

Submission to the UN CERD on the UK Government's Implementation of its Recommendations on the Prevent Duty

Introduction

Prevent Watch is the only organisation in the United Kingdom dedicated exclusively to monitoring, documenting, and providing casework support to individuals and families affected by the Prevent duty. Our work gives us a direct, evidence-based window into how Prevent operates in practice and how its harms are experienced disproportionately by Muslim communities and ethnic minorities.

This submission responds to the UK Government's follow-up response to the Committee's 2024 recommendations.

The Committee's findings were clear in both their diagnosis and proposed remedy. It identified that the Prevent duty and the wider CONTEST strategy have created an "atmosphere of suspicion" towards Muslim communities and have a discriminatory and disproportionate impact on the human rights and fundamental freedoms of ethnic and ethno-religious minorities, particularly children. It highlighted the high number of referrals and interventions involving Muslims, including by public sector professionals such as teachers and healthcare workers, and raised concerns about the absence of effective safeguards against abuse, the lack of adequate access to personal data, and the absence of effective remedies¹.

On this basis, the Committee called on the UK to revise its counter-terrorism framework, suspend the Prevent duty, and introduce robust safeguards to ensure that these measures do not result, in purpose or effect, in profiling or discrimination. It further called for effective and independent monitoring mechanisms, as well as access to prompt remedies and adequate reparations for those affected².

Our central concern is that the UK Government has not meaningfully engaged with the substance of these findings or recommendations.

¹ Committee on the Elimination of Racial Discrimination (Sept, 2024) Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of the United Kingdom of Great Britain and Northern Ireland. *United Nations International Convention on the Elimination of All Forms of Racial Discrimination*, para 33. Available at: <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=eqkYVa%2BkjiGj0mBWvEO0dBBwraP69uFn2lCcVE3EMz5uM3b5qSOWBzG9Xeevs3QwpxJ6iE5rSCeKXd%2FYRYH6sYD7LJOvSm47LUptNKKQypU%3D>

² Op cit 1, para 34

1. Failure to Acknowledge the Discriminatory Nature of Prevent

- 1.1. Despite the clarity of the Committee's findings, the UK Government's response does not engage with the premise that Prevent produces discriminatory and disproportionate outcomes.
- 1.2. This position reflects a broader and consistent approach taken across recent review processes. The Independent Review of Prevent³ by William Shawcross, published in 2023, rejected the characterisation of Prevent as discriminatory and instead framed many of the concerns raised by civil society as part of an "Islamist" campaign seeking to undermine the UK's counter-terrorism strategy. This framing is itself problematic and reinforces the very "atmosphere of suspicion" identified by the Committee.
- 1.3. This position is continued in the Lessons for Prevent⁴ report by Lord David Anderson, KC, published after the Committee's 2024 findings. The report does not engage with those findings as authoritative treaty body determinations. Instead, it presents concerns about discrimination as a "narrative" advanced by "some individuals and groups," rather than as evidence requiring a substantive response. When referring to international scrutiny, including by CERD, the report characterises these concerns as having been "picked up" by UN bodies, implying that such findings reflect external allegations rather than conclusions reached through the treaty process.
- 1.4. In its response to the Committee, the UK government claims that:

"The Prevent duty is implemented in line with the Public Sector Equality Duty... [and] an equality impact assessment was completed... to ensure that there is no disproportionate impact on any protected groups."⁵

³ Home Office (Feb 2024). Independent Review of Prevent. *Gov.UK* Available at: <https://www.gov.uk/government/publications/independent-review-of-prevents-report-and-government-response/independent-review-of-prevent-accessible>

⁴ Office of the Independent Prevent Commissioner (Nov 2025) Lessons for Prevent. *Gov.UK*. Available at: <https://www.gov.uk/government/publications/lessons-for-prevent/lessons-for-prevent-accessible>

