

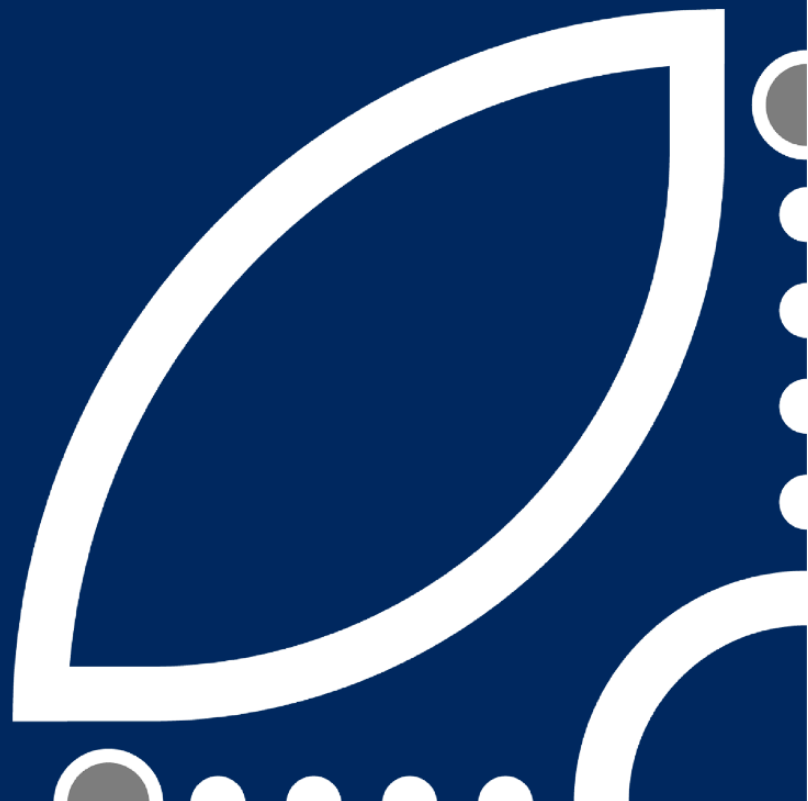


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Breaking the Blob

*A study and antidote to
British ungovernability*

June 2026



**BREAKING THE BLOB:
A STUDY AND ANTIDOTE TO
BRITISH UNGOVERNABILITY**

Cambridge Circus Research

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June 2026

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Foreword

The British state is not known for its coherence or joined-up thinking these days. It has the peculiar ability to stand in favour of a policy position at one point, while simultaneously sabotaging it at another.

Many political commentators and policymakers are wrestling with the idea that modern Britain has become ungovernable. Putting aside the questions this should raise about the quality of a political class who have been trusted with running one of the world's richest and most powerful democracies, it is evident that something is wrong in the British state. Orders are issued by elected politicians, and they subsequently disappear like water poured into sand. Policies are created and sent out for public consultation only to die from a thousand cuts inflicted by stakeholders and civil society.

While governments are repeatedly elected with mandates from the public to end illegal immigration, secure the borders, maintain law and order, and cut welfare spending, many arms of the state are directly involved in subverting and undermining the government's own political priorities. This leaves politicians wondering why the levers of power they supposedly have the ability to pull seem to be broken, and voters and taxpayers disillusioned with democracy.

What is the cause of all of this? Britain didn't used to be like this, that much is agreed. Britain historically had a supreme Parliament – the elected dictatorship – with untrammelled legal power over the country. It purportedly had a permanent civil service that served the interests of the country regardless of the political party leading the House of Commons. Britain's common law legal system was known for allowing quick and flexible policymaking.

Today, many people across the British political spectrum have identified what has filled the gears of government with sand and brought the British state to a standstill. The Human Rights Act, the Climate Change Act, the Constitutional Reform Act, the Equality Act and the Constitutional Reform and Governance Act have created a new constitution and now set the terms of political debate. Each of them, in their own way, has ensured that power has diffused away from Parliament and into unelected and unaccountable arms of the state. What former Education Secretary, Michael Gove, and his chief adviser, Dominic Cummings, called *The Blob* nearly 20 years ago – the web of state-funded organisations which attempted to stymie education reform in the early 2010s – has been replicated throughout many areas of public policy. This has turned the British state into a hall of mirrors where seemingly nothing can be achieved.

This situation is neatly described as “a state at war with itself” in the debut report by Cambridge Circus Research. This report, *Breaking the Blob: A study and antidote to British ungovernability*, is an exciting new paper which anyone interested in re-democratising the British state should read with enthusiasm. Throughout the paper, the authors elegantly describe the web of arm's-length bodies, charities, non-governmental organisations, local government bodies, and activists which receive handsome funds from the taxpayer to thwart the legitimate actions of the government and to provide a sheen of bureaucratic respectability to progressive political activism.

There are few areas of public policy where this matter needs to be addressed with more urgency than immigration. As the authors highlight, the Home Office, the principal government department responsible for border control, funds a range of organisations which actually campaign against the Home Office's own policies. The Home Office shows how “a department can become both funder and target, creating an evidence loop in which publicly funded organisations supply parliamentary criticism, litigation pressure or media narratives against the policy system that funds them.”

Serving as a special adviser in the Cabinet Office in 2022, I found it eye-opening that there were essentially no ways of barring organisations which campaigned against the government from receiving public money. Broad definitions of what counts as a charitable purpose and protections granted by the Human Rights Act meant that many organisations which conduct political activism can continue to

receive government money. The successful legal challenge against Kemi Badenoch's attempt to prevent the taxpayer awarding a grant to KNEECAP shows how strongly embedded this dysfunction is.

The paper offers a way out of this mess, with an astute list of recommendations which – if enacted – would ensure greater transparency in the system so taxpayers, ministers, and voters can see where their money is being spent and what on; and, most importantly, put in place new rules to stop the British public's money from being used against the British people's interests again.

The most important lesson from the DOGE affair in the United States in 2025 was the absolute necessity of total transparency in where public money is spent. Today, ministers are flying blind, directing government departments and public money without a real idea of where it might all end up. Thanks to the findings and recommendations in this helpful report, perhaps ministers, advisers, and MPs in the future will be better equipped to steer the British state back to democracy and prosperity.

Fred de Fossard
May 2026

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1. Executive summary

This paper examines how parts of the UK NGO, charity, foundation, and public-interest litigation ecosystem operate as a coordinated, durable political force. The argument is not that charitable activity is inherently improper, or that civil society should be prevented from scrutinising government. The concern is narrower and institutional: tax-advantaged, publicly funded, or foundation-funded bodies combine grantmaking, regranting, litigation, media placement, parliamentary evidence, and consultation activity in ways that frustrate elected policy without equivalent transparency or democratic accountability. This is exacerbated by a regulator which is underfunded, toothless, and unfit for purpose.

For a political party seeking to govern amid this landscape, the practical risk is posed not by a single hostile organisation, but by a network of actors singularly committed to frustrating their agenda. Major foundations fund intermediaries; intermediaries funnel to frontline organisations; legal charities and advice bodies identify claimants and evidence; campaign organisations supply oppositional narratives; media outlets present campaign representatives as neutral experts; and the same bodies appear in formal consultations and parliamentary evidence. Immigration and asylum provide the clearest examples, including the Conservative government's Rwanda scheme and Labour's UK-France "one in, one out" arrangement.

The central institutional problem is democratic displacement. Governments may possess a mandate for an agenda, but implementation can be slowed, reframed, or effectively vetoed by networks that are legally sophisticated, professionally funded, and only partially transparent. The policy response should therefore focus on increased transparency, stricter definitions within charity law, and better preparation ahead of policy delivery.

Core findings

1. Charity law permits policy campaigning where it furthers charitable purposes, but the boundary between charitable advocacy and political purpose is too permissive and too weakly enforced in practice [S1].
2. The infrastructure is layered: large foundations and public bodies fund intermediaries, intermediaries fund or support campaign groups, campaign groups generate evidence and media pressure, and legal charities or public-law firms translate policy opposition into litigation.
3. Immigration and asylum are the clearest policy fields in which this system operates, but the model also appears in climate policy, protest law, equality policy, procurement, citizenship, legal aid, and public administration.
4. There are also national security implications – weak oversight has allowed networks of charities funded, directed, or acting on behalf of hostile state actors including Iran. Some of these charities propagate proscribed group propaganda and advance antisemitic and Holocaust-denying rhetoric.
5. Public funding can create a "state-funded opposition loop", in which departments, local authorities, or arm's-length public bodies finance organisations that later campaign, litigate, or give evidence against the state in the same policy field.
6. Consultation responses, select-committee evidence, and broadcast appearances can give organised advocacy networks the appearance of neutral expertise or broad civil-society consensus.
7. The Charity Commission is responsible for over 170,000 registered charities but possesses only 457 employees, including the board. This is insufficient to pursue meaningful enforcement of

charities in breach of charities law. As it stands, the Charity Commission is simply not fit for purpose.

8. The data on grants is highly fragmented and incomplete. Many of the numbers disclosed in this report must be treated as lower bounds. Transparency would be greatly improved if an auditable centralised data repository were available to cross-reference grants to charities and track funding flows.

Recommendations at a glance

1. Stop the routine public flow of money to campaigning or litigating charities. Public money should only be used for tightly specified service delivery, not unrestricted advocacy or litigation.
2. Tighten charity legislation so that organisations whose sustained dominant activity is political campaigning, policy obstruction, or strategic litigation are not eligible for charitable status merely because the activity is framed through broad charitable objectives. This would also involve reforming the Charity Commission itself, on a model akin to its pre-2006 Act incarnation, and increasing their enforcement powers.
3. Limit charities to specific, concrete, and auditable charitable purposes, with a stronger requirement to show an identifiable public benefit rather than broad ideological aims or allowing mission creep.
4. Introduce a grassroots-majority eligibility test for charities engaged in policy advocacy: bodies should retain charitable privileges only where a majority of income comes from verifiable grassroots sources, such as individual members, small donors or genuinely local civic bodies, rather than from large foundations, state grants, or regranting intermediaries.
5. Restrict flows of money from charities to non-charities, especially connected campaign companies, unless the transfer is tightly tied to a charitable purpose, fully disclosed, and incapable of subsidising political or non-charitable campaigning.
6. Require mandatory grant and regrant disclosure, clear disclosure of funding, and a register that maps out overlapping interests of senior leadership for charities and foundations above a threshold.
7. Anticipate potential challenges to new legislation and policies in order to enable more robust implementation and prevent unnecessary delays.
8. Require disclosure in consultations, parliamentary evidence and media briefing where an organisation is a public-funding recipient, claimant, intervener, campaign convener, or member of a relevant coalition.
9. Make campaigning activity by charities taxable, shifting the burden of enforcement on auditors rather than statutory bodies.

2. Introduction

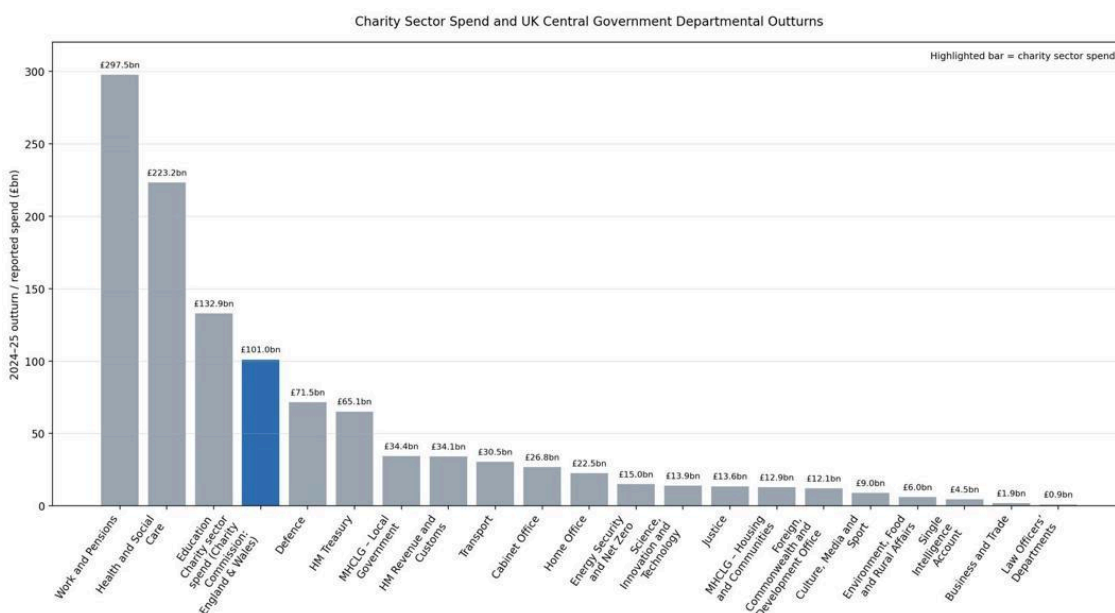
Political influence is rarely exercised by individual charities acting alone. It is more often exercised through a network: grantmakers, hosted funds (where multiple grantmaking organisations pool resources), regrants vehicles, research institutes, public-law charities, activist training organisations, signatory coalitions, community organisations, and professional litigators. Each node can plausibly describe its own work as narrow, charitable, beneficiary-facing, or technical. Together, however, the network can act as an organised policy machine.

Charities and NGOs often share professional partnerships, trustees, and informal networks for directing their campaigns. In the course of this investigation, it was observed that employees of these organisations often pass through several similar ones, with the same backers and broad aims. Many of the frontline charities, receiving funding from the same grantmaking organisations, possess overlapping mandates and goals, teaming up to amplify their message.

The relevant question is therefore not merely: is a specific charity breaking charity law? The important strategic questions are: who funds the work; how far does the money travel; which organisations repeatedly appear together; which groups are producing evidence, claimants, media spokespeople and legal arguments; which funders are financing both service provision and policy change; and where are the same trustees, advisers, lawyers, and campaigners moving across the system?

This paper maps the wider ecosystem around grantmaking networks, intermediary funds, litigation capacity, and campaign infrastructure. It sets out the operating model, the legal and state-process routes of influence, the associated policy-delivery risks, and a reform programme for political parties and future ministers. This is, unfortunately, only the beginning. These organisations have decades of experience in shaping the policy landscape and have developed an incredibly effective playbook to achieve their aims. Care is required in order to understand the best ways of blunting the outsized influence they have on political life.

However, it is the authors' belief that these recommendations would be useful to both current and future governments, to demand greater transparency from an opaque ecosystem, which often strategically leverages its influence to frustrate the policies of the government of the day.



Sources: Charity Commission Annual Report & Accounts 2024-25; HM Treasury, Public Expenditure Statistical Analyses 2025, Table 1.12 (2024-25 outturn). Included: central government departmental groups only. Excluded: devolved administrations, Small and Independent Bodies, and PESA 'other expenditure' lines.

Figure 1. Annual spend of the charity sector compared to major government departments

2.1 The legal and regulatory baseline

The Charity Commission accepts that charities can campaign and can support or oppose policies where doing so furthers their charitable purposes. But CC9, the Charity Commission's guidance around campaigning and political activity, also states that a charity cannot have a political purpose and must not be used as a vehicle for the personal or party-political views of trustees or staff [S1]. This distinction is the hinge on which much of the present issue turns. Many organisations can remain formally within the rules while engaging in policy activity that has unmistakable political consequences.

The Charity Commission's 2024 election casework summary also illustrates the regulator's approach: it focuses on explicit party endorsement, candidate visits, social media, and compliance with charity law in campaign periods [S2]. This matters because the most sophisticated organisations rarely need explicit party endorsements. They influence the policy environment through issue framing, legal action, consultation responses, evidence packs, media placement, coalition letters, and voter-relevant moral narratives.

3. What they do

The network performs six core functions. These functions can be lawful and legitimate, but they also create strategic obstacles for a government or party that is trying to implement a programme opposed by the sector.

1. **Service provision and casework.** Many organisations begin with advice, welfare, legal representation, or support for vulnerable groups. This provides proximity to potential claimants, case studies and evidence.
2. **Narrative production.** The network relies on reports, briefings, parliamentary submissions, media quotes, and training to turn complex administrative questions into moral narratives around cruelty, racism, climate failure, corruption, authoritarianism, or denial of rights.
3. **Coalition management.** Open letters and sign-on statements make a small number of coordinated institutions appear as a broad social front. This can be effective because journalists and politicians often count signatories rather than map funding links.
4. **Movement infrastructure.** Intermediaries fund organising, training, governance support, media coaching, and legal capacity. This allows small groups to behave like professional campaign organisations.
5. **Strategic litigation.** NGOs and legal charities identify cases, develop evidence, fund pre-litigation research, intervene in cases, and challenge guidance, regulations, policy documents, and judgments on individual cases.
6. **Policy re-engineering.** Even when a case is not fully successful, litigation and campaigning can force government to revise guidance, re-run decisions, publish new impact assessments, or alter the manner in which policy is implemented.

4. Example organisations

The ecosystem is best understood as a set of functional categories. The same organisation may perform more than one role.

| Layer | Typical function | Illustrative organisations | Practical implications |
|-------------------------------------|--|--|--|
| Major foundations / endowments | Provide large, multi-year grants and strategic direction; fund research, advocacy, litigation capacity, and intermediary vehicles. | Trust for London, Barrow Cadbury Trust, Paul Hamlyn Foundation, Esmee Fairbairn Foundation, Joseph Rowntree organisations, City Bridge Foundation, Unbound Philanthropy. | They can sustain policy campaigns for years, even where electoral coalitions or government attention cycles move on. |
| Intermediaries and hosted funds | Pool donor money, regrant, incubate campaigns, provide governance support, and fund movement infrastructure. | Civic Power Fund, Justice Together Initiative, Strategic Legal Fund, Migration Exchange, funder collaboratives. | They reduce reputational exposure for original funders and create a distributed “many voices” effect. |
| Legal and advice charities | Provide casework, referrals, evidence, claimants, witness statements, public-law analysis, and litigation support. | Asylum Aid, JCWI, Detention Action, Bail for Immigration Detainees, Medical Justice, Public Law Project, Liberty. | They can convert administrative weaknesses into strategic litigation and policy precedent. |
| Campaign and organising groups | Mobilise communities, generate petitions, open letters, media lines, local pressure, and direct engagement. | Praxis, We Belong, Care4Calais, NEON-linked training networks, Hope Unlimited / Hope Not Hate ecosystem. | They turn legal and policy questions into moral narratives and organised pressure. |
| Public-interest litigation vehicles | Bring or support challenges on procurement, climate, constitutional, and administrative-law issues. | Good Law Project, ClientEarth, Friends of the Earth. | They broaden the model beyond immigration into the whole machinery of government. |

Table 4.1 Anatomy of the sector

From charity to political effect

Influencing policy does not necessarily mean that a charity has broken the law. A charity may remain within the formal rule that campaigning must advance charitable purposes, while its practical effect is to obstruct or delegitimise the elected government’s policy. This is particularly potent where the charity’s purposes are broad: poverty, equality, racial justice, human rights, access to justice, environmental protection, refugee welfare, community empowerment, or democratic participation. These purposes can be used to justify advocacy across a very wide policy field.

4.1 Grantmakers and funders

Trust for London

Category: Major foundation / grantmaker.

Trust for London is a major London-focused funder. In 2024, it reported £8.4 million in grant funding across 96 grants, alongside £615,000 in social investment [S3]. Its programme areas include poverty, social justice, and migrant destitution. Its grant page for We Belong – a programme for ending migrant destitution – describes funding for a project that includes engagement with young migrants and campaigning to make indefinite-leave-to-remain fees more affordable [S4].

Network role: It sits upstream of campaign and migrant-rights organisations, and can fund both practical support and policy work.

Policy relevance: Relevant for immigration, poverty, welfare, housing, London governance, and “hostile environment” debates.

Indicative sources: [S3][S4]

Barrow Cadbury Trust

Category: Major foundation / grantmaker.

Barrow Cadbury Trust’s published funding list includes grants to Joint Council for the Welfare of Immigrants (JCWI) for “core campaigning, advocacy and communications costs”, Detention Action for “advocacy and campaigning work”, and Civic Power Fund for the “Power project and legal hub” [S5]. This makes it a useful case study because its public grant descriptions make the policy and campaigning function explicit rather than merely inferred.

Network role: It acts as a direct funder of advocacy organisations and as an upstream supporter of intermediary and legal-infrastructure projects.

Policy relevance: Relevant for immigration, criminal justice, movement lawyering, advocacy capacity, and campaigning infrastructure.

Indicative sources: [S5]

Paul Hamlyn Foundation, Esmee Fairbairn Foundation and Unbound Philanthropy

Category: Major foundations / philanthropic backers.

These funders appear repeatedly in immigration, access-to-justice, and “racial equality” spaces. The Strategic Legal Fund lists Trust for London, Esmee Fairbairn Foundation, Unbound Philanthropy, and Paul Hamlyn Foundation among its 2026 funders [S6].

Network role: They provide the patient capital that allows specialist advocacy networks to survive between headline political moments.

Policy relevance: Relevant for migrant rights, strategic litigation, youth organising, culture, education, and social-justice campaigns.

Indicative sources: [S7][S8]

The Legal Education Foundation

Category: Legal philanthropy / justice infrastructure.

The Legal Education Foundation describes itself as funding law for social justice and supporting communities to use the law to create a more just and equal society [S9].

Network role: It supports legal capacity, fellowships, community lawyering, and access to justice.

Policy relevance: Relevant because it shows how litigation capacity is deliberately built, funded, and professionalised.

Indicative sources: [S9]

4.2 Intermediaries and regranting infrastructure

Civic Power Fund

Category: Intermediary / community-organising fund.

Civic Power Fund presents itself as a donor fund dedicated to community organising and long-term funding in key geographies across the UK [S10]. GrantNav records Civic Power Fund as a recipient of multiple grants, with a cumulative total above £5 million in the 360Giving data at the time of review [S11]. Civic Power Fund also publishes Funding Justice analysis of UK social-justice grantmaking; Funding Justice 3 analyses over 20,000 grants from 84 grantmakers totalling £935.7 million [S12].

