ADDRESSING TRANSNATIONAL REPRESSION IN THE UK:

A SET OF RECOMMENDATIONS TO THE UK GOVERNMENT

IPHR International Partnership for Human Rights

State Capture Accountability Project

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I. The Authors

1. **International Partnership for Human Rights ("IPHR")** is an independent, non-governmental organisation founded in 2008. Based in Brussels, IPHR works closely with civil society groups from a range of countries to raise human rights concerns at the international level and promote respect for the rights of vulnerable communities.

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2. **State Capture Accountability Project ("SCAP")** is a non-profit organisation registered in the Netherlands. Our vision is of a global society where states exist to serve their people, and where economic and political elites are unable to bend laws and institutions to serve their own advantage. We convene and support civil society, investigators, journalists, data analysts, academics, policy experts, and legal professionals to conduct research and undertake policy advocacy to promote a deeper understanding of state capture and use legal avenues to counter it.

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II. Introduction

3. Transnational repression (hereafter, "TNR") is a term used to describe "governments reaching across borders to silence dissent among diasporas and exiles, including through assassinations, illegal deportations, abductions, digital threats, Interpol abuse, and family intimidation".[1] According the Parliamentary Assembly of the Council of Europe ("PACE"):

> *[T]hese practices not only violate numerous non-derogable and fundamental human rights of the individuals targeted, but are also a threat to the rule of law, democracy and the national security of the States where those individuals live and have found refuge.*[2]

4. A marked erosion of the rules-based international order[3] and rapid technological advancements[4] have contributed to a recent increase in TNR activity in Europe and beyond.[5] Freedom House, for instance, has documented 1,035 cases of TNR around the globe since 2014, involving 44 origin or perpetrator states and 100 host states – putting 3.5 million people at risk.[6] Today, TNR is being increasingly relied upon as part of regime preservation policies by Russia, Iran, Turkey, Saudi Arabia, Tajikistan, Egypt, and China, among others.[7]

5. On 20 May 2024, the then Minister of State for Security stated that the "UK will not tolerate transnational repression and will stand up for the rights of all people to live here safely and freely".[8] A year later, the new Minister for Security summarised the government's position on the topic as follows:

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1 Freedom House, "Transnational Repression", available at: *https://freedomhouse.org/report/transnational-repression.*

2 Parliamentary Assembly, "Transnational repression as a growing threat to the rule of law and human rights: Resolution 2509 (2023), 23 June 2023, para. 8; available at: *https://pace.coe.int/en/files/32999/html.*

3 See UN General Assembly, '*Resolution adopted by the General Assembly on 22 September 2024, 'Pact for the Future*'', 22 September 2024, A/RES/79/1; PACE, "The need for a renewed rules-based international order", 11 December 2024, available at: *https://rm.coe.int/as-pol-2024-27-draft-report-the-need-for-a-renewed-rules-based-interna/1680b2c73e*; UK Parliament, House of Lords Library, "Challenges to a rules-based international order", 9 January 2025, available at: *https://lordslibrary.parliament.uk/challenges-to-a-rules-based-international-order/#fn-24.*

4 See statement by the head of the Chechen Republic, Ramzan Kadyrov: "This modern age and technology allow us to know everything and we can find any of you, so don't make it worse for yourselves" - Caucasian Knot, @ Кавказский Узел, "Кадыров угрожает эмигрантам из Чечни" [Kadyrov Threatens Emigrants from Chechnya], June 8, 2016, *https://www.youtube.com/watch?v=uOcdFuFXyIs.*

5 Parliamentary Assembly, "Transnational repression as a growing threat to the rule of law and human rights: Report by the Committee on Legal Affairs and Human Rights", 5 June 2023, available at: *https://pace.coe.int/pdf/256e9019f883b202d16a9c4b4771cba8a8699a84efd6205d2c2f23ea9e244dd7/doc.%2015787.pdf*; Civicus Lens, "The Long Reach of Authoritarianism", 20 March 2024, available at: *https://lens.civicus.org/the-long-reach-of-authoritarianism/*; Freedom House, "NEW REPORT: More Governments Engaged in More Transnational Repression during 2022", 6 April 2023, available at: *https://freedomhouse.org/article/new-report-more-governments-engaged-more-transnational-repression-during-2022.*

