

mend

MEND SUBMISSION TO ISLAMOPHOBIA/ANTI-MUSLIM HATRED DEFINITION WORKING GROUP

1.1. This submission from Muslim Engagement and Development (MEND) to the Islamophobia/Anti-Muslim Hatred Definition Working Group's July 2025 call for evidence makes the argument that the government should adopt the All-Party Parliamentary Group on British Muslims' definition of Islamophobia ¹ over the term anti-Muslim hatred. This submission highlights the inherent and manifold flaws in the term anti-Muslim hatred, while underscoring the conceptual superiority and practical applicability of Islamophobia for legal, policy and institutional frameworks.

1.2. MEND is a community-funded organisation whose primary objective is to combat Islamophobia in Britain. We also work to encourage political, civic, and social engagement within British Muslim communities through empowering British Muslims to interact with political and media institutions effectively. Our approach to achieving this involves a combination of community engagement (through education, community events, local campaigns to encourage voting etc.) and advocacy work (involving victim support, submissions to parliamentary inquiries, media analysis, election resources, briefings etc).

2. Why the Government Should Adopt the APPG Definition of Islamophobia:

2.1. In 1997 The Runnymede Trust published its report, *Islamophobia: A Challenge for Us All*, highlighting the need to tackle Islamophobia.² Almost three decades later, Islamophobia not only persists but has intensified. Home Office data shows that Muslims have consistently been the most targeted group in religious hate crimes in the UK. In 2023/24, 38% of all religious hate crimes were targeted at Muslims.³ In October 2024 alone, Islamophobic incidents surged by 763%.⁴

Recent events underline this alarming trend. In summer 2024, far-right riots saw mosques vandalised, Muslim-owned businesses targeted and individuals assaulted.⁵ That August, a mosque in Northern Ireland was petrol bombed and defaced with racist graffiti.⁶ In March 2025, a mosque in Aberdeen was attacked during evening prayers.⁷ Political rhetoric has fuelled this hostility. Figures in Reform

¹ Defines Islamophobia as "rooted in racism and is a type of racism that targets expressions of Muslimness or perceived Muslimness."

² 'Islamophobia: A Challenge for Us All', The Runnymeade Trust, 1997, https://www.runnymedetrust.org/publications/islamophobia-a-challenge-for-us-all

³ Home Office. (2023) Hate Crime, England and Wales, 2022 to 2023, https://www.gov.uk/government/statistics/hate-crime-england-and-wales-2022-to-2023/hate-crime-england-and-wales-2022-to-2023

⁴ '763% Spike in Islamophobia for the Month of October 2024', Islamophobia Response Unit, 25 Nov 2024, https://www.theiru.org.uk/763-percent-spike-in-islamophobia/

⁵ 'How UK's Deep Rooted Islamophobia Problem Stoked Far-Right Riots', *The Independent*, 3 Aug 2024, https://www.independent.co.uk/news/uk/home-news/uk-islamophobia-farright-riots-b2590693.html

⁶ 'Northern Irish First Minister Condemns Mosque Attack and Other Violence', *The Guardian*, 11 Aug 2024, https://www.theguardian.com/politics/article/2024/aug/11/northern-irish-first-minister-condemns-mosque-attack-and-other-violence

⁷ 'Aberdeen Mosque Targeted in 'Despicable' Attacks as Police Open Probe', *The National*, 17 Mar 2025, https://www.thenational.scot/news/25012490.aberdeen-mosque-targeted-despicable-attacks-police-open-probe/

UK have openly called for the deportation of Muslims, while Nigel Farage has warned that Muslims want to form a "fifth column and kill us". 8