⁵ Committee on the Elimination of Racial Discrimination (Sept 2025) Information received from the United Kingdom of Great Britain and Northern Ireland on follow-up to the concluding observations on its combined twenty-fourth to twenty-sixth periodic reports. *United Nations International Convention on the Elimination of All Forms of Racial Discrimination*, para 19. Available at: <https://docstore.ohchr.org/SelfServices/FilesHandler.ashx?enc=YXr6vpCVb4Y%2BXewha%2BoKvinCY5ti6xXukpL6Tkv6ZxLevCsACSkP4ExteNwPxDZMDb7lqNwW4yI4uIvzNAmNw4Gwg7hM929Utk8mXmkThE%3D>

- 1.5. However, the Equality Impact Assessment⁶ (EIA) does not support this claim. Far from demonstrating the absence of disproportionate impact, the assessment explicitly acknowledges it. Under religion or belief, it notes that Muslims are overrepresented within Prevent relative to their proportion of the general population. Under race, it recognises that policy changes may disproportionately affect ethnic minorities.
- 1.6. The Government's response to these findings is not to investigate, mitigate, or remedy the disproportionate impact identified, but to justify its approach by reference to a perceived threat from Islamist terrorism. This is not compliance with the Public Sector Equality Duty; it is a justification for non-compliance. The Equality Act 2010 requires public authorities to have due regard to the need to *eliminate* unlawful discrimination and *advance* equality of opportunity⁷, not to explain why existing disparities are convenient to retain.
- 1.7. Furthermore, the EIA contains a direct internal contradiction that undermines its conclusions entirely: it simultaneously claims that the overrepresentation of Muslims in Prevent is proportionate to the threat from Islamist terrorism, while its own statistics show that the majority of individuals (42% in 2021-22) deemed suitable for the deradicalisation programme, Channel, have been referred for far-right concerns, not Islamist concerns (and that far-right referrals are more likely than Islamist referrals to be adopted onto Channel).
- 1.8. An EIA that relies on circular reasoning and contains internal contradictions cannot serve as evidence that the state has complied with its obligations under either the Equality Act or the Convention, and the Committee should not accept it as such.
- 1.9. Taken together, the UK Government's response does not engage with the Committee's finding that Prevent produces discriminatory and disproportionate outcomes. Instead, it reflects a consistent approach in which concerns about discrimination are reframed, minimised, or justified through reference to existing frameworks and perceived security risk. This approach prevents the State from taking the steps necessary to eliminate discriminatory impact, as required under the Convention.
- 1.10. Prevent Watch therefore recommends that the Committee require the State party to formally acknowledge the discriminatory and disproportionate impact of Prevent, as identified by the Committee, and to demonstrate how this is being assessed and addressed in practice.**

⁶ Home Office (Feb 2023) The Response to the Independent Review of Prevent: Equality Impact Assessment. *Rights and Security International*. Available at: <https://www.rightsandsecurity.org/wp-content/uploads/2025/05/4.-The-Response-to-the-Independent-Review-of-Prevent-EIA-002.pdf>

⁷ Legislation.gov.uk (n.d) Equality Act 2010, Section 149. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/section/149>

2. Expansion of Prevent and Entrenchment of Discriminatory Impact

- 2.1. The Committee's recommendation to suspend the Prevent duty should have prompted, at minimum, a period of genuine reflection and restraint. Instead, the UK has pursued the opposite course: Prevent is being actively expanded in scope, and rearticulated under new policy frameworks that are hostile towards Muslim communities and ethnic minorities.
- 2.2. One example of this trajectory is the political and policy response to the Southport attack of July 2024, in which three young girls were killed at a children's dance class. Within 24 hours, social media posts falsely claiming the perpetrator was Muslim, a refugee, or an asylum seeker had an estimated 27 million impressions⁸.
- 2.3. The misinformation directly fueled the summer riots of 2024 which occurred against a backdrop of already dominant anti-Muslim and anti-immigrant narratives in UK public life that the Committee had already identified as a concern. It is notable that the Committee's recommendations of August 2024, identifying Prevent as generating an atmosphere of suspicion towards Muslim communities, arrived at a moment when the real-world consequences of exactly that atmosphere were visible on the streets of English towns and cities.
- 2.4. It subsequently emerged that the perpetrator of the Southport attack had previously been known to authorities and had been referred to Prevent on multiple occasions, but was assessed as not meeting the threshold for intervention⁹.
- 2.5. Rather than prompting scrutiny of Prevent's effectiveness, this was used to justify its expansion, despite the Committee's call for restraint. The Prime Minister and Home Secretary relied on this framing to position Prevent simultaneously as having failed and as the necessary solution. The Prime Minister stated¹⁰ that the Prevent assessment decision not to pursue through to Channel was "clearly wrong" and promised a review of the "entire counter-extremist system", while the Home Secretary announced an end-to-