6 Freedom House, "Transnational Repression", available at: *https://freedomhouse.org/report/transnational-repression.*; Human Rights Watch, "We will find you", 22 February 2022, available at: *https://www.hrw.org/report/2024/02/22/we-will-find-you/global-look-how-governments-repress-nationals-abroad.*

7 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, para. 8, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

8 They Work For You, "Oppression: Home Office written question", 20 May 2024, available at: *https://www.theyworkforyou.com/wrans/?id=2024-05-15.26457.h.*

> *TNR in the UK tends to be targeted and specific, where perpetrating states particularly focus on individuals whom they perceive as threats or otherwise seek to control, such as vocal critics, dissidents, or activists opposed to their regime. While TNR does not affect large numbers of people across the UK, its impacts can be severe - not only for those directly targeted but also for wider communities, where fear and concern may spread.*[9]

6. The Minister for Security also concluded that "the UK's response to tackling state-directed threats is world leading" and that "the UK has the appropriate tools and system-wide safeguards in place to robustly counter this threat", citing the National Security Act 2023, police training, diplomatic measures and online guidance for at-risk communities.[10]

7. Unfortunately, this is not entirely consistent with the experience of those victims and exiled communities spoken to by the authors, who say they do not feel adequately supported or protected by UK authorities against TNR threats. The government's position is also disputed by the parliamentary Joint Committee on Human Rights ("JCHR"), which recently opined that "the UK currently lacks a clear strategy to address TNR", has no definition of TNR, and "does not routinely collect data on TNR events".[11] The JCHR also found that the police "often lacks the training necessary to respond effectively to TNR, resulting in inconsistent and ineffective support for TNR victims".[12]

8. In this paper, the authors set out 11 recommendations for improving the UK Government's response to TNR threats. These recommendations are based on the authors' research and analysis of global TNR trends, interviews with TNR victims and exiled communities, a gap analysis of UK legal and policy frameworks, and a review of international best practices. These recommendations are also informed by analysis and publications by other non-governmental organisations, the JCHR, and the Council of Europe. The authors echo the UK Government's position that "the UK's tools and approach [to TNR] must remain agile in response to this changing threat environment".[13] We hope that our recommendations will assist the UK Government to ensure that the UK remains a safe haven for human rights defenders, journalists, activists, and other democratic opponents and critics of authoritarian regimes.

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9 UK Parliament, "Transnational Repression Review: Statement made on 14 May 2025", available at: *https://questions-statements.parliament.uk/written-statements/detail/2025-05-14/hlws631.*

10 UK Parliament, "Transnational Repression Review: Statement made on 14 May 2025", available at: *https://questions-statements.parliament.uk/written-statements/detail/2025-05-14/hlws631.*

11 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summar and paras 21 and 22, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

12 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and p.1 available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

13 UK Parliament, "Transnational Repression Review: Statement made on 14 May 2025", available at: *https://questions-statements.parliament.uk/written-statements/detail/2025-05-14/hlws631.*

III. Recommendations

1. Adopt a broad definition of TNR enshrined in law

9. The authors recommend adopting a comprehensive, victim-centred definition of TNR to be enshrined in law. The definition will provide a scaffold for laws and policies to counter TNR and allow for accurate and useful data collection on TNR in the UK. This recommendation reflects the views of the JCHR[14] and the Council of Europe's Committee on Legal Affairs and Human Rights.[15]

10. The definition should be developed in consultation with TNR victims and targeted exiled communities and aligned with definitions adopted by members of the Council of Europe and other UK allies. The definition should cover a broad range of TNR conduct – including assaults, intimidation, digital threats, abuse of extradition and mutual legal assistance, and duress applied through family members and property. It should recognise that the perpetrator state may also target journalists, lawyers, parliamentarians and activists with host and third-country citizenships, for their perceived support to targeted exiles.

11. The authors propose the following definition as a starting point for developing an official UK Government definition of TNR:

Foreign government conduct perpetrated (or having impact) on UK territory, including but not limited to – assassinations, violence, intimidation, harassment, illegal deportations, abductions, digital threats, abuse of Interpol extradition and mutual legal assistance proceedings, strategic lawsuits against public participation, unlawful asset appropriation and revocation of travel documents – aimed at intimidating, silencing, coercing, harassing, or harming exiled individuals and communities and those who support them.

