EXPLANATORY MEMORANDUM TO

THE NATIONAL SECURITY ACT 2023 (DESIGNATED BODIES) REGULATIONS 2026

2026 No. [XXXX]

1. Introduction

1.1 This Explanatory Memorandum has been prepared by the Home Office and is laid before Parliament by Command of His Majesty.

1.2 This memorandum contains information for the Joint Committee on Statutory Instruments and the Secondary Legislation Scrutiny Committee.

2. Declaration

2.1 Dame Angela Eagle, Minister for Security at the Home Office, confirms that this Explanatory Memorandum meets the required standard.

2.2 The Deputy Director for the State Threats Unit at the Home Office confirms that this Explanatory Memorandum meets the required standard.

3. Contact

3.1 The State Threats Unit at the Home Office: 2 Marsham Street, London, SW1P 4DF, can be contacted by email with any queries regarding the instrument: STULegislationTeam@homeoffice.gov.uk. Alternatively, the department can be contacted by telephone: 020 7035 4848.

Part One: Explanation, and context, of the Instrument

4. Overview of the Instrument

What does the legislation do?

4.1 This instrument designates the Islamic Revolutionary Guard Corps, the Islamic Movement of Companions of the Right, and the Main Intelligence Directorate of the General Staff of the Armed Forces of the Russian Federation Volunteer Corps under the National Security Act 2023 ("NS Act 2023"). The designations are intended to protect the safety or interests of the UK by disrupting the designated bodies through criminal offences targeting those who work with and support them.

Where does the legislation extend to, and apply?

4.2 The extent of this instrument (that is, the jurisdiction(s) which the instrument forms part of the law of) is the United Kingdom.

4.3 The territorial application of this instrument (that is, where the instrument produces a practical effect) is the United Kingdom.

4.4 The offences in sections 17A to 17C NS Act 2023 can apply to conduct outside the United Kingdom. However, where conduct takes place wholly overseas, this will generally be where the person is a UK person (within the meaning at section 3 NS Act 2023), acting for or on behalf of the Crown, holds office under the Crown or is in Crown employment. In the case of section 17C, it also applies where a material benefit is, was or is to be provided in or from the United Kingdom.

4.5 More broadly, the power to designate and consequential offences generally have a significant UK connection, e.g. assisting a designated body in UK-related activities or acting for a purpose that a person knows, or ought reasonably to know, is prejudicial to the safety or interests of the United Kingdom. A body may only be designated where the Secretary of State considers this necessary to protect the United Kingdom's safety or interests.

5. Policy Context

What is being done and why?

5.1 The National Security (State Threats) Act 2026 ("the Act") received Royal Assent on 8 July 2026. The Act implemented a recommendation by Jonathan Hall KC, the Independent Reviewer of State Threats Legislation, to introduce a proscription-like power for state threats. It inserted section 33A into the NS Act 2023 which enables the Secretary of State to designate bodies involved in foreign power threat activity where doing so is considered necessary to protect the safety or interests of the UK. Following designation, a number of criminal offences apply in relation to the designated body including supporting a designated body, assisting a designated body and obtaining material benefits from a designation body.

5.2 The Home Secretary has decided to exercise the designation power in section 33A of the NS Act 2023 in respect of the Islamic Revolutionary Guard Corps, the Islamic Movement of Companions of the Right and the Main Intelligence Directorate of the General Staff of the Armed Forces of the Russian Federation Volunteer Corps. These are the first bodies to be designated under this power.

Islamic Revolutionary Guard Corps

5.3 The Islamic Revolutionary Guard Corps ("IRGC") is an integral part of the Iranian State. Its influence is multi-dimensional, spanning military, economic, domestic, security and foreign policy issues.

5.4 The IRGC is a branch of the Iranian armed forces but is independent from Iran's regular army. The IRGC is ultimately accountable to the Supreme Leader of Iran, Mojtaba Khamenei, who is responsible for setting the IRGC's overarching strategic aims. It consists of six main branches: IRGC Ground Force, IRGC Navy, IRGC Aerospace Force, IRGC Quds Force (IRGC-QF), IRGC Intelligence Organisation (IRGC-IO) and the Basij. While each is a separate branch, they all regularly collaborate and have a degree of shared decision-making at senior level within the larger body.

5.5 The IRGC-QF and IRGC-IO, together with the Ministry of Intelligence and Security (MOIS), form the Iranian intelligence apparatus. Within the IRGC, the IRGC-IO is the main body responsible for intelligence, while the IRGC-QF undertakes foreign military operations. IRGC-QF maintains and operates covert intelligence networks around the world and plays a central role in extending Iranian influence across the Middle East and beyond.