Network role: It is a prime example of the “funnel” or “amplifier” organisation: a single recipient of upstream grants that can redistribute resources, knowledge, and legitimacy into a wider ecosystem.

Policy relevance: Relevant for community organising, migrant power, youth organising, campaign training, legal/governance support, and coalition infrastructure.

Indicative sources: [S10][S11][S12]

Justice Together Initiative

Category: Collaborative fund / immigration legal infrastructure.

Justice Together describes its mission as building a community of people and organisations to transform access to justice in the UK immigration system through grantmaking and collaboration [S13]. Its aim is explicitly systemic change rather than only charitable relief for individuals.

Network role: It connects advice, front-line provision, lived experience, influencing, and system change.

Policy relevance: Relevant for immigration and asylum legal capacity, legal-aid gaps, “advice deserts” and policy advocacy.

Indicative sources: [S13]

Strategic Legal Fund

Category: Pre-litigation and intervention funding.

The Strategic Legal Fund describes itself as a source of grants for legal work that advances justice for people disadvantaged because of migration status [S7]. The Immigration Law Practitioners Association (ILPA) states that it manages the fund and that the fund supports pre-litigation research, development of strategic litigation, and third-party interventions in relevant cases [S8].

Network role: It moves the network upstream from litigation to case development. That is strategically significant because test cases require research, claimant identification, expert evidence, and framing before a claim is issued.

Policy relevance: Relevant for any government policy relating to immigration, asylum, nationality, detention, removals, no recourse to public funds, and migrant access to services.

Indicative sources: [S7][S8]

4.3 Campaign, legal and advocacy organisations

Joint Council for the Welfare of Immigrants

Category: Migrant-rights charity / legal and policy organisation.

JCWI describes funders including Barrow Cadbury Trust, Civic Power Fund, City Bridge Foundation, and others [S14]. Its 2024-25 annual report lists multiple grant and donation streams, including Trust for London, Barrow Cadbury Trust, Joseph Rowntree Foundation, the Legal Education Foundation, the Strategic Legal Fund, and Civic Power Fund [S15]. JCWI has also been a claimant in right-to-rent litigation against the Home Office [S16].

Network role: It combines policy campaigning, legal work, coalition activity, and litigation.

Policy relevance: Relevant for immigration enforcement, right to rent, visa processing, border policy, work routes, and “hostile environment” policies.

Indicative sources: [S14][S15][S16]

Asylum Aid

Category: Legal charity / asylum representation.

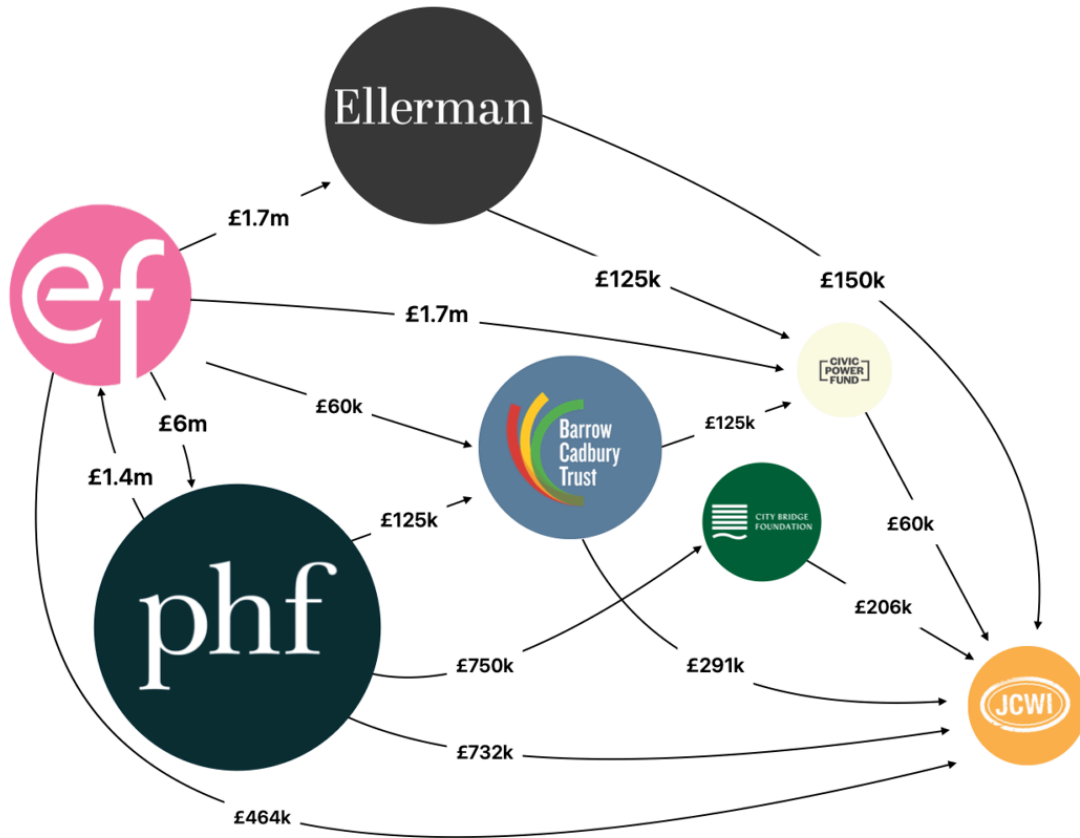
Asylum Aid has participated in litigation aimed at preventing deportations under the Rwanda Scheme. In 2024, the court recorded that Asylum Aid, a registered charity delivering legal representation to asylum seekers, challenged Home Office “Safety of Rwanda Version 2.0” guidance [S17].

Network role: It illustrates how advice and representation charities can become strategic litigants where an administrative policy affects the population they serve.

Policy relevance: Relevant for asylum policy, safe-third-country rules, removals, and post-legislative guidance challenges.

Indicative sources: [S17]

Funding flows to the Joint Council for the Welfare of Immigrants



Data for this graphic was sourced from publicly available grantmaking data compiled by 360Giving between 01/01/2015 and 31/12/2025. Accessible at grantnav.threesixtygiving.org/

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Figure 2. Selected funding flows into the JCWI, showing upstream support from major funders and intermediaries.

Detention Action, Bail for Immigration Detainees and Medical Justice

Category: Detention and removals legal-advocacy organisations.

Detention Action brought litigation against fast-track asylum appeal rules; Medical Justice brought a challenge to the removal-window policy; Bail for Immigration Detainees (BID) provides legal advice and representation to people in detention. [S18][S19].

Network role: They identify procedural weaknesses in detention, appeals, and removal processes and convert them into litigation or policy pressure.

Policy relevance: Relevant for detention expansion, removal windows, fast-track appeals, deportation flights, and vulnerability screening.

Indicative sources: [S18][S19]

Reprive

Category: Legal-action charity / strategic advocacy organisation.

Reprive describes itself as a legal action charity that works on death-penalty cases, torture, detention, drone strikes, rendition, and related national-security or rule-of-law questions [S20][S21]. In practice, it is also a politically salient campaigning actor. The Rowntree civil-society exhibit included in this report identifies Reprive as a recipient of funding from both the Joseph Rowntree Charitable Trust and the Joseph Rowntree Reform Trust, which makes it a useful example of how charity-labelled or civil-society funding can support highly contested policy advocacy.

A particularly clear example is Reprive's intervention in the Shamima Begum case. In February 2019, it publicly criticised then Home Secretary Sajid Javid's decision to block Begum's return to the UK, arguing that Britain could not "outsource British justice to Trump or Assad" [S22]. The point here is not to relitigate the merits of that case. It is to show how a legal-action charity can move beyond discussions of abstract rights and stray into direct contestation of a minister on one of the most politically sensitive issues of the time.

Network role: Reprive combines legal casework, investigative work, parliamentary evidence, and public campaigning. That makes it important not only as an individual organisation, but also as a model of how legal charities can shape elite debate around security, counter-terrorism, deportation, and the treatment of British-linked jihadist cases [S20][S21].

Policy relevance: Relevant for counter-terrorism, citizenship deprivation, extradition, consular responsibility, sanctions on intelligence-sharing, and the wider boundary between legal advocacy and political campaigning.

Indicative sources: [S20][S22][S21]

Good Law Project, Friends of the Earth and ClientEarth

Category: Public-interest litigation and environmental law actors.

Good Law Project has brought governance and procurement litigation, and with Friends of the Earth and ClientEarth challenged the government's climate strategies in 2022 and 2024 [S23][S24][S25]. These examples show that the legal-complex model is not limited to migrant-rights NGOs.

Network role: They use public law, statutory duties and disclosure to challenge national policy and force government to publish revised plans.

Policy relevance: Relevant for climate, energy, planning, procurement, governance, public finance, and administrative law.

Indicative sources: [S23][S24][S25]

Liberty and Public Law Project

Category: Civil-liberties and public-law litigation organisations.

Liberty has pursued long-running litigation concerning investigatory powers and bulk data powers [S26]. Public Law Project brought the Supreme Court challenge against the Legal Aid Residency Test (which would have required a litigant to have lived in Britain for 12 months to be eligible for legal aid) [S27].

Network role: They operate as high-capacity legal challengers and interveners on the boundaries of executive power.

Policy relevance: Relevant for surveillance, policing, legal aid, constitutional reform, and judicial review.

Indicative sources: [S26][S27]

Hope Unlimited / Hope Not Hate ecosystem

Category: Connected charity and non-charitable campaign structure.

The Charity Commission concluded a regulatory compliance case into Hope Unlimited Charitable Trust, formerly Hope Not Hate Charitable Trust, after concerns about its relationship with a non-charitable company. The Commission stated that it was satisfied the charity had responded to directions for greater transparency [S28].

Network role: It is the most useful public example of the regulatory concern created by connected charitable and non-charitable campaigning entities using related brands.

Policy relevance: Relevant for charities utilising limited companies for their activities (twin-track structures), branding confusion, connected-party risk, and Charity Commission enforcement.

Indicative sources: [S28]

5. How they operate

The operating model is best read as a sequence rather than as a list of organisations. Money moves first, followed by legitimacy, professional capacity, claimants, evidence, litigation, and media narrative. The important point for a political party is that no single actor has to own the whole campaign. Influence is distributed through funders, intermediaries, legal charities, campaign groups, academics, journalists, and state-funded service providers.

| Stage | Mechanism | Example | Strategic implication |
|-------------------------|---|--|--|
| 1. Capital formation | Large foundations allocate grants to policy fields such as migrant justice, community organising, climate accountability, or access to justice. | Trust for London grants; Barrow Cadbury funding to advocacy and legal hubs; Legal Education Foundation funding law-focused work. | Creates multi-year resilience beyond electoral cycles. |
| 2. Intermediation | Funds are routed through collaborative or specialist intermediaries that can regrant or provide governance and campaign infrastructure. | Civic Power Fund; Justice Together; Strategic Legal Fund. | Blurs the line between original funder intention and recipient-level political activity. |
| 3. Capacity building | Recipients receive training, communications support, governance advice, legal development, and organising tools. | Community organising funds; legal hub; pre-litigation research grants. | Small organisations gain professional policy and legal capacity. |
| 4. Case generation | Front-line groups identify individuals affected by policy and connect them with lawyers, journalists and campaigners. | Rwanda, detention, removal-window, right-to-rent, and citizenship-fee litigation. | Operational implementation becomes vulnerable to coordinated challenges. |
| 5. Narrative escalation | Campaigners publish personal stories, reports, sign-on letters, and social-media materials while legal proceedings advance. | Open letters, media briefings, persistent use of morally charged language. | Legal and moral pressure become mutually reinforcing. |
| 6. Policy ratchet | Even partial legal wins force revised guidance, further consultation, new impact assessments, or new legislation. | Challenging revised versions of the Rwanda Scheme, further climate policy litigation after court rulings. | The implementation of policy can be delayed, even without ultimately defeating it - this is still viewed as a success. |

Table 5.1 Operating models of the NGO-Charity Complex

5.1 The “funnel” model

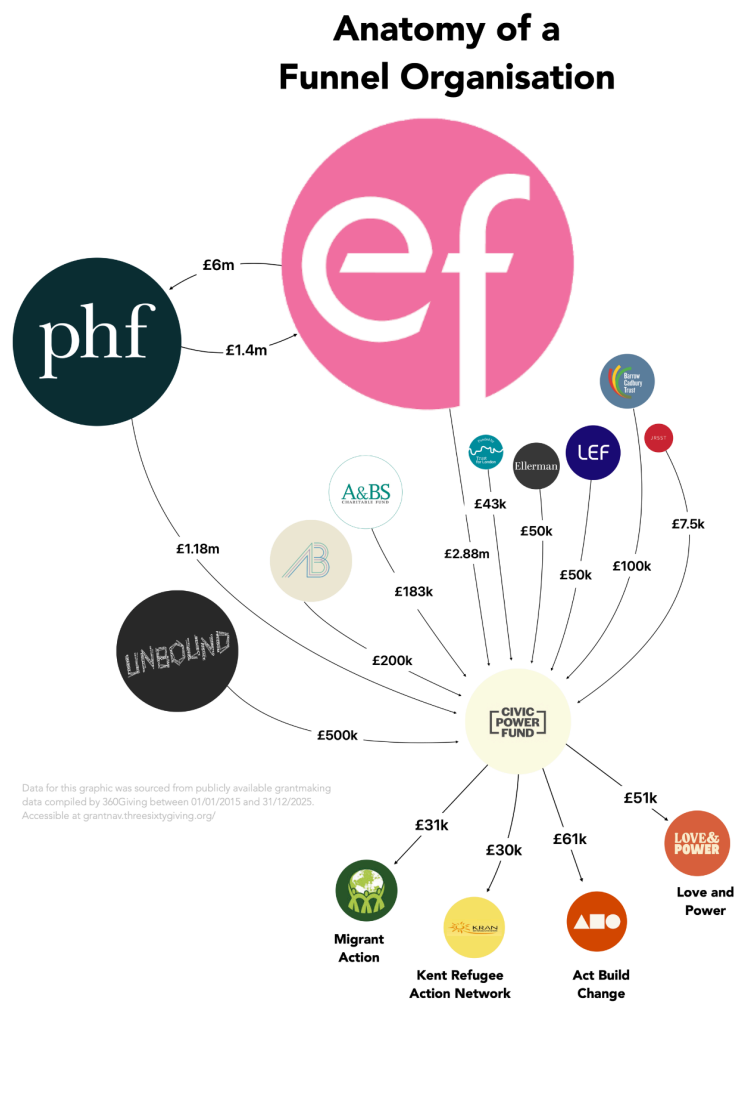


Figure 3. Anatomy of a funnel organisation: Civic Power Fund is positioned between multiple upstream funders and selected downstream organising groups, illustrating how grant money and organisational capacity can be concentrated and regranted. Taken together, Figures 2 and 3 demonstrate how the funnel organisations operate within the wider network. Funnel organisations often grant additional funds that were already given to downstream organisations directly by their upstream funders. For example, Paul Hamlyn provides direct grants to JCWI, while also funding the City Bridge Foundation, which itself makes its own grants to JCWI.

The first operating model is the funnel organisation. A funnel organisation receives grants from multiple major funders, pools or coordinates them, and then distributes money, expertise, legitimacy or campaign infrastructure downstream. Civic Power Fund is the clearest example in this report. It sits between large foundations and a wider field of smaller organising and campaign bodies.

The funnel model should be treated as a political priority. It makes the ecosystem harder to understand by reading individual accounts alone. A downstream organisation may look small, local, and spontaneous. The strategic question is whether it has received money, training, legal support, communications help, or campaign scripts from a larger body.

5.2 The twin-track model



Figure 4. The twin-track model: Hope Unlimited Charitable Trust receive grants which are then re-granted to Hope not Hate Ltd, a non-charitable limited company

A second model is the connected charity/non-charity structure. The public regulatory example is Hope Unlimited Charitable Trust, formerly Hope Not Hate Charitable Trust. In January 2026, the Charity Commission stated that it had concluded a regulatory compliance case after the charity addressed concerns about its relationship with a non-charitable company and after directions for greater transparency [S28].

This does not by itself prove wrongdoing by other organisations. It does, however, illustrate why these structures deserve systematic scrutiny. Where a charity and a non-charitable campaign company share branding, personnel, donors, or audiences, the public may be unable to distinguish tax-advantaged charitable work from more overtly political campaigning. A future policy framework should consider restricting connected structures, and at the very least require clarity, separation, audit trails, and public-facing explanations.

5.3 Government as funder, target and evidence source

A recurring policy-delivery problem is that the state may directly or indirectly finance organisations that then campaign against, litigate against, delay, reframe, or operationally complicate the state's own

objectives. The problem is not public funding of charities in itself. Many state-funded services are necessary, and legal aid exists precisely to secure access to justice. The problem arises when public money for advice, welfare, resettlement, equality training, or service delivery sits inside organisations that also undertake advocacy, coalition management, strategic litigation, media pressure, or campaign work against the same department or policy objective.

For political parties and future ministers, the question is therefore practical: is public money buying neutral organisations to deliver services, or is it cross-subsidising opposition to its own agenda? The answer cannot be assumed from a charity’s name or mission statement. It requires mapping out its funding, litigation, and campaign output. Where a body receives government contracts, legal-aid income, local-authority grants, devolved-government grants, or National Lottery Community Fund money while also seeking to alter or defeat government policy, the relationship should be visible to ministers, Parliament, and the public.

| Organisation | Public/state-linked funding evidence | Practical Effects | Strategic significance |
|-----------------|---|---|---|
| Migrant Help | Charity Commission financial history records government-contract income of £20.46m, £30.00m, £31.88m, £42.77m, and £54.00m across 2021-25, plus government grants rising to £5.01m in 2024 and 2025 [S29]. The Home Affairs Committee records that the AIRE service is delivered by Migrant Help and is independent of the Home Office and accommodation providers [S30]. | The Home Affairs Committee concluded that the AIRE service had not been able to meet demand and that the Home Office had failed to manage performance effectively; it recommended urgent action or an alternative provider if performance could not be brought to an acceptable standard [S30]. | This is the purest “state makes a rod for its own back” example in operational terms: a large Home Office-linked service provider can become a delivery bottleneck, cause reputational vulnerability and be a source of system failure even without being primarily a litigation actor. |
| Refugee Council | Charity Commission financial history records government-contract income of £3.87m, £383k, £45k, £2.13m, and £3.62m across 2021-25, and government grants of £3.09m, £7.15m, £8.40m, £8.46m, and £4.44m [S31]. Its annual reports also describe Home Office-funded advice/support services for children and young people seeking asylum [S32]. | Refugee Council policy material opposed the Illegal Migration Act 2023 and Rwanda Plan, warning of “system meltdown” and calling for repeal or reversal of central asylum-policy measures [S33]. | The same policy ecosystem can depend on state-funded refugee support, while also facing sustained policy opposition from major refugee-sector organisations. This may be defensible, but only if the boundary between funded service delivery and advocacy is explicit. |
| Refugee Action | Charity Commission financial history records government-contract income of £797k, £1.80m, £4.49m, £5.58m, and £1.77m across 2021-25, plus government grants of £1.29m, £251k, £184k, £198k, and £405k [S34]. Its annual report cites Home Office, HMRC and local-authority funding streams [S35]. | Refugee Action coordinates and participates in policy campaigns, including a 103-charity letter to the Home Secretary and the Lift the Ban coalition on asylum seekers’ right to work [S36][S37]. | This illustrates the coalition-pressure version of the risk: a body with public funding can also act as a campaign convener against the direction of government policy. |
| Asylum Aid | Charity Commission financial history records government-contract income of £61.31k, £190.46k, £208.31k, and £248.92k from 2021-24, plus £64k government grants in both 2023 and 2024 [S38]. | Asylum Aid participated in Rwanda-related litigation, including challenge to “Safety of Rwanda Version 2.0” guidance [S17]. Its Charity Commission description includes legal advice/representation and | A legal charity can be both a publicly funded advice provider and a strategic litigant against Home Office policy. That is not necessarily improper, but the funding and litigation relationship should be visible. |

Breaking the Blob

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| | | “lobbying and campaigning” for a fairer asylum process [S39]. | |
| JCWI | JCWI states that it has a contract with the Legal Aid Agency to provide immigration legal advice [S40]. The Legal Aid Agency is an executive agency of the Ministry of Justice [S41]. | JCWI was a claimant in right-to-rent litigation against the Home Office [S16] and combines legal work with policy campaigning and coalition activity. | Legal-aid funding can support access to justice while the same organisation also challenges immigration-enforcement. The policy issue is separation, transparency and ministerial awareness. |
| Public Law Project | Charity Commission financial history records government-contract income of £114.40k, £0, £19k, £14.79k, and £77.93k across 2021-25, plus government grants of £24.17k and £666 in 2021-22 [S42]. | Public Law Project works to widen and improve access to legal aid [S43] and brought the Supreme Court challenge against the legal-aid residence test [S27]. | This is a classic case of the state making a rod for its own back. Public money flows to an organisation that often goes on to challenge state policies in court. |
| ClientEarth | Charity Commission financial history records government grants of £1.04m, £926.68k, £856.20k, £0, and £452.50k across 2020-24, plus government-contract income of £70.19k and £91.91k in 2021-22 [S44]. | ClientEarth has challenged government climate strategies that they see as insufficient, alongside Friends of the Earth and Good Law Project [S23][S24]. The Charity Commission records ClientEarth’s activities as advocacy, litigation and research [S45]. | The model extends beyond immigration. State-linked funding may coexist with strategic litigation that constrains national energy, climate and economic policy. |
| Praxis Community Projects | Charity Commission financial history records government-contract income of £599.33k, £546.75k, £744.71k, £960.22k, and £300k across 2021-25, plus government grants of £97.09k, £81.43k, and £684.73k in 2023-25 [S46]. | Praxis is a migrant-rights service and organising actor in the broader network. Further work should separate publicly funded advice/service delivery from campaign, organising and coalition activity. | This is a high-priority audit target. Substantial public funding appears alongside migrant-rights advocacy, but more granular grant-level attribution is needed before making a stronger claim. |
| Bail for Immigration Detainees | BID describes free legal advice for detainees. a BID practitioner page notes that the Legal Aid Agency amended the legal-aid contract to provide advice for immigration detainees held in prisons [S47]. | BID states in parliamentary written evidence that it challenges immigration detention and engages in research, policy, and advocacy work [S48]. It is part of the detention/removals legal ecosystem discussed above. | Legal-aid infrastructure can support advice to detainees while also feeding policy and litigation pressure against detention policy. This should be mapped. |
| Medical Justice | Charity Commission financial history records no government contracts and one small government grant of £4.16k in 2022 [S49]. | Medical Justice challenged removal-window policy alongside an individual claimant [S19]. The Charity Commission describes its work as assisting detainees with medical/legal advice, challenging inadequate healthcare, monitoring Home Office implementation, and seeking policy improvements [S50]. | This is not a major state-funding example, but it should be retained as a contrast. Strategic litigation can arise even where direct government funding is minimal. |
| Stonewall Equality Ltd | Charity Commission financial history records government grants of £1.87m, £426.39k, £527.87k, £618.76k, and £454.65k across 2021-25, and government-contract income of £380.46k, £183.45k, and £403.32k in 2023-25 [S51]. | Public-sector bodies have paid for Stonewall workplace programmes. Several government and public bodies later reviewed or withdrew from Stonewall schemes amid value-for-money and policy-influence concerns [S52][S53]. | Public bodies can fund external advocacy/training organisations that shape institutional policy in contentious areas. |

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| <p>We Belong</p> | <p>We Belong’s Charity Commission annual-report filing describes a multi-year National Lottery Community Fund grant for organisational expenditure focused on the Manchester Chapter [S54]; We Belong also announced Manchester expansion supported by the National Lottery Community Fund [S55].</p> | <p>We Belong campaigns on young migrants’ rights and policy issues, including leave-to-remain fees and the wider “hostile environment” policy field already discussed in this report.</p> | <p>This is arm’s-length public funding rather than direct departmental funding. It still belongs in the map because National Lottery money can support organisational capacity in contested policy fields.</p> |
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Table 5.2. Public/state-linked funding evidence and associated policy-friction risks.