2. Adopt a comprehensive whole-of-government strategy for tackling TNR-related conduct

12. The UK Government views TNR primarily as a matter of national security. This is reflected in the fact that TNR is qualified as "foreign interference" in the National Security Act 2023. This in turn informs government policy and allocation of resources. As a result, responsibility for addressing TNR falls primarily to counter-terrorism police, the intelligence agencies, and the courts. It can also be inferred from the Minister for Security's May 2025 statement that the UK strategy on TNR relies largely on the deterrent effect of the new criminal offences and investigative powers under the National Security Act 2023, as well as TNR targets' willingness to report suspected TNR conduct to the police.

13. The government's approach to TNR overlooks the complex and multi-faceted nature of the

14 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, para. 22, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

15 Council of Europe Parliamentary Assembly – Committee on Legal Affairs and Human Rights, "Transnational repression as a growing threat to the rule of law and human rights", 5 June 2023, doc. 15787, available at: *https://pace.coe.int/en/files/32828/html.*

TNR challenge. A national security approach to TNR may also have adverse consequences on individual liberties[16] and encourages the government to view exiled communities as a potential national security threat, rather than persons in need of protection. Effectively tackling TNR requires deeper engagement with the affected communities and systematic data collection to inform the government's response to all aspects of TNR. Each exiled community faces a unique set of circumstances that need to be clearly understood by all relevant government bodies. There is no "one size fits all" guidance on how to deal with TNR victims. Simply directing victims to dial "999 or 101" to report suspected TNR activity ignores a lack of trust for and trauma associated with engaging with law enforcement by many TNR victims. This approach is likely to lead to underreporting and exposes victims to the lottery of police stations and duty officers.[17] Crucially, this approach fails to engage all other relevant government agencies that inevitably deal with the fallout of TNR. According the JCHR, the UK currently lacks a clear strategy and cross-government coordination on TNR, which can result in inconsistent response and gaps in support for individuals at risk.[18]

14. Relevant government bodies include law enforcement and intelligence agencies, social, housing and health services (including mental health providers), agencies dealing with extradition and mutual legal assistance requests, diplomatic accreditation, and asylum, and immigration agencies. All relevant agencies need to have adequate training and accurate information based on reliable research and data to understand and contextualise the situations faced by TNR victims from different exile communities. This requires a whole-of-government strategy and a human-rights-based approach to TNR. It also requires coordination, information-sharing, and standard operating procedures for cross-government action on TNR.

3. Create a dedicated cross-government focal point on TNR

15. The key to an effective cross-government strategy to tackle TNR is a focal point for inter-agency cooperation, public outreach, and data repository. The focal point should be a cross-government body, independent of any government body or agency, with reporting requirements to Parliament. The TNR focal point should have sufficient resources to enable it to carry out its full mandate.

16. The focal point should serve as a central, accessible point for the public to report TNR conduct – via a 24-hour telephone hotline, a secure online submissions portal, and in-person interviews. Its staff should be trained and have access to relevant information to enable them to provide support and advice to actual and potential targets of TNR, refer them to relevant law enforcement agencies and units for legal and psychosocial support, and act as a support service throughout the process. The focal point should also be able to advise TNR victims

16 Jonathan Hall KC, "Transnational Repression: What Planet Are We On?", 29 May 2024, available at: *https:terrorismlegislationreviewer.independent.gov.uk/wp-content/uploads/2024/05/TNR-What-Planet.pdf.*

17 In a recent case, a TNR victim spoken to by the authors was unable to transfer her evidence to the Metropolitan Police via its web portal, and could not secure an investigative interview with a relevant officer to take her statement. She was bounced from operator to operator who clearly were not equipped to deal with the complexity and specificity of her TNR case.

18 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 95, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

and members of exiled communities on digital and physical security and provide guidance on their rights and available safeguards in a language that they can understand.

17. The focal point should also be responsible for collecting data on, monitoring, and analysing trends in TNR incidents. It should act as an independent central repository of this information and analysis. This information could be used to advise and inform decisionmaking at central and local government level. The information could also be used by law enforcement and intelligence agencies, immigration and asylum decisionmakers, and counsel in extradition proceedings. The focal point would also be in the position to assist government with developing policy and legal reforms to address TNR.

18. Finally, the focal point should play the role of facilitating inter-agency cooperation in dealing with specific TNR incidents by all relevant government bodies and agencies. At the international level, the focal point could also advise and assist the government to cooperate and coordinate with allies, partners, and international organisations in this area.

