

StaCU Annual Report

2024/25



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Foreword



In February 2023, the Independent Review of Prevent (IRP) recommended there was a need for greater oversight of Prevent, the programme designed to stop people becoming terrorists or supporting terrorism.

The IRP recommended the creation of a specific body – the Standards and Compliance Unit, or StaCU – to ensure Prevent maintains the highest standards of delivery and adheres to objectives as agreed by democratically elected ministers.

In September 2023, as the Commissioner for Countering Extremism, I was asked by the Home Secretary to oversee StaCU's creation and subsequent implementation. It was a crucial milestone for Prevent: StaCU was structured to receive and investigate complaints about any aspect of delivery, doing so in a transparent manner and rooted in the independence that is core to the Commission for Countering Extremism's existence.

We are pleased to share findings from our first year of operation, one in which StaCU has received and resolved a range of complaints from both practitioners and the wider public.

The findings reinforce my conviction that robust, independent scrutiny is fundamental to maintaining Prevent's effectiveness and focus.

A handwritten signature in blue ink, consisting of a stylized 'R' and 'S'.

Robin Simcox

Commissioner for Countering Extremism
April 2025

Background

The Independent Review of Prevent recommended the establishment of a Standards and Compliance Unit (StaCU) to address and investigate complaints from both Prevent practitioners and the general public. StaCU was launched on 28 February 2024 and has been integrated as a distinct entity within the Commission for Countering Extremism. As Commissioner for Countering Extremism, Robin Simcox assumed the responsibility of overseeing all complaints received by StaCU.

The primary objective of StaCU is to ensure adherence to Prevent standards and guidance as approved by ministers and laid out in Prevent Duty Guidance. StaCU also fulfils an oversight function by analysing complaints data and feeding this information back to the Prevent Ministerial Oversight Board.

Between September 2023 and January 2024, the first phase of launch included recruitment of the StaCU team and agreement of a terms of reference, which outlined the role and remit of the unit. Following this, StaCU was operationalised in February 2024, with launch of a public facing website and online complaints form. During this time, the Commission for Countering Extremism worked closely with other government departments, operational partners and devolved administrations, agreeing processes for complaints handling and data sharing.

The StaCU Investigator was appointed in November 2024. Since then, work has been undertaken in the following areas:

- Further refining StaCU's Investigative function and development of a StaCU-specific Theory of Change which delineates between the standards and compliance functions of the StaCU and the role of the Home Office in determining policy and objectives.
- Development of a Manual of Investigations Guidance to explain the methodologies employed within StaCU investigations.
- Scoping of potential areas for investigation. Drawing on consultation with the Prevent practitioner network, a range of potential compliance issues have been noted which potentially warrant further investigation.

StaCU Partners Day, held in September 2024 was an opportunity to recognise the progress to-date on developing the independent oversight function of Prevent. It also served as an opportunity for stakeholders to share ideas for StaCU development.



Overview of StaCU roles and responsibilities

StaCU processes and then investigates complaints from both Prevent practitioners and the wider public regarding delivery of Prevent. Types of complaints may include:

- concerns that a specified authority may not be upholding their duty to Prevent
- concerns about quality of Prevent delivery
- concerns about organised and concerted anti-Prevent activity impacting delivery of the programme
- concerns about non-adherence with recommendations from the Independent Review of Prevent

Each complaint received by StaCU is assigned a dedicated caseworker. If appropriate, StaCU will ask the complainant if they would like their concern escalated to the relevant overseeing body (for example, a government department). StaCU will then work closely with the relevant body to thoroughly investigate the complaint, keeping the complainant updated throughout.