5.4 The twin-track model in practice: Rowntree

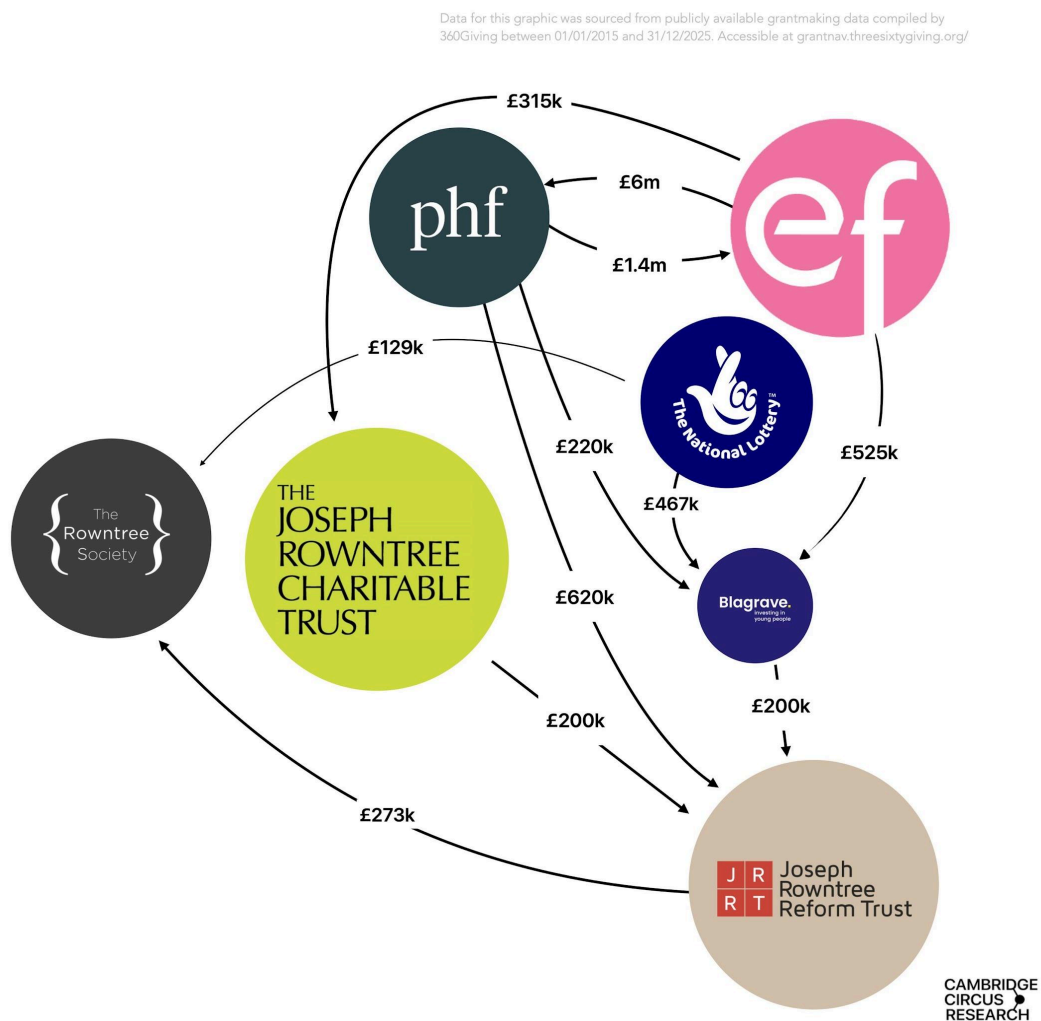


Figure 5. Money flows between various charitable grantmaking organisations and the non-charitable Joseph Rowntree Reform Trust

The figures reproduced in Appendix A show Rowntree-linked flows into civil-society and racial-equality organisations using 360Giving/open-grants data, showing how the Joseph Rowntree Charitable Trust and Joseph Rowntree Reform Trust operate across adjacent spaces. One is formally charitable, the other is structurally able to support more political work. The point is not that every recipient is acting improperly. But this demonstrates how the system can allow money classified broadly as support for

“civil society”, “rights”, “democracy”, or “racial equality” to support organisations whose practical output is directed at changing, challenging, or delegitimising government policy.

Civil society pursuing political goals

The Rowntree civil-society exhibit identifies Reprieve, the Involve Foundation, and Rights and Security International among recipients of significant grant funding. Reprieve is a legal-action and human-rights organisation whose policy work includes torture, detention, military force, extradition, and counter-terrorism questions [S20]. Its response to the Shamima Begum case criticised then Home Secretary Sajid Javid’s position and framed Begum as the responsibility of the British state and judicial system [S22]. Involve describes itself as working for more open, participatory, and deliberative politics and government [S56], while the associated Democracy Network describes a project of building “collective power and influence” [S57]. Rights and Security International has opposed elements of the Prevent architecture and published research arguing that Prevent has a chilling effect on environmental and anti-racism activism and Muslim communities [S58][S59].

Reprieve is therefore a particularly useful boundary case for this report. It is not a marginal activist group, but a well-connected legal charity able to frame contentious questions of citizenship, national security, and executive responsibility in rights-based language while still pursuing outcomes directly contrary to ministerial policy. That combination of legal prestige, charitable status, and political salience is exactly why these networks matter to parties trying to govern.

The strategic significance is that these organisations may be presented as neutral civil-society or legal-capacity actors, while their practical activity is often directed at contested public-policy outcomes. This does not automatically breach charity law. It does, however, show how fragile the legal distinction between “charitable purpose”, “policy advocacy”, and “political activity” becomes when an organisation repeatedly campaigns against named policies, departments, or ministers.

Race, equality, and immigration constructing policy opposition infrastructure

The Rowntree racial-equality exhibit shows the same operating pattern in a different policy field. Funding in the race/equalities space can support organisations whose outputs include challenges to detention, immigration enforcement, criminal justice, policing, deportation, equality law, and public-order policy. The appendix exhibit material specifically identifies organisations such as Detention Action, Right to Remain, and the Coalition for Racial Equality and Rights as examples of groups operating in this intersection between the charity sector and direct policy contestation.

The operational lesson is that public-policy opposition is often not housed in a single “immigration” or “legal” silo. It can be distributed through race, equality, democracy, participation, civil liberties, arts, youth, community organising, and anti-poverty portfolios.

5.5 A state at war with itself: public money, departmental conflict, and proxy narratives

Home Office grants and adversarial policy feedback



Figure 6. Home Office-linked rights, identity and advocacy grants. The exhibit shows selected grant flows to organisations that provide advice or support but also criticise Home Office asylum, immigration, deportation, or modern-slavery policy.

The second set of exhibits adds an even more direct problem: public money can fund organisations that then supply the evidence, legal arguments, media narratives, or parliamentary pressure used to criticise the same state’s policy agenda. This is not always improper. A government may need independent bodies to provide advice, victim-support organisations, refugee-support contractors, and cultural institutions. But the absence of a cross-government conflict map means that departments can inadvertently finance advocacy that frustrates another part of government. This diagram goes to the core of the argument: a department can become both funder and target, creating an evidence loop in which publicly funded organisations supply parliamentary criticism, litigation pressure, or media narratives against the policy system that funds them.

The Home Office exhibit shows the clearest form of self-conflict. Migrant Help operates the Advice, Issue Reporting and Eligibility (AIRE) service, a core part of the asylum-support system; the Home Affairs Committee later drew on Migrant Help data and evidence when criticising the Home Office's management of asylum accommodation [S30]. The AIRE Centre has also challenged Home Office-linked deportation practice in relation to Operation Nexus, a collaboration between the police and the Home Office concerning foreign-national offenders; contemporary reporting described its crowdfunding for the High Court challenge [S60]. Likewise, the British Refugee Council, which has received substantial state funding every year, has acted as a litigation friend on multiple occasions in age-dispute cases before immigration tribunals involving asylum claims.

Southall Black Sisters (SBS) received £6.3 million from the Home Office in the last ten years while co-filing the first police super-complaint against the Home Office itself [S61]. The 2018 complaint (validated by police inspectorates in 2020) argued Home Office immigration enforcement deters migrant women from reporting domestic violence. SBS used funding from a government department to suggest the policy of *the same government department* harms abuse victims. In 2021, SBS submitted a consultation response rejecting the government's New Plan for Immigration as causing "egregious harm" to asylum-seeking women [S62]. In 2025, SBS was involved in nine demonstrations in nine major cities against the Immigration White Paper. Throughout, it received Home Office grants. Anti-Slavery International used Home Office funding to argue restrictive Home Office immigration policies actively push people into traffickers' hands. The organisation campaigned against the Nationality and Borders Act 2022 and the Illegal Migration Act 2023, calling them "cruel" and "destructive to modern slavery protections" [S63]. In October 2025, Anti-Slavery International led a 33-organisation letter condemning the Immigration White Paper as contradicting modern slavery prevention. The government therefore funds an organisation that argues that government policy enables slavery.

DCMS cultural funding and counter-narrative production



Figure 7. DCMS-linked rights, identity and advocacy grants. The exhibit shows selected cultural and civil-society recipients whose public work can shape contested narratives on migration, identity, race, gender and political journalism.

Cultural funding can help determine how voters, journalists, and officials understand terms such as “hostile environment”, asylum, displacement, equality, and rights, even where another department is trying to enforce a restrictive policy.

The DCMS exhibit illustrates a softer but strategically important version of the same problem. Cultural and identity grants can support organisations that shape the public narrative around immigration, race, gender, or protest. Good Chance Theatre emerged from work around the Calais camp and has used theatre to advocate for and humanise the refugee experience [S64]. Counterpoints Arts describes work that reframes migration through art, culture, and human stories and has been central to Refugee Week-style cultural campaigning [S65]. The Migration Museum presents immigration history through exhibitions and public education. Such projects may be artistically or educationally defensible, but they

also shape the political context in which Home Office enforcement, border control, and asylum policy are judged.

This is the cross-Whitehall problem. One department may fund cultural or civil-society projects that normalise a narrative directly at odds with another department's mandate. The remedy is transparency, mapping, and ministerial accountability. Public grants should state whether they fund service delivery, cultural work, advocacy, legal challenge, campaign capacity, narrative change, or policy research, and the Cabinet Office should maintain a cross-departmental register of publicly funded organisations that litigate, campaign, or give parliamentary evidence against government policy. Additionally, charities that use any funds to litigate against the government should have those funds subjected to taxation. It should be clear that these actions do not fall under the scope of charitable activities.

Policy implication

The practical recommendation is a stricter regime regarding government funding of charities. The state should not be in a position where it is financing its own opponents. Charities can form a valuable part of the ecosystem in terms of service provision. However, it is not incumbent on the taxpayer to finance opposition to policies, many of which those same taxpayers voted for. Charities in receipt of state funding should have much tighter rules on the advocacy and campaigning they are allowed to pursue.

6. The legal complex

Once the funding and operating models are understood, the next stage is the policy battlefield itself. The legal complex turns political opposition into costly court battles; the media layer turns campaign positions into expert commentary; and the state-process layer turns NGO submissions into consultation records, select-committee evidence, and administrative pressure. These are different fronts of the same contest over policy implementation.

Judicial review is a legitimate constitutional mechanism. While the government should of course not be above the law, a political organisation must understand how litigation is used strategically and must build policy that can withstand coordinated attack. In sensitive fields, the playbook of announcing a policy, drafting it later, and defending in court after failure, is a recipe for defeat.

| Case / policy area | NGO or charity role | What happened | Strategic lesson |
|-------------------------------------|--|---|---|
| Rwanda removals policy | Individual claimants and affected asylum seekers challenged the Rwanda policy; NGOs and unions including Care4Calais, Detention Action, PCS, and Asylum Aid were connected to challenges or related claims [S66][S67]. | The Supreme Court upheld the finding that the policy was unlawful because of risks relating to Rwanda's asylum system [S68]. Later, Asylum Aid challenged Safety of Rwanda Version 2.0 guidance after the 2024 Act [S17]. | A flagship policy can be attacked at multiple levels: evidence of a country's safety (for removed asylum seekers), individual procedural fairness, guidance, statutory interpretation, and operational removal decisions. |
| Right to Rent / hostile environment | JCWI issued judicial review proceedings challenging the right-to-rent scheme [S16]. | The High Court initially found against the scheme; the Court of Appeal later allowed the Secretary of State's appeal on key grounds, but the litigation generated major political and legal scrutiny [S16]. | Even partial or reversed victories can reshape the narrative around enforcement policy and generate equality/legal-risk pressure. |
| Detained Fast Track | Detention Action challenged fast-track asylum appeal rules and processes [S18]. | The litigation contributed to the collapse or suspension of a fast-track appeals regime after findings about unfairness and legality [S18]. | Any reactive policy attempting to solve a problem quickly will be vulnerable to sustained challenge. Policymakers must anticipate these and bake in robust procedures to ensure their implementation. |
| Removal-window / no-notice removals | Medical Justice challenged removal-window policy alongside an individual claimant [S19]. | The Court of Appeal considered the balance between the efficiency of the removals process and access to justice; the case shows how procedural timelines become the battleground [S19]. | Operational efficiency measures must be designed with safeguards with access to courts in mind or they become targets for litigation. |
| Legal-aid residence test | Public Law Project challenged the proposed residence test for civil legal aid [S27]. | The Supreme Court judgment was given in 2016 [S27]. The case is a model of public-law litigation directed at the legal infrastructure surrounding policy. | Legal-aid and access-to-justice rules are not merely administrative: they are strategic terrain. |
| Child citizenship registration fees | PRCBC and a child claimant challenged the child registration fee [S69]. | The Supreme Court considered whether the Home Secretary could make a child's right to register as British conditional on payment of £1,012 [S69]. | Fees, waivers and administrative charges can be attacked as making statutory rights practically inaccessible. |
| Investigatory Powers Act | National Council for Civil Liberties / Liberty challenged bulk powers and data-sharing safeguards [S26]. | The litigation ran for years and concerned compatibility with convention rights and EU-derived standards [S26]. | Civil-liberties litigation can use long timelines to keep policy under review and pressure amendments. |

| | | | |
|---|---|---|---|
| Net Zero Strategy and Carbon Budget Delivery Plan | Friends of the Earth, ClientEarth, and Good Law Project challenged government climate plans [S23][S24]. | The High Court found legal defects in the government's plans in both 2022 and 2024, requiring revised approaches [S23][S24]. | Statutory duties can be used to judicialise broad economic and energy strategy. |
| Covid procurement / PPE transparency | Good Law Project brought public-interest litigation on procurement transparency and governance [S25]. | The court recorded Good Law Project's role as a not-for-profit bringing public-interest litigation in areas including governance [S25]. | Procurement, transparency and ministerial process are fertile ground for litigation and political narrative-building. |

Table 6.1 The legal complex matrix

6.1 Rwanda as the model case

The Rwanda scheme should be treated as the model case for future resistance to a hard-edged immigration or asylum policy. It involved challenges at the policy level, affected individuals, emergency interim relief, NGO and union support, international evidence, human-rights arguments, domestic public-law arguments, points on procedural fairness, and subsequent litigation against new guidance. The Supreme Court case page records that the claimants challenged both the lawfulness of the Rwanda policy generally and the individual decisions to remove them [S68]. The later SM and Asylum Aid litigation shows that even after new legislation, guidance can remain a target for litigation [S17].

For any future government, the lesson is not simply to expect judicial review. The lesson is to assume that campaigners will challenge implementation at every stage: primary legislation, secondary legislation, guidance, decision letters, country evidence, equality analysis, operational timetables, detention, access to lawyers, removal notices, ministerial statements, and civil-service obligations. The litigation threat therefore starts at policy design, not at the first removal flight.

6.2 The legal complex's operating logic

1. Identify a morally sympathetic claimant or class of claimants.
2. Frame the policy as a rule-of-law, fairness around procedure, equality, rights, or statutory-duty problem rather than as a disagreement over politics.
3. Use charities to gather evidence from affected populations and frontline workers.
4. Use strategic legal funds to pay for pre-litigation research, expert evidence, or interventions.
5. Generate media pressure before hearings and interpret any procedural concession as proof of broader policy illegitimacy.
6. If the policy survives, challenge its implementation; if guidance is rewritten, challenge the new guidance; if legislation is passed, challenge compatibility, interpretation, or operational decision-making.

6.3 Pattern examples for policy teams

The legal-complex pattern is easiest to understand through recurring examples. Each example should be converted into a short operational case note for ministers, advisers, and policy officials before comparable reforms are announced.

Box 1: Rwanda as full-spectrum resistance. The Rwanda scheme shows how a flagship policy can generate policy-level litigation, individual claims, NGO and union support, evidence of a country's safety, emergency relief, procedural challenges, and later guidance litigation. The operational lesson is that opponents will challenge every layer of implementation, not only the headline policy.

Box 2: Climate litigation as economic-policy leverage. The climate cases show that the same model is not confined to immigration. Statutory duties can be used to force disclosure, require revised plans and judicialise broad economic, energy, and industrial strategy.

Box 3: Coalition and media-pressure campaigns. Signatory letters, coordinated consultation submissions, and press amplification can create a national-news cycle that looks like a broad civic consensus. The analytical task is to distinguish genuine independent breadth from repeated organisations linked by funding, personnel, legal advisers, or campaign infrastructure.

6.4 Media amplification and the “impartial expert” problem

A related but often overlooked layer is media placement. As well as litigating and lobbying, campaigning organisations also seek repeated placement in broadcast and print news as commentators or “experts” on policy areas where they are active participants. Such representatives do not necessarily lack knowledge, but audiences are often not given enough context about the organisation’s campaigning, coalition-building, fundraising, or litigation activities on the same issue.

An illustrative example is the *Standard’s* 31 October 2025 report on a YouGov poll about local and national concerns. The article quoted Saeema Syeda of JCWI saying the poll “proves what we’ve been saying all along – there is no immigration crisis” and describing concern as a “manufactured panic” pushed by politicians and parts of the media [S70]. That is straightforward advocacy messaging, but presented in a conventional news format. At the organisational level, JCWI’s own year-end review states that its work combines frontline legal defence with strategic litigation, policy advocacy, and narrative change, and reports that it secured over 45 national press quotes and nearly 50 broadcast appearances in 2025 [S15][S71].

For political and government analysis, the point is not to deny NGOs a voice. It is to treat repeated media placement as part of the pressure system surrounding a policy. A representative may be framed as an informed commentator while also being part of a funded campaigning and litigation network on the same issue. The practical response is to map recurring spokespeople, broadcast appearances, quote patterns, and press-office outputs alongside grant flows, coalition activity, and litigation.

6.5 Case study: coordinated opposition to the Conservative government’s Rwanda scheme

The Rwanda scheme remains the clearest example of coordinated full-spectrum resistance to a government policy. Opposition did not come from a single charity or a single court case. Rather, it involved a layered combination of individual claimants, charities, campaign groups, legal teams, and a trade union, operating across litigation, evidence-gathering, communications, and political pressure.

Detention Action announced in April 2022 that a legal challenge had been brought against the Home Secretary’s Rwanda policy, including a pre-action letter challenging the failure to disclose the criteria by which asylum seekers would be selected for transfer [S72]. Asylum Aid later explained that when its own challenge was heard in October 2022, that hearing followed earlier hearings in cases brought by Care4Calais, Detention Action, PCS, and a number of individuals, plus a separate hearing focused on the data-sharing parts of the Rwanda arrangements [S73]. PCS later stated publicly that it, alongside Care4Calais, Detention Action, and eight refugees, had launched a judicial review challenge and welcomed the Court of Appeal’s ruling that the government’s Rwanda plan was unlawful [S67].

The campaign then moved through successive layers. The Supreme Court recorded that the claimants challenged both the lawfulness of the Rwanda policy generally and the individual decisions to remove them [S68]. Even after Parliament enacted the Safety of Rwanda Act, Asylum Aid filed a further High Court challenge to the Home Office’s “Safety of Rwanda” guidance, arguing that the policy unlawfully

instructed decision-makers to ignore compelling individual evidence of onward-risk and refoulement [S17].