4. Systematically monitor and record TNR-related incidents

19. An effective national response to TNR must be based on reliable data and credible evidence. The JCHR has found that "the Home Office does not currently collect, or require police forces to collect, data on TNR incidents taking place in the UK".[19] As such, the government appears to have developed its legal and police responses to TNR prior to collecting and analysing data which should inform such responses.

20. Data collection and analysis systems on TNR activity in the UK must be set up as soon as possible. This data collection should be overseen by a cross-government TNR focal point (as suggested above). Law enforcement and intelligence agencies should be required to systematically contribute all relevant data on TNR to this centralised database. Analyses of TNR trends should be conducted regularly and made publicly accessible. The data should also be made available to and inform decisionmaking by law enforcement, intelligence agencies, asylum, immigration, and extradition decisionmakers, and other government bodies supporting TNR victims.

21. The UK should share its data and analysis with allies and partners, in exchange for TNR data collected in other countries. Regional-level data should inform collective foreign policy action against TNR-perpetrating states, as well as border security and diplomatic accreditation.

19 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 18, available at: https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.

5. Create training programmes, guidance, and country-specific resources on TNR for law enforcement, national security, immigration/ asylum, and other relevant agencies

22. Training and guidance on TNR have been recently made available to police forces but are only mandatory for counter-terrorism police in the UK. This training is mainly limited to foreign interference and the powers introduced under the National Security Act.[20] The authors are not familiar with the content of the training. To date, TNR victims who have engaged with UK law enforcement have reported inconsistent responses.[21]

23. The authors believe that there is no "one size fits all" training or guidance that could contextualise and prepare government agencies for all TNR cases. Each exiled community experiences different forms of TNR which arise in unique cultural, political, and historical contexts. Adequate protection from and responses to TNR threats require a good level of understanding of the experience of each exiled community – not just the legal powers available for TNR investigation and prosecution. While standard operating procedures and guidance on policing powers are important, law enforcement should also receive country-specific guidance, informed by contemporaneous data collection and analysis.

24. Furthermore, police forces are not the only agencies that have to deal with TNR victims and perpetrators. Other government bodies and agencies, including national security and intelligence agencies, immigration and asylum decisionmakers, extradition judges and counsel, social services and health professionals, and other relevant government agencies would also benefit from guidance and country-specific resources on TNR.

6. Reinforce legislative protections against strategic lawsuits against public participation

25. Strategic lawsuits against public participation (SLAPPs) are a form of TNR – when launched by regime-connected individuals or companies for the purpose of silencing government critics, journalists and activists. SLAPPs are aimed at harassing, intimidating and financially and psychologically exhausting their targets by using defamation and other types of legal claims.[22] The National Security Act 2023 does not include SLAPPs as a form of prosecutable TNR. The Economic Crime and Corporate Transparency Act 2023 defined SLAPPs and introduced protections for defendants in SLAPPs cases – but only extended these protections

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20 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 54, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

21 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 51-52, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

22 Gov.UK, "Policy Paper: Economic Crime and Corporate Transparency Act: strategic lawsuits against public participation", available at: *https://www.gov.uk/government/publications/economic-crime-and-corporate-transparency-act-2023-factsheets/economic-crime-and-corporate-transparency-act-strategic-lawsuits-against-public-participation-slapps.*

in cases that feature "economic crimes".[23] This places many TNR-related SLAPPs outside the protection of the only legislation in this area – including cases brought against journalists and civil society organisations alleging human rights violations, war crimes and other atrocities, or electoral fraud.[24]

26. The authors echo the JCHR in urging the government to introduce comprehensive anti-SLAPPs legislation that applies beyond cases involving economic crimes.[25] The authors further recommend perpetrators and enablers of SLAPPs on behalf of foreign powers to be considered, prosecuted, or sanctioned as perpetrators of TNR – with necessary legislation introduced for this purpose.

7. Prevent TNR-linked abuse of extradition, Interpol, and mutual legal assistance

27. Perpetrator states regularly abuse extradition, Interpol, and mutual legal assistance systems to capture and/or harass their critics and opponents. Such abuse results from the absence of adequate safeguards and controls. The authors call on the UK Government to work together with its allies and partners and international institutions to stop authoritarian regimes and kleptocrats from using international judicial / law enforcement cooperation mechanisms for their nefarious aims.

