



**International
Development
Committee**

Wednesday, 17 June 2026

The Rt Hon Shabana Mahmood MP
Secretary of State for the Home Department
Home Office

The Rt Hon Baroness Chapman of Darlington
**Minister of State (International Development and Africa) for Foreign,
Commonwealth & Development Office**

[By email]

Subject: National Security (State Threats) Bill: implications for humanitarian organisations and development delivery

Dear Home Secretary,

I am writing on behalf of the International Development Committee regarding the National Security (State Threats) Bill and its implications for humanitarian organisations.

The committee recognises the government's objective of strengthening the United Kingdom's ability to deter, detect and disrupt threats from foreign states and their proxies, including through the creation of new offences relating to designated bodies. We acknowledge that the Bill is intended to build on the National Security Act 2023 and to provide additional tools to address state threats.

However, the committee is concerned that the new offences may have unintended consequences for impartial humanitarian actors and, more broadly, for the delivery of UK-supported assistance in complex environments.

Humanitarian organisations often operate in areas where state-linked actors exercise territorial control. In such contexts, engagement with all parties to a conflict may be necessary to secure access to affected populations, obtain security guarantees, maintain staff safety, and deliver life-saving assistance. We have been told by those in the sector that this may include direct meetings with relevant actors, provision of medical care, visits to detainees, use of local systems, and payment of routine operational costs such as permits, taxes and utilities.



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The committee notes that the Bill creates offences of supporting a designated body, assisting a designated body, and obtaining or accepting material benefits from a designated body. We also note that the explanatory notes say the offences are without prejudice to any applicable privileges and immunities, and are not intended to criminalise conduct relating to humanitarian assistance or other activities that support basic human needs. We are however concerned that, absent clear safeguards on the face of the Bill, routine humanitarian activities could be placed at risk of criminalisation, even where they are carried out solely for humanitarian purposes and in accordance with international humanitarian law. At a minimum, the Bill creates legal uncertainty for humanitarian organisations, which may result in a chilling effect on their activities.

Assisting a designated body

The committee is particularly concerned by the breadth of the proposed offence in new section 17B. As drafted, section 17B would criminalise conduct intended materially to assist a designated body in carrying out UK-related activities, as well as conduct likely materially to assist such a body where the person knows, or ought reasonably to know, that this is likely. The Bill further provides that conduct which may be likely materially to assist includes providing, or providing access to, information, goods, services or financial benefits.

The committee notes that the Explanatory Notes state that conduct relating to humanitarian assistance or other activities that support basic human needs, in accordance with domestic and international law, would not be such conduct if it assists overseas activities by a designated body, since those activities would not be contrary to the safety or interests of the United Kingdom within the meaning of section 17B(4)(b).

However, the committee remains concerned that the Bill does not contain an express exemption for humanitarian organisations on its face. In practice, humanitarian organisations may need to provide goods or services, engage with local authorities, or maintain an operational presence in areas under the control of a designated body. These ordinary features of humanitarian action could potentially fall within the scope of the offence.

This raises a risk not only of prosecution, but also of investigation, delay and operational hesitation, which may impede life-saving activity. We are concerned that reliance on exclusions, defences or licensing mechanisms is not an adequate safeguard, particularly in humanitarian emergencies.



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Obtaining material benefits from a designated body

The committee is also concerned about the implications of new section 17C. As drafted, section 17C would make it an offence to obtain, accept or retain a material benefit from a designated body, or to agree to accept such a benefit, where the person knows or ought reasonably to know its source. "Material benefits" may include financial benefits and information.

While the Bill contains certain exclusions and defences, the committee is concerned that humanitarian and related actors may still face uncertainty in circumstances where information, access arrangements, or other practical forms of engagement are required in order to operate safely and effectively in conflict settings.

The committee is concerned about the wider operational effects of these provisions. We have been warned by those in the sector that broadly framed offences may contribute to de-risking by banks, suppliers, logistics providers and other commercial actors, thereby making it more difficult for humanitarian organisations to function in affected environments. Further, donors may become more reluctant to support operations in areas where designated groups are present.

Humanitarian exemption

We accept that the offences are not intended to criminalise conduct relating to humanitarian assistance, however, we are concerned that this assurance is not expressly included in the Bill itself.

Will you consider amending the Bill to include an express humanitarian exemption making clear that offences relating to designated bodies do not apply to the activities of impartial humanitarian organisations acting in accordance with international humanitarian law?

We would also be grateful if you could provide the committee with the government's assessment of the Bill's potential impact on humanitarian access, the delivery of UK-supported assistance, and the willingness of banks, suppliers and implementing partners to support operations in areas where designated bodies are present.

We request a response to this letter as soon as possible. As is standard practice, we will be placing this letter and your response in the public domain.



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I have also copied this letter to the Minister for International Development and Africa for the Foreign, Commonwealth and Development Office.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Champion'.

**Sarah Champion MP
Chair of the International Development Committee**