The strategic significance lies in the cumulative operating model. The network attacked evidence of a country's safety, selection procedures, fairness timetables, data-sharing, union workplace issues, ministerial guidance, and the wider public narrative. Meanwhile, front-line organisations and campaign groups maintained a constant public argument that the policy was cruel, unlawful, or unworkable. Whether one thinks that opposition justified or not, the practical effect was to delay implementation, increase legal and administrative cost, force repeated redrafting, and keep the policy in a near-permanent state of contestation.

6.6 Case study: coordinated opposition to Labour's UK–France “one in, one out” deal

The same networked model can be seen in the response to Labour's UK–France treaty. When the treaty came into force in August 2025, the government said it provided a legal basis for the “groundbreaking” UK–France “one-in, one-out” pilot scheme. Under the agreement, anyone entering the UK on a small boat could be detained and returned to France, while an equal number of migrants would be eligible to come to the UK through a new route if they had not attempted an illegal crossing before [S74].

Opposition quickly formed across charities and campaign organisations. This was a coordinated, structural approach to frustrate the deal through a multi-pronged strategy. The first was moral delegitimisation. JCWI published a statement [S75] calling the policy “state-sponsored human trafficking”. Other organisations joined the effort to frame the policy as “racist” and “cruel”.

The second was the creation of a united coalition front of NGOs acting to amplify opposition to the policy. The JCWI statement is explicitly collective, with several British and French migration charities named as signatories.

The third was to generate policy briefings aimed at Parliament and elite audiences. Refugee Action released a policy briefing for Parliament arguing that the policy makes certain asylum claims inadmissible by mode of arrival and is therefore in contravention of international refugee law [S76]. Amnesty International likewise published a policy briefing that described the arrangement as “another cruel, costly failure dressed up as policy” and argued that it would cement the role of smugglers rather than solve the problem [S77].

The fourth was to create legal friction around the policy. The first legal setback came quickly when, in September 2025, the High Court temporarily blocked the removal of an Eritrean man scheduled to be deported under the policy. The judge ruled that owing to a trafficking/modern slavery claim, there was a “serious issue to be tried” over whether the claim prevented removal to France. This demonstrates the likely legal pattern: not necessarily a single frontal challenge to the treaty, but repeated individual challenges based on trafficking, vulnerability, legal access, procedural fairness, or removal risk [S78].

The fifth was to build specialist evidence around vulnerability and detention. Medical Justice framed the issue around trafficking survivors detained under the scheme, stating that a judicial review by survivors was being heard and linking the case to barriers to disclosure documented by the Detention Taskforce, which Medical Justice chairs. This supplied the evidential layer needed to pursue further litigation: clinical harm, trauma, detention effects, modern-slavery disclosure barriers, and vulnerability screening [S79].

The sixth was to pressure the delivery chain. This was one of the most operationally significant parts. JCWI and Action Against Detention and Deportations launched a pledge campaign against Air France, explicitly saying they were putting pressure on the airline to stop facilitating deportations under the

scheme [S80]. JCWI later stated that, with 27 other British and French charities and groups, it had written to Air France, Titan Airways, AlbaStar Airlines, and Corendon Airlines, the four airlines it said were then known to be undertaking removals from the UK to France under the scheme [S81].

JCWI's own 2025 review records extensive media activity, including over 45 national press quotes and nearly 50 broadcast appearances [S71]. This is analytically important because it shows how the ecosystem works beyond the courtroom: front-line groups support affected individuals, campaign organisations issue joint statements, NGOs generate media pressure, and activists seek to make operational partners such as airlines less willing to cooperate.

The lesson is that policy can be frustrated at several points simultaneously: in the courts, in public debate, in administrative implementation and in the willingness of carriers, contractors, or public bodies to participate. The issue is not that criticism exists, but that coordinated opposition can turn every part of the delivery chain into a potential veto point, unless government anticipates that operating pattern from the outset.

6.7 Expert laundering and broadcast capture: worked examples

For internal analytical purposes, “expert laundering” describes the process by which an advocacy position is presented to the public as neutral expertise. The phrase should be used carefully in public-facing material, because many NGO representatives are genuinely knowledgeable. However, where an organisation is simultaneously campaigning, litigating, receiving public funds, coordinating coalitions, or pressuring delivery partners, media appearances by its staff should be analysed as part of the policy-opposition architecture rather than as detached expert commentary.

This is not primarily a question of censorship or access to media, but of disclosure and context. A newspaper, broadcaster or wire service may describe an NGO representative as a “director”, “chief executive”, “human rights expert”, or “refugee charity” spokesperson while omitting that the same organisation is party to relevant litigation, running a live campaign, receiving public or arm's-length public funds, or seeking to change the precise policy under discussion.

Example 1 – JCWI and immigration polling. The *Standard's* October 2025 report on immigration polling quoted Saeema Syeda of JCWI saying there was “no immigration crisis” and that concern about immigration was a “manufactured panic” pushed by politicians and parts of the media [S70]. Taken in isolation this reads as a news quote from a campaigner. In context, JCWI describes its own work as combining frontline legal defence, strategic litigation, policy advocacy, and narrative change, and states that in 2025 it secured over 45 national press quotes and nearly 50 broadcast appearances [S72]. The operational inference is that media placement is not incidental but part of the organisation's stated model of influence.

Example 2 – Refugee Council takes on the role of service provider, campaigner, and commentator. Enver Solomon, then chief executive of the Refugee Council, authored a *Standard* piece arguing that preventing asylum seekers from working was an “extraordinary own goal”, using organisational experience and economic analysis to advocate policy change [S82]. The *Standard* later quoted him in a news report describing government plans to scrap guaranteed asylum support as “harsh and unnecessary” and unlikely to deter people who had experienced persecution, torture, or family death in war [S83]. This demonstrates the hybrid role: a service charity can appear as a welfare expert, a policy advocate, and a media commentator at once.

Example 3 – Zoe Gardner and the expert/campaigner boundary. Zoe Gardner is frequently presented in public debate through expert language. Another Europe is Possible describes a report by her as coming from a “prominent migration expert”, the *Guardian* describes her as a writer who specialises in immigration policy, and LBC has hosted her to discuss a video released by Keir Starmer relating to

migrant detention [S84][S85][S86]. The disclosure issue is that Gardner’s own website describes her not only as a researcher and commentator, but also as a campaigner on UK immigration and asylum policy, with previous roles at the Stop Trump Coalition, JCWI, Asylum Aid, the Race Equality Foundation, the European Network on Statelessness, and the European Council on Refugees and Exiles [S87]. OpenDemocracy’s author biography is even more explicit, describing her as an “independent immigration policy expert and campaigner”. OpenDemocracy also says she campaigns for the rights of migrants and refugees, and states that as a grassroots activist she has organised campaigns independently and with Another Europe Is Possible and UK Stop Trump [S88]. Media and political audiences should understand when a quoted “migration expert” is also a long-standing campaign actor with a defined policy position.

Operational recommendation: government and political parties should pre-brief ministers, spokespeople, and sympathetic commentators with neutral wording that identifies the role of repeat NGO commentators without attacking beneficiaries.

6.8 Insertion into processes of state: consultations, parliamentary evidence and policy formation

A further form of influence is institutional rather than purely public-facing. Many of the same NGOs and charities that litigate, campaign, issue open letters, and appear in the media also enter formal state processes as recognised stakeholders. They respond to civil-service consultations, attend departmental engagement sessions, submit evidence to parliamentary committees, appear as oral witnesses, brief parliamentarians, and seek to shape committee reports, amendments, and implementation guidance. This is lawful and often procedurally invited. The risk is that organised networks can convert partisan or campaign positions into official stakeholder evidence, giving them an aura of institutional neutrality.

The policy risk is therefore that the same organisation can appear in five roles at once: service provider, public grant recipient, claimant or intervener in litigation, media expert, and official stakeholder. A department may fund an organisation to deliver advice or casework; another part of the state may invite it into a consultation or committee inquiry; the organisation may then use that status to legitimise a campaign against the very policy the state is trying to deliver.

Parliamentary and consultation processes are designed to gather evidence. House of Commons guidance explains that committees invite written evidence and hear oral evidence, and that select committees have powers relevant to evidence gathering, including taking oral and written evidence [S89]. Political parties and departments should understand when evidence is coming from a repeated, funded and coordinated advocacy network rather than a genuinely independent or representative source.

Worked example 1: Home Office New Plan for Immigration consultation

The Home Office’s New Plan for Immigration consultation is a useful model. The government described the plan as having three objectives: increasing fairness and efficacy, deterring illegal entry, and removing more easily those with no right to be in the UK [S90]. It invited a wide range of views and perspectives from stakeholders and the public [S90]. The later government response states that Home Office and Ministry of Justice officials undertook 48 separate engagement sessions with targeted stakeholders, including technical areas of the plan, and that the consultation results were considered before policy decisions were finalised and before introduction of the Nationality and Borders Bill [S91].

This created an official channel through which migration and human-rights NGOs could shape the policy record. Refugee Council published a detailed consultation response; Liberty published a formal response that focused on, among other matters, immigration judicial review and fixed recoverable costs; and Liberty’s public summary argued that the plan formed part of a wider attempt to limit how

government is held accountable through the courts, Parliament, and opposition in the streets [S92][S93][S94]. In practical terms, the consultation process went far beyond merely receiving public opinion. It also created a structured opportunity for organised legal and campaign groups to frame the evidential and rights-based objections that would later inform parliamentary debate, campaigning, and litigation risk.

Worked example 2: Nationality and Borders Bill and Illegal Migration Bill evidence

Parliamentary evidence provides a second route into the machinery of policy. JCWI submitted written evidence on the Nationality and Borders Bill, describing itself as a leading immigration charity covering immigration, asylum, and nationality law [S95]. It also submitted evidence in the Illegal Migration Bill scrutiny process, referring to its legal helpline for UNISON members and its support for clients affected by right-to-work checks [S96]. This illustrates the service-provider-to-policy-actor pathway: there is a seamless thread between contact with affected individuals transforming into evidence, evidence being used as legislative argument, and finally the legislative argument becoming political and legal pressure.

The same pattern is visible beyond JCWI. The Runnymede Trust submitted evidence on the Border Security, Asylum and Immigration Bill, arguing that the Bill continued a pattern of migration policies that disadvantage communities of colour and reinforced a punitive approach prioritising deterrence over protection [S97]. Liberty submitted evidence to the Joint Committee on Human Rights on the Crime and Policing Bill 2025, arguing that the Bill introduced powers risking criminalisation of those in poverty and those who protest [S98]. These are not simply external campaign lines: once submitted and published by Parliament, they become part of the formal legislative evidence base.

Worked example 3: oral evidence and committee-platform effects

Select committee oral evidence can have an even stronger legitimising effect because witnesses appear inside Parliament and are questioned by MPs. The Home Affairs Committee's inquiry into Channel crossings, migration, and asylum-seeking routes through the EU examined the growth in small-boat crossings, the role of criminal gangs and the response of UK and French authorities [S99]. Its oral-evidence publications included witnesses from the Refugee Council and Migrant Voice, alongside asylum seekers and other stakeholders [S100]. This is a normal part of parliamentary scrutiny, but for political analysis it matters because it gives selected civil-society organisations a privileged channel into the public record.

Once an organisation is repeatedly used as a committee witness, consultation respondent, media commentator, and litigant, it gains a form of quasi-institutional authority. Its submissions can be cited in debates, committee reports, press coverage, impact assessments, judicial-review grounds, and future consultation responses. Campaign organisations become embedded in the evidence architecture that the state itself uses to understand, defend, or modify policy.

Worked example 4: ClientEarth and climate-finance policy

The pattern is not limited to immigration. ClientEarth's evidence to the Environmental Audit Committee on the financial sector and the UK's Net Zero transition stated that it had submitted written evidence and given oral evidence on a number of EAC inquiries, and made recommendations about regulators, statutory objectives, greenwashing enforcement and the Financial Services and Markets Bill [S101]. This demonstrates how a litigation-capable NGO can also enter the formal policy process and seek to shape the legal and regulatory architecture governing whole sectors of the economy.

6.9 How state-process insertion changes the policy battlefield

Insertion of charities into state processes changes the policy battlefield in five ways. First, it allows campaign groups to convert political arguments into official evidence. Second, it gives media outlets a reason to treat campaigners as recognised experts. Third, it creates material that can be quoted back at ministers in Parliament, litigation and consultation responses. Fourth, it gives organisations repeated access to officials, committee clerks, MPs, peers, and advisers. Fifth, it makes opposition appear procedural and technocratic rather than ideological.

This creates an asymmetry for government. Ministers are accountable for delivery, but the environment in which they operate can be shaped by organisations whose funding, coalition relationships, litigation activity, and ideological objectives are not visible to the ordinary reader of a consultation summary or committee report. A government may therefore find itself debating not a neutral evidence base but a policy record partly constructed by its organised opponents.

6.10 Recommended safeguards for consultations and parliamentary evidence

Outright exclusion of these groups from the legislative process could prove difficult. However, proper disclosure, mapping, and weighting are necessary in order that state processes are not captured by special interest groups. Care must be exercised in the invitation of representatives of these groups to participate in policy-formation processes.

1. **Stakeholder relationship maps.** For major consultations, departments should publish a map of organisational respondents by funder, coalition, umbrella network, and known litigation or campaign activity, where this can be established from public sources.
2. **Consultation independence notes.** Consultation summaries should distinguish individual responses, mass-template responses, coordinated organisational responses, and responses from organisations with overlapping funders or shared coalition memberships.
3. **Adversarial stakeholder declarations.** Organisations giving evidence to government or Parliament should be asked to declare whether they are litigating, threatening litigation, campaigning, or receiving public money in the same policy area.
4. **Public-funding flags.** Departments should identify where a consultation respondent or parliamentary witness is also a recipient of direct government grants, local-authority funding, arm's-length public money, or Legal Aid Agency funding.
5. **Committee witness balance.** Parliamentary committees should avoid treating large NGO coalitions as representative of broad public opinion unless they also hear from delivery bodies, frontline officials, affected local authorities, enforcement agencies, taxpayers, service users, and dissenting experts.

While civil society should of course be heard, it should not be allowed to appear more independent, representative, or neutral than it actually is. The state should know when the same network is shaping the consultation record, litigating the policy, briefing the media, and receiving public money at the same time.

7. Dangers

The dangers of this network should be framed carefully. A future government should be careful not to overreach by treating lawful civil-society activity as illegitimate. Nonetheless transparency, accountability, and democratic balance have not kept pace with the scale and sophistication of the sector.

| Danger | Description | Practical effect |
|-----------------------------------|--|--|
| Democratic asymmetry | A government is judged by voters and Parliament, while philanthropic networks can pursue policy goals over decades with limited public scrutiny. | Elected mandates are converted into administrative battles in which unelected actors have structural advantages. |
| Manufactured consensus | Open letters and coalitions can make a small, interfunded network appear as a large spontaneous public movement. | Ministers and media may mistake organised elite consensus for mass opinion. |
| Policy delay | Even unsuccessful litigation can delay implementation, increase cost and sap political momentum. | Government loses the tempo of reform. |
| Opacity of regranting | Money can pass from a major foundation to an intermediary and then to small campaign groups, making the original source and strategic purpose harder to track. | Public and parliamentary scrutiny are weakened. |
| Regulatory under-enforcement | The Charity Commission often works through guidance, casework and remedial action rather than sanctions. | Pushing the boundary may be rational if consequences are limited. |
| Legal dependency of policy | Policies are increasingly drafted in anticipation of judicial review rather than primarily for operational delivery. | The administrative state becomes more cautious, slower and more lawyer-led. |
| Reputational intimidation | Opponents can be wrongly framed as hostile to the vulnerable, racist, anti-rights, anti-climate, or corrupt. | Civil servants, businesses, and local authorities may avoid cooperation with government policy. |
| Conflicts and revolving-door risk | Trustees, advisers, officials, lawyers, and campaigners may move across funders, charities, public bodies, and advisory groups. | The line between independent civil society and policy insider networks becomes blurred. |

Table 7.1 Matrix of dangers

The central danger of this is democratic displacement. Although the elected government remains formally responsible for delivery, the policy tempo is increasingly set by unelected networks able to combine litigation, media pressure, philanthropic capital and administrative delay. Opposition is legitimate, but democracy is at risk when organised, tax-advantaged, and sometimes publicly funded networks can wield a powerful veto without equivalent transparency or accountability.

8. Policy recommendations and legislative reform programme

Any response should combine legislative reform, tightening transparency rules, increasing funding discipline, and regulatory enforcement. The objective must be to restore democratic accountability where tax-advantaged or publicly funded organisations operate as an organised network of policy opposition.

The following recommendations should be read as a governing programme. First, amend the Charities Act 2011 to prevent charities from being primarily used for political activity. Second, understand the network. Third, make funding and regranting visible. Fourth, stop public money from building adversarial policy infrastructure. Fifth, design controversial policy as if it will be attacked legally, institutionally, and narratively from day one.

8.0 Create a statutory charitable neutrality test

The central pillar of legislative reform should be the introduction of a statutory charitable neutrality test in the Charities Act 2011. This moves political campaigning from simply a matter of Charity Commission guidance to a statutory limit on charitable status where political activity becomes dominant, strategic, or non-incident to the organisation's charitable work, and where they receive substantial funds from non-grassroots organisations.

The reform is not intended to prevent civil-society organisations from campaigning, litigating, publishing research, giving evidence to Parliament, or seeking to influence policy. They should remain free to do so. However, they should not be able to do so while enjoying charitable status, Gift Aid, tax privileges, public subsidy, enhanced reputational trust, and access to public-sector funding streams.

The principle behind the amendment is simple: charitable status ought to be reserved for direct public benefit, independent research, education service provision, or the enforcement of existing rights, not for subsidised political pressure.

Organisations that wish to campaign for changes to law, policy, public expenditure, administrative discretion, or electoral outcomes should remain free to operate as campaign groups, companies, think tanks, membership bodies, or non-charitable civil-society organisations. They should not be able to do so as charities where political activity is their dominant purpose, principal activity, or ordinary operating model.

8.0.1 Make dominant political purpose incompatible with charity status

The Charities Act 2011 should be amended so that an institution is not considered eligible for charitable status where its dominant purpose, principal activity, or operating model is political campaigning rather than direct charitable public benefit.

The statutory bar should not apply merely because a charity analyses public policy, publishes research, makes technical recommendations, gives evidence to Parliament, responds to consultations, or occasionally seeks changes to law or policy in order to improve the delivery of its charitable purposes. Many legitimate charities, including research institutes and think tanks, acquire practical or technical knowledge through research, education, casework, welfare provision, conservation, service delivery, or legal analysis. They should remain able to make evidence-based representations to government and Parliament or publish policy research as required.

The bar should instead apply where campaigning, mobilisation, or policy advocacy becomes the organisation's practical reason for existence. For these purposes, political campaigning should mean activity intended directly to secure a predetermined political, legislative or governmental outcome

through public mobilisation, pressure campaigns, coalition campaigning, strategic litigation, or sustained advocacy, rather than through independent research, education, or direct charitable work.

Relevant political campaigning may include activity intended to influence:

1. the making, amendment, or repeal of legislation;
2. the policy of central, devolved, or local government;
3. the decision of a public authority, regulator, or public body;
4. the allocation of public expenditure;
5. the implementation of a contested public policy;
6. the electoral success, public standing or political reputation of a party, candidate, minister, elected office-holder, or prospective candidate.

However, an organisation should **not** be treated as having a prohibited political purpose merely because it:

1. conducts research into public policy;
2. publishes policy analysis or fiscal, legal, social, or economic modelling;
3. evaluates government proposals;
4. reaches conclusions that imply legislative or policy change;
5. gives evidence to Parliament or government;
6. hosts debates, lectures, seminars, or educational events;
7. publishes technical recommendations arising from its research;
8. explains the likely consequences of different policy choices.

The distinction should be between research that leads to recommendations and campaigning that uses research as a wrapper. The former can be charitable. The latter should not be.

A charity should be treated as having a prohibited political purpose only where, viewed in the round, political campaigning is:

1. **dominant** – it is the main activity by expenditure, staff time, senior-management focus, communications output, or organisational strategy;
2. **strategic** – it forms part of a sustained plan to secure a predetermined change in law, policy, or public administration;
3. **recurring** – it is repeated across campaigns, coalitions, consultation responses, litigation, and media work over multiple years;
4. **substitutive** – the claimed public benefit depends primarily on government adopting the charity's preferred policy, rather than on the charity providing research, education, service delivery, or direct public benefit itself;

5. **ideological** – the organisation’s work is directed mainly at advancing a political or ideological settlement rather than delivering concrete charitable services, research, education, welfare, conservation, advice, or analysis;
6. **mobilising** – the organisation seeks to generate public, media or donor pressure against named laws, policies, ministers, parties, candidates, or public authorities;
7. **adversarial as a business model** – the organisation’s ordinary model is to litigate against, campaign against, or delegitimise government policy rather than provide relief, education, advice, research, welfare, conservation, reconciliation, or other direct charitable activity.

This test should be applied to the organisation’s overall character, not to isolated examples of campaigning or policy commentary. A charity should not lose charitable status because it submits evidence to a consultation, proposes a technical amendment to legislation, criticises a government proposal, publishes inconvenient research, campaigns for better enforcement of existing law, or explains how policy affects its beneficiaries.

The statutory safe harbour should protect charities whose public-policy work is:

1. evidence-based;
2. methodologically transparent;
3. educational or technical in character;
4. non-party-political;
5. open to genuine disagreement;
6. proportionate to the organisation’s charitable work;
7. not primarily designed to mobilise public pressure;
8. not a vehicle for a predetermined ideological or legislative campaign.

This would protect genuine think tanks, educational bodies, animal-welfare charities, free-speech charities, poverty charities, etc., while still targeting organisations whose real operating model is permanent political advocacy under charitable cover.

8.0.2 Limit charities to specific, auditable, and concrete purposes.

In order to qualify as charities, organisations should be required to identify:

1. the beneficiary class they serve;
2. the direct public benefit they provide;
3. the practical charitable activity through which that benefit is delivered;
4. the distinction between their charitable work and any political, campaigning, or ideological objectives.