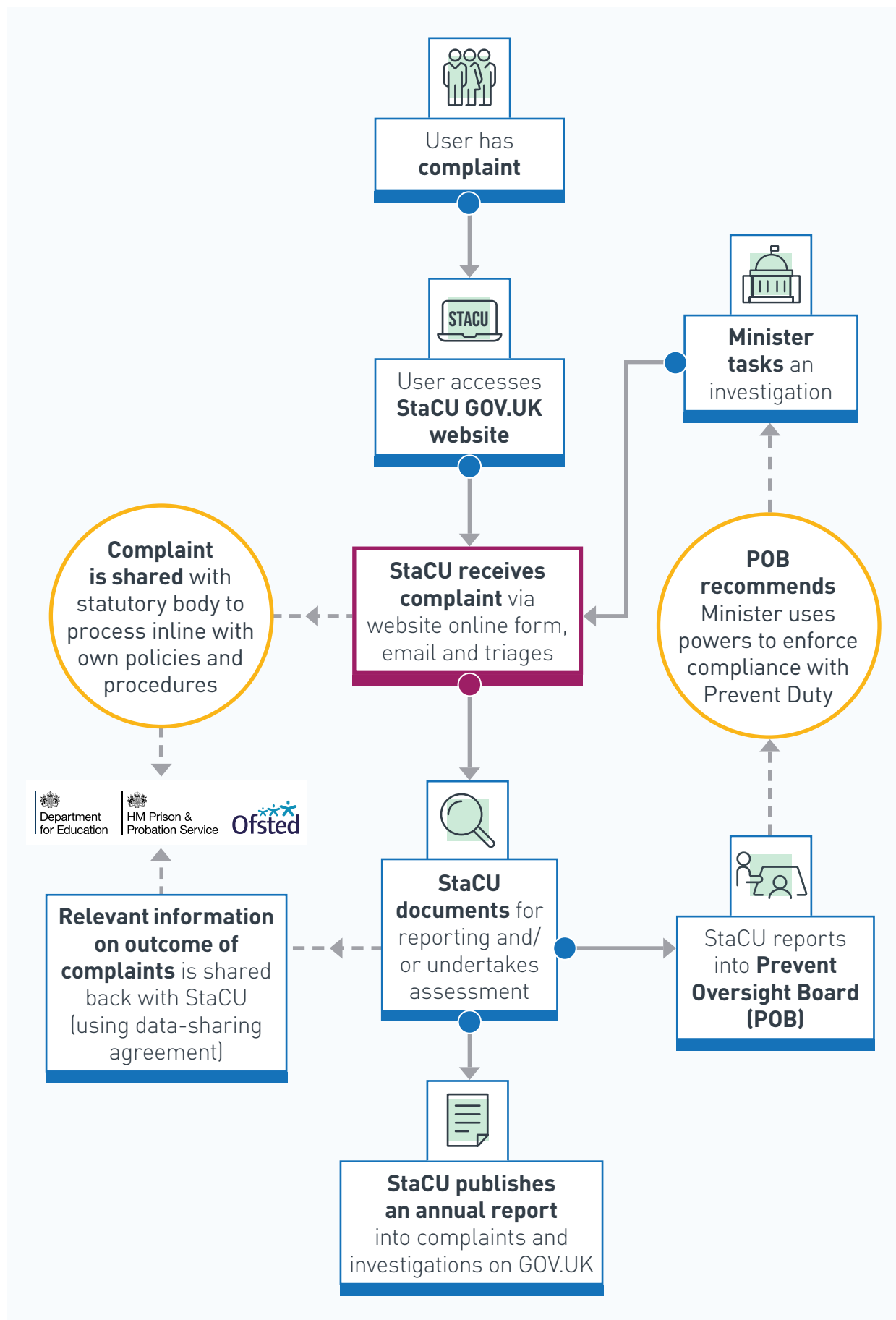
Case study 1

- A child was reportedly referred to Prevent by the school.
- The parents were contacted by social services about the referral and told they had been assigned a caseworker.
- The parents logged a complaint with StaCU and agreed to it sharing their complaint with relevant bodies.
- StaCU referred the case to the Department for Education, alongside the Local Authority Prevent team and Counter Terrorism Policing, to understand the reasons behind the referral and to ensure correct processes were followed.
- Following a thorough examination of the case, it emerged that the school attempted to make a Prevent referral but submitted it through an incorrect route.
- Several other issues were identified with the decision making process followed by the school.
- The parents of the child were given a detailed explanation and reassurance that no record has been found of a formal Prevent referral.
- A multi-agency debrief was held whereby several actions and recommendations were discussed, such as additional Prevent training for employees in the school. The reason for the school's initial referral was ultimately assessed to not be in scope for Prevent.

In addition to receiving formal complaints, StaCU scans social media for open-source complaints related to Prevent. These are not logged as formal complaints and are instead logged as 'observations'. Where sufficient details are provided, StaCU flags these observations to relevant bodies and works with them to implement any improvements. Data from observations helps inform StaCU's wider understanding of Prevent delivery and performance.

As recommended in the Independent Review of Prevent, ministers can also task StaCU to conduct specific investigations into agencies or institutions that may be failing to comply with the Prevent Duty. A summary of findings following investigations will be made public.

In some instances, concerns do not immediately have the required evidence to support a formal investigation. In these circumstances, StaCU can undertake further research to interrogate the validity of these concerns.



StaCU also fulfils the oversight function of Prevent by analysing complaints data and feeding this information back to the Prevent Ministerial Oversight Board for action.

The Independent Review of Prevent noted:

“one body within the government that could have been used to provide better scrutiny of overall Prevent delivery is the Prevent Oversight Board. However, its membership consists of high-level figures, such as those in ministerial and director-level positions, who have many other duties, and the board appears to meet very infrequently.”¹

Since StaCU’s launch, zero Prevent Oversight Board meetings have been held.

Other forms of governance and oversight include quarterly operational group meetings attended by other government departments and operational partners. Additionally, monthly dashboards and complaints outcome reports are produced for internal purposes.



¹ Independent Review of Prevent, page 98, February 2023, available at: https://assets.publishing.service.gov.uk/media/63e26968d3bf7f17385a3421/Independent_Review_of_Prevent.pdf

Complaints

In the 2024 to 2025 period, StaCU has received 55 complaints to date. This section breaks down the cases received in this period and highlights trends. The data is broken down by themes, organisations and regions.

The majority of our complaints are malicious, misguided and misinformed. The next highest figure pertains to organisations not complying with the Prevent Duty and Home Office guidance.

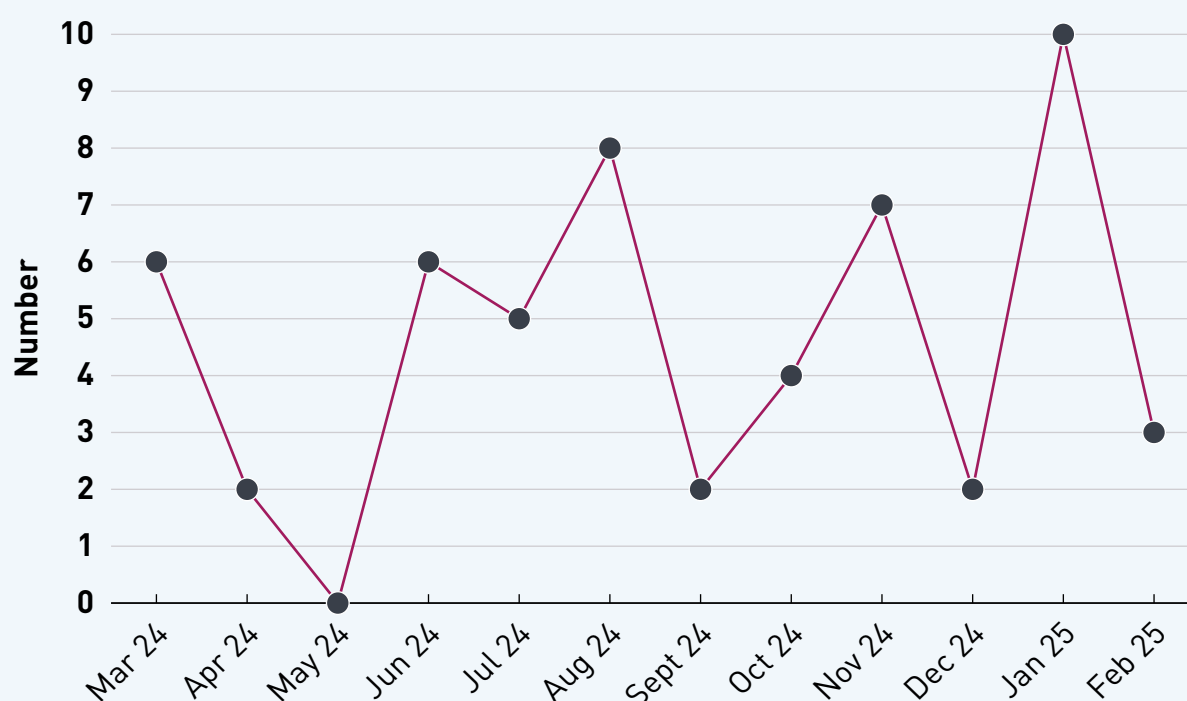
Time taken to handle a complaint:

- Time taken to handle a complaint is counted from the date it has been received to the date the complainant has received their outcome letter.
- On average it takes StaCU 18 working days to resolve a complaint.
- The length of time can significantly vary based on the complexities of the case and the number of organisations it involves.

Number of complaints each month:

- There is no clear trend displaying complaints increasing or decreasing throughout the year.
- The highest number of complaints received has been in January 2025, with 10 complaints (18%).
- The lowest number of complaints received was in May 2024, with 0 complaints (0%).

Number of complaints by month

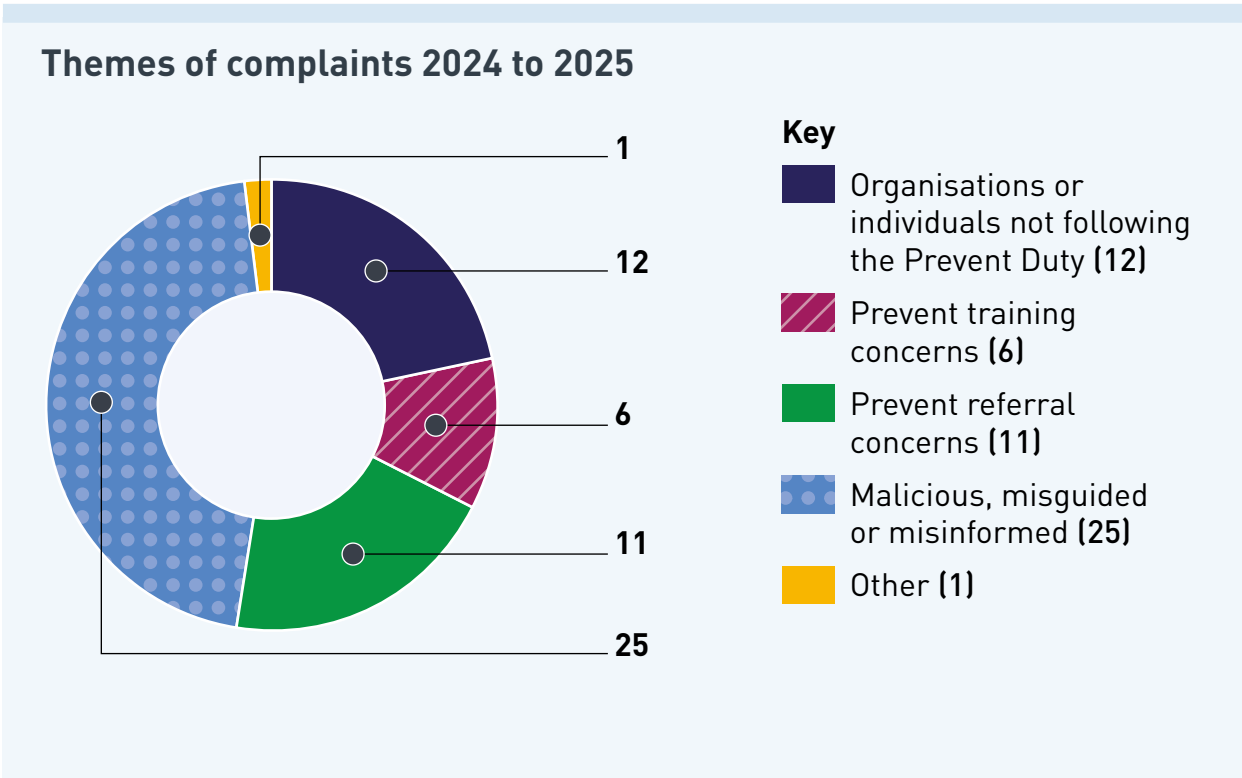


Theme of complaints

Complaints are categorised according to the four themes below. The purpose of the categories is to assist in analysing trends. The theme of the complaint is categorised based on the information provided by the complainant.

The 3 most common themes were:

- malicious, misguided or misinformed – 25 complaints (45%)
- organisations or individuals not following the Prevent Duty – 12 complaints (22%)
- Prevent referral concerns – 11 complaints (20%)



Case study 2

- A complaint was made to StaCU about the imbalance of ideologies covered in training delivered to an educational institution.
- The complainant highlighted that the training was focused predominantly on Extreme Right Wing and failed to pay adequate attention to Islamist ideology.
- StaCU contacted the relevant Local Authority and completed a review of the training materials.
- The Local Authority also provided a copy of the feedback they collated from the training session.
- Upon review, StaCU concluded that there was a sufficient balance between the different ideologies covered throughout the training. The Local Authority also promoted the range of additional training on offer, including a course that provides more details on ideologies such as Islamist extremism.
- The complaint was made anonymously, so the caseworker was unable to feedback to the complainant about our review and the additional training on offer.
- For audit purposes, a detailed case report has been produced and stored internally.