28. The authors call on the UK government to introduce additional vetting requirements for extradition requests from states with documented misuse of criminal justice systems to suppress political opponents and critics. Blanket suspensions of extraditions – such as that applied to Russia by the UK Government in 2022[26] – should be used whenever there is evidence of extradition requests being regularly used as part of a TNR policy. The principle of non-refoulement must be rigorously applied when members of the targeted groups (e.g., dissidents, activists, journalists, members of the democratic opposition, and conscientious objectors) are subjected to extradition requests on political grounds. New legislation should introduce a rebuttable presumption of imminent risk of irreparable harm in such cases – reversing the burden of proof onto the state to prove that the individual in question is not being targeted as part of a TNR policy.

29. Similarly, we call on the UK Government to apply rigorous vetting to other mutual legal assistance requests from states with documented TNR policies. Such states should be required to demonstrate, with credible evidence, that the requests for mutual legal assistance are not made pursuant to a TNR policy.

30. Finally, the UK should take a leading role in reforming Interpol. We echo JCHR's concern over the Interpol leadership's refusal to acknowledge that its systems are being misused by

23 Ibid.

24 E.g.: UK Anti-Slapp Coalition, "Case: in focus – Eliot Higgins", available at: *https://antislapp.uk/project/eliot-higgins/.*

25 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 51-52, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

26 Withers, "UK to end extradition to Russia", 15 March 2022, available at: *https://www.withersworldwide.com/en-gb/insight/read/uk-to-end-extradition-to-russia.*

authoritarian regimes or to take remedial action.[27] The UK should work with its allies and partners to equip and safeguard Interpol against misuse for TNR policies. At the national level, the UK Government should warn UK citizens and residents who are subject to abusive Interpol Notices and Diffusions.

8. Review asylum and immigration cases through a TNR lens

31. The UK has a long and proud history of giving refuge to vocal critics and opponents of authoritarian regimes. Nevertheless, the current wave of anti-immigration sentiment in UK politics risks undermining the UK's status as a bastion of democracy. TNR victims spoken to by the authors are genuinely concerned that their predicaments will not be taken into consideration when applying for visas or asylum. Moreover, the JCHR has documented evidence that the use of Interpol Red Notices by authoritarian regimes has a significant impact on immigration and asylum applications – raising an automatic presumption of criminality that is very difficult to rebut.[28]

32. The authors call on the UK Government to ensure – through police and regulatory frameworks – that all asylum and immigration cases that raise credible evidence of TNR are given due consideration. This requires ensuring that information/data on TNR-related activities by perpetrator states is accessible and given full consideration in asylum and immigration decisionmaking. Asylum and immigration case officers should be trained and provided with guidance on TNR and country-specific practices – informed by rigorous data collection and exchange of information with allies and partners.

9. Apply sanctions and export controls to undermine and deter TNR

33. The UK Government recognises that its foreign policy tools are crucial to the UK's response to TNR threats.[29] Sanctions are a key part of this toolkit. The use of targeted sanctions could enable the UK to prevent key perpetrators of TNR from accessing UK territory, UK-based assets, the UK financial system, and other key services. Targeted sanctions are particularly effective for targeting those foreign officials, agencies, organisations and proxies that cause harm in the UK but are out of reach of UK law enforcement and courts. In addition to targeted sanctions, trade sanctions and export controls could be used to prevent the export of tools of repression and conflict to foreign adversaries and to exert economic pressure to deter harmful conduct.

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27 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 51-52, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

28 UK Parliament – Joint Committee on Human Rights, "Transnational repression in the UK", Seventh Report of Session 2024-25, HC 681/HL Paper 160, summary and para. 76, available at: *https://publications.parliament.uk/pa/jt5901/jtselect/jtrights/681/report.html.*

29 UK Parliament, Hansard, "Transnational Repression Review", Volume 767: debated on Wednesday 14 May 2025, available at: *https://hansard.parliament.uk/commons/2025-05-14/debates/25051471000008/TransnationalRepressionReview.*

34. In the authors' view, there are significant gaps in the UK's current sanctions regulatory framework when it comes to addressing TNR. While Section 1 of SAMLA gives the UK Government broad powers to make sanctions regulations to address TNR-related challenges,[30] current implementing regulations are inadequate for addressing TNR threats.

35. Consequently, the authors recommend enacting a new global sanctions regime under SAMLA focused on TNR aimed at punishing perpetrators, preventing future TNR conduct in the UK, and upholding the UK's leading role in promoting democratic pluralism and human rights. The new sanctions regime should enable the government to apply targeted sanctions to persons and entities involved in or enabling TNR conduct. In parallel, geographic-focused regimes should introduce export controls on goods, technologies, and services used for or contributing to TNR-related conduct by perpetrator states (e.g., digital technology and software used for surveillance, online tracking, and hacking).

