

PARLIAMENTARY BRIEFING

Reviewing the Islamic Centre of England and the Wider IRGC-Linked Institutional Network

A case for a whole-system review of Iranian state-linked charitable, religious, and civic infrastructure operating in the United Kingdom.

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AUGUST 2026

OVERVIEW

A Policy Inconsistency at the Heart of UK National Security

The United Kingdom now treats the Islamic Revolutionary Guard Corps (IRGC) as a major state-threat concern and has strengthened the legal architecture available to counter those acting on its behalf in Britain. Yet a serious policy inconsistency remains.

Institutions with documented historic ties to the Iranian Supreme Leader's office, and with repeated regulatory concerns attached to them, have continued to benefit from forms of legal, administrative, and reputational legitimacy inside the UK. This briefing argues for a whole-system review, not merely a narrow review of one institution.

The Islamic Centre of England should be examined as part of a broader mapping exercise into the full IRGC-aligned or IRGC-enabling institutional ecosystem in Britain, including charities, religious centres, educational entities, community associations, cultural bodies, and visa-sponsoring structures where relevant.

An entity cannot plausibly claim charitable protection while operating under structural influence from actors or ideological chains associated with a hostile state apparatus that the UK itself has identified as a national-security threat.

Where organisations are shown to operate contrary to charity law, to lack independence from hostile state influence, or to function as vehicles for extremist propaganda, political influence, or operational facilitation, the Charity Commission and relevant authorities should use the full extent of their statutory powers, including removal of charitable status where the legal threshold is met.

CORE RECOMMENDATION — MINISTERS AND PARLIAMENT SHOULD CALL FOR

An urgent cross-government review of the Islamic Centre of England, including governance, funding, programming, overseas affiliations, speaker networks, immigration sponsorship activity, and compliance with charity law.

A wider review of the full IRGC-linked or IRGC-sponsored institutional structure operating in the UK, including entities that may not formally identify as political but that function as ideological, logistical, financial, or influence nodes.

A Charity Commission-led and Home Office-supported examination of whether charitable status is being used to shield institutions whose operations are inconsistent with public benefit, independence, and national security.

Consideration of suspension, regulatory intervention, trustee disqualification, removal of charitable status, or referral for further enforcement action where legal tests are satisfied.

THE STRUCTURAL PROBLEM

A Question of State Coherence

A review confined solely to the Islamic Centre of England would risk treating a structural problem as an isolated anomaly. The strategic concern is not merely that one institution has faced repeated regulatory findings, but that the UK may be dealing with a broader ecosystem of religious, cultural, charitable, and educational bodies which, taken together, create an enabling environment for Iranian state influence and ideological projection.

Britain cannot claim to have hardened its posture toward the IRGC while leaving institutional side doors open through approved sponsorship channels, historical ties to Tehran's religious authority, and bodies that retain public-facing legitimacy despite repeated governance failures.

Where one arm of government identifies an Iranian structure as a security threat while another continues to confer administrative legitimacy on aligned entities, the result is not prudence but contradiction.

EVIDENCE RELEVANT TO THE ISLAMIC CENTRE OF ENGLAND

The Islamic Centre of England has already been the subject of substantial public concern and formal regulatory action. In 2021, a Foreign Office minister stated in Parliament that the Islamic Centre of England and its director were the official religious representatives in the UK of Iran's Supreme Leader, Ayatollah Ali Khamenei. That fact alone raises obvious questions about independence, governance, and whether a UK charity can properly function while structurally tied to the religious-political authority at the apex of the Islamic Republic.

In May 2025, the Charity Commission stated that it had found misconduct and/or mismanagement in the administration of the Islamic Centre of England and issued a formal order under section 84 of the Charities Act 2011 requiring significant governance reforms. During that inquiry, the requirement in the governing document that one trustee serve as the official UK religious representative of the Supreme Leader of Iran was removed because of concerns about conflicts of interest and the charity's apparent lack of independence.

Additional public reporting has linked the regulator's concerns to events held at the charity's premises that eulogised Qasem Soleimani, the late commander of the IRGC's Quds Force, and to further concerns over items allegedly suggesting support for Hezbollah being sold at a later event while the inquiry remained ongoing. Even where allegations require proper legal testing, the cumulative pattern is already sufficient to justify a far more rigorous state response than piecemeal casework.

THE THREAT ENVIRONMENT

The IRGC Is a State-Threat Actor, Not a Controversial Foreign Body

The Government has made plain that Iranian malign activity, including that of the IRGC, is unacceptable, and the UK has sanctioned the IRGC in its entirety. Ministers have pointed to the National Security Act 2023 as a major new toolkit against individuals working for state entities such as the IRGC, including where activities involve espionage, political interference, sabotage, or assassination. In July 2026, the Government announced new powers effectively outlawing support for the IRGC and linked groups, reflecting the severity with which the UK now views the threat.