5.6 Additionally, the IRGC has a role in Iran's ballistic missile development and IRGC-QF is responsible for the operation of some of Iran's most advanced military capabilities. The IRGC provides political, financial and military support to a number of militant groups, including Hizballah in Lebanon and Syria; militia groups in Iraq; and the Houthis in Yemen.

5.7 The UK Government has identified activity linked to the IRGC involving threats to life and intimidation on UK soil. In January 2024, the UK announced sanctions

targeting Iranian officials responsible for threats to kill on UK soil and criminal gangs who do the regime's bidding overseas. The Iranian officials designated under these sanctions were members of IRGC Unit 840, which was exposed in relation to plots to assassinate two Iran International TV journalists in the UK.

5.8 In 2022, the National Cyber Security Centre issued an advisory alongside international partners exposing malicious activity. The advisory highlighted the threat from cyber proxy actors affiliated with the IRGC targeting a broad range of entities, including entities across multiple US critical infrastructure sectors as well as Australian, Canadian and UK organisations.

5.9 While the IRGC has already been sanctioned in its entirety by the UK, designation will support disruption and enforcement activity against those supporting or facilitating UK-related activities carried out by the IRGC. It will reinforce the UK's position that the IRGC's malign activities are unacceptable and will not be tolerated.

The Islamic Movement of Companions of the Right

5.10 The Islamic Movement of Companions of the Right ("IMCR") (Harakat Ashab al-Yamin al-Islamiyah) first emerged online on 9 March 2026, when its founding statement was shared across a small cluster of pro-Shia and pro-Iran Telegram accounts.

5.11 The first public statement by IMCR appeared immediately after an explosion outside the Synagogue of Liège, Belgium. Between March and May 2026, across Europe and in the UK, there were a series of attacks against Jewish communities, journalists and Israeli interests.

5.12 IMCR have publicly claimed seven attacks at UK locations linked to Jewish and Israeli communities, and Persian-language media, including the antisemitic arson attack on four Hatzola ambulances in Golders Green on 23 March.

5.13 In May 2026, the US indicted and charged an individual with terrorism-related offences for his alleged activities as an operative of Kata'ib Hizballah and the IRGC, including his alleged involvement in attacks claimed by IMCR.

5.14 On 10 June 2026, the UK, alongside international partners, condemned the lethal plotting and other malign actions by Iran's Intelligence Services and the recent campaign of attacks across Europe targeting Jewish communities, Iranian journalists and US interests, claimed by IMCR. This statement sent a clear message to groups like IMCR that we will not tolerate their deplorable actions.

5.15 Designation of IMCR will support further disruption and enforcement activity against this Iran-linked proxy, and signal clearly that the use of proxy actors to undermine the security of the UK and its allies will not be tolerated.

Main Intelligence Directorate of the General Staff of the Armed Forces of the Russian Federation Volunteer Corps

5.16 The Main Intelligence Directorate of the General Staff of the Armed Forces of the Russian Federation Volunteer Corps ("GRU VC") refers to a set of volunteer and mercenary style formations, including those reported under designations such as DobroKor or linked schemes such as Redut, which are assessed to be controlled, coordinated and overseen by the Main Directorate of the General Staff of the Armed Forces of the Russian Federation ("the GRU"). The GRU is Russia's military intelligence service, responsible for foreign intelligence collection, cyber activity, and covert operations, including sabotage and assassination activity conducted overseas.

5.17 The GRU VC was established following the 8th Congress of the Union of Donbas Volunteers in February 2023, held in Russian-occupied Mariupol. Reporting indicated that Konstantin Malofeev, Chairman of the Supreme Council of the Union of Donbas Volunteers, called for disparate volunteer formations to be unified into a single structure. Malofeev has been sanctioned by the United Kingdom for his involvement in destabilising activity in Ukraine.

5.18 In June 2023, the Russian Ministry of Defence ordered volunteer formations in Ukraine to formalise contracts, enabling command and control to pass to the GRU and Ministry of Defence. Following this, and the subsequent fragmentation of the Wagner Group, many former Wagner units agreed to come under GRU-linked command structures. In 2023 the Wagner Group was proscribed in the UK under the Terrorism Act 2000 for being concerned in terrorism. Wagner Group's activity involved serious organised violence and threatened international security and UK interests.

5.19 In 2024, two individuals organised an arson attack on a Ukrainian-owned business in east London on behalf of the Wagner Group, a proxy organisation acting for the Russian state. The subsequent absorption of significant elements of Wagner into GRU-linked volunteer corps structures illustrates how such formations extend the reach of Russian state activity and contribute to the threat to the United Kingdom.

