
  - The Committee noted specifically that it could not ignore the volume of evidence demonstrating a lack of trust of the programme amongst those delivering and receiving services, and concluded that while it could not take a view on the allegations of spying, it recommended the Government conduct an independent review of those claims.<sup>2</sup>

### *Academic research considering impact of Prevent*

- **Abbas, M (2019) ‘I grew a beard and my dad flipped out!’ Co-option of British Muslim parents in countering ‘extremism’ within their families in Bradford and Leeds, *Journal of Ethnic and Migration Studies*, 45:9, 1458-1476**
  - The research based on interviews with young Muslims living in Leeds and Bradford.
- **Acik, N Deakin, J and Hindle, R (2018)“Safeguarding, Surveillance and Control: School Policy and Practice Responses to the Prevent Duty and the “War on Terror” in the UK” in *The Palgrave International***

<sup>2</sup> Allegations of spying are not within the Terms of Reference as issued by the Home Office for this Review of Prevent.

***Handbook of School Discipline, Surveillance and Social Control.* Deakin, J., Taylor, E. & Kupchik, A. (Eds.). Palgrave Macmillan Ltd**

Findings based on empirical research in schools in the North West.

- **Acik, N. and Pilkington, H. (2018) *Youth Mobilisation of Suspect Communities UK.***
  - o Findings from empirical 26 in-depth research interviews with young Muslims over 11 months
- **Alexander, J. (2019). *Prevent: Accounts from the Frontline. Feminist Dissent, 4, p. 202-215***
  - o Based on frontline professional practitioner experience of being a youth worker, reports on the pressures on youth workers from Prevent Officers.
- **Bigo, D, Bonelli, L, Guittet, E. and Ragazzi, F (2014) ‘Preventing And Countering Youth Radicalisation In The EU’. Study For The European Parliament Committee On Civil Liberties, Justice And Home Affairs (LIBE):**
  - o Available at:  
[Http://Www.Europarl.Europa.Eu/Regdata/Etudes/Etudes/Join/2014/509977/IPOL-LIBE\\_ET\(2014\)509977\\_EN.Pdf](http://www.europarl.europa.eu/regdata/etudes/etudes/Join/2014/509977/IPOL-LIBE_ET(2014)509977_EN.Pdf) (Accessed: 3rd August 2015) (widespread literature and policy review).
- **Bolloten, B (2015) ‘Education Not Surveillance’. UK: Institute of Race Relations.**
  - o Available At: [Http://Www.Irr.Org.Uk/News/Education-Not-Surveillance/](http://www.irr.org.uk/news/education-not-surveillance/)
- **Blackwood, L ., Hopkins, N., and Reicher, S., “From Theorizing Radicalization to Surveillance Practices: Muslims in the Cross Hairs of Scrutiny” *Political Psychology, Vol. 37, No. 5, 2016: 597-612***
  - o Based on the authors’ first-hand experience of WRAP training, they provide a critical review of the training.
- **Brown, K.E. (2008) *The Promise and Perils of Women’s Participation in UK Mosques: The Impact of Securitisation Agendas on Identity, Gender and Community BJPIR: 2008 VOL 10, 472–491:***
  - o Author’s first-hand analysis and literature review, argues that the instrumental use of gender by Prevent has had the impact of relegating Muslim women’s political activism to a sideshow.
- **Brown, K. & Saeed, T., (2014): *Radicalization and counter-radicalization at British universities: Muslim encounters and alternatives, Ethnic and Racial Studies***
  - o Based on data from in-depth interviews the research shows how security discourses of radicalization constrain student activism, university experience and identities
- **Busher, J, Choudhury, T, Thomas, P and Harris, G (2017) ‘What The Prevent Duty Means For Schools And Colleges In England: An Analysis Of Educationalists’ Experiences’. Research Report: Aziz Foundation**
  - o Available At: [Http://Eprints.Hud.Ac.Uk/Id/Eprint/32349/](http://eprints.hud.ac.uk/id/eprint/32349/) (Accessed: 15th July 2017). Report based on a survey of 225 educational staff and interviews with staff in nine schools and further education colleges in England. half (57%) the respondents said that the Prevent duty has made Muslim students more likely or considerably more likely to feel stigmatised. This pattern was stronger still among BME respondents, where 76% said that the Prevent duty made Muslim students more likely, or considerably more likely, to feel stigmatised. These findings were broadly supported by interview data.