This is especially important for broad charitable causes such as human rights, equality, and diversity, community development, racial harmony, education, and environmental protection. These purposes can be legitimate, but they are also highly elastic. Without clearer boundaries, they can be used to justify almost any campaign for legal, social, or political change.

The Act should therefore make clear that a purpose under these broad heads is charitable only where pursued through direct relief, advice, education, mediation, service provision, research, conservation, welfare provision, or enforcement of existing legal rights. It should not be charitable where pursued primarily through lobbying, public mobilisation, narrative campaigning, or strategic litigation for policy change.

8.0.3 Amend the public benefit test

The public-benefit test should be amended so that a claimed public benefit is insufficient where the benefit depends primarily on securing a change in law, government policy, public expenditure, administrative discretion, or electoral outcome.

A charity should not be able to claim charitable status simply because its trustees believe that their preferred political settlement would benefit the public. For example, an organisation should not be charitable merely because it believes that abolishing a border policy, expanding legal aid, changing protest law, altering climate policy, increasing welfare spending, or changing equality law would advance justice or social welfare.

The test is simple: does the organisation provide a direct, identifiable, and charitable public benefit now, through its own charitable activity, or does its claimed benefit depend mainly on persuading the state to adopt its preferred policy?

If the answer is the latter, the organisation should not enjoy charitable status for that activity.

This should not prevent research charities from analysing policy choices, nor should it prevent service charities from explaining how policy affects their beneficiaries. It should prevent charities from claiming that political victory itself is the charitable benefit.

8.0.4 Limit public funding of charities engaged in political actions

The state should not routinely fund organisations that use charitable infrastructure to campaign against, litigate against, or frustrate the state's own policy objectives.

A new public-funding firewall should provide that a charity receiving money from a minister, government department, public body, local authority, NHS body, police and crime commissioner, devolved administration, regulator, or arm's-length public body must not use any funds, staff time, premises, data, branding, systems, or administrative capacity for political activity.

This would ensure the taxpayer is not funding litigation against the state itself, while not preventing the government from buying capabilities or service delivery it would not otherwise have.

8.0.5 Create a grassroots-majority test for charities engaged in policy advocacy

Where a charity seeks to campaign, litigate, or intervene on public policy, continued charitable eligibility should depend in part on whether it is genuinely rooted in civil society rather than primarily sustained by large foundations, public money, or regranteeing intermediaries.

A charity engaged in policy advocacy should be required to show that a majority of its policy-advocacy income comes from verifiable grassroots sources, such as:

1. Individual members;
2. Small donors;

3. Local associations;
4. Beneficiary communities;
5. Genuinely independent civic bodies;
6. Small-scale voluntary contributions.

Organisations primarily funded by large foundations, state grants, public contracts, arm's-length public bodies, or regranting intermediaries should not receive the same charitable privileges for political advocacy. The purpose of this test is to distinguish genuine grassroots civic association from professionally funded policy activism.

This test would not automatically remove charitable status from service charities that receive institutional funding. It would apply where the organisation seeks to use charitable status for policy advocacy, litigation, campaigning, or public mobilisation.

8.0.6 Restrict transfers from charities to non-charities

The Act should include a strong anti-avoidance rule covering sister organisations, campaign companies, fiscal sponsors, trading arms, and non-charitable affiliates.

A charity should not be permitted to fund, subsidise, staff, promote, share data with, share branding with, provide administrative support to, or otherwise assist a non-charitable organisation where it knows, or ought reasonably to know, that the support will enable political activity.

Transfers from charities to non-charities should be lawful only where:

1. The transfer is strictly necessary for a defined charitable purpose;
2. The recipient's use of funds is contractually restricted to that charitable purpose;
3. The transfer is fully disclosed;
4. The charity can audit the use of funds;
5. The recipient is prohibited from using the funds, staff time, branding, or data for political activity;
6. Connected-party relationships are declared.

Connected charity/non-charity structures should face a presumption of separation. Where branding, staff, trustees, directors, donors, premises, data, or campaign infrastructure overlap, the Charity Commission should be required to assess whether charitable resources are indirectly supporting non-charitable political campaigning.

8.0.7 Require mandatory political-activity reporting

Every charity above a defined income threshold, such as £100,000, should file an annual political-activity return.

The return should disclose:

1. Total spending on policy, public affairs, campaigning, and communications;
2. Staff time allocated to policy, campaigning, litigation support, and public affairs;

3. Grants to non-charitable organisations;
4. Re-grants received and re-grants made;
5. Public funding received;
6. Whether any public funds were used for advocacy, campaigning, or litigation;
7. Meetings with ministers, MPs, peers, councillors, civil servants, regulators, and special advisers;
8. Consultation responses and parliamentary evidence submitted;
9. Litigation, interventions or pre-action correspondence involving public authorities;
10. Membership of coalitions, campaign groups, or sign-on letters;
11. Whether any connected organisation undertook political campaigning.

False or misleading reporting should be grounds for regulatory action, repayment of funds, and trustee disqualification.

8.0.8 Make political campaigning expenditure non-charitable and taxable

Charity law and tax law should be amended so that expenditure on political campaigning, policy advocacy, strategic litigation for policy change, public mobilisation, coalition campaigning, and narrative campaigning is treated as non-charitable expenditure unless it falls within a narrow exemption for technical, evidence-based representations directly connected to charitable service delivery.

Campaigning expenditure should therefore be separately accounted for, reported, and, where appropriate, taxed. This would shift part of the enforcement burden from the Charity Commission alone to auditors, HMRC, and trustees. If an organisation wishes to spend money on political campaigning, it should be free to do so, but it should not receive charitable tax treatment for that expenditure.

The rule should distinguish between legitimate charitable research or technical evidence and political campaigning. Independent research, education, consultation responses, and technical evidence should remain charitable where they are methodologically transparent and ancillary to charitable purposes. Public mobilisation, strategic litigation to force policy change, campaign advertising, and pressure campaigns should not.

Persistent or material non-charitable campaigning expenditure should trigger Charity Commission review of whether the organisation remains eligible for charitable status.

8.0.9 Reform the Charity Commission and strengthen enforcement

The Charity Commission should be reconstituted in line with its pre-Charities Act 2006 organisation and functions: a narrower regulator focused on charity-law compliance, charitable status, trustee conduct, public benefit, and misuse of charitable resources, rather than a broad civil-society facilitator. The Commission should not be expected merely to issue guidance and encourage best practice. It should be a statutory regulator with the capacity, willingness, and duty to enforce the boundary between charity and politics. It should be given clearer statutory duties and greater investigatory capacity in relation to political activity. The Charity Commission as it stands is not fit for purpose, has too broad a mandate, and takes far too long to respond to potential breaches.

Political campaigning should become a specific trigger for regulatory action. The Commission should be required to open a statutory inquiry where there is credible evidence of:

1. serious political activity by a charity;
2. repeated political activity by a charity;
3. use of public money for political activity;
4. indirect political activity through a connected non-charity;
5. threats to national security;
6. false or misleading political-activity reporting;
7. strategic litigation or campaigning that appears to have become a dominant organisational purpose.

Particular note should be taken of the time-sensitive nature of enforcement action. Where, for example, threats to national security are of particular salience, the Charity Commission ought to be able to restrict the financial activities of the charity pending investigation.

The Commission should also be resourced to examine networks rather than only individual charities. It should be able to investigate funder relationships, regrants chains, shared staff, shared branding, connected entities, repeated coalitions and charity-to-non-charity transfers.

8.1 Transparency and reporting

1. Mandatory regrant disclosure. Require charities and foundations above a threshold to disclose not only direct grants but also onward regrants, with purpose descriptions, dates, amounts, and ultimate recipients where reasonably knowable.
2. Require grants to be tagged as service delivery, research, advocacy, litigation, organising, communications, capacity building, or unrestricted core funding. This should use a standard taxonomy compatible with Charity Commission accounts and 360Giving.
3. Require claimants and interveners that are organisations to disclose institutional funders for the litigation or pre-litigation work, subject to narrow exceptions for individual safety and legal professional privilege.
4. Publish all central and local government grants to charities and NGOs in a machine-readable form, including whether the recipient is simultaneously campaigning or litigating against government in the same policy area.
5. Require charities with related non-charitable companies, campaign brands, or trading arms to publish a clear separation statement. This should include instances of shared staff, shared trustees/directors, shared premises, shared donors, IP/brand licensing, and service agreements.
6. Charities, foundations and intermediary funders above a defined income or grantmaking threshold should disclose overlapping trusteeships, senior leadership roles, advisory-board roles, shared funders, shared campaign infrastructure, and close organisational relationships with other charities, non-charitable campaign bodies, litigation organisations, or funder collaboratives. This should allow Parliament, regulators, and departments to identify whether apparently separate organisations are in fact part of a connected policy network.
7. Where a charity, NGO or foundation representative appears in media coverage, provides background briefing, or is presented as a technical expert in a policy area, the organisation should be expected to disclose whether it is publicly funded, engaged in litigation, coordinating

campaigns, submitting evidence to Parliament, or receiving relevant foundation/regranting support in the same policy field.

8.2 Judicial review and public law

1. Build litigation risk into policy design. For controversial reforms, departments should prepare a litigation-readiness file before announcement, covering statutory powers, consultation, equality duties, human-rights issues, evidence base, ministerial reasoning, and likely grounds of challenge.
2. Narrow charities' ability to bring judicial review. Charities should only be able to bring, fund or coordinate judicial review where the case is directly connected to their charitable objects, their own legal rights, or the protection of clearly identifiable beneficiaries. They should not be able to use charitable status to conduct broad political litigation against lawful government policy.
3. Exclude general campaign litigation from charitable activity. Repeated judicial reviews aimed principally at delaying, frustrating, or overturning government policy should be treated as evidence of political campaigning, not charitable work. Where this pattern emerges, the Charity Commission should review whether the charity's activities remain compatible with charitable status.
4. Tighten standing and intervention rules. Courts should preserve access to justice for directly affected individuals, but apply stricter tests to charities, NGOs and repeat interveners. Institutional litigants should have to show direct operational expertise, a genuine beneficiary interest, and a close connection between the case and their charitable purposes.
5. Require funding and interest transparency. Charities and NGOs seeking to bring or intervene in judicial review should disclose material third-party funding, foreign funding, campaign-linked fundraising, and any political or organisational interests connected to the litigation.
6. Prevent public money funding circular litigation. Government grants and contracts should prohibit public funds being used, directly or indirectly, to support litigation, or campaigning against government policy unless expressly authorised.

8.3 Government engagement and procurement

1. Stakeholder mapping before consultation. Before relying on consultation responses, map the funding and coalition relationships among respondents. Do not treat a coordinated network as independent evidence of broad public opinion.
2. Departments should not fund advocacy against their own statutory objectives.
3. No hidden policy subsidies. Public money for service delivery should not be cross-subsidising campaigning, litigation, or communications.
4. Publish ministerial and senior-official meetings with advocacy NGOs in a more searchable format, including topic, participating organisations, and whether the organisation has active litigation against the department.
5. Procurement due diligence. Where NGOs bid for public contracts while campaigning against the same policy area, departments should assess delivery risk, neutrality, data handling, and reputational exposure.

8.3.1 Public-funding discipline: stop public money funding policy friction

The public-funding evidence above points to a simple principle: public money should not be used to build, maintain, or cross-subsidise organisations whose practical function is to frustrate the same state's policy objectives. Essential advice, safeguarding, and delivery of certain services can be funded where necessary, but it should be procured or granted under tight conditions that prevent public subsidy of campaigning, litigation, narrative change, or political communications.

1. Default prohibition on discretionary public grants to campaigning charities. Central government, local government and arm's-length bodies should not make discretionary grants to charities or NGOs engaged in active political advocacy, strategic litigation, or coalition campaigning against government policy in the same field, unless Parliament has expressly authorised that purpose.
2. Delivery of services by ring-fenced contract only. Where a charity is genuinely needed to deliver advice, support, or casework, the funding should be contractual, tightly specified, auditable and ring-fenced from advocacy, litigation, campaigning, and unrestricted overheads.
3. No unrestricted public core funding for adversarial organisations. Public money should not provide unrestricted core funding to bodies that campaign or litigate against the state in the relevant policy area.
4. Departments should not fund advocacy against their own statutory objectives without explicit ministerial approval, a published justification of public interest, and a clear explanation of why the activity cannot be provided by a politically neutral provider.
5. Recipient declarations. Publicly funded organisations should declare active or threatened litigation, open letters, coalition and media campaigns, and funded advocacy work relating to the department or policy area from which they receive money.
6. Departments should retain audit rights to test whether public money, shared staff, shared premises, overhead allocation, or unrestricted surpluses are indirectly supporting campaign activity.
7. Annual parliamentary disclosure. Government should publish a machine-readable annual return showing all public grants and contracts to NGOs, campaign bodies and charities, the purpose of each payment, and whether the recipient has active litigation, campaigning or consultation activity in the same policy area.

9. Concluding remarks

For decades now, the NGO–Charity complex has operated with impunity. It has done this without any mandate, forms of accountability, or effective way of being challenged. With this paper, the authors hope to have taken a small step in changing that. While charities perform an important function in a healthy democracy, in Britain, they have been allowed to metastasise into an all-encompassing network that pursues explicitly ideological goals without any input from other segments of society. Despite a nominal restriction on political campaigning by charities, this legislation is virtually unenforceable, and any charity wishing to pursue campaigns towards their preferred political objectives has been free to do so. The consequences of this are clear for all to see: successive governments have been incapable of pursuing expressed electoral mandates after falling victim to repeated campaigning and litigation. Legislative processes have been hijacked through their insertion into every level of the policy process. Most of these organisations are entirely unknown to the majority of people, and yet exert a staggering amount of influence at all stages of the political process, with the benefit of special treatment for tax purposes, and often even taxpayer money. If no action is taken on this, it will be impossible for any reforming government to achieve its objectives. The time to act is now.

10. Sources and audit trail

The following sources provide an open-source audit trail for the legal, regulatory, grantmaking, and case-study material used in this briefing.

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Appendix A. Evidence tables and visual exhibits

This appendix brings together the evidence tables and visual exhibits that support the network analysis in the main body, included here to preserve the audit trail.

A.1 Trustee ecosystem table

The trustee and board-member overlaps below illustrate the personnel network connecting migration, civil-liberties, environmental, development, and legal-advocacy organisations.

| Individual | Charities / organisations served on | Focus areas | Notes / source relevance |
|----------------------------|---|--|--|
| Hellen Grace Akwii-Wangusa | Oxfam GB (Trustee); ActionAid International (Chair, Board); Christian Aid (Advisory Member); KARIBU Foundation-Norway (Member) | Poverty alleviation; international development; humanitarian aid | Strong ties to global-south-focused NGOs; illustrates cross-African/UK progressive networks. |
| Areeba Hamid | Greenpeace UK (Co-Executive Director, Board Member); Joint Council for the Welfare of Immigrants (JCWI) (Board Member) | Environmental justice; migration rights | Links climate activism with immigrant advocacy. |
| Will McCallum | Greenpeace UK (Co-Executive Director, Board Member); Kaleidoscope Trust (Board Member) | Environmental justice; LGBTQ+ rights | Connects eco-campaigning with queer advocacy. |
| Jean McLean | Greenpeace UK (Board Member); Tax Justice UK (Board of Directors) | Environmental justice; economic inequality/tax reform | Ties environmentalism to fiscal justice efforts. |
| Ruth Breddal | Liberty / National Council for Civil Liberties (Trustee, EC Interim Chair); Amnesty International UK (former Chair, Section Board; former Board of Directors, AIUK) | Civil liberties; human rights | Recent transition from Amnesty to Liberty highlights human-rights sector mobility. |
| Stephen King | Oxfam GB (Trustee); CARE International (former Board Member); Global Witness (former Board Member); Myanmar Trust UK (Board Member) | Poverty alleviation; women's rights; anti-corruption/resource justice | Multiple overlaps in international development and transparency NGOs. |
| Andrew Lines | Amnesty International UK Charitable Trust (Chair); Anthony Nolan (Trustee); Oxfam GB (former leadership roles in operational groups) | Human rights; medical research | Past Oxfam involvement shows movement from development to rights-focused boards. |
| Alastair Livesey | Liberty (Trustee); JUSTICE (Board Member); Bail for Immigration Detainees (former Board Member) | Civil liberties; legal reform; migrant detention rights | Concentrated in UK legal/human-rights ecosystem. |
| Ruth Davison | Greenpeace UK (former Trustee); Oxfam GB (former Board Member); National Emergencies Trust (current Trustee/lead on fundraising) | Environmental justice; poverty alleviation; emergency response | Illustrates serial service across eco-development charities. |
| Annie Campbell | Bail for Immigration Detainees (BID) (former Director, Board Member); Joint Council for the Welfare of Immigrants (JCWI) (Chair) | Immigration detention; welfare of immigrants; policy reform | Leadership bridges direct legal support for detainees with national policy advocacy. |
| Elizabeth Anne Mottershaw | Asylum Aid (Trustee); Helen Bamber Foundation (Trustee) | Asylum legal representation; support for torture/trafficking survivors | Shared role reflects close operational ties between Asylum Aid and Helen Bamber Foundation. |
| Areeba Hamid | Joint Council for the Welfare of Immigrants (JCWI) (Board Member); Detention Action (former involvement via campaigns) | Migrant rights; immigration detention reform | Board service at JCWI connects to wider migrant-rights campaigning. |
| Alison Harvey | Kalayaan (Trustee, former Chair); Asylum Aid (former staff/collaborator/advisory ties) | Migrant domestic workers' rights; immigration law reform | Sector-wide immigration-law experience and advisory links. |

A.2 Trust for London trustee/personnel table

The following table provides a more granular Trust for London-related personnel exhibit.

| Individual | Charities / organisations served on |
|----------------------------|--|
| Andrew Beal | Ex-Big Society Capital; Trustee, Central YMCA |
| Andrew Brown OBE | Ex-Church Commissioners CEO; Chair, William Leech Foundation; Trustee, Mediation Hertfordshire |
| Denise Joseph | Family business owner; Trustee, Resource for London, JW3, Nisa-Nashim, OneVoice Europe |
| Dr Omar Khan | Director, TASO; ex-Director, Runnymede Trust |
| Meredith Niles | Ex-Marie Curie; Chair, SOFII; Deputy Chair, Plan International UK; Trustee, CAF |
| Nick Peters | Investment accountant; Trustee, Action4Youth |
| Precious Sithole | CEO, Social Practice ENT; Founder, Beyond Suffrage; Fellow, Royal Society of Arts |
| Rosemarie Paul | Head of Economic Crime, CAF |
| Rosie Ferguson OBE | Incoming CEO, UK Youth; ex-CEO, Gingerbread, London Youth, House of St Barnabas |
| Rosie Hewat | Global HR leader; lived experience of poverty |
| Rowena Estwick | Co-CEO, Ten Years' Time; ex-Guy's & St Thomas' Charity |
| Stephen Burns | Executive Director, Peabody; Chair, United St Saviour's Charity; Trustee, House of St Barnabas |
| Alderwoman Liz King BEM JP | City of London; Founder, Square Mile Food Bank |

A.3 Media-pressure screenshots

The media screenshots below illustrate how open letters and NGO coalitions can create a national-news pressure cycle. They are included as visual exhibits, not as independently verified evidence of the underlying reporting.

Environmental groups warn Rishi Sunak over green pledges

© 29 July 2023



Jemma Crew
BBC News

Dozens of environmental groups have warned the prime minister they will not "stand by" while politicians use the environment as a "political football".

BBC: environmental groups / green pledges

Rights groups urge Starmer to dial down anti-migrant rhetoric

Exclusive: 136 organisations call on PM to stop using 'demonising language', after his remarks before crime summit

UK politics live - latest updates



Starmer: 'We all pay the price for insecure borders - from the cost of accommodating migrants to the strain on our public services.' Photograph: Kin Cheung/AFP/Getty Images

Guardian-style screenshot: anti-migrant rhetoric

EXCLUSIVE: Linking sex attacks to migration is 'dangerous racist diversion' warn 100 women's rights groups

In a letter to Keir Starmer and Yvette Cooper, organisations including Rape Crisis England and Wales, the End Violence Against Women Coalition and Refuge called on ministers to stand up to the 'dangerous narrative'



NEWS By Dave Burke Political Correspondent
13:02, 19 Aug 2025 | Updated 16:52, 20 Aug 2025



Political screenshot: grooming-gangs / diversion framing

Rights groups warn against UK plans to weaken torture protections in ECHR

Exclusive: Ministers face pushback over potential changes to asylum seekers' rights before Council of Europe meeting



The document signalled the UK's intent to move on article 3, saying that while people should never face torture, the legal interpretation of inhuman or degrading treatment 'has been expanded over time'. Photograph: Omar Marques/Getty Images

Article screenshot: ECHR protections / asylum seekers

A.4 Media-amplification exhibit

The exhibit below reproduces an archived screenshot of a news report quoting a representative of JCWI on immigration polling. It is included as a practical illustration of the “impartial expert” problem discussed in Sections 6.4 and 6.7. The screenshot is consistent with the Standard article cited at [S70].



Saeema Syeda, of the Joint Council for the Welfare of Immigrants (JCWI), said the poll "proves what we've been saying all along - there is no immigration crisis".

She said: "It's a manufactured panic, pushed by some politicians and parts of the media to distract from what actually matters to people.

"Across our communities, we share the same priorities - making ends meet, accessing healthcare, decent schools and secure homes. We need to end scapegoating and look for solutions."