This matters for charity policy because institutions do not become security-neutral merely by adopting charitable or religious form. If an entity operates as a prestige platform, recruitment environment, ideological relay, funding conduit, or logistical facilitator for a hostile state network, its formal legal wrapper does not diminish the security risk. It can increase it, by granting public legitimacy and lowering scrutiny thresholds.

Influence Operations Work Through Civic and Religious Infrastructure

Modern hostile-state activity does not depend only on spies, covert operatives, or direct terror plots. It also works through softer structures: representative bodies, religious authorities, community institutions, cultural programming, educational outreach, and organisations able to shape narratives, recruit sympathisers, and provide access or cover. Foreign influence and ideological entryism frequently operate by embedding themselves within open institutions, gaining legitimacy, suppressing scrutiny, and reshaping civic space from within.

The Risk Is Cumulative, Not Only Episodic

A conventional law-enforcement mindset can underestimate ideological and institutional threats because it looks for discrete offences rather than cumulative patterns. Yet the strategic problem may consist of repeated governance failures, symbolic alignment with sanctioned actors, conflict-of-interest structures, propaganda dissemination, administrative sponsorship privileges, and recurrent overlap with the authority structures of a hostile regime.

A state serious about countering hostile influence cannot wait for every node to ripen into a standalone prosecution if the broader architecture already indicates structural risk.

CHARITY LAW FUNDAMENTALS

Charitable Status Is Conditional, Not Absolute

Charitable status in English law is not a shield against scrutiny; it is a privileged status contingent on compliance with legal duties. Trustees must ensure that a charity acts only in furtherance of its purposes, provides public benefit, manages conflicts appropriately, complies with the law, protects charitable assets, and exercises reasonable care and skill. That principle applies with even greater force where national-security concerns and hostile-state influence are in view.

Independence From Foreign Political-Religious Authority Is Legally Relevant

The Charity Commission has already stated that removal of the requirement for a trustee to act as the official UK religious representative of the Supreme Leader of Iran addressed concerns about conflicts of interest and apparent lack of independence that were at odds with charity law. This is a crucial point: the regulator has already publicly recognised that formal structural ties to the apex authority of the Iranian state created a legal governance problem.

That finding has implications beyond one charity. Any organisation whose constitutional arrangements, trusteeship, operational direction, funding dependencies, or effective control reflect comparable subordination to a hostile foreign authority should be examined for the same reasons. The issue is not theology; it is legal independence, public benefit, and national integrity.

Public Benefit Cannot Be Reconciled With Extremist Glorification

A charity exists to advance recognised purposes for public benefit. Where events, programming, speakers, publications, or sales activity glorify sanctioned extremists, disseminate propaganda aligned to violent or proscribed actors, or create an enabling environment for a hostile state's influence operations, serious questions arise as to whether the organisation is acting consistently with its stated objects or with charity law at all.

STANDARD OF RESPONSE

The legal response should be evidence-led and procedurally fair. But fairness does not require passivity. If the evidence shows repeated misuse of charitable form or persistent governance structures incompatible with charitable status, the case for removing that status becomes compelling.

ESTABLISHED REGULATORY FAULT LINES

The argument for intervention is not novel. UK charity regulation already rests on settled precedent that charitable status is a conditional public privilege, not an immunity from scrutiny. The Charity Commission has repeatedly intervened where trustee independence broke down, where conflicts of loyalty distorted governance, where connected-party influence displaced independent judgment, or where charities were used as fronts or vehicles for conduct incompatible with charitable purposes.

Independence and Conflicts of Loyalty

The Charity Commission's own guidance makes clear that trustees must exercise judgment in the interests of the charity, not an external founder, controller, or affiliated body — a principle that applies a fortiori where the outside influence is a foreign political-religious authority or state-linked network.

Removal From the Register and Trustee Disqualification

In the All Wales Ethnic Minority Association case, the Commission removed the organisation from the register after prolonged governance failures. In a 2025 case, trustees were disqualified after a charity was used as a front for criminal activity — demonstrating charitable form does not protect an organisation when trustees fail in their core duties.

Foreign-Directed Civic Activity as a National-Security Concern

The National Security Act 2023 and the Foreign Influence Registration Scheme show Parliament has already accepted that activities carried out at the direction of foreign powers can pose sufficient risk to require transparency obligations and, in some circumstances, criminal penalties for non-compliance.

A Whole-Network Approach, Not Siloed Casework

Charity regulation already examines governance design, patterns of non-compliance, and relationships of control across an organisation as a whole. A whole-network review of IRGC-linked structures would therefore not be mission creep — it is the ordinary logic of modern regulation applied to a foreign-influence problem.