- **Chisholm, T and Coulter, A (2017) Safeguarding And Radicalisation. Research Report August 2017. UK: Government Social Research.**
  - o Available At:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/635262/Safeguarding\\_And\\_Radicalisation.Pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/635262/Safeguarding_And_Radicalisation.Pdf) The report commissioned by the Department for Education examines experiences of implementing Prevent. Has some powerful case studies and cites examples of interventions that social workers and others feel that race and / or religion was a relevant factor in decision to escalate.
- **Coppock V. and McGovern, M (2014) “Dangerous Minds’? Deconstructing Counter-Terrorism Discourse, Radicalisation and the ‘Psychological Vulnerability’ of Muslim Children and Young People in Britain” *Children and Society* 28: 242-256**
- **Dresser, Paul (2018) Counter-Radicalisation Through Safeguarding: A Political Analysis of the Counter-terrorism and Security Act (2015). *Journal for Deradicalization* (16):125-164**
  - o Provides a critical analysis of the language of Prevent as safeguarding.
- **Dresser, P., (2019) “Trust your instincts – act!” PREVENT police officers’ perspectives of counter-radicalisation reporting thresholds, *Critical Studies on Terrorism*, 12:4, 605-628.**
  - o Qualitative study provides insight into PREVENT police officers’ accounts of the reporting stage of PREVENT; A thematic analysis of semi-structured interviews identified the mobilisation of intelligence on the basis of “gut feelings” and “instinct”.
- **Faure-Walker, R., (2019): Teachers as informants: countering extremism and promoting violence, *Journal of Beliefs & Values*, DOI: 10.1080/13617672.2019.1600321:**
  - o Article is an analysis of the impact of the language under Prevent. Based on experiences as a teacher whose students frequently expressed concerns that they were being targeted by PREVENT. “A strategy that they told me they thought was a racist and overzealous state surveillance operation. They told me that they did not express these views to other adults as they feared that PREVENT meant that doing so would result in their referral to the security services.” Gives examples of student who were afraid to speak on issues and seek help and support because of fears of Prevent.
- **Fernandez, S., (2018) The Geographies of Prevent: The Transformation of the Muslim Home into a Pre-Crime Space *Journal of Muslims in Europe* 7 (2018) 167-189**
- **Githens-Mazer, J and Lambert, R (2010) ‘Why conventional wisdom on radicalization fails: the persistence of a failed discourse’. *International Affairs*, 86(4), pp 889-901**
- **Heath-Kelly, C (2012) ‘Reinventing Prevention or Exposing the Gap? False Positives In UK Terrorism Governance And The Quest For Pre-Emption’. *Critical Studies On Terrorism*, 5(1), pp 69-87.**
- **Heath-Kelly, C. Strausz, E., (2017) *Counter-terrorism in the NHS Evaluating Prevent Duty Safeguarding in the NHS* University of Warwick,**
  - o available at  
[https://warwick.ac.uk/fac/soc/pais/research/researchcentres/irs/counterterrorisminthenuhs/project\\_report\\_60pp.pdf](https://warwick.ac.uk/fac/soc/pais/research/researchcentres/irs/counterterrorisminthenuhs/project_report_60pp.pdf)



- Research based on survey of 329 NHS staff, finds that survey also revealed that NHS staff strongly identified hate speech, the possession of radical Islamic/Anarchist philosophy, and anger at foreign policy as indicators of radicalisation.
- **Heath-Kelly, C. Strausz, E., (2019) The banality of counterterrorism “after, after 9/11”? Perspectives on the Prevent duty from the UK health care sector, *Critical Studies on Terrorism*, 12:1, 89-109**
  - Analysis of data from 329 NHS staff, the study finds that the majority of those surveyed approved of the Duty, but were somewhat unconvinced of its status as genuine safeguarding. More concerning were the prominent trends within survey data which showed how staff associate radicalisation with philosophy possession and with hate speech. Illiberal attitudes and beliefs are being associated with radicalisation. Survey results raise concerns that WRAP training generates a significant number of inappropriate referrals, some of which are removed from the system by the local safeguarding team, whereas others are deemed “misguided” by the Police Prevent Lead or Local Authority.
- **Isakjee, A. (2014) *Tainted Citizens: The Securitised Identities of Young Muslim Men in Birmingham* PhD Thesis: University of Birmingham**
  - Fieldwork on the experiences of young Muslims in Birmingham. It investigates the impacts of the Prevent agenda and the surveillance scheme called ‘Project Champion’, both of which had significant implications for Muslim identity and its governance in the city.
- **Jarvis, L., and Lister, M., (2013) ‘Disconnected Citizenship? The Impacts of Anti-terrorism Policy on Citizenship in the UK’ *Political Studies* 61(3): 656-75**
  - Based on focus groups and interview, the research explores the differences in the experiences of counter terrorism measure of different groups in the UK. Evidence of how BME citizens feel their sense of equal citizenship is being eroded.
- **Jerome, L., Elwick, A. and Kazim, R., (2019) ‘The impact of the prevent duty in schools: a review of the evidence’ *British Educational Research Journal***
  - Reviews all of the material based on empirical studies in England involving school-teachers and students published between 2015 (when the duty was introduced) and the beginning of 2019 (27 articles and reports in total), to consider the impact of the policy on schools. The evidence gives support to those who have been critical of the Prevent duty in schools, and that it seems to be generating a number of unintended and negative side-effects.
- **Augestad Knudsen, R. (2018): Measuring radicalisation: risk assessment conceptualisations and practice in England and Wales, *Behavioral Sciences of Terrorism and Political Aggression***
  - The article examines the role of the 22 risk indicators in EGR 22+, concludes that ‘while not rejecting the possible value of specialised terrorism-related individual risk assessment tools, the article finds that the conceptualisations underpinning the tools’ indicators and their use make their present counter-terrorist roles questionable’. Queries whether aiming to measure ‘radicalisation’ at all might be a non-starter, given the concept’s controversial nature, unclear meaning, and uncertain precise role in leading to terrorist offences. Besides the methodologically weak grounds for using the ERG-originated indicators in the Channel setting, the conceptualisation of radicalisation underpinning the indicators also puts the utility of their present uses into question and the use of the same indicators at two opposite points of an assumed radicalisation-to-terrorism scale not only relies on the much-criticised idea that such a scale exists.