⁸ Anon (Aug 2025) UK: X's design and policy choices created fertile ground for inflammatory, racist narratives targeting Muslims and migrants following Southport attack. *Amnesty International*. Available at: <https://www.amnesty.org/en/latest/news/2025/08/xs-design-and-policies/>

⁹ Dodd, V (Jan 2025) Axel Rudakubana was referred to counter-extremism scheme three times. *The Guardian*. Available at: <https://www.theguardian.com/uk-news/2025/jan/20/axel-rudakubana-was-referred-to-counter-extremism-scheme-three-times>

¹⁰ Press Release (Jan 2025) PM statement on the Southport public inquiry: 21 January 2025. *Gov.UK*. Available at: <https://www.gov.uk/government/news/pm-statement-on-the-southport-public-inquiry-21-january-2025>

end review of Prevent thresholds, stating in Parliament that referrals for Islamist extremism had “previously been too low”.¹¹

- 2.6. This is the atmosphere of suspicion the Committee identified, operating in its most acute form: a policy response that increases the exposure of Muslim communities to counter-terrorism intervention, justified by reference to an attack that had no connection to those communities, announced while anti-Muslim riots were still unfolding across the country.
- 2.7. A second and more structural form of expansion can be seen in the UK Government's Social Cohesion Action Plan, *Protecting What Matters*¹², published in March 2026, which explicitly strengthens Prevent in education, local government, and civil society by disingenuously leveraging the language of integration and shared values. The plan formally adopts the definition of extremism published by the previous Conservative government, in March 2024, which was accompanied by the explicit naming of several Muslim organisations¹³ as targets for state action despite not being subject to, or meeting the criteria for, proscription.
- 2.8. The continuity in discriminatory framing across successive governments demonstrates that the hostile environment towards Muslims and migrants is not a partisan issue but one that has been embedded in policy.
- 2.9. The Social Cohesion Action Plan singles out Islamism as a “predominant threat” and commits to an annual State of Extremism report structured specifically around Islamist ideology alongside the far right and far left. This is significant: it institutionalises the association between Muslim communities and extremism as a permanent feature of government reporting, at precisely the moment the Committee called for that association to be dismantled.
- 2.10. Moreover, the plan explicitly strengthens Prevent, committing to use enforcement powers under section 30 of the Counter-Terrorism and Security Act 2015 to compel compliance in education, and to further expand monitoring of universities’ activities, including in relation to “non-violent extremism” and “divisive or intolerant narratives” that may be linked to terrorism. In doing so, it continues to extend Prevent into areas of non-

¹¹ UK Parliament (Dec 2024) Preventing Radicalisation Volume 759: debated on Tuesday 17 December 2024. *Hansard*. Available at: <https://hansard.parliament.uk/commons/2024-12-17/debates/24121749000021/PreventingRadicalisation>

¹² Ministry of Housing, Communities and Local Government (April 2026) *Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom*. *Gov.UK*. Available at: <https://www.gov.uk/government/publications/protecting-what-matters-towards-a-more-confident-cohesive-and-resilient-united-kingdom/protecting-what-matters-towards-a-more-confident-cohesive-and-resilient-united-kingdom>

¹³ Seddon, P. & Casciani, D. (March 2024) Michael Gove names groups as he unveils extremism definition. *BBC*. Available at: <https://www.bbc.co.uk/news/uk-politics-68564577>

violent expression and broadens its application in ways that will reproduce the same patterns of disproportionate impact and inadequate safeguards identified as problematic by the Committee.