This underscores the urgent need for an official definition of Islamophobia. In 2018, the All-Party Parliamentary Group (APPG) on British Muslims proposed a widely consulted and rigorous definition: "Islamophobia is rooted in racism and is a type of racism that targets expressions of Muslimness or perceived Muslimness". ⁹ This is the most widely recognised definition of Islamophobia in the UK and should be adopted by the UK government. It has been endorsed by over 850 Muslim organisations, more than 100 academics, over 60 local authorities and a number of political parties except the Conservatives. ¹⁰ Labour adopted the APPG when under the leadership of Jeremy Corbnyn, but moved away from soon after being voted into government ¹¹

The APPG definition recognises that Islamophobia is not limited to hate crimes but includes structural and institutional racism. ¹² It acknowledges that people are often targeted based on perceived Muslim identity through names, clothing or skin colour, mirroring how racism operates. ¹³ As former APPG vice-chair Wes Streeting said, Islamophobia is a form of "structural, often unconscious, bias." ¹⁴

While some critics have argued that the definition could stifle free speech or act as a "blasphemy law", these concerns are unfounded. 15 The definition distinguishes between criticism of religion, which is protected under British law, and hate directed at individuals because they are, or perceived to be, Muslim. Rather it targets the demonisation of Muslims and includes guidance to prevent misuse.

The APPG definition provides a robust and useful definition of Islamophobia which reflects the lived experiences of British Muslims, aligns with legal principles and upholds freedom of speech. Its adoption by the government would establish consistency across sectors, facilitating clearer legal, policy and educational responses to Islamophobic hate. To ensure clarity in application, the definition

⁸ 'Reform UK drops two more election candidates over racist comments', *The Guardian*, 3 Apr 2024, https://www.theguardian.com/uk-news/2024/apr/03/reform-uk-drops-two-more-election-candidates-over-racist-comments; 'Nigel Farage on Jews, Muslims, Palestinians and Israel: His Most Controversial Quotes', *Middle East Eye*, 4 Jun 2024, https://www.middleeasteye.net/news/nigel-farage-jews-muslims-palestinians-and-israel-his-most-controversial-quotes

⁹ 'Islamophobia Defined: The Inquiry into a Working Definition of Islamophobia', All Party Parliamentary Group on British Muslims,

https://static1.squarespace.com/static/599c3d2febbd1a90cffdd8a9/t/5bfd1ea3352f531a6170ceee/154331510 9493/Islamophobia+Defined.pdf

¹⁰ "Approaching a Definition of Islamophobia", Community Policy Forum, Oct 2024, https://communitypolicyforum.com/wp-content/uploads/2024/10/Position-Paper-Approaching-a-Definition-of-Islamophobia.pdf

¹¹ 'UK Government Quietly Backs away from Islamophobia Definition,' Hyphen, 18 September 2024, https://hyphenonline.com/2024/09/18/uk-government-quietly-backs-away-from-islamophobia-definition/

¹² 'Defining Islamophobia: A Contemporary Understanding of How Expressions of Muslimness Are Targeted', Muslim Council of Britain, 2021, https://mcb.org.uk/wp-content/uploads/2020/11/SINGLE-SPREAD-Report-020321_compressed.pdf

¹³ Chris Allen, 'Why UK's Working Definition of Islamophobia as a 'Type of Racism' is a Historic Step', *The Conversation*, 27 Nov 2018, https://theconversation.com/why-uks-working-definition-of-islamophobia-as-a-type-of-racism-is-a-historic-step-107657; 'Right Definition for the Right Fight', *Institute of Race Relations*, 23 May 2019, https://irr.org.uk/article/right-definition-for-the-right-fight/

¹⁴ 'Yes, Islamophobia is a Type of Racism. Here's Why, *The Guardian*, 15 May 2019, https://www.theguardian.com/commentisfree/2019/may/15/islamophobia-racism-definition-free-speechtheresa-may

¹⁵ 'What is Islamophobia and Why does Tory Government Not Accept Definition?', *The Guardian*, 27 Feb 2024, https://www.theguardian.com/news/2024/feb/27/what-is-islamophobia-and-why-does-tory-government-not-accept-definition

should be used alongside the Coalition Against Islamophobia's guidelines, which protect freedom of expression while clarifying how Islamophobia manifests in practice. 16