- Kundnani, A. (2012) 'Radicalisation: the journey of a concept', *Race & Class* 54(2): 3-25
- Kundnani, A. (2015) *A Decade Lost: Rethinking Radicalism and Extremism*. London: Claystone:
  - o Critique of the evidence and assumptions underpinning the concept of radicalisation and extremism.
- Lakhani, S. (2012) "Preventing Violent Extremism: Perceptions of Policy from Grassroots and Communities" *The Howard Journal* 51(2) 190-206:
  - o Qualitative study based on interviews with 56 respondents the research finds particular concern and suspicions of intelligence gathering and spying within Muslim communities.
- McKendrick, D and Finch, J (2016) 'Under Heavy Manners?': Social Work, Radicalisation, Troubled Families and Non-Linear War. *British Journal of Social Work*, 47 (2), pp 308-32
- Mythen, G, Walklate, S and Peatfield, E (2017) 'Assembling and Deconstructing Radicalisation in Prevent: A Case of Policy-Based Evidence Making?' *Critical Social Policy*, 37(2), pp 180-201.
- Qurashi, F (2017) 'Just Get on With It: Implementing the Prevent Duty in Higher Education and The Role of Academic Expertise'. *Education, Citizenship and Social Justice*, 12(3), pp 197-212.
- Stevens, D. (2009) 'In Extremis: A Self-Defeating Element in the "Preventing Violent Extremism" Strategy', *Political Quarterly* 80 (4), 517–25.
- Stevens, D. (2011) 'Reasons to be Fearful, One, Two, Three: The "Preventing Violent Extremism" Agenda', *British Journal of Politics and International Relations*, 13 (2), 165–88:
  - o David Stevens (2009; 2011) questions Prevent's underlying assumption that specific religious ideas function as stimulants of violent extremism, a critique wrapped within a broader concern over the legitimacy and utility of state intervention in matters of faith.
- Stanley, T, Guru, S. And Gupta, A (2018) Working With PREVENT: Social Work Options for Cases Of 'Radicalisation Risk'. *Practice* (09503153), 30(2), pp 131-146.
- Stanley, T, Guru, S and Coppock, V (2017) 'A Risky Time For Muslim Families: Professionalised Counter-Radicalisation Networks'. *Journal Of Social Work Practice*, 31(4), pp 477-490.
- Vaughn, L. (2019) 'Doing Risk': Practitioner Interpretations of Risk of Childhood Radicalisation and the Implementation of the HM Government PREVENT Duty, PhD Thesis, University of Liverpool:
  - o A combination of fear and lack of guidance, rather than confidence, is demonstrated as both potentially increasing, and decreasing, the likelihood of practitioners making referrals to PREVENT/CHANNEL;
- Younis, T, and Javhad, S (2019) *Keeping Our Mouths Shut: The Fear and Racialized Self-Censorship of British Healthcare Professionals in PREVENT Training Cult Med Psychiatry* (2019) 43:404–424:
  - o Based on interviews with 16 Healthcare professionals, results reveal two themes underlying the self-censorship healthcare staff. The first theme is fear, which critical NHS staff experienced as a result of the political and moral subtext underlying PREVENT training: the 'good' position is to accept the PREVENT duty, and the 'bad' position is to reject it, distrustful settings in which the gaze of unknown colleagues stifles personal expression; reluctant trainers who admit PREVENT may be unethical



but nonetheless relinquish responsibility from the act of training; and socio-political conditions affecting the NHS which overwhelm staff with other concerns.

- **Scott-Baumann, *A Re/presenting Islam on Campus* (September 2018)**
  - o Three year research project looking at Islam on UK campuses, finding that many Muslim students self-censoring and disengaging from UK campus life as a result of the UK Government's counter-terrorism strategy, led to wariness among Muslim and non-Muslim students about participating in research about religion, freedom of speech and campus life.