FOUR PRECEDENT-BASED TESTS

Independence test: Can trustees demonstrate genuine independence from foreign political-religious direction?

Public-benefit test: Are activities genuinely directed to charitable public benefit, or do they materially serve a hostile state's objectives?

Governance test: Have trustees complied with regulatory advice and orders, managed conflicts, and exercised proper oversight?

National-security coherence test: Is the state undermining its own security posture by allowing linked institutions to retain charity privileges?

POLICY QUESTIONS PARLIAMENT SHOULD ASK

1. How many charities, religious institutions, educational bodies, and cultural organisations in the UK have documented structural, governance, funding, or representational links to the Iranian state, the office of the Supreme Leader, sanctioned Iranian entities, or persons associated with the IRGC?
2. What due-diligence standards are currently used across the Home Office, Charity Commission, HMRC, and other relevant bodies to assess whether charitable or sponsorship privileges are being used by entities linked to hostile states?
3. Have any such bodies retained visa-sponsorship permissions, tax advantages, or public-sector access while under live regulatory or national-security concern?
4. What criteria will the Government apply in deciding whether an institution's ties to the Iranian state are merely historical, or are sufficiently current and operational to justify regulatory intervention?
5. Will Ministers support a coordinated review of the wider IRGC-sponsored or IRGC-enabling institutional structure in Britain, rather than treating each case as disconnected?

RECOMMENDED PARLIAMENTARY ASKS

Immediate Asks

Request that the Home Office suspend any relevant sponsorship privileges held by the Islamic Centre of England pending the outcome of a national-security and regulatory review, if lawful thresholds are met. Urge the Charity Commission to publish, as far as legally permissible, a fuller account of the governance, compliance, and public-benefit issues under examination. Ask the Government to direct relevant departments to identify the full network of UK entities with documented ties to the office of the Supreme Leader, sanctioned Iranian actors, or IRGC-linked structures.

Medium-Term Asks

Establish a cross-government review mechanism covering charity law, immigration sponsorship, hostile-state influence, sanctions compliance, counter-extremism, and foreign interference in relation to Iran-linked bodies. Review whether current charity-law powers are sufficient where an organisation may not meet criminal thresholds but nevertheless functions as a vehicle for hostile-state influence.

Enforcement Asks

Where evidence demonstrates persistent misconduct, lack of independence, failure to comply with orders, or activity inconsistent with public benefit, the Commission should consider the strongest available interventions, including removal or restructuring of trustees, disqualification, and loss of charitable status. Where evidence suggests criminality, sanctions breaches, or foreign-agent activity, cases should be referred promptly to enforcement authorities.

RESPONDING TO LIKELY COUNTERARGUMENTS

"This would unfairly target Muslim charities"

The proper answer is that the proposed test is not theological, sectarian, or communal. It is legal and national-security based. The issue is not that an organisation is Muslim or Shia; the issue is whether it is independent, lawfully governed, genuinely charitable, and free from structural subordination to a hostile foreign state apparatus. Any organisation of any background should face the same scrutiny if similar facts arise.

"Regulatory findings are not criminal convictions"

That is correct, but it misses the point. Charitable status does not require the state to wait for a criminal conviction before acting. Charity regulation exists precisely because misconduct, mismanagement, conflicts, non-compliance, and lack of independence can justify intervention long before criminal liability is adjudicated.

"Some links may be historical rather than current"

That is why a structured review is needed. The purpose of the review is to distinguish residual or historical associations from ongoing operational, financial, ideological, or governance relationships. A rigorous review protects both national security and procedural fairness.

CONCLUSION

The UK has already recognised the gravity of the IRGC threat in sanctions policy, national-security legislation, and public ministerial statements. It should now apply the same seriousness to the domestic civic and charitable infrastructure through which Iranian state influence may persist.

A review of the Islamic Centre of England is necessary, but it is not sufficient. The proper task is to examine the entire IRGC-sponsored, IRGC-linked, or IRGC-enabling institutional structure in Britain and to remove charitable status wherever legal standards are not met and public benefit has been compromised.

National security requires coherence. Charity law requires integrity. The current settlement risks providing neither.

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This briefing has been prepared for the consideration of Members of both Houses of Parliament, Ministers, and relevant regulatory bodies including the Charity Commission and the Home Office. It draws on documented public record, published regulatory findings, and established precedent in UK charity law and national-security legislation.

PURPOSE OF THIS BRIEFING

To support an informed, evidence-based parliamentary debate on the adequacy of the UK's current framework for identifying and addressing hostile-state-linked institutional structures operating under charitable or civic cover, using the Islamic Centre of England as the starting case study for a wider systemic review.

Members are invited to raise the questions and asks set out in this briefing in the appropriate parliamentary and regulatory forums.