3. Why Islamophobia and not Anti-Muslim Hatred?

This section of the submission outlines the core reasons why the term "Islamophobia" should be used over alternative terminologies, such as "anti-Muslim hatred." Employing use of the extant academic literature, the advice of legal experts and scholars, along with the lived experiences of the victims of this type of discrimination, we argue here that the term "Islamophobia" offers a more comprehensive, all-encompassing and actionable conceptualisation of the unique types of prejudice faced by Muslims and those perceived to the Muslim living in Britain.

3.1. Why do some prefer "Anti-Muslim Hatred"?

Some argue for the widespread employment, and public discourse and among policymakers, of the term anti-Muslim hatred instead of Islamophobia¹⁷. The argument made by proponents of the term anti-Muslim hatred usually relate to its purported definitional clarity and clearer enforceability in the legal and policy worlds. Indeed, it is commonplace for critics of the term Islamophobia to argue that its definitional elasticity means that it allows for the conflation of legitimate criticism of religious ideas and practices with discrimination against the group of people holding those ideas and/or engaged in those practices - in this case Muslims ¹⁸. Such people typically argue that the inherent vagueness of the term Islamophobia means that it is amenable to exploitation by those who may wish to insulate Islam from any critique or criticism, having a chilling effect on freedom of speech in the UK. From this perspective, they may argue that anti-Muslim hatred is more precise in its parameters, clearly targeting prejudice against Muslims as people, or at least people who are perceived to be Muslim, rather than religious ideas. Proponents of the term anti-Muslim hatred argue that its definitional clarity means that it is more easily applied in legal and policy contexts. These who prefer the term anti-Muslim hatred point out that protection against discrimination based upon religious belief is already covered in extant hate crime laws ¹⁹. The widespread employment of anti-Muslim hatred - they argue - will help to avoid the more ambiguous connotations associated with Islamophobia.

4. The Case for Islamophobia over anti-Muslim Hatred.

This section outlines the core reasons why MEND believes the term anti-Muslim hatred does not go anywhere near far enough toward addressing the experiences of discrimination, bigotry and hostility faced by Muslims on a daily basis across the UK. We argue that, while we believe freedom of speech to be a fundamental bedrock of our democracy, arguments like those made above are fallacious, fail to take into account the gravity of discrimination faced by many Muslims and, worryingly, are often

Islamophobia or Anti-Muslim Racism - or What? - Concepts and Terms Revisited. Robin Richardson. http://www.insted.co.uk/anti-muslim-racism.pdf

http://www.civitas.org.uk/content/files/islamophobiaananthologyofconcerns.pdf

 $^{^{16}\, \}hbox{`CAI Guidelines', Coalition Against Islamophobia,} \, \underline{\hbox{https://coalitionagainstislamophobia.org}}$

¹⁷ Defining 'Islamophobia' is Not the Answer to Combatting Anti-Muslim Hate. The National Security Society. August 2024. https://www.secularism.org.uk/opinion/2024/08/defining-islamophobia-is-not-the-answer-to-combatting-anti-muslim-hate

¹⁸ Islamophobia: An Anthology of Concerns. Civitas. 2019.

¹⁹ Angela Rayner to Promise New Definition of Islamophobia. Free Speech Union. March 2025. https://freespeechunion.org/angela-rayner-to-promise-new-definition-of-islamophobia/

weaponised by an increasingly emboldened far-right movement to deny the painful experiences of Muslims who have been discriminated against by virtue of their religious beliefs.

