

Sent Electronically

Rt. Hon. Shabana Mahmood MP Home Office 2 Marsham Street London SW1P 4DF

7 November 2025

Dear Home Secretary,

We are writing to you from the Tackling Transnational Repression in the UK Working Group ("Working Group") regarding the Government's response to the recent Joint Committee on Human Rights (JCHR) report on Transnational Repression (TNR). The Working Group is dismayed by the Government response, which lacks transparency, an appropriate definition of TNR, and a clear plan of action for meaningful community engagement to inform future policy and practice. The picture it paints does not correspond with testimony we have gathered from targeted communities, or with our own experience as a working group which includes groups directly affected by TNR, most of whom are still unable to access protection and support.

As a coalition of civil society organisations, researchers and diaspora groups advocating for effective, human rights-based policy responses to TNR, we welcome the Government's recognition of TNR as a human rights issue, and its increasing coordination on the issue, both internally and internationally, within the G7 and other international bodies. However, this recognition remains rhetorical and has not yet translated into concrete actions, and – as the evidence we submitted to the JCHR showed – continues to sideline those most affected by TNR.

We would therefore welcome the opportunity to meet with you and your officials to discuss the Working Group's experience, and to share our wider recommendations on addressing TNR in the UK. In particular, we would like to discuss several areas of concern which emerged in the Government response.

We were surprised by the Government's description of TNR as "certain foreign state-directed crimes against individuals", which runs counter to the overwhelming body of evidence received by our Working Group and published by the JCHR, which shows that TNR very often manifests

through actions that do not involve crimes being committed within the UK jurisdiction. To restrict TNR protections to acts which cross a criminal threshold would leave many targets unable to secure the support they need. We note that the Government's description is also narrower than those of the G7, of which the UK is a prominent member, and of the UN OHCHR, placing the UK firmly outside the prevailing international consensus.

We also found the Government's claim that the UK "maintains a hard operating environment" with "system-wide safeguards" against TNR – a claim attributed to the Defending Democracy Taskforce's review – difficult to accept and even harder to verify. This assertion, made without sharing any information about the review with stakeholders, stretches credulity and contradicts the substantial body of evidence submitted to the JCHR inquiry.

The Government's refusal to create a dedicated TNR hotline and reporting mechanism and its insistence that conventional police reporting channels are sufficient for targets in the UK to lodge complaints is deeply disappointing. We know from our experience that existing police routes (999 and 101) are not equipped to respond to TNR threats and have led to under-reporting and mishandled cases. The claim that a bespoke hotline would be "duplicative" and "risks reinforcing the perception that TNR is widespread or ubiquitous", as well as the confident assertion by the Government that call volumes would be low "given the targeted and specific nature of TNR in the UK" ignores clear evidence from the inquiry showing that current systems routinely fail victims, who are passed between agencies without appropriate support.

Home Secretary, the JCHR inquiry was a unique opportunity to hear from the communities targeted by TNR, civil society and other experts to accurately identify the scale of the issue and explore ways the UK can respond to this evolving challenge. The Working Group sees the Government's response as a significant missed opportunity to seize the momentum and demonstrate the UK is a safe country for those targeted for speaking out.

The Tackling Transnational Repression in the UK Working Group therefore urges the Government to take the immediate following actions:

- **1. Establish structured engagement with affected communities and civil society.** We urge the Government to develop and publish a formal outreach and engagement plan with clear actions, timelines, and accountability measures to involve diaspora communities, researchers, and civil society organisations in shaping the UK's response to TNR. Engagement should ensure that the experiences of those directly affected inform all stages of policy and implementation.
- 2. Create a dedicated TNR reporting mechanism. The Government should establish a dedicated and confidential reporting channel such as a TNR hotline or specialist contact point to enable those targeted by TNR to report incidents safely and access support. This mechanism should address the well-documented shortcomings of existing police routes (999 and 101), which do not meet the specific needs of those targeted by TNR, and assist with reporting and data-gathering.

- **3.** Adopt a clear and comprehensive definition of Transnational Repression. We recommend that the Government adopt an explicit, comprehensive definition of TNR, aligned with international standards and the UK's G7 commitments and in consultation with affected communities. A consistent definition is essential for coherent policy, accurate data collection, and ensuring that all forms of TNR are recognised and addressed across departments.
- **4. Commit to regular reporting to Parliament on progress.** We recommend that the Government provide annual reports to Parliament detailing progress in tackling TNR. These reports should cover cross-government coordination, international cooperation, data collection, and training provided to law enforcement and other relevant agencies.

We note the Government's commitment to "keep its approach to TNR under regular review" and urge that this process results in a comprehensive strategy grounded in transparency, accountability, and meaningful engagement with affected communities.

We would appreciate the opportunity to discuss these questions with you further, and thank you for your attention to the serious and growing threat which transnational repression poses to the UK.

Yours sincerely,

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Adam Baillie, Iran International

Dr Andrew Chubb, *University of Lancaster*

Susan Coughtrie, Foreign Policy Centre

Nicola Macbean, The Rights Practice

Fiona O'Brien, Reporters Without Borders

Kerry Moscogiuri, Amnesty International UK

Nik Williams, Index on Censorship

On behalf of the Tackling TNR in the UK Working Group