Malicious, misguided or misinformed

Complaints classified as malicious, misguided or misinformed do not require further actions by StaCU. This is due to issues such as lack of information or complaints unrelated to Prevent incorrectly sent to StaCU.

Organisations not following the Prevent Duty

This theme of complaint refers to instances whereby specified authorities are either failing to comply with the Duty or failing to deliver in line with the direction set by ministers through the Prevent Duty Guidance or IRP. Examples of these complaints include:

- schools engaging with organisations or individuals of extremist concern
- Local Authority promotion and engagement with organisations of extremist concern, including those identified in the IRP
- Prevent roles (both Prevent-funded and locally funded) not using correct terminology, such as avoidance of the term Islamism

Case study 3

- A complaint was made to StaCU about a Local Authority website linking to the websites of two external organisations highlighted in the Independent Review of Prevent. This was assessed to be a potential breach out of statutory obligations set out within the Prevent Duty.
- StaCU contacted the local Prevent Coordinator and requested that they carry out their own due diligence on the organisations. Upon completion of their own investigation, the Local Authority agreed to remove links to the webpages from their website with immediate effect.
- The complainant was provided a response on the outcome and is satisfied that their complaint has been resolved.

Prevent referral concerns

This theme of complaint refers to individuals who believe they have been referred to Prevent and disagree with the referral. This also refers to complaints regarding the handling of referrals and potential failures in process and communication with the subject of the referral.

Poor Prevent training provided

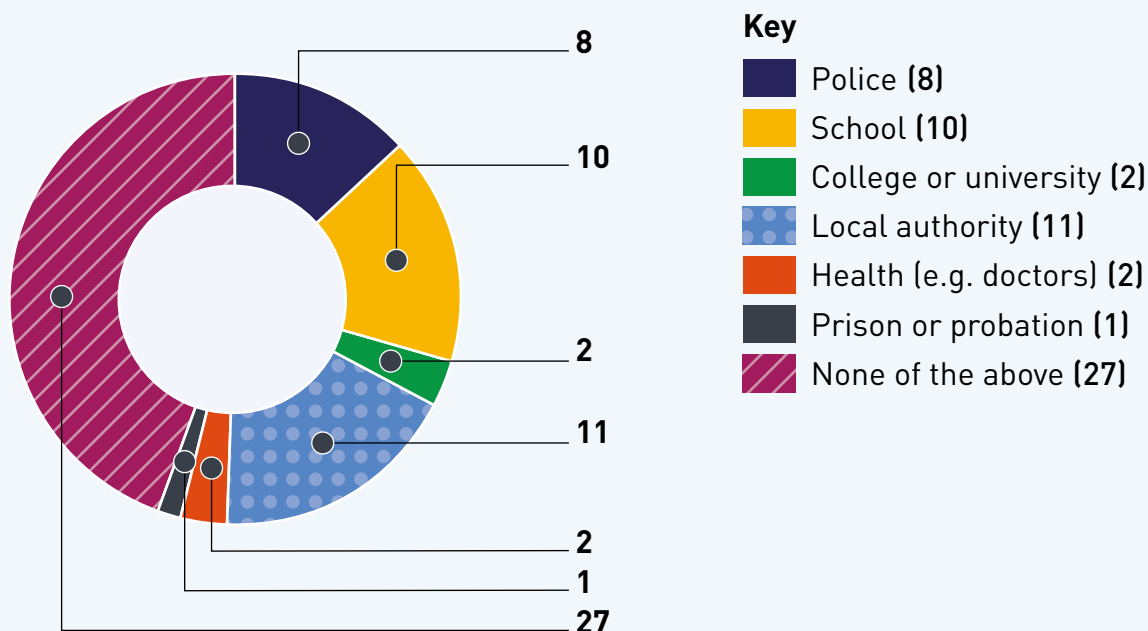
This theme of the complaint refers to individuals who work in an organisation which is bound by the Prevent Duty and receive training as part of this. Please see [Case study 2](#) regarding a complaint we received regarding training.

Organisation type

If appropriate, each complaint is classified by the organisation it refers to. This helps identify which organisation StaCU might need to engage with to investigate the complaint further. Local Authorities, police, and schools were referenced most commonly in complaints. Some complaints can refer to several organisations:

- 11 complaints involve Local Authority (18%)
- 8 complaints involved Police (14%)
- 10 complaints involve School (18%)
- 2 complaints involve College or University (3%)
- 2 complaints involve Health (3%)
- 1 complaint involves Prison and Probation (2%)

Type of organisation referenced in complaint



Complaints that sit within the malicious, misguided or misinformed category are not assigned an organisation type. Instead, these complaints are listed as 'none of the above'.

In addition to complaints referring to a particular sector or type of organisation, some complaints require StaCU to work directly with another oversight body. In 2024 to 2025, StaCU referred 7 complaints to the Department for Education, 9 complaints to Local Authorities and 1 complaint to the Home Office to inform our investigation.

In some instances, complaints cannot be directly triaged by StaCU into another body due to policies around existing complaints procedures. In these cases, StaCU signposts the complainant to appropriate complaints mechanisms once StaCU assessment has been completed. In 2024 to 2025, StaCU signposted 10 complaints to other organisations including the NHS, Office for Students and police force professional standards departments.