4.1. Free Speech

Firstly, it must be stressed that proponents of the term Islamophobia do not intend to suppress freedom of speech around religious critique, or is this the practical effect of its proper usage ²⁰. The APPG definition very explicitly protects freedom of expression while clearly delineating the boundary where the right to critique religious ideas and practices ends and protection from discrimination begins. The flagship 2018 APPG on British Muslims report, Islamophobia Defined, invited evidence from those concerned that the proposed definition of Islamophobia could hinder freedom of speech around religion. Indeed, the report clearly states that the definition:

"[does] not to interfere with the right of individuals to criticise Islam or engage Muslims in critical discussions about their religion." ²¹

Elsewhere the report explicitly states that:

"Criticism of religion is a fundamental right in an open society and is enshrined in our commitment to freedom of speech." ²²

Let us be clear: it is not Islamophobic to criticise Islam. Islamophobia describes a type of racialised religious discrimination targeting people; not the ideas that those people hold. Indeed, the 2018 APPG report goes at lengths to argue that its proposed definition does not prevent legitimate debate or theological critique about Islamic beliefs or practices. The report draws a clear boundary between the criticism of ideas on one hand - which it makes clear must be protected under freedom of speech laws - and discrimination or hostilities toward people based on their "perceived Muslimnes" on the other. It is the latter point that the APPG definition of Islamophobia seeks to deal with. We must reject the false dichotomy between protecting free speech and protecting individuals/groups from systemic discrimination. Islamophobia as a term and sociological concept allows our societies to both defend the civil liberties that are a cornerstone of our democracy while confronting deeply embedded forms of systemic and structural discrimination and racism.

4.2. Systemic discrimination and Institutional Islamophobia

²⁰ For examples see Defining Islamophobia: A Contemporary Understanding of How Expressions of Muslimness are Targeted. The Muslim Council of Britain. March 2021. https://mcb.org.uk/wp-content/uploads/2022/11/FULL-SPREAD-IslamophobiaReport_020321_compressed.pdf

Islamophobia, Free Speech and Multicultural Equality, in Symposium on Tariq Modood, Essays on Secularism and Multiculturalism. 2019. https://research-information.bris.ac.uk/en/publications/islamophobia-free-speech-and-multicultural-equality-in-symposium-

²¹ Islamophobia Defined. All-Party Parliamentary Group on British Muslims. 2018. p.18. https://static1.squarespace.com/static/599c3d2febbd1a90cffdd8a9/t/5bfd1ea3352f531a6170ceee/15433151 09493/Islamophobia+Defined.pdf

²² Islamophobia Defined. All-Party Parliamentary Group on British Muslims. 2018. p.11. https://static1.squarespace.com/static/599c3d2febbd1a90cffdd8a9/t/5bfd1ea3352f531a6170ceee/15433151 09493/Islamophobia+Defined.pdf

Unlike anti-Muslim hatred, Islamophobia provides a more comprehensive conceptual framework for addressing the full spectrum of prejudice faced by Muslims. While it does include overt acts of pedestrian hatred - such as a Muslim woman having her headscarf torn off in the street - it necessarily goes further, by incorporating the forms of systemic and institutionalised discrimination faced by Muslims ²³. Focusing on the quantifiable acts of day-to-day anti-Muslim hatred, as the term anti-Muslim hatred does - while important - fails to account for Islamophobia as a broader sociological problem. By focusing solely on the concrete and measurable acts of anti-Muslim hatred, anti-Muslim hatred fails to take into account one all-important point: the very socio-cultural contexts and structures that give rise to and legitimate those acts in the first place.

Islamophobia, is an innately sociological concept that recognises the prejudice and bigotry faced by Muslims in Britain is produced and reproduced by certain ideas/assumptions embedded in our laws, policies and culture. Unlike anti-Muslim hatred, Islamophobia equips policymakers with a sociological lens through which to carry out structural analyses of discriminatory policies embedded within, for example, immigration, counter-terrorism legislation, media portrayals of Muslims and employment practices. It is important to note that none of this systemic and structural prejudice against Muslims employs any 'hatred' at all towards Muslims, and hence would not be captured by the narrower term 'anti-Muslim hatred.'

