

# National Security (State Threats) Bill 2026

Bond briefing note June 2026

## Background

Last week the Government introduced the National Security (State Threats) Bill 2026, which creates new offences related to interaction with “designated bodies” linked to foreign states. Whilst we appreciate the Bill’s intention, absent of adequate carveouts in the Bill itself, **we are deeply concerned by the potential unintended consequences it will likely have on our humanitarian, development and peacebuilding operations.**

The Bill builds on the National Security Act 2023 and would give the Secretary of State a new power to designate bodies involved in threat activity linked to foreign powers. It’s broadly modelled on proscription under the Terrorism Act 2000 (for which there are also no humanitarian activity exceptions or General License provisions) and introduces a set of new criminal offences linked to those designated bodies, including where states use proxies to carry out activity in the UK.

## What are our concerns?

- If the Bill passes in its current form – without adequate humanitarian safeguards – UK aid organisations **are likely to face significant barriers to assisting people in countries where this new law will apply.**
- The negative consequences of the new Bill on aid operations will likely be very similar to those resulting from the Terrorism Act, **which have been comprehensively documented**, including by independent think tanks such as [Chatham House](#) and [ODI Global](#). Issues include extensive de-banking, difficulties supporting basic public health, education, water and other services, and challenges accessing critical aid supplies.
- Our principal concerns relate to the offences listed in sections **17B and 17C of the proposed NS 2026 Bill**. Each offence carries a maximum penalty of up to 14 years’ imprisonment, a fine, or both. Aid organisations work in highly complex environments where, in order to provide assistance, they are required to engage with all parties and may be required to pay regulated and compulsory fees, for example for visas, utilities, municipal and state taxes (where it has been impossible to negotiate tax rebates or similar exceptions). Such payments are permissible under UN Security Council Resolution 2664 in relation to UN sanctions but could be problematic under sections 17B and 17C of the new National Security (State Threats) Bill 2026.
- We welcome the Government’s inclusion of safeguards and defences related to humanitarian and activities to support basic human needs in the Bill’s Explanatory Notes and accompanying Factsheet. However, at present this is not reflected in

the Bill itself. We know from experience that most donors, banks, and private sector suppliers to aid agencies **require legal certainty to be written into the legislation itself to feel adequately assured and to avoid overcompliance / the ‘chilling effect.’**

- **The solution is to adapt the language currently proposed in sections 43 and 50 of the Explanatory Notes so that it is inserted into the Bill itself (in relation to sections 17B and 17C): *Conduct relating to humanitarian assistance or other activities that support basic human needs does not constitute unlawful conduct.***

## **Wider Context and Precedent (Sanctions and Counterterrorism)**

- **The UK has previously shown global leadership in its efforts to safeguard humanitarian action around the world** – particularly its successful push to secure UN Security Council Resolution 2664. This Resolution stipulates that a range of activities necessary to ensure the timely delivery of humanitarian assistance or to support basic human needs are not a violation of UN sanctions.
- The UK has committed in its own strategy, [Deter, disrupt and demonstrate – UK sanctions in a contested world](#) to minimise the "unintended consequences from sanctions within the UK and globally – including to protect humanitarian priorities; to address implications for businesses and for the UK and global economy; and to enable specified legitimate activity."
- The Independent Reviewer of Terrorism Legislation (IRTL), Jonathan Hall KC, notes that "there is a debilitating tension between the demands of the Terrorism Act 2000, and imperatives of international aid and peacebuilding" and that "there is **no effective mechanism** which allows humanitarian organisations to get permission or a waiver from possible criminal liability where those risks are found to exist."
- The Counter-Terrorism and Border Security Act 2019 includes an [exception](#) from the designated area offence for 'aid of a humanitarian nature.'

## **What needs to change?**

We understand that the intention is for the Bill to be fast-tracked. We are therefore **asking the Government to delay this process to allow adequate time to consult with the Tri-Sector Working Group to ensure the Bill is fit for purpose.** This would align with the recommendation by the Independent Reviewer of Terrorism Legislation in his report on the Terrorism Acts in 2023, [accepted](#) by the Government, to consult with the Tri-Sector Working Group on this type of legislation.

However, given we think the delay is very unlikely, we are asking parliamentarians to:

- Make interventions with a Home Office Minister / whips to ask for an exception for humanitarian agencies.
- Support any amendment proposing a humanitarian exception put forward in either the House of Commons on Wednesday 17<sup>th</sup> June, or in the subsequent votes in the House of Lords.
- Raise concerns in Parliament about the risks to aid operations and ask for on the record assurance from Ministers that activities that address humanitarian need, or prevent or resolve conflict, are not within the scope of the proposed legislation.

As stated, we welcome the Government's intention to keep its citizens safe. But the transient process in which this Bill is being pushed through, and the lack of any humanitarian exception, will not only put UK citizens at risk of arrest, but will hamper our organisations' ability to operate.

## **About Bond**

Bond is the UK network for organisations working in international development, humanitarian aid and peacebuilding. Many of our members work in high-risk jurisdictions to deliver vital humanitarian aid, peacebuilding and development activities.

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