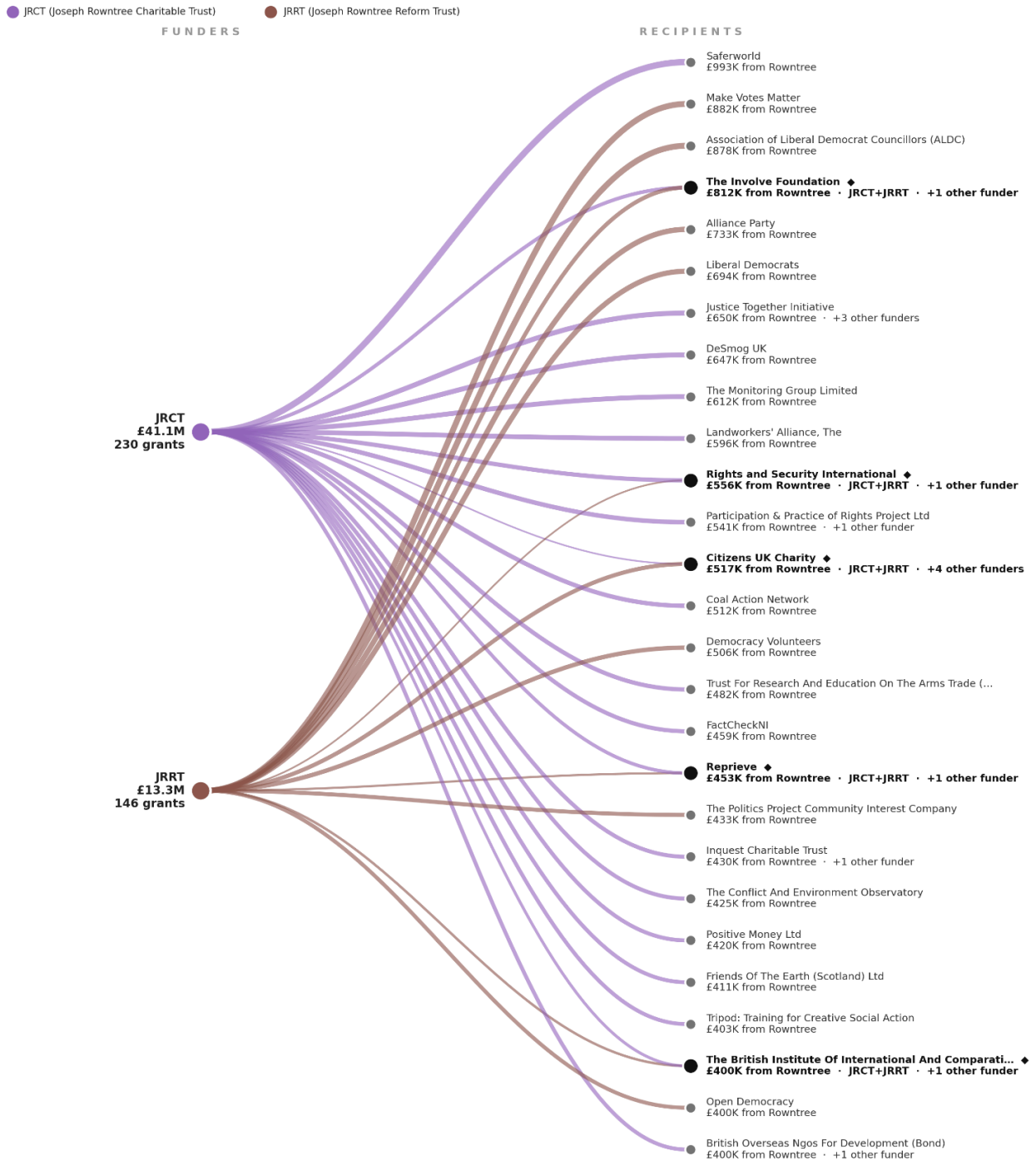
Figure A4. Example of advocacy messaging carried into mainstream news coverage through a quoted NGO representative (media-amplification exhibit; compare [S70]).

A.5 Rowntree civil-society funding flow

Rowntree → Civil Society (CIV)

Where Joseph Rowntree money lands · JRCT + JRRT combined

This diagram contains data on recipient organisations with combined total grants of on or above £400,000. Recipient organisations were assigned a three letter code based on the type of work they do. Grantees in bold receive funding from both organisations.



Data for this diagram was drawn from 360Giving and covers all publicly available data from the period 01/01/2015 to 31/12/2025. Accessible at grantnav.threesixtygiving.org/

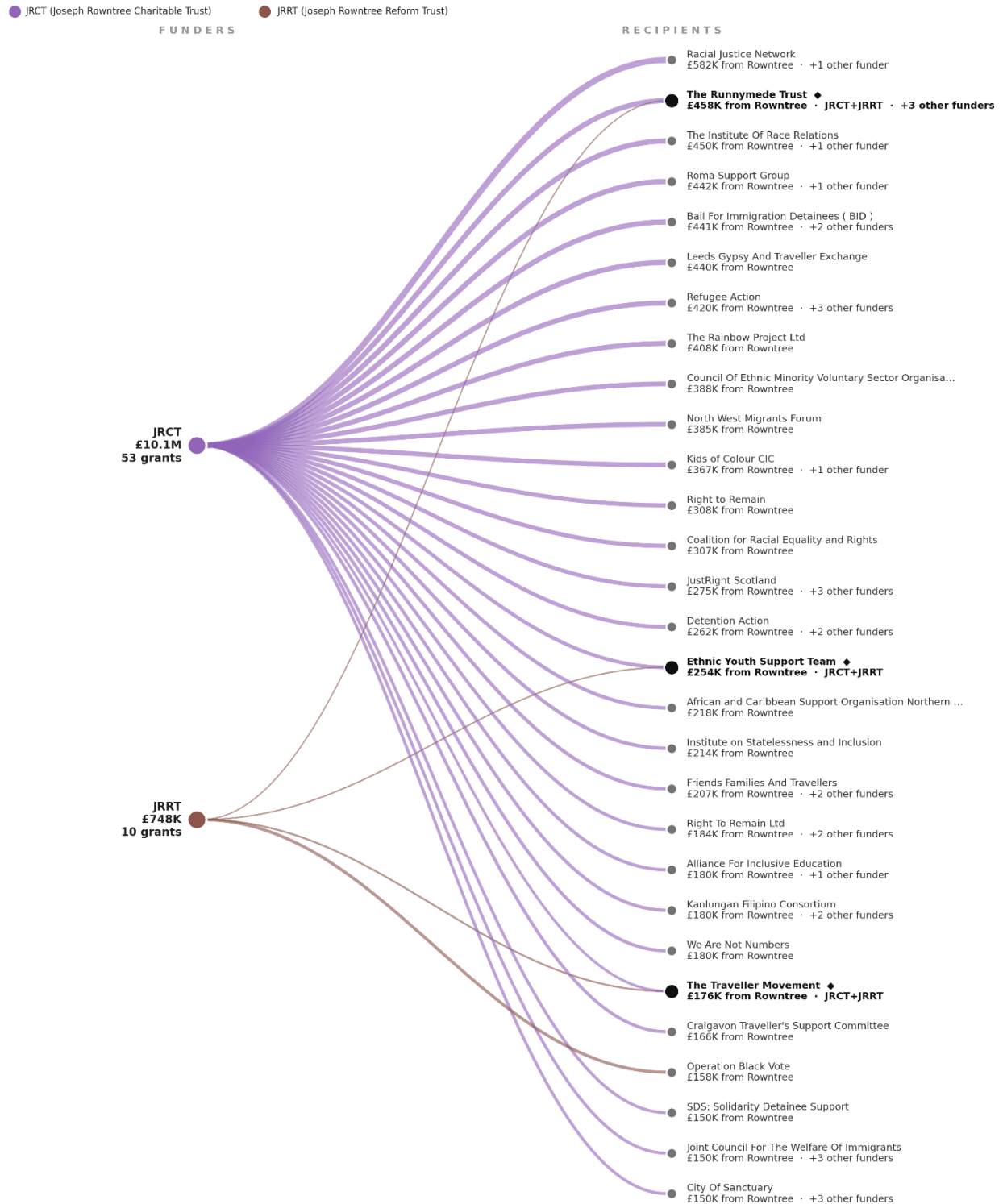
Figure A5.1. Rowntree-linked funding flows into civil-society organisations

A.6 Rowntree racial-equality funding flow

Rowntree → Racial Equality (RAC)

Where Joseph Rowntree money lands · JRCT + JRRT combined

This diagram contains data on recipient organisations with combined total grants of on or above £400,000. Recipient organisations were assigned a three letter code based on the type of work they do. Grantees in bold receive funding from both organisations.



Data for this diagram was drawn from 360Giving and covers all publicly available data from the period 01/01/2015 to 31/12/2025. Accessible at grantnav.threesixtygiving.org/

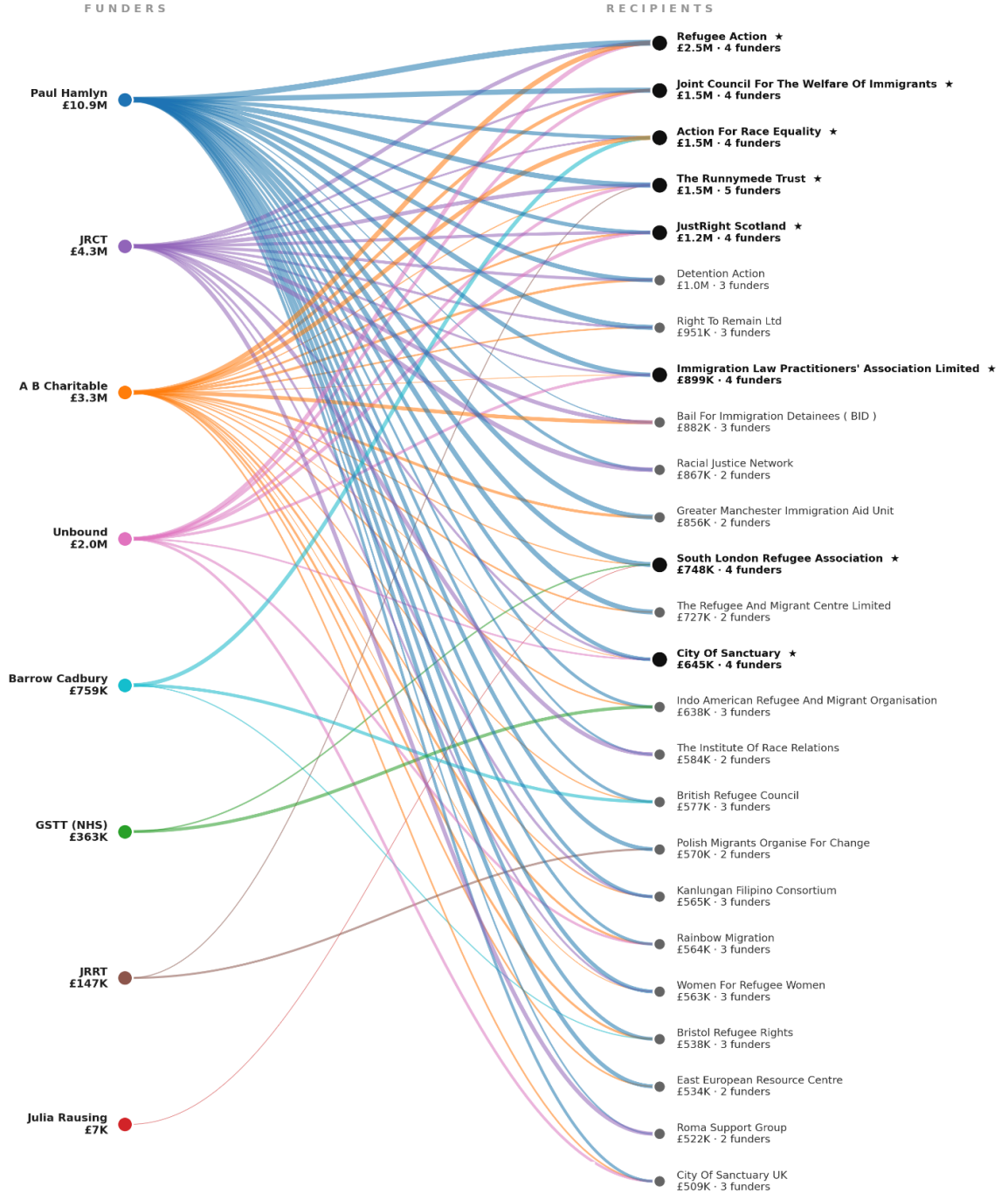
Figure A5.2. Rowntree-linked funding flows into racial-equality organisations

A.7 Multi-funder racial-equality network

Racial Equality (RAC)

Multi-Funder Convergence

This diagram contains data on recipient organisations with combined total grants of on or above £500,000. Recipient organisations were assigned a three letter code based on the type of work they do. Grantees in bold receive funding from multiple organisations.



Data for this diagram was drawn from 360Giving and covers all publicly available data from the period 01/01/2015 to 31/12/2025. Accessible at grantnav.threesixtygiving.org/

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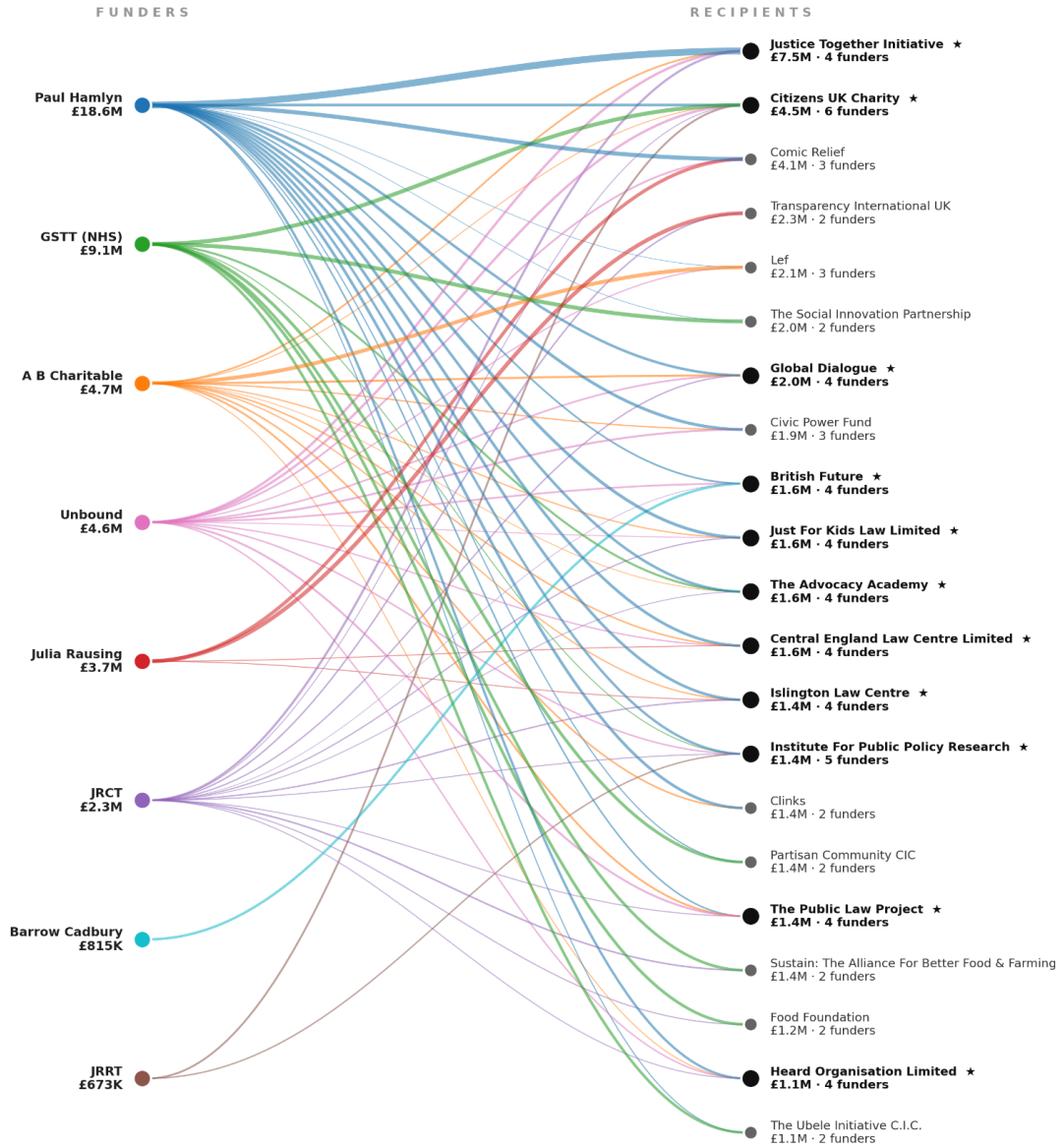
Figure A7. Multi-funder convergence across the migrant-rights, race and equalities space, using a 360Giving-derived visualisation.

A.8 Multi-funder civil-society network

Civil Society (CIV)

Multi-Funder Convergence

This diagram contains data on recipient organisations with combined total grants of on or above £1M. Recipient organisations were assigned a three letter code based on the type of work they do. Grantees in bold receive funding from multiple organisations.



Data for this diagram was drawn from 360Giving and covers all publicly available data from the period 01/01/2015 to 31/12/2025. Accessible at grantnav.threesixtygiving.org/

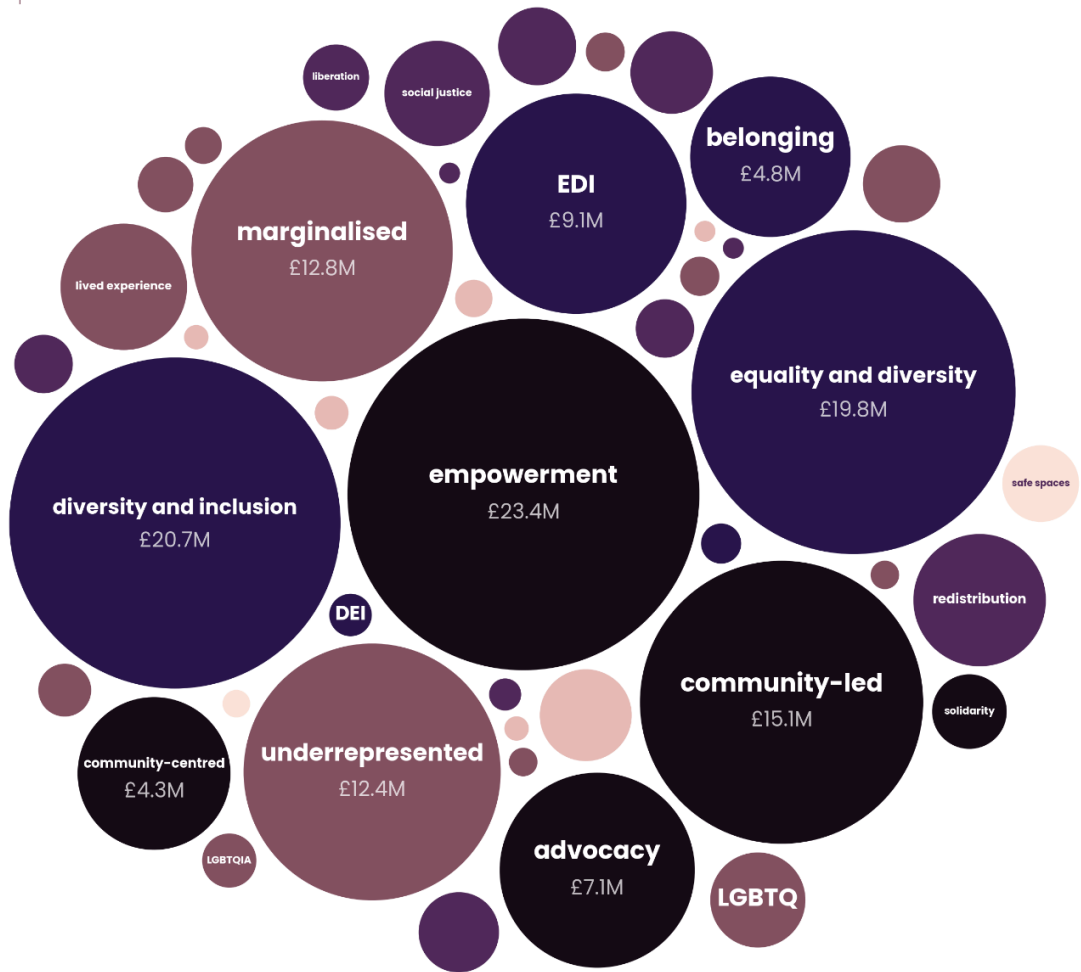
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Figure A10. Multi-funder convergence across the civil-society space.