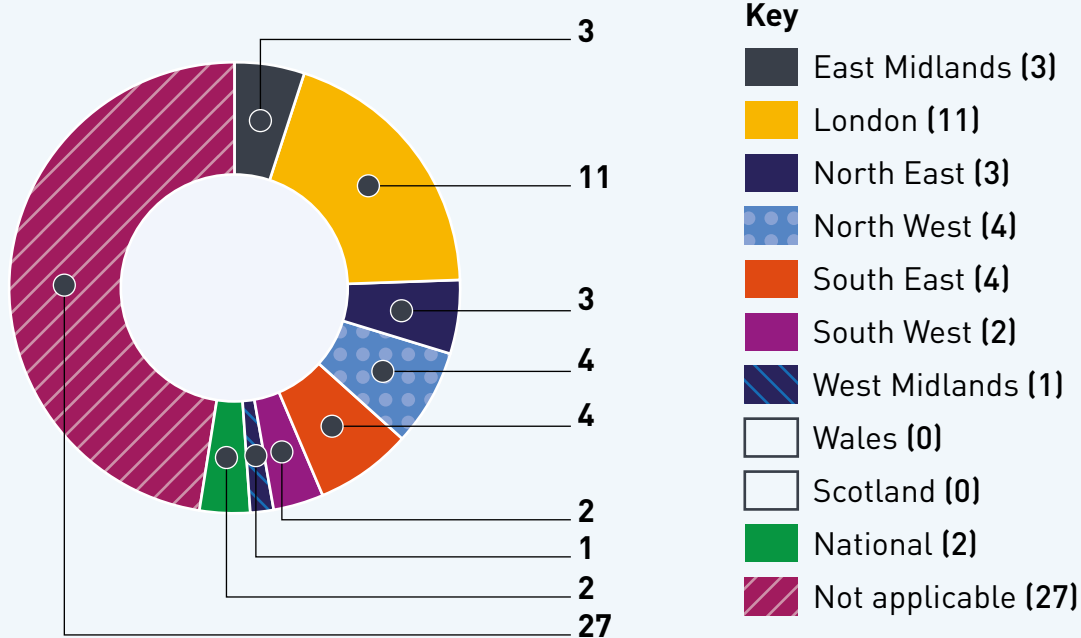
Regional breakdown:

This section depicts the geographical spread of complaints received. Similar to organisation type, some complaints can refer to several regions.

Complainants are not obliged to identify their location they are complaining about on the form and cases classified as malicious, misguided or misinformed are not allocated a region, to prevent inaccurate trend analysis (hence 47% 'not applicable').

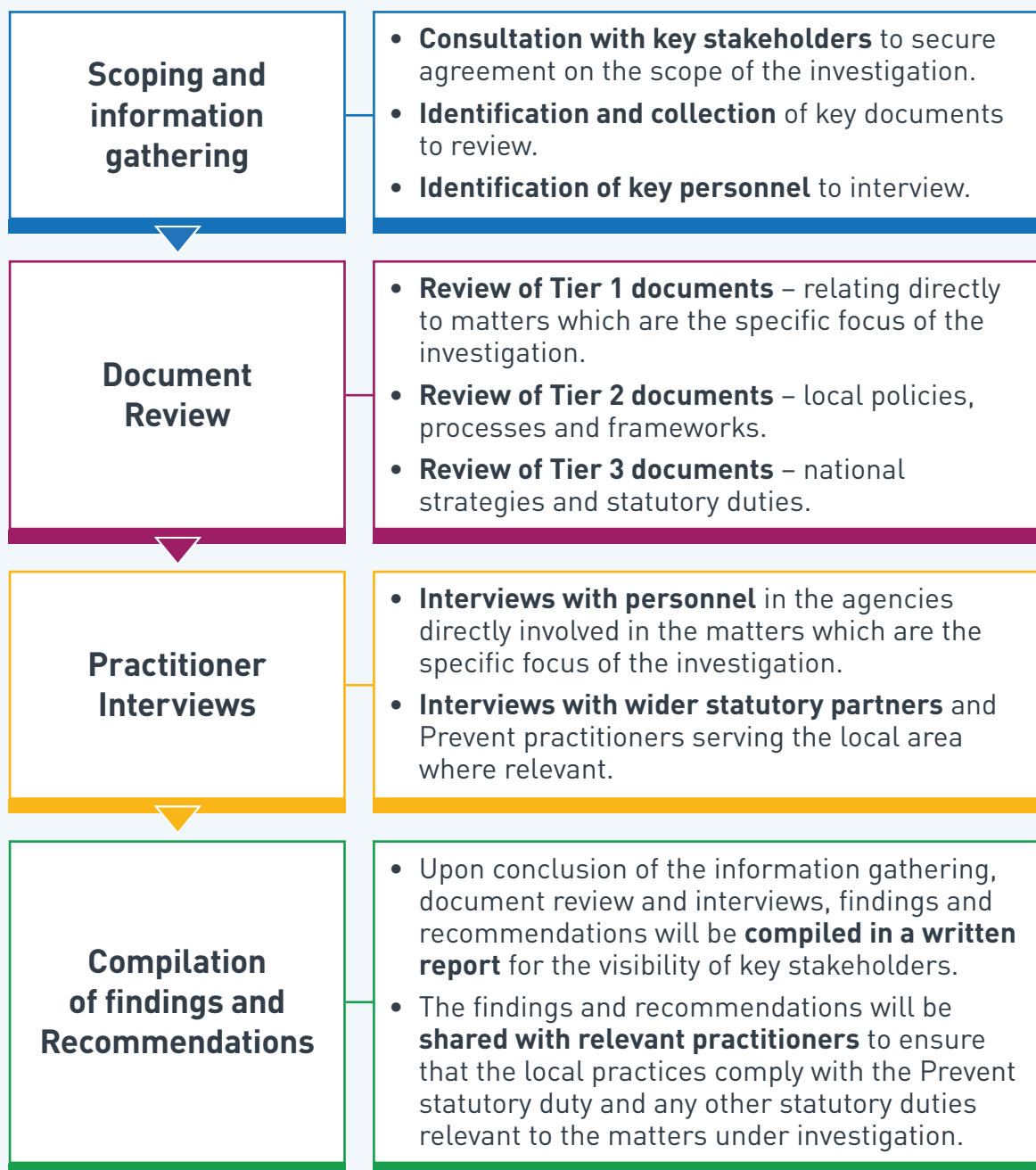
- The region that had the highest number of complaints was London with 11 complaints (20%).
- The regions with the lowest amount of complaints were Wales and Scotland with 0 complaints (0%).