- 2.11. Taken together, these developments show that Prevent is not being reconsidered in light of the Committee's findings but rather expanded through both crisis response and policy design.
- 2.12. Prevent Watch submits that the Committee should be alert not only to the continued operation of Prevent, but to its transformation under the guise of social cohesion as well as security. The Committee should therefore call on the State party to halt further expansion and to demonstrate how current policies comply with its obligation to eliminate discriminatory impact.

3. Ineffective Remedial Measures

- 3.1. The Committee's 2024 recommendations called specifically for three things: the introduction of robust safeguards to ensure that counter-terrorism measures do not result in discrimination; effective and independent monitoring mechanisms; and access to prompt remedies and adequate reparations for those negatively impacted by Prevent.
- 3.2. The UK's response conflates these three obligations, presenting existing enforcement mechanisms as though they constitute safeguards for those harmed, and internal oversight structures as though they constitute independent monitoring. None of the mechanisms relied upon by the government meets any of the three standards the Committee set.
- 3.3. **On safeguards:** The primary mechanism cited by the UK as a safeguard is the Standards and Compliance Unit, known as StaCU¹⁴. It is important that the Commission understand StaCU's structural position before considering its adequacy. StaCU was created in February 2024 within the Commission for Countering Extremism (CCE), which is itself a body housed within and funded by the Home Office¹⁵. Complaints about Prevent are therefore handled by a unit that sits inside the very department responsible for Prevent's design and delivery.

¹⁴ Op cit 5, para 20.

¹⁵ Mulla, I. (Feb 2024) UK Home Office accused of dodging accountability over Prevent complaints. Middle East Eye. Available at: <https://www.middleeasteye.net/home-office-accused-dodging-accountability-prevent>

- 3.4. The UK’s response describes the problem with this perfectly when it states that StaCU “works to ensure that Prevent is being delivered properly within the direction set by UK Government ministers” and that “ministers have the power to instruct investigations through the unit”. This is not a safeguard for the public, it is a compliance mechanism that protects the policy itself.
- 3.5. Prevent Watch has observed this distinction in practice as we have documented evidence of several individuals who have sought to raise concerns about their experience of Prevent through StaCU only to be directed back to the very internal institutional mechanisms that generated the harm in the first place.
- 3.6. This is not Prevent Watch’s assessment alone. The Government’s own interim Prevent Commissioner, Lord Anderson, acknowledged in his end of tenure letter¹⁶ that complaints to StaCU “often ended up being declared out of scope or referred to other organisations” and concluded that he was “frankly doubtful whether StaCU fulfilled its intended aim of promoting public confidence in Prevent”.
- 3.7. The Committee should be particularly concerned that the body within which StaCU sits, the CCE, is itself ideologically aligned with pushing a narrative that generates suspicion of Muslims and migrants – so much so that it was actively soliciting complaints from anonymous far-right social media accounts that claimed Prevent focused too much on the far-right and “turning a blind eye to Islam”, with no equivalent engagement with those who complained that Prevent unfairly targeted Muslim communities¹⁷. In effect, the body that the UK’s response suggests handles complaints about Prevent was amplifying the ideological position of those who wanted it to bear down harder on the very communities the Committee found to be most harmed.
- 3.8. **On independent monitoring:** The UK points to the newly created Independent Commissioner of Prevent as evidence of effective independent monitoring¹⁸. However, the appointment of Tim Jacques¹⁹ to the role raises the same concern identified in relation to StaCU: that oversight of Prevent has been placed in the hands of those drawn from within the system being overseen.

¹⁶ Office of the Independent Prevent Commissioner (April 2026) End of Tenure Letter. *Gov.UK*. Available at: <https://www.gov.uk/government/publications/commissioners-end-of-tenure-letter/end-of-tenure-letter>

¹⁷ Mulla, I. (Jan 2025) UK extremism commission solicits Prevent complaints from far-right social media. *Middle East Eye*. Available at: <https://www.middleeasteye.net/news/uks-extremism-commission-asks-far-right-anonymous-online-users-prevent-complaints>

¹⁸ Op cit 5, para 21.