10. Review diplomatic accreditation through a TNR lens

36. It is no secret that foreign agents operate on UK soil under diplomatic cover. In some cases, these agents have received diplomatic accreditation or some other form of immigration status in the UK despite being accused of carrying out TNR-related activities or similar abuses in other countries.[31] The UK Foreign, Commonwealth and Development Office must introduce more rigorous screening of applications for diplomatic visas to avoid granting accreditation to diplomatic personnel linked to past abuses and credible reports of involvement in TNR. Where diplomatic and consular staff become involved in TNR activities on UK soil (see Chinese Consulate incident in Manchester), [32] they must be immediately expelled and diplomatic accreditation withdrawn.

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30 A purpose is within this subsection if the appropriate Minister making the regulations considers that carrying out that purpose would—

(a)further the prevention of terrorism, in the United Kingdom or elsewhere,

(b)be in the interests of national security,

(c)be in the interests of international peace and security,

(d)further a foreign policy objective of the government of the United Kingdom,

(e)promote the resolution of armed conflicts or the protection of civilians in conflict zones,

(f)provide accountability for or be a deterrent to gross violations of human rights, or otherwise promote—

(i)compliance with international human rights law, or

(ii)respect for human rights,

(g)promote compliance with international humanitarian law,

(h)contribute to multilateral efforts to prevent the spread and use of weapons and materials of mass destruction, or

(i)promote respect for democracy, the rule of law and good governance.

31 E.g.: Euromed Rights, "Statement: Egypt's Diplomatic Missions Weaponized as transnational repression tool", 8 September 2025, available at: *https://euromedrights.org/publication/egypts-diplomatic-missions-weaponized-as-transnational-repression-tool/;* The News Line, "UK Soft on War Crimes Suspect – says Sri Lanka Campaign for Peace and Justice", 9 April 2012, available at: *https://wrp.org.uk/features/uk-soft-on-war-crimes-suspects-says-sri-lanka-campaign-for-peace-and-justice/.*

32 E.g.: YouTube, "Sky News - China Consul-General: It was my 'duty' to pull protester's hair", 19 October 2022, available at: *https://www.youtube.com/watch?v=BFGIM6I6EaQ.*

11. Champion a Council of Europe Convention on TNR

12. Existing Council of Europe instruments, including the ECHR, do not specifically and adequately address the distinctive challenges presented by TNR. There is no consistency or coordination in national approaches to tackling TNR across Europe. The scale and complexity of the challenges require urgent collective action by the Council of Europe on the definition, approach, and responses to TNR and its various forms across the Council of Europe space. To this end, there should be a Council of Europe-level binding legal instrument that would harmonise domestic legislation and policy on TNR and foster cooperation between member state ministries and agencies to effectively tackle TNR across Europe.

13. The Council of Europe has recognised the growing threat of TNR and the need for collective action by European governments. In June 2023, PACE passed Resolution 2491, urging member states to recognise TNR as a transnational attack on democratic values and the rule of law.[33] The resolution calls for coordinated legislative, diplomatic, and law enforcement responses.[34] In May 2024, the Steering Committee for Human Rights of the Council of Europe began considering the need for and feasibility of a non-binding additional instrument on TNR.[35] In our opinion, a non-binding additional instrument, as currently being contemplated, would not adequately meet the current and anticipated challenges of TNR. There is a need for binding harmonising standards setting out the responsibilities of member states to prevent and counter TNR conduct and on the right to protection and support for TNR victims. There is also a need for regional law to regulate inter-state cooperation and intelligence-sharing on TNR.

14. As a leading member of the Council of Europe and global advocate for human rights and democracy, the UK should champion a Council of Europe convention on TNR.

33 Parliamentary Assembly, "Transnational repression as a growing threat to the rule of law and human rights: Resolution 2509 (2023), 23 June 2023, para. 14, available at: *https://pace.coe.int/en/files/32999/html.*

34 Ibid.

35 Parliamentary Assembly, ""Transnational repression as a growing threat to the rule of law and human rights: Reply to Recommendation", Doc. 16114, 5 February 2025, available at: *https://pace.coe.int/en/files/34166/html.*