Number of complaints by region



Investigations

Overview of investigative process

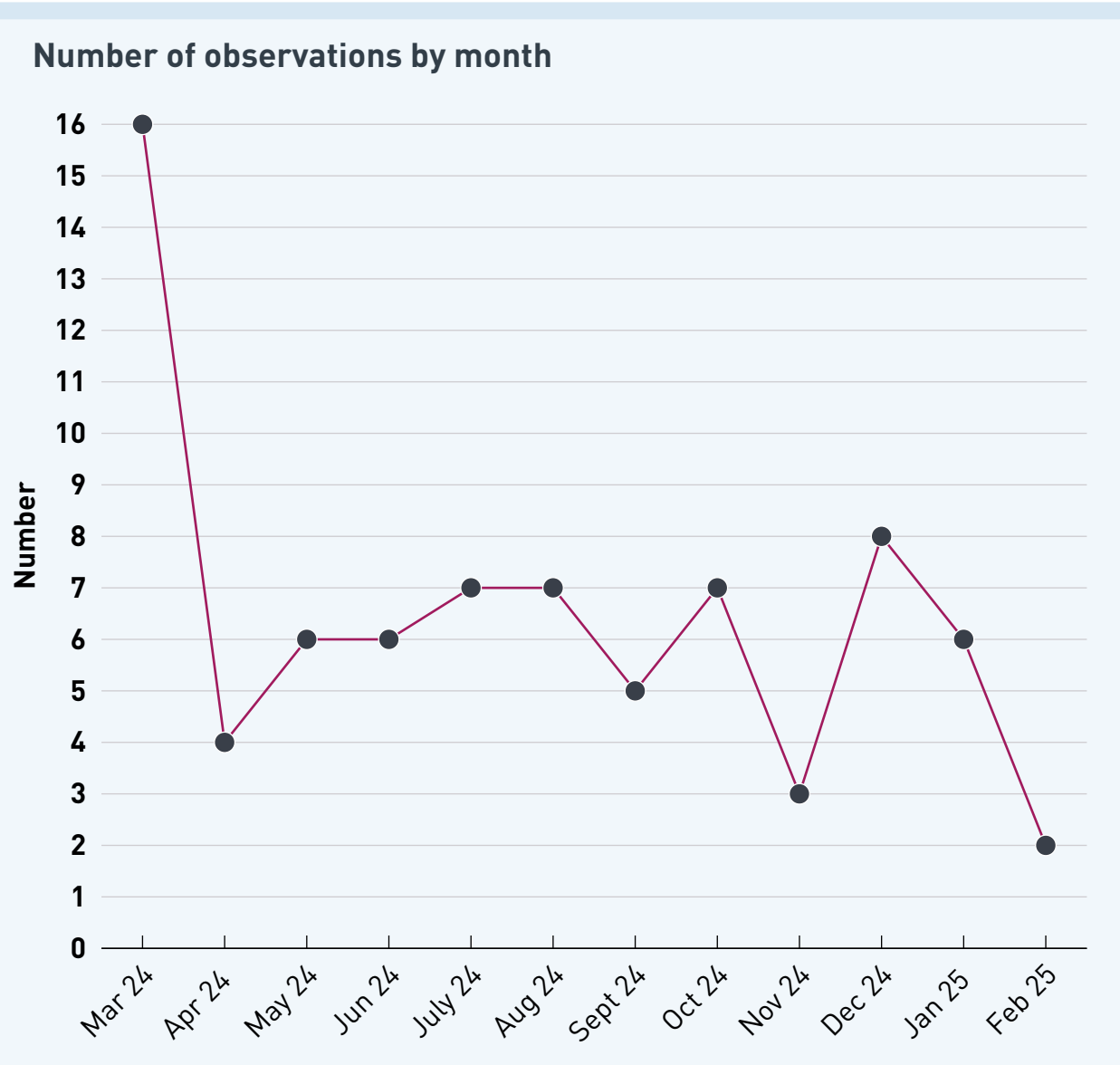


Current status

To date, one investigation has been proposed to the Minister for Security. This investigation was approved in March 2025 and began immediately after.

Observations

To date, there have been 77 observations by StaCU of Prevent related complaints online. Open-source complaints are predominantly collated from the social media platform X (formerly Twitter).