¹⁹ Home Office et al (April 2026) Appointment of a new Independent Prevent Commissioner. *Gov.UK*. Available at: <https://www.gov.uk/government/news/appointment-of-a-new-independent-prevent-commissioner>

- 3.9. Mr Jacques previously served as Deputy Assistant Commissioner for Counter Terrorism Policing and as Senior National Coordinator for Prevent, holding direct operational responsibility for the national implementation of the programme he is now tasked with overseeing.
- 3.10. Prevent Watch is concerned²⁰ that this reflects a broader issue in the design of oversight. The Home Office has designated as independent an individual whose career was built within the counter-terrorism structures under scrutiny. Oversight has therefore shifted from a unit within government to a role filled from within counter-terrorism policing. In neither case is the body investigating Prevent independent of the system that produced it.
- 3.11. The question of independence is compounded by the question of power. The Independent Commissioner has no statutory basis, no legally enforceable powers, and no ability to compel disclosure, order remedies, or require reparations. An oversight body without statutory powers cannot provide the effective and independent monitoring the Committee called for, regardless of who occupies the role.
- 3.12. The Committee called for effective and independent monitoring. What exists instead is a system in which oversight bodies are drawn from within the same institutional framework and are not equipped with the powers necessary to enforce accountability.
- 3.13. The UK's response states that the Commissioner will provide scrutiny "to maximise the efficiency of Prevent" and will focus on "reviewing the programme's effectiveness, identifying gaps and problems before they emerge". However, this is not independent scrutiny of whether Prevent is discriminatory; rather, it is a programme improvement function. The Commissioner has been created to make Prevent work better, not to assess whether it causes harm that requires remedy or whether its impact on Muslim communities and racialised minorities is compatible with the UK's obligations under the Convention. That remit alone places the role outside the scope of what the Committee recommended.
- 3.14. Prevent Watch therefore recommends that the Committee call on the State party to establish genuinely independent oversight of Prevent, with statutory powers, structural independence, and the remit necessary to investigate discriminatory impact, order reparations, and provide meaningful accountability to the communities most harmed.

²⁰ Senior Editor (April 2026) Prevent Watch responds to the appointment of the new Prevent Commissioner. *Prevent Watch*. Available at: <https://www.preventwatch.org/prevent-watch-responds-to-the-appointment-of-tim-jacques-as-independent-prevent-commissioner/>

Conclusion

This submission has documented a consistent pattern of denial, conflation and expansion. The UK government has not acknowledged the discriminatory nature of Prevent but justified it. It has not suspended the Prevent duty but expanded it through crisis response and policy design. It has not established independent safeguards for those harmed but created compliance mechanisms that protect the programme from accountability. It has not provided remedies or reparations but pointed to oversight structures drawn from within the counter-terrorism establishment, with no statutory powers and no remit to address discriminatory harm.

Across successive governments and multiple review processes the response to evidence of discrimination against Muslim communities has been consistent: reframe it, minimise it, or justify it by reference to security. The Shawcross review framed civil society concerns as an “Islamist campaign”. The Anderson report treated the Committee's own findings as allegations “picked up” from others. The EIA acknowledged Muslim overrepresentation and justified it by reference to threat. The oversight body solicited complaints from those who wanted Prevent to bear down harder on Muslim communities. The newly appointed Independent Commissioner previously served as Senior National Coordinator for Prevent, holding direct operational responsibility for the very programme he is now appointed to oversee.

The communities most harmed by Prevent have lived with this framework for over two decades, have been referred to counter-terrorism programmes by their teachers, doctors and social workers, and have had data held about them on security databases in some cases since childhood, and with no accessible route to redress.

Taken together, the continued denial of discrimination, the conflation of programme enforcement with individual safeguards, the presentation of misleading claims about the adequacy of the equality impact assessment, and the expansion of Prevent under new policy frameworks present a misleading picture of compliance with the Committee's recommendations.

We hope the Committee will urge the UK government to revisit those recommendations and provide a genuine commitment to them, with a timeframe in which they will be realised.

Dr
Director
May 2026

|

Layla

Prevent

Aitlhadj
Watch