A.9 Misallocation of scientific and technical research funding

Innovate UK grants by search term hits

Bubble area proportional to actual spend (£) matched in project public descriptions · FY2015–16 to present



● Inclusion & diversity
 ● Equity & justice
 ● Community & participation
 ● Identity & representation
 ● Bias & power
 ● Other

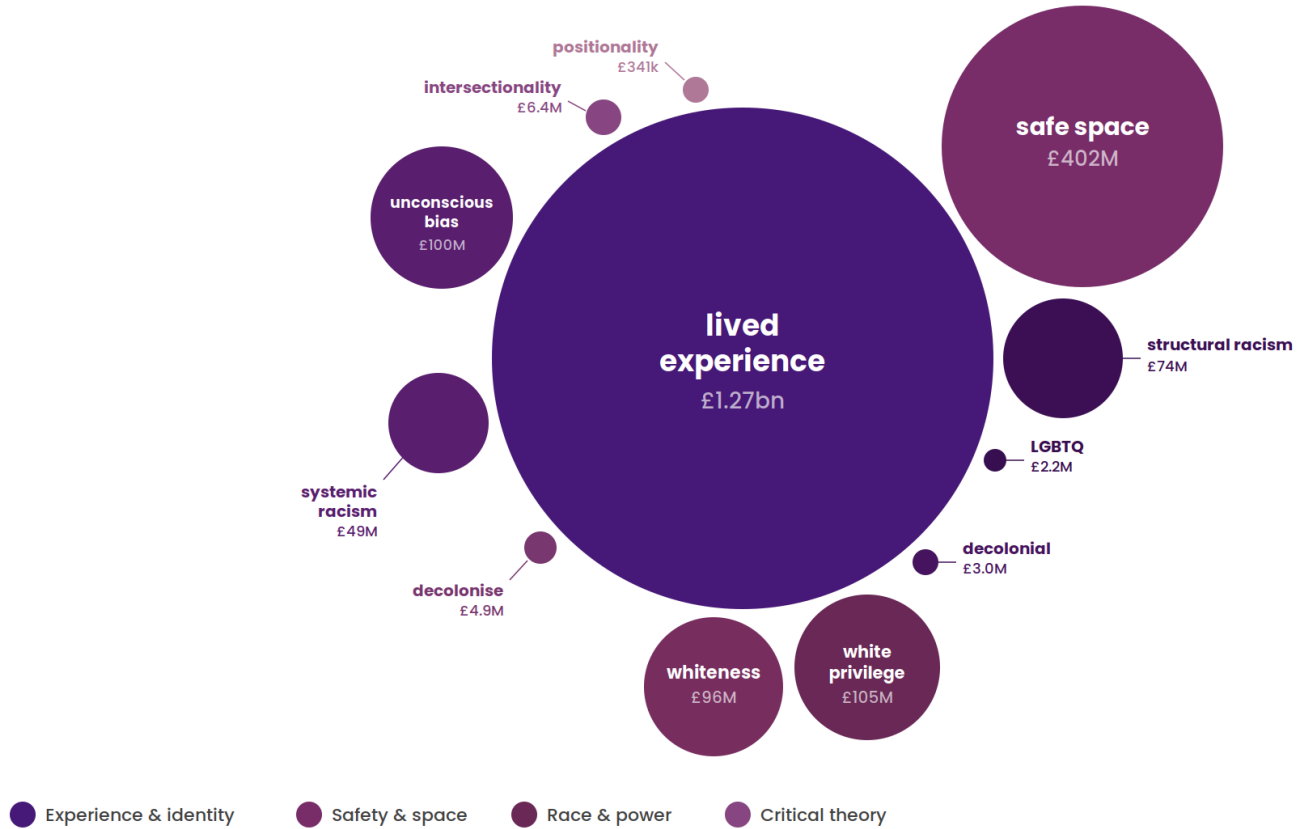
755 rows matching any term · £120.9M total matched spend · £13.3B total Innovate UK spend · 0.9% share
 Drawn from publicly available grantmaking data published by UK Research and Innovation

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Figure A9.1. Successful grant applications to UKRI's Innovate UK with politicised research. Terms filtered for contextual relevance.

ESRC grants by selected search term spend

Bubble area proportional to actual spend (£) matched in project public descriptions · 2015 to present
Excludes: diversity and inclusion (£1.71bn)



Spend by search term · one project may match multiple terms · bubble area proportional to spend · 2,640 studentship grants which matched the criteria could represent more than £238M spend but have been excluded due to insufficient individual data. Drawn from publicly available grantmaking data published by UK Research and Innovation

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Figure A9.2 ESRC grants given by selected search term

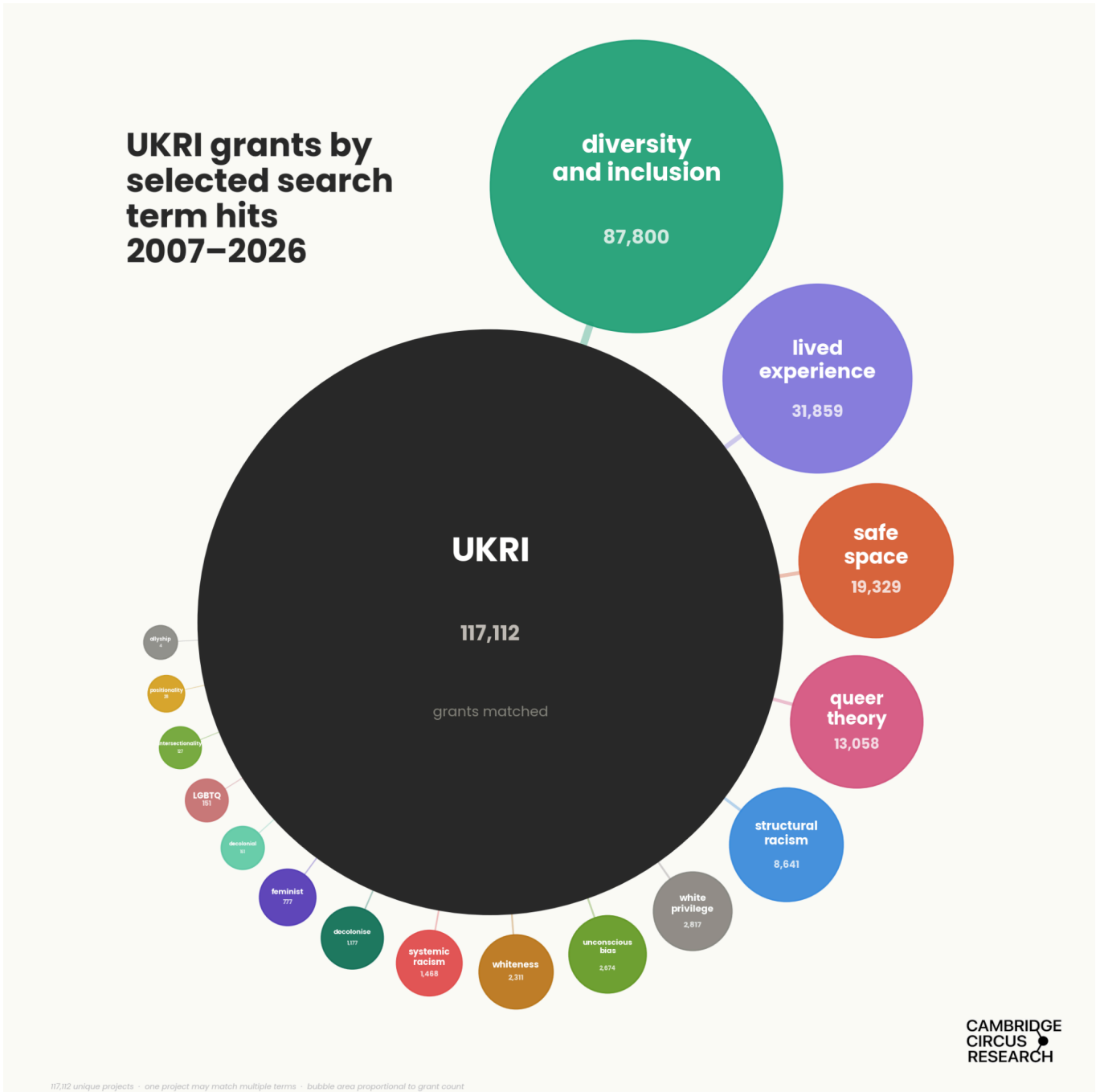


Figure A9.3 Number of grants given by UKRI which correspond to specific search terms

Appendix B. Further Case Studies

B.1 The Gender Ideology Lobby

Gender Advocacy NGOs before and after the Review into Mermaids

Between 2015 and 2022, Mermaids and Gendered Intelligence (GI) dominated advocacy in the arena of gender issues. In institutional funding terms, every major trust, fund, and arm's-length body interested in grantmaking in this space had a relationship with both organisations. However, Mermaids were the dominant front-facing organisation, frequently appearing in the media and making public interventions in the media, while GI operated in their shadow. The 2022 Charity Commission investigation into Mermaids' activities ended that. So went the narrative: the Charity Commission opened its inquiry into Mermaids in November 2022, funders began to step back, the sector ended up on the defensive. The funding data tells a different story.

NGOs that were already involved with Mermaids did not cease funding gender advocacy (broadly defined) after the review into Mermaids. Already embedded in the same funder networks, GI absorbed the financial and institutional capital that left Mermaids between 2022 and 2024. New funders – Comic Relief, the City Bridge Foundation, BBC Children in Need, Trust for London, Sport England – entered the space for the first time. The post-2022 institutional linkages for gender advocacy are broader and more financially secure than anything that existed before the inquiry opened.

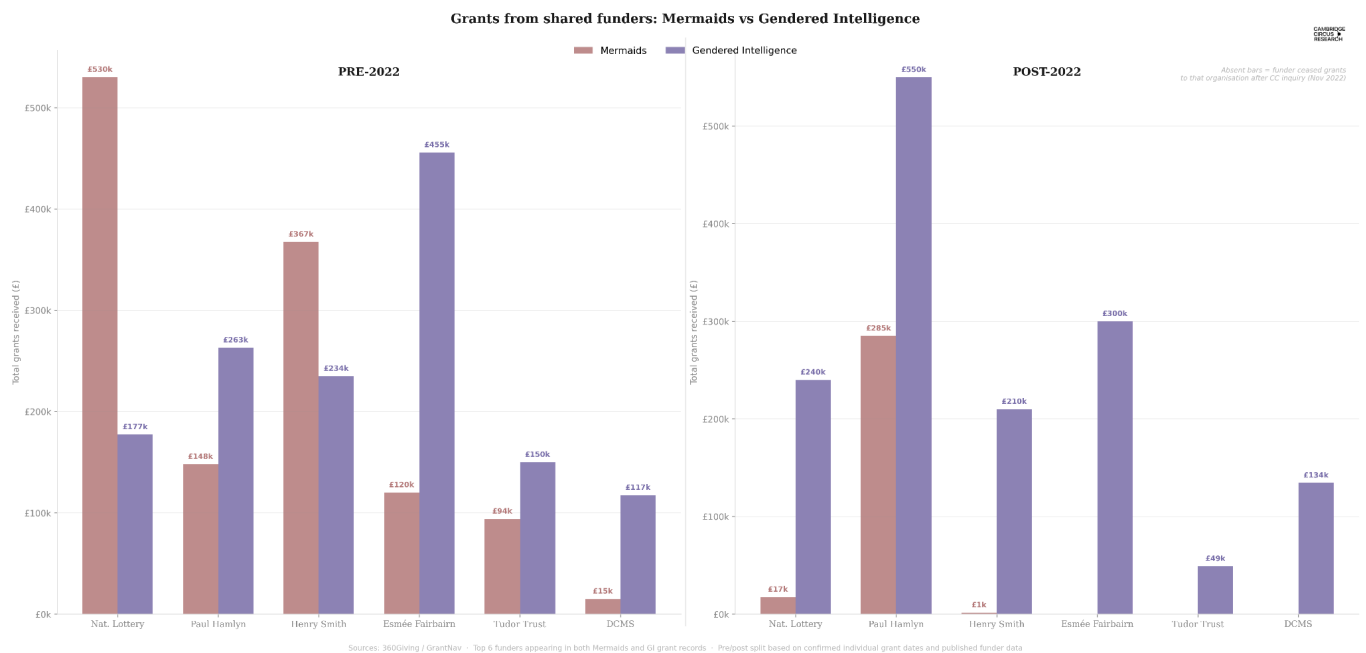


Figure B1.1. Funding flows into Mermaids and Gendered Intelligence pre and post 2022 Charity Commission investigation.

Mermaids, as we can see, has since then primarily survived on its donor base. What was left of multi-year grants from the big players is beginning to run dry but over £2 million in individual donations in the two years after the inquiry are shown on their accounts. The organisation was chastened by the experience of the period between the Charity Commission investigation and the Cass Review, but the funding networks visualised here can clearly demonstrate that although in individual terms Mermaids has suffered, gender advocacy as a whole has never before been more institutionally connected or financially supported than in 24/25.

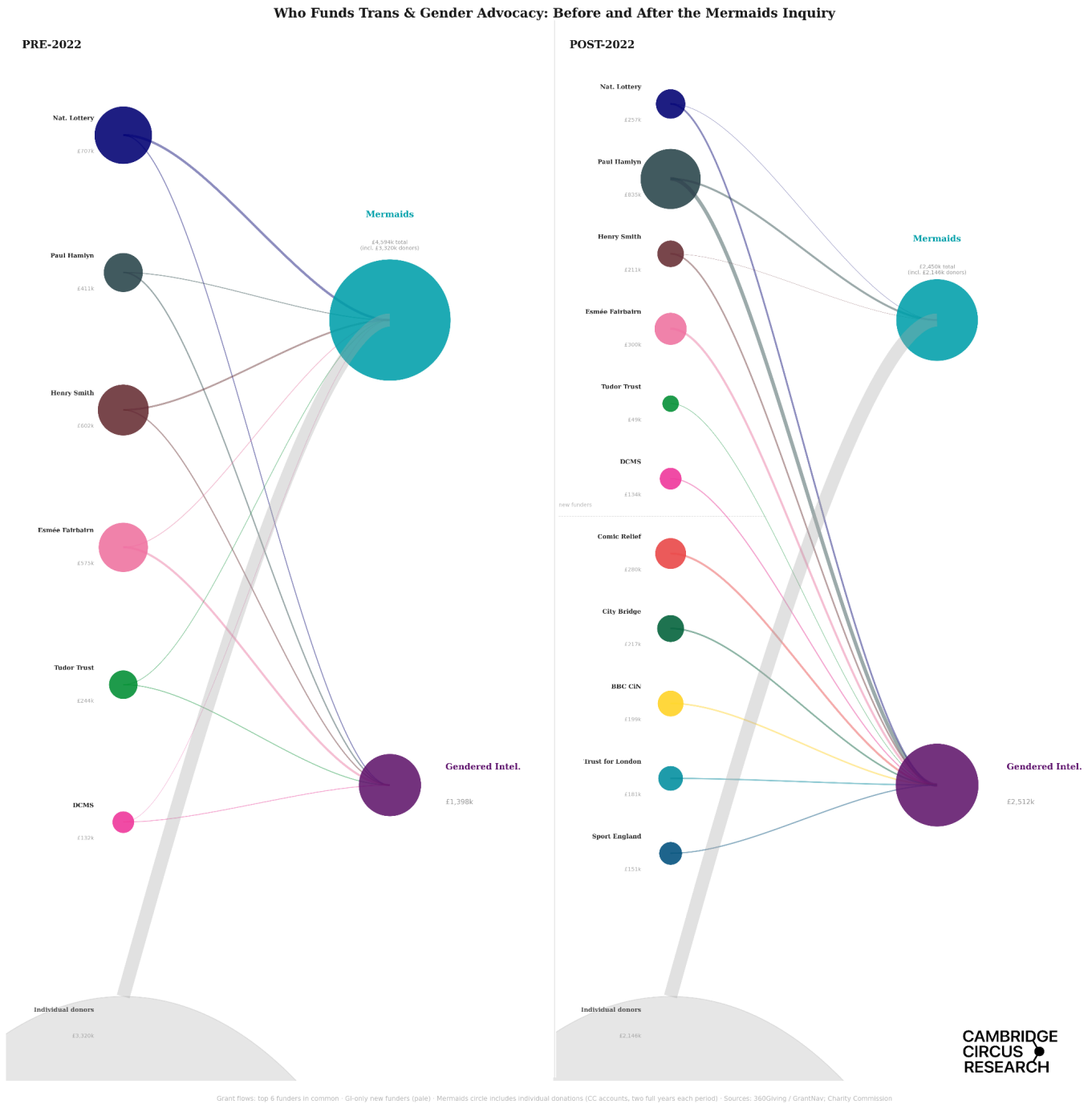


Figure B1.2. Funding networks for Mermaids and Gendered Intelligence, pre and post Charity Commission investigation.

In summary, the net effect of the most significant regulatory intervention ever directed toward a gender advocacy charity was in fact to consolidate and expand the funding infrastructure around the sector. Instead of driving away donors, the decline of Mermaids in institutional terms opened up room for other organisations like GI to bring in funders who never previously had the political space to issue grants to Mermaids. Drawing on stronger institutional relationships with the Department for Culture, Media, and Sport (DCMS), Sport England, Comic Relief, and Children In Need, the gender lobby is in a better position to influence public policy than basically ever before.

B.2 Shelter’s litigation against local councils

Shelter is a major UK housing and homelessness charity focused on securing safe, affordable housing, and ending homelessness. It combines frontline advice services with legal action, policy advocacy, and public campaigning. The funding architecture surrounding homelessness policy creates a structurally circular system in which public funds support both the delivery of statutory services and the routine legal challenge of those same services. The Ministry of Housing, Communities and Local Government (MHCLG) funds Shelter to deliver frontline homelessness support and to operate the National Homelessness Advisory Service (NHAS), which provides legal training and guidance to local authority officers responsible for implementing homelessness duties. Through these roles, Shelter is embedded within the administrative machinery of service delivery, shaping how statutory obligations are interpreted and applied in practice.

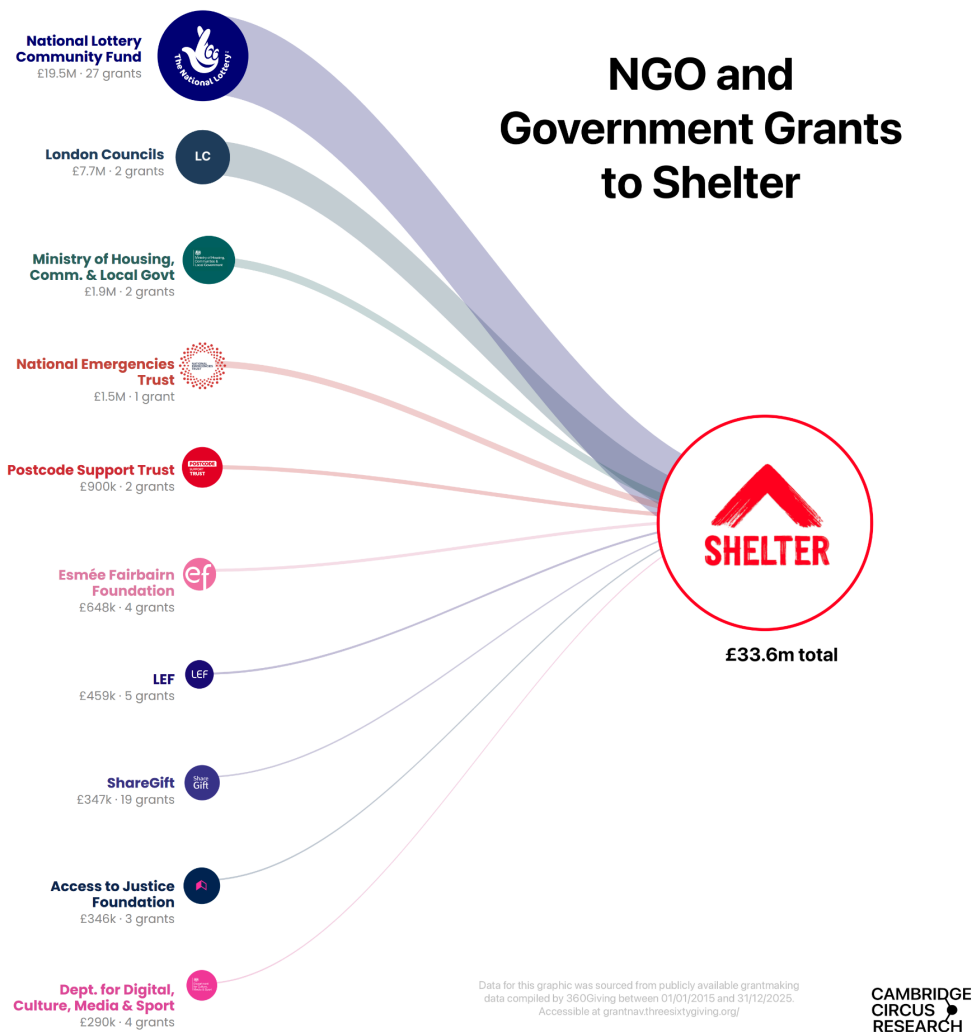


Figure B2.1. Funding flows to Shelter, which primarily come from arm’s-length bodies, local government, and central government departments.

At the same time, the organisation operates a legal practice in which challenging those very decisions is not incidental but core to its model. Shelter’s intervention in *R (Bano) v London Borough of Waltham Forest*, listed for hearing in March 2026, reflects a sustained pattern rather than a discrete instance. Its legal team systematically pursues judicial review claims and pre-action protocol correspondence against local authorities in relation to housing allocation, suitability decisions, and the discharge of

homelessness duties. This activity is further institutionalised through the Housing Loss Prevention Advice Service (HLPAS), funded by the Ministry of Justice, which trains solicitors specifically to bring such challenges.

The result is that litigation risk becomes a routine feature of homelessness administration. Local authorities – funded by MHCLG and trained in part by Shelter itself – are regularly placed in a position where they must either adopt Shelter’s interpretation of their statutory duties or face the financial and operational burden of defending proceedings in the Administrative Court. Given the asymmetry of costs, many authorities concede at the pre-action stage. In this way, the credible threat of legal action operates as a mechanism for influencing administrative behaviour irrespective of whether claims proceed to judgment.

This establishes a dual role that is structurally embedded rather than incidental. Public funding supports Shelter as a service delivery partner within the homelessness system, while simultaneously enabling a legal function in which initiating or threatening litigation against public bodies is a standard and recurring activity. The same organisation is therefore positioned both inside the system – training officers, advising on duties, and delivering services – and outside it, applying legal pressure to reshape how those duties are exercised.

No single grant is anomalous in isolation. However, taken together, MHCLG funding for service delivery and training, alongside MoJ support for legal capacity, sustains an operational model in which state resources underpin both sides of an adversarial relationship. It is a profoundly illustrative case of a state-funded body that has not merely initiated legal action against the state but has adopted it as a routine part of its work.

B.3 Show Racism the Red Card

Show Racism the Red Card (SRtRC) is a registered charity delivering anti-racism workshops to around 50,000 children a year in British state schools. It presents itself as an educational organisation but is functionally a political operation which derives its income from publicly funded bodies. It openly promotes the use of children as a delivery mechanism for contested views on immigration and protest, running extremely close to a breach of statutory rules on political impartiality in schools. Workshop content receives no meaningful oversight from the Department for Education, Ofsted, or the local authorities and academy trusts paying for it. Customers of Show Racism the Red Card include Sunderland, South Tyneside, Kirklees, Lancashire, Perth & Kinross, and Falkirk councils, as well as Multi-Academy Trusts such as Our Children 1st in Middlesbrough (five consecutive years of commissioning) and IRIS Learning in Sunderland.