5.20 The Government assesses that GRU-linked volunteer and proxy formations, including the GRU VC, form part of a wider pattern of state threats directed at the UK and its interests. These structures enable deniable and scalable operations, including sabotage and other destabilising activity, while obscuring direct state involvement. Accordingly, GRU-directed Volunteer Corps structures represent a threat to UK national security, both through their overseas activity and their potential to facilitate hostile activity within the United Kingdom.

What was the previous policy, how is this different?

5.21 Prior to this instrument being introduced, the bodies were not designated and so not included in the list of designated bodies at Schedule 6A to the NS Act 2023.

6. Legislative and Legal Context

How has the law changed?

6.1 Section 33A of the NS Act 2023 (inserted by section 1 of the Act) introduces a power for the Secretary of State to designate a body by regulations. A body may be designated where the Secretary of State reasonably believes that it is, or has been, involved in foreign power threat activity and considers that designation is necessary to protect the safety or interests of the United Kingdom. A designation may include alternative names where a body operates under more than one name or where multiple bodies are, in substance, the same.

6.2 Such Regulations may amend the 2023 Act to insert a Schedule listing the bodies designated under section 33A.

6.3 These Regulations are the first made under section 33A. They designate three bodies and, in so doing, amend the NS Act 2023 to insert a Schedule listing these designated bodies (including certain alternative names).

6.4 Designations take effect as soon as the regulations come into force, applying the criminal offences at sections 17A to 17C of the NS Act 2023 (inserted by section 2 of the Act): supporting a designated body, assisting a designated body, and obtaining etc material benefits from a designated body.

6.5 Section 33C of the NS Act 2023 (inserted by section 3 of the Act) provides a mechanism for reviewing designations. A designated body, or a person affected by a designation, may apply to the Secretary of State for removal of the designation or an alternative name. Where such an application is refused, there is a right of appeal to the Proscribed Organisations Appeal Commission.

Why was this approach taken to change the law?

6.6 This is the only possible approach to make the necessary changes.

7. Consultation

Summary of consultation outcome and methodology

7.1 No public consultation has been undertaken in connection with this instrument, given the sensitive nature of the Government's assessment of the bodies being designated, which rely on intelligence assessments. The Home Office has led a cross-government and stakeholder review of each of the bodies to support advice to the Secretary of State on whether the statutory test for designation was met for each of them.

8. Applicable Guidance

8.1 There will be guidance available for businesses regarding how the offences under the Act may affect them, available shortly after these designations come into force. How the offences are applied is an operational decision for the police, who may choose to produce their own guidance.

Part Two: Impact and the Better Regulation Framework

9. Impact Assessment

9.1 A full Impact Assessment has not been prepared for this instrument as it is not expected to have a significant impact on business, and any potential impacts are considered to fall below the de minimis threshold for producing an Impact Assessment. An Impact Assessment was produced for the National Security (State Threats) Act 2026, which is available on GOV.UK[1].

Impact on businesses, charities and voluntary bodies

9.2 There is no, or no significant, impact on business, charities or voluntary bodies.

9.3 The legislation does not impact small businesses.

9.4 There is no, or no significant, impact on the public sector.

10. Monitoring and review

What is the approach to monitoring and reviewing this legislation?

10.1 Section 63 of the NS Act 2023 provides for the Secretary of State to appoint an Independent Reviewer of State Threats Legislation ("the Independent Reviewer") to review the operation of Parts 1 and 2 of the NS Act 2023. Part 1 of the NS Act 2023 concerns various offences and powers relating to espionage, sabotage and persons acting for foreign powers. The Act inserted into Part 1 NS Act 2023 new provisions for the designation of bodies for involvement in foreign power threat activity. These

[1] https://www.gov.uk/government/publications/national-security-state-threats-bill-2026-impact-assessment

Regulations are made under such provisions and so fall within the remit of the Independent Reviewer's functions under NS Act 2023.

10.3 The Independent Reviewer is required to carry out an annual review and send their report to the Secretary of State as soon as reasonably practicable after the review's completion, but may produce carry out such standalone reviews as they consider

10.4 Reports received by the Secretary of State under section 63 NS Act 2023 must be laid before Parliament.

Part Three: Statements and Matters of Particular Interest to Parliament

11. Matters of special interest to Parliament

11.1 None.

12. European Convention on Human Rights

12.1 The Home Secretary, The Rt Hon Shabana Mahmood MP, has made the following statement regarding Human Rights:

"In my view the provisions of the National Security Act 2023 (Designated Bodies) Regulations 2026 are compatible with the Convention rights."

13. The Relevant European Union Acts

13.1 This instrument is not made under the European Union (Withdrawal) Act 2018, the European Union (Future Relationship) Act 2020 or the Retained EU Law (Revocation and Reform) Act 2023 ("relevant European Union Acts").