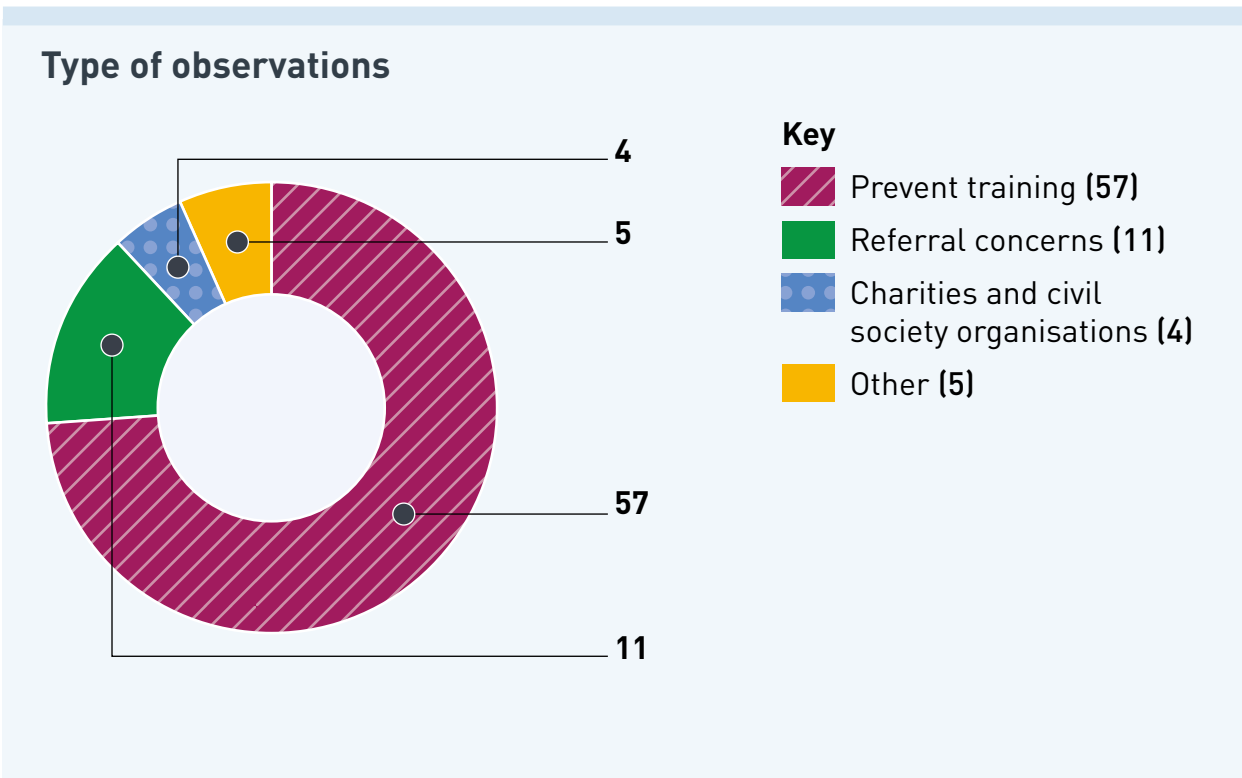


Theme of observations

StaCU only records open-source complaints where it relates to delivery of the Prevent Duty specifically. Observations to date relate to sit within 4 broad categories:

The 3 most common themes were:

- Prevent training – 57 observations (74%)
- referral concerns – 11 observations (14%)
- charities and civil society organisations – 4 observations (5%)
- other – 5 observations (7%)



The majority of StaCU observations relate to delivery of Prevent training. Concerns relating to training typically revolve around a disproportionate focus on Extreme Right Wing in comparison to Islamist extremism, and excessive focus on wider influences and ideologies which do not reflect the predominant terrorist threat. These include conspiracy theorists and environmental extremism.

The IRP identified a “lack of training on how to manage controversial issues of substance regarding extremist ideology²” and a “culture of timidity exists among practitioners in the round when it comes to tackling Islamism³”. The high volume of open-source complaints observed by StaCU indicate the concerns outlined within the IRP have not sufficiently been addressed. We are aware that many training products have been refined and improved in the time since the publication of IRP and hope this will lead to less observations of this kind as time progresses.

StaCU has attempted to independently verify claims regarding content of Prevent delivery, but to-date has only achieved verification of 10% of recorded observations. Without verification, StaCU is unable to confirm the validity and accuracy of concerns identified within the observations.

Additionally, some examples of training cited issues which do not have any connection to the terrorist threat. These include:

- socialism
- anti-abortion
- Brexit
- the gender critical community
- anti-vaccination
- veganism
- literary texts (including Beowulf, Chaucer, Shakespeare, Milton, Hobbes, Locke, Tolkien, Orwell and Kipling)
- influencers and commentators
- television programmes (including Great British Railways, Yes Minister, Thick of It)

To aid verification and provide an opportunity to formally complain, StaCU has responded publicly to observations on X, providing information on where to lodge a formal complaint. However, none of those who made observations online were willing to subsequently make a formal complaint.

Therefore, while these open-source complaints echo findings within the IRP where books by mainstream British conservative commentators were referenced in a Prevent product as “cultural nationalist ideological texts”, StaCU cannot confirm that remains the case.⁴

2 Ibid., page 8

3 Ibid.

4 Ibid., page 24

To further explore training concerns, StaCU launched a survey to be completed by Local Authorities, schools and colleges, with the aim of understanding what training is being sought and delivered beyond the existing GOV.UK training offer. The survey asked questions around who delivered the training, and how the respondent found the content and quality of the training. Over 60% of respondents have sought or delivered training beyond the existing Home Office offer. Reasons provided included:

- need for localised context
- face-to-face engagement with trainer
- ability to learn more through Q&A
- ability to keep updating the package as/when events
- overlay local issues on top of national picture
- easier to track attendance of staff
- more targeted to Prevent responsibilities of staff
- independent training is more appealing to communities
- requirement for more in-depth or bespoke training

Specified Authorities may require training beyond the central government offer because they must comply with wider statutory duties and legal responsibilities which entail additional complexities when delivering frontline services. Nevertheless, the open market for delivery of Prevent training does risk exposing practitioners to training which is not in-line with the Prevent Duty Guidance or the IRP, leading to a decline in standards and misunderstanding over what is and is not in scope for Prevent.

Afterword

StaCU's first year of operation has seen the aim to develop a robust complaints and investigations functions achieved; and the case as to why independent oversight of Prevent is vital strengthened.

As a significant departure from existing complaints processes within Specified Authorities, StaCU maintains in-house Prevent delivery expertise and is well placed to understand the unique challenges to effective Prevent delivery on the ground when investigating complaints and instances of non-compliance with the Prevent Duty.