Islamophobia also captures the narrative drivers of discrimination against Muslims, including myths of a 'Muslim takeover' of Europe and notions of a civilisational conflict between Islam and the Christian West. This compounds the need for the government to accept the APPG definition of Islamophobia, which by is able to capture these instances of systematic discrimination.

4.3. The Language of Structural Discrimination

The term anti-Muslim hatred risks treating discrimination, prejudice and bigotry against Muslims as an isolated phenomenon, divorced from the broader sociological factors that produce and sustain such patterns of racial and religious oppression. If anti-Muslim hatred is adopted as the language to capture prejudice against Muslims then this gives carte blanche to those who accept and perpetuate structural Islamophobia to continue, with the argument that they are not demonstrating any hatred towards Muslims.

4.4. Racialisation and Perceived Muslimness

The concept of Islamophobia captures the fact that in practice this form of discrimination is often heavily racialised, and targets people because they are perceived to be Muslim, even if they are actually non-Muslim ²⁴. Non-Muslim South Asians, such as Sikhs, have often been targeted because the perpetrator believed them to be Muslim based upon phenotypical characteristics, such as skin colour and a beard, or because of certain cultural markers perceived to be Muslim, such as the wearing

The Politics of Islamophobia: Race, Power and Fantasy. David Tyrer. 2013. https://www.plutobooks.com/9781849648745/the-politics-of-islamophobia/

Islamophobia, Racial Discrimination Law and the Question of Self-Identification. Intersections on Race and Religion. 2024. https://www.tandfonline.com/doi/full/10.1080/1070289X.2024.2362048

²³ For more on systemic Islamophobia, see: Islamophobia in Britain: The Making of a Muslim Enemy. Leonie Jackson. 2017. https://link.springer.com/book/10.1007/978-3-319-58350-1

²⁴ British Men Suffering Islamophobic Abuse Because They 'Look Muslim,' Research Reveals. The Independent. 2017. https://www.independent.co.uk/news/uk/home-news/muslim-hate-abuse-racism-uk-verbal-physical-emotional-look-beards-islamophobia-research-a8005156.html

of a turban. The narrow remit of the term anti-Muslim hatred fails to account for this, as it fails to account for the racism or cultural racism that drives such bigotry, focusing only on "Muslimness" and not "perceived Muslimness." By honing in on the latter, the term Islamophobia explicitly highlights the process of racialisation involved. Indeed, this inbuilt definitional flexibility is important when crafting policy responses that address the full range of affected communities, which includes non-Muslims perceived as being Muslim. A government decision to legislate the APPG definition of Islamophobia would give legal and social parity by incorporating the ongoing discrimination faced by Muslims in the streets, media, politics, housing and workplace into mainstream equality and antiracism frameworks.

4.5. Widespread Usage

The term Islamophobia has accrued significant usage in both domestic and international policy arenas, highlighting its widely accepted legitimacy. For example, the United Nations recognises March the 15th as the International Day to Combat Islamophobia, with that date being chosen as the anniversary of the mass shootings at the Christchurch Mosque in New Zealand, in which 51 Muslims were killed during Friday prayer in 2019. The European Commission against Racism and Intolerance (ECRI) systematically documents attendance across EU member states. In the UK, the APPG definition has been widely accepted by councils, political parties, trade unions and numerous civil society bodies. In academia, numerous books and peer-reviewed journal articles have been written about Islamophobia ²⁵, bodies have been set up with the sole purpose of studying the phenomenon while activists have long employed it ²⁶. Terms like anti-Muslim hatred, on the other hand, have gained nowhere near the same level of popular usage.

5. Guidelines for Defining and Identifying Islamophobia.

- 5.1. When defining Islamophobia, we recommend the following criteria are met:
- 1. Islamophobia is a form of racialised religious discrimination. Any government-adopted definition of Islamophobia should acknowledge that it operates at the intersection of race and religion in line with legal precedent in the UK and Europe. For example, the Equality Act of 2010 affirms that discrimination can arise from a combination of racial and religious identities.
 - 2. The definition should include structural, institutional, cultural and interpersonal forms of Islamophobia. This includes state-led policies like Prevent which organisations like the United Nations and Amnesty International have long recognised unfairly discriminates against Muslims workplace discrimination, street-based hate crimes, surveillance of Muslim communities and the media's role in perpetuating harmful stereotypes around Muslims.
 - 3. A meaningful government definition must forged with, and accepted by, a broad spectrum of grassroots Muslim actors and community representatives. Government-imposed organisations, or tokenistic consultations with cherry-picked groups, only serve to undermine legitimacy and effectiveness.

According to the author's own quantitative analysis, at least 8 out of 10 academic article abstracts directly use the term "Islamophobia" in discussing discrimination against Muslims.

²⁵ Some of which have been referenced in the footnotes of this submission. For more examples see: The Muslims are Coming. Arun Kundnani. 2015. The Islamophobia Industry. Nathan Lean. 2017. Islamophobia and the Politics of Empire. Deepa Kumar. 2021.

²⁶ See Coalition Against Islamophobia: https://coalitionagainstislamophobia.org/

- 4. The definition must reflect how Islamophobia intersects with gender, race, class, age, and migration status affecting visibly Muslim women, Black Muslims and coverts in distinct ways.
- 5. The definition must be very clear in distinguishing between legitimate critique of religious ideas and practices on one hand and the right to freedom from hate speech against Muslims in the other. Hate speech or incitement is not a matter of freedom of speech, nor is it protected by freedom of speech laws.
- 6. The definition must be operational across both statutory and non-statutory domains, allowing it to guide public policy, legislation, equality monitoring and institutional conduct. Where it is deemed necessary, statutory reform should extend the legal concept of race to fully protect multi-ethnic religious groups such as Muslims.
- 7. The definition should reflect the UK's legal obligations and build upon legal precedent that recognises ethno-reliigous identity as a protected characteristic, thereby harmonising domestic protections with international human rights commitments.
- 8. The definition should be adopted and utilised by all public sector bodies.
- 5.2. When identifying examples of Islamophobia, we recommend the following guidelines are followed, which are distillations of those outlined and agreed upon by The Coalition Against Islamophobia ²⁷.
- Inciting, justifying, or facilitating violence against Muslims or those perceived to be Muslim on the basis of their religious identity.
- Causing, calling for, aiding, or justifying the killing or harming of individuals due to their perceived or actual association with Muslims.
- Alleging that Muslims collectively threaten humanity, Western values, or are to blame for societal or economic ills faced by the Western world.
- Promoting dehumanising, vilifying, or stereotypical claims about Muslims.
- Generalising Muslims as culturally incompatible, exotic, underdeveloped, inferior, or inherently different from British society and incompatible with its values, institutions and norms.
- Espousing the inferiority of Muslims relative to other social and/or religious groups.
- Attributing collective guilt to Muslims for actions of individual Muslims, groups, states, or even non-Muslims.
- Imposing behavioural or moral standards uniquely on Muslims not expected of other groups.
- Committing or endorsing attacks verbal, physical, or symbolic against individuals, institutions, or property identified as Muslim or associated with Muslims.

²⁷ See The Coalition Against Islamophobia: https://coalitionagainstislamophobia.org/

• While legitimate critique of Islam is not Islamophobic, it becomes so when used to encourage hatred, dehumanisation, or collective condemnation of Muslims. A typical example would be using criticism of religion to argue that Muslims are collectively evil or uniquely predisposed toward violence.

How Can MEND Assist Parliamentarians, Policymakers and Community Stakeholders?

- Providing briefings, information, analysis, and expertise on issues impacting Muslim communities.
- Arranging opportunities for parliamentarians, policymakers, and community stakeholders to engage with their local Muslim communities.
- Conducting research within Muslim communities.
- Connecting parliamentarians, policymakers, and community stakeholders to other local stakeholders.