Furthermore, practitioners and members of the public who say they would not previously have wanted to share their concerns directly with relevant agencies have done so with StaCU.

The first 12 months has also seen the identification of trends which are indicative of the widespread challenges facing the effective implementation of the Prevent Duty, especially at Local Authority level. For some areas there has been a failure to deliver Prevent beyond a single appointee. One practical consequence of this has been that other, non-Prevent parts of a Local Authority are funding or engaging with those of extremist concern. Clearly, this breaches the Prevent Duty in spirit.

Of particular concern are cases where Local Authorities continue to partner with individuals and institutions who we judge "create and take advantage of permissive environments to promote or condone violence and to spread harmful ideologies that undermine our values and society".⁵

There also remains an ongoing, chronic unwillingness by both funded and non-funded Prevent staff to use the word "Islamist" because they fear this will act as a barrier to engagement with communities. The enhanced and improved training offer now available via Gov.UK and trusted external providers has the potential to help resolve this problem. However, the significant volume of non-quality assured, third-party provider training products that remain in usage is one reason why this problem endures.

In general, the quality of training and ensuring that an appropriate level of attention is being given to Islamism – the main terrorism and extremism threat the country faces – remains an ongoing concern. This was a wider shortcoming identified by the IRP and StaCU will continue to thematically analyse complaints it receives around this issue and take action where appropriate.

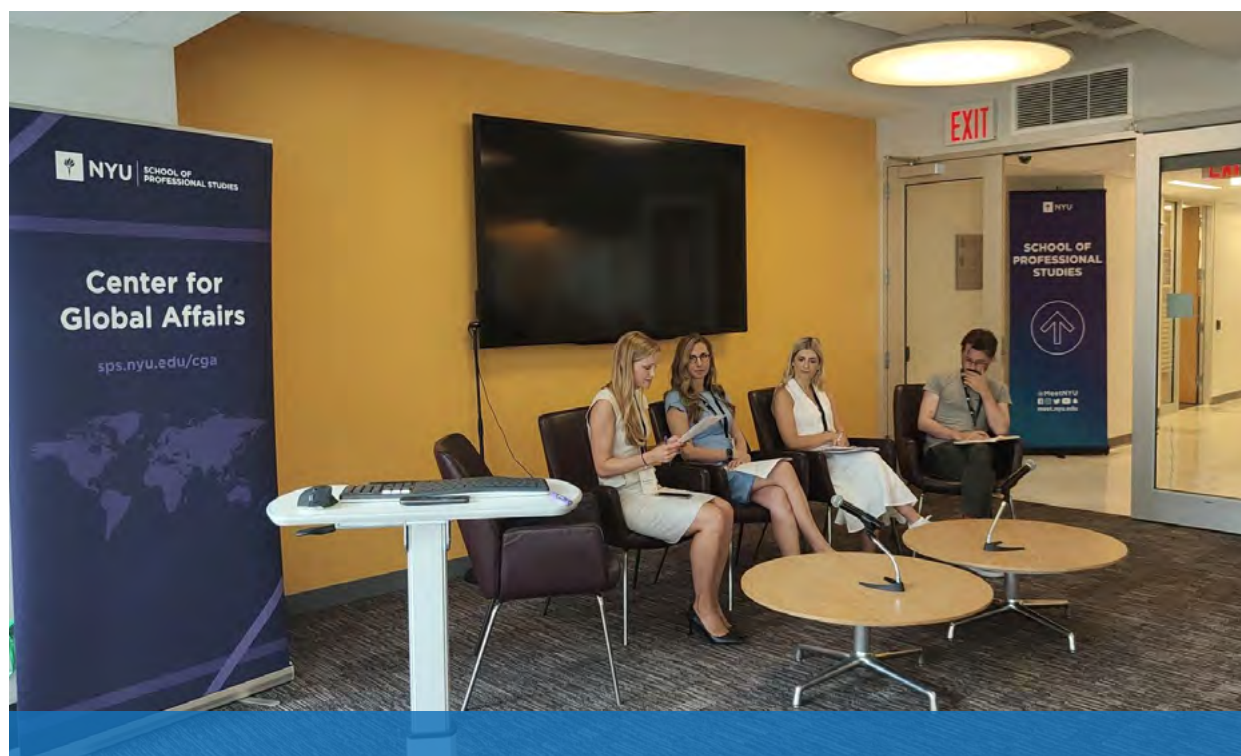
5 See Prevent Duty Guidance, 'Permissive Environments', updated 6 March 2024, available at: www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible

StaCU has identified several instances where local practices are at variance with national guidance. StaCU fulfils a crucial role in identifying and addressing these gaps to ensure Prevent is delivered in accordance with the statutory Duty and in line with the IRP recommendations.

StaCU will also continue to collaborate with relevant stakeholders including government agencies, civil society organisations and academic institutions to gain insights on the effectiveness of Prevent delivery and work undertaken to deliver the recommendations of the IRP.

Within this context, StaCU will undertake work to further understand the standards of delivery across the system. An example of positive work undertaken this year to determine standards in delivery was the study and subsequent publication of Standards for Employing Formers in P/CVE by Gordon Clubb and his colleagues at the International Centre for Counter Terrorism.⁶

Additionally, there maintains a need for continued proactive engagement with the public and practitioner networks to promote awareness of StaCU. Awareness raising and promotion of our independent complaints function will continue in 2025.



Leeds University held a two-day workshop with New York University on the 'standards for engaging with formers'

⁶ Clubb and others, 'Standards for Employing Formers in P/CVE', November 2024, available at: <https://icct.nl/sites/default/files/2024-11/Clubb%20et%20al.%2C%20Standards%20for%20Employing%20Formers%20in%20PCVE%202.pdf>