Over 83% of SRtRC’s income now comes not from public donations and legacies but from fees charged to schools, local authorities, and other public bodies – a proportion that has more than doubled since 2021. It is primarily a fee-for-service business sustained by public money, operating under charitable status that confers tax advantages and reputational protection. The workshops are additionally co-funded by Sainsbury’s, whose logo appears on the face of curriculum materials delivered in state schools – including a lesson about political demonstrations and a lesson about immigration – without any public disclosure of the sponsorship value.

Published accounts this year detail the organisation’s institutional donor base. Their financial backers are dominated by Labour-affiliated trade unions: UNISON, Unite, and the National Education Union. These are unions that collectively donate tens of millions of pounds to the Labour Party while simultaneously funding an organisation delivering politically contested content into classrooms.

Two curriculum documents – obtained from SRtRC’s Education Hub, partially reproduced here – show the highly politicised content of many of these sessions.

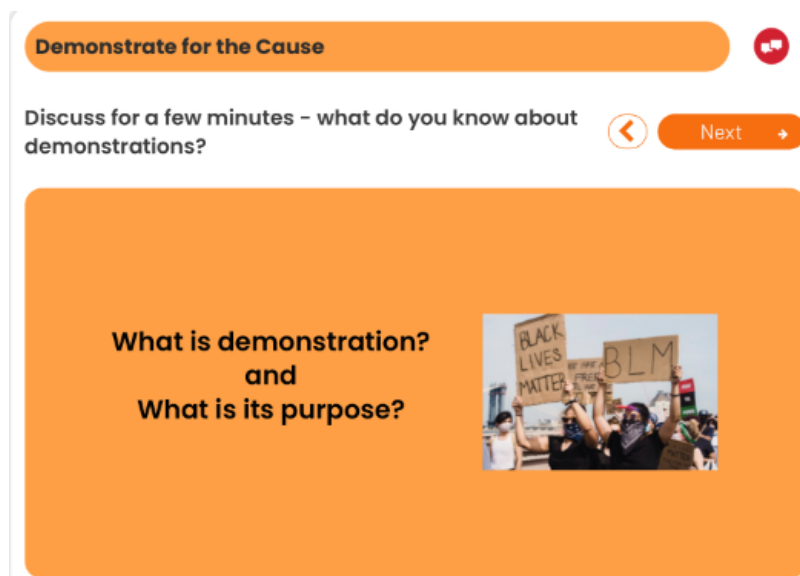


Figure B3.1. Presentation slides for workshop content delivered by SRtRC representatives. Obtained from Show Racism the Red Card’s Education Hub.

“Demonstrate for the Cause” is a lesson about political protest. Its introductory slide shown to pupils features a Black Lives Matter demonstration photograph. The lesson culminates in pupils being instructed to plan and stage an actual demonstration in their school, using the hashtag #StandUpToRacism as a starting point. That hashtag is a named political campaign with direct organisational roots in the Socialist Workers Party. Pupils are taught how to make banners, chant, choose locations for maximum audience, and share their demonstration on school social media. Teacher notes instruct staff that Black history must be embedded “throughout the whole school curriculum” – a contested political position on curriculum design presented as fact.

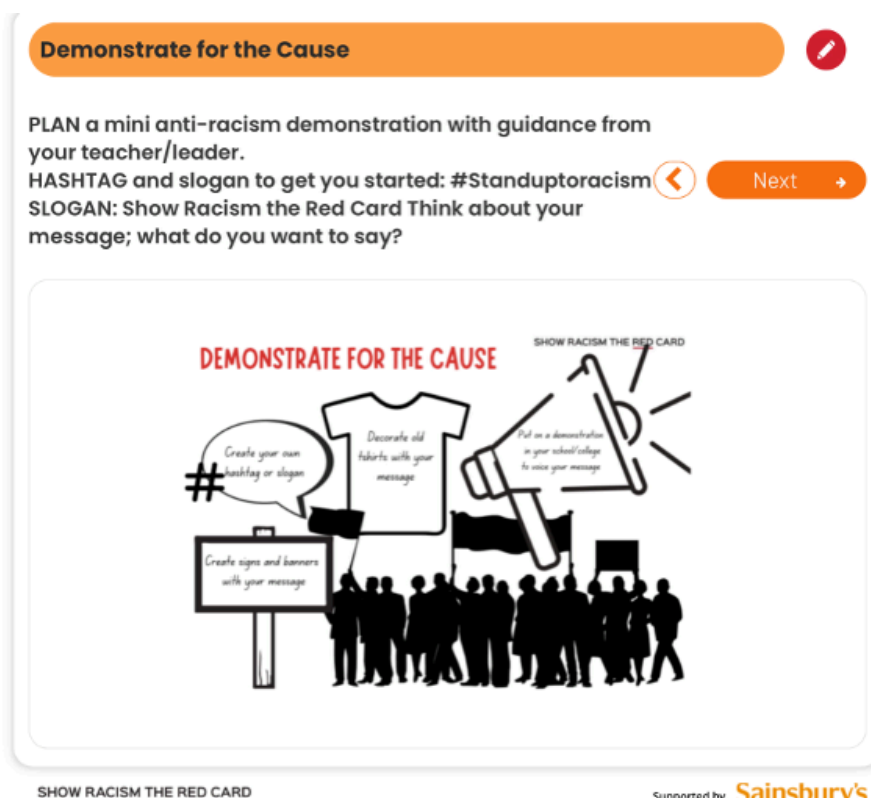


Figure B3.2. Facilitator notes for workshop content delivered by SRtRC representatives. Obtained from their online Education Hub.

“Celebrating Migration”, another session offered by SRtRC opens with the instruction that the lesson is an opportunity to explore “what is positive and good about migration” – not what migration is, but why it is good. Pupils study two newspaper headlines critical of immigration – “Migrants: How Many More Can We Take?” and “Migrant Workers Flooding Britain” – and are then instructed to identify the negative language, and are then instructed to rewrite them with a positive tone. The model answer provided to teachers is “MIGRANT WORKERS BRING FRESH HOPE TO BRITISH ECONOMY.” The lesson presents only pro-immigration economic and humanitarian arguments, framed as fact. No information to balance this contested viewpoint appears anywhere in the six slides or in the facilitator notes. The assessed output is a pro-immigration newspaper article written by the pupil.

Immigration has been identified in the recent inspection of Bristol Brunel Academy as an area in which a balance of views is required, as part of the DfE’s latest set of guidelines on impartiality. The lesson presents one side only, frames the opposing perspective as harmful misinformation, and produces exclusively pro-immigration lesson outcomes. It was produced by organisations in active political opposition to government immigration policy at the time of production.

Section 406 of the Education Act 1996 prohibits the promotion of partisan political views in school teaching. Section 407 requires balanced presentation of opposing views on political issues. The DfE’s 2022 Political Impartiality in Schools guidance explicitly names immigration as a topic requiring balanced treatment and requires schools to check that external providers’ materials do not promote partisan political views. The “Demonstrate for the Cause” lesson unambiguously runs counter to the 2022 DfE guidance, as well as potentially constituting multiple breaches of Section 406. Teaching pupils to organise a demonstration under a specific far-left campaign hashtag is not civic education. It is the facilitation of partisan political activity in school.

SRtRC’s own education coordinator stated in a union magazine that the goal of the workshops is for children to “go back into their homes and educate their parents, because problematic behaviour does not come from young people. They parrot what they hear in the media or in their family.” This is not an isolated framing. The Assistant Head Teacher of Pallister Park Primary School – which has received SRtRC workshops for five consecutive years, paid for by a Multi-Academy Trust in Middlesbrough – said on the record that she hoped “the children will take some of the messages and learning home with them, which will help bridge the generation gap.”

A Year 5 teacher at the same school said the workshops were important because “sadly we know that some people in the local area hold some very challenging views” and expressed concern about “the kind of people they are engaging with.”

In a similar manner to other charitable organisations identified in this report, it raises questions about the misuse of charitable status by organisations which are politically active, even if they stop short of outright endorsement of political parties. It is also yet another example of an organisation whose charitable status is increasingly running counter to the political activity undertaken, and the service delivery model they operate.

B.4 Iranian-backed charities and their networks of support

An extremely concerning aspect of the problems surrounding the enforcement of charity laws and regulations is the growing network of Iranian regime-sympathetic, or in some cases explicitly regime-linked outfits with charitable status operating in Britain. Most of the organisations in the network of Iran-adjacent organisations identified in Lord Walney’s 2024 report *Protecting Our Democracy From Coercion* are embedded in the charitable sector [S103]. Two charities that are not, Abrar Islamic Foundation and the Dar Alekhma Trust, have proved extremely tricky for the Charity Commission to deal with. They are financially self-contained – funded almost entirely by UK property assets built up over four decades, alongside a stream of voluntary donations whose ultimate origin is not publicly traceable. The

Charity Commission and the National Terrorist Financing Investigations Unit (NTFIU) have been attempting since 2020 to provide an answer to whether the “voluntary donations” line in the accounts of these two charities represent genuinely organic community giving, or whether any portion of it originates from sources that would be problematic to disclose – namely the Iranian state or those associated with it.

The usual “follow the money” approach taken for NGO networks is only partially helpful in the case of the Iranian-backed charities most acutely identified in the Walney report. There are no 360Giving threads to pull on, donations are opaque and at times borderline irrelevant to those charities. Mature, asset rich, and problematic solely in political and national security terms, Abrar and Dar Alekhma are minimally exposed to the kind of reputational dive suffered by an organisation like Mermaids when Charity Commission investigations open. Possession of prime central London property portfolios – including secure tenancy agreements with the diplomatic missions of Antigua and Belize – insulate these charities from the consequences of investigation by the regulator. Mechanisms that would be devastating in grantmaking terms to those in other parts of the charity sector do not function in the case of these charities.

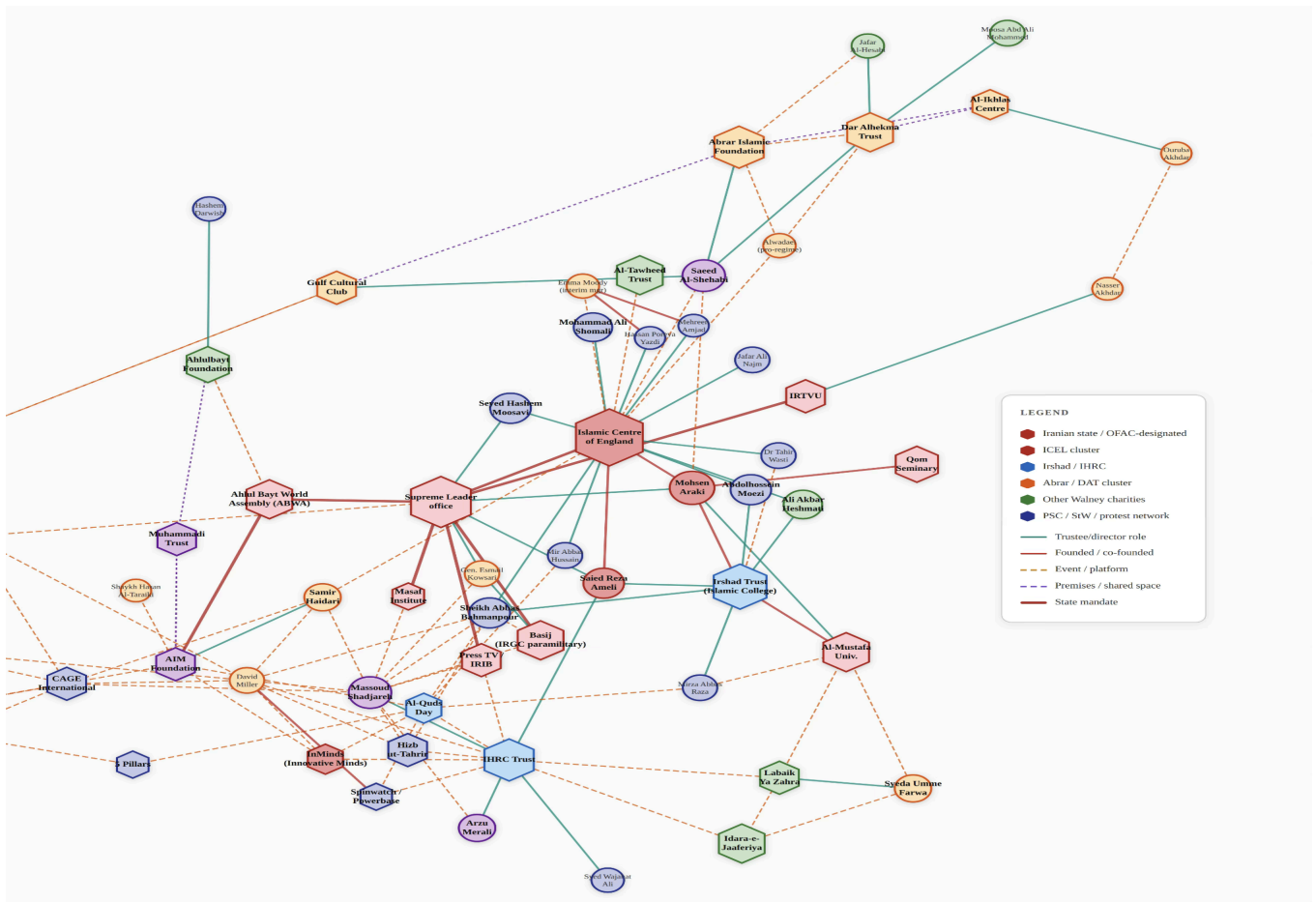


Figure B4.1. Iran-adjacent charities and influence networks in Britain. Cropped for visibility.

The Walney Report’s recommendations, while useful, do not adequately address the competency problem in the Charity Commission. It is the recommendation of this report that the charities regulator should have much broader powers – in the manner of proscription under the Terrorism Act – to freeze assets and suspend the activities of groups in cases where charities are under investigation for possible links to hostile state actors or extremism. Before a statutory inquiry is opened, the Commission’s options are limited – it can issue official warnings and require information, but cannot exercise the Section 76 protective powers at all. The Commission opened a formal inquiry specifically so that it would then have access to further statutory powers that are only available once an inquiry has been opened.

One further complication specific to terrorism cases are issues around contempt of court and judicial prejudice. The Commission was unable to progress its inquiry into the Foundation for Relief and Reconciliation in the Middle East during the course of a Metropolitan Police investigation so as not to prejudice any criminal charges. This contributed to the length of an inquiry into possible transfers of funds to the Islamic State. In the most serious cases, the Commission’s own investigation may effectively be paused while law enforcement takes the lead – meaning the interim protective powers sit unused precisely when the risk is highest.

This is clearly an area where the Charity Commission’s inadequate enforcement procedures are not merely a financial or a sector-reputational problem but rather endanger whole-state approaches to countering violent extremism and threats from hostile states. That the Charity Commission does not have the institutional wherewithal to use its enforcement mechanisms on organisations whose activity it has made clear it believes to be suspicious, is instructive. It is a case where basic competency issues within the Charity Commission, its ability to enforce its own rules and to do so in good time, pose real dangers to national security.

B.5 Charities and overseas terrorism

A further national-security concern arises where charities operate in conflict zones or terrorist-active territories. Charity Commission inquiries into Syria/Turkey aid work exposed repeated weaknesses in cash controls, convoy governance, overseas partner due diligence, volunteer vetting, end-use verification, and serious-incident reporting.

The risk often lies in how the aid is delivered: cash, vehicles, containers, food, medical supplies, volunteers, warehouses, or local partners can be diverted, taxed, seized, repurposed, or exploited by armed groups. The same infrastructure can also be attractive to hostile-state proxies or hostile non-state actors seeking legitimacy, logistics, community access, or narrative cover. In particular, cash couriering, despite being strongly discouraged by the Charity Commission, is still legal. This is a high-risk vector for terrorist financing, whether deliberate or accidental.

The policy lesson is clear: high-risk overseas charity work should not operate on trust-based assumptions. It should operate as a controlled financial, logistics, and security system.

| Stage | Vulnerability | National-security risk |
|--------------------------|---|--|
| Fundraising | Informal appeals, crowdfunding, personal accounts | Unclear provenance of funds |
| Movement of money | Cash couriering, weak bank trails | Funds become hard to trace |
| Logistics | Aid convoys, vehicles, containers | Dual-use movement of goods, people, or equipment |
| Delivery | Weak local partner checks | Armed-group or hostile-actor capture |
| End use | No reliable inventory, receipts, or verification | Goods can be seized, taxed, sold, or repurposed |
| Reporting | Late serious-incident or terrorism reporting | Authorities discover risk after the fact |

Table B5.1 The Conflict-zone Risk Chain

Source / basis: Based on repeated mechanisms identified in Charity Commission inquiries into Syria/Turkey aid charities and appeals, including Aid Convoy, Al-Fatiha Global, Syria Aid, Anaya Aid, One Nation, Human Appeal, Human Aid UK, and Team Syria.

The Syria conflict revealed a recurring regulatory pattern. Several charities or charitable appeals were not found to have deliberately funded terrorism, but they did exhibit mechanisms through which terrorist-finance or hostile-actor risk could arise.

| Charity / appeal | Publicly identified issue | Main risk mechanism |
|-------------------------|--|---|
| Aid Convoy | Police seized cash connected to Syria aid convoys; weak records and monitoring were later identified | Cash couriering; convoy risk; poor end-use evidence |
| Al-Fatiha Global | Rapid income growth, weak controls, poor records of goods, inadequate partner due diligence | Fast-growing informal aid operation; weak Turkey/Syria controls |
| Syria Aid | Funds raised without adequate registration; personal bank accounts used | Informal appeal; personal-account risk; weak audit trail |
| Anaya Aid | Cash seized at Heathrow and Dover despite previous regulatory concern | Repeated cash-courier risk |
| One Nation | Weak due diligence on partners and convoy volunteers; poor container accountability | Partner risk; volunteer risk; unverified goods |
| Human Appeal | Flour trucks stopped and Idlib warehouse seized by Hay'at Tahrir al-Sham | Armed-group seizure; weak incident controls |
| Human Aid UK | Turkey-based Syria partner assessed by police as linked to support for al-Qaeda-aligned individuals; documentation missing | Overseas partner compromise; missing records |
| Team Syria | Sole trustee failed to account adequately for source and destination of funds | Informal control; no credible end-use evidence |

Table B5.2 selected Charity Commission inquiry examples

The main terrorist-finance and hostile-actor vulnerabilities are:

1. **Cash couriering** – once cash leaves regulated banking channels, provenance, custody, and end use become difficult to prove.
2. **Aid convoys** – convoys can carry humanitarian goods, but also vehicles, people, equipment, cash, and legitimacy.
3. **Weak volunteer vetting** – charities may not know who is travelling under their name or using their convoy infrastructure.
4. **Overseas partner risk** – UK charities often rely on local partners in Turkey or Syria; if those partners are compromised, funds, and goods may be diverted.
5. **In-kind diversion** – flour, fuel, vehicles, medicines, radios, clothing, tents, ambulances, and warehouse stock can be seized, taxed, or repurposed by armed groups.
6. **Informal appeals and personal accounts** – unregistered fundraising and personal bank accounts make it difficult to separate legitimate aid from misapplication.
7. **Late reporting** – delayed reporting of seizure, diversion or partner compromise prevents timely action by the Charity Commission, police, banks, HMRC, or sanctions authorities.

The same weaknesses can be exploited by hostile states, terrorist groups, or proxies. They do not need to control a UK charity directly. They may exploit weak governance, compromised local partners, diaspora networks, ideological affinity, opaque funding flows, or humanitarian branding.

The risk includes:

| Hostile-actor use | Description |
|------------------------------|---|
| Logistics cover | Using charitable routes to move goods, people or money |
| Legitimacy laundering | Presenting a political or militant cause as humanitarian |
| Community access | Using charity work to gain influence in diaspora or religious communities |
| Narrative alignment | Amplifying narratives useful to hostile states or extremist movements |
| Financial leakage | Taxing, seizing, selling, or redirecting charitable goods |
| Information access | Using humanitarian or advocacy work to gather sensitive community or policy information |

Table B5.3

This case study shows why charity regulation is not merely a domestic governance issue. In conflict zones, weak charity controls can become a national-security vulnerability. Charitable funds, goods, logistics, volunteers, branding, and local partnerships can all be exploited by terrorist organisations, armed groups, or hostile actors.

The state should preserve legitimate humanitarian action, but require charities operating in terrorist-active or hostile-actor environments to meet a higher standard of financial control, partner verification, end-use evidence, and incident reporting.

Appendix C. The Regulatory Problem

| Regulator | Staff figure used | Regulated population / scope | Headline financial metric under oversight | Approx. entities per staff member | Approx. money metric per staff member | Source / basis |
|--|---|--|--|-----------------------------------|---------------------------------------|--|
| Charity Commission | 457 staff on payroll (as at 31 Mar 2025) | 170,862 registered charities; also regulates some unregistered charities | £102bn charity spend; £101bn charity income in 2024-25 | c. 374 charities | c. £221m spend | Charity Commission Annual Report 2024-25 |
| Financial Conduct Authority (FCA) | 5,198 average employees (FCA parent company, 2024-25) | Around 42,000 regulated businesses; around 41,000 prudentially supervised firms | UK financial-system assets around £27tn in 2022. Note: FCA shares system oversight with PRA/Bank of England. | c. 8 firms | c. £5.2bn assets | FCA Annual Report 2024-25; House of Commons Library |
| Ofgem | 2,276 average whole-time-equivalent staff (2024-25) | Retail market: 23 domestic energy suppliers and 72 business suppliers active in Apr 2025; broader remit includes networks, wholesale and schemes | British homes spent c. £57.6bn on energy in 2023; consumer debt/arrears were £3.85bn in Q4 2024 | c. 0.04 retail suppliers | c. £25m household spend | Ofgem Annual Report 2024-25; Ofgem retail market report; Nesta |
| Ofwat | 394 FTE staff (as at 31 Mar 2025) | 17 water companies providing water and wastewater services to over 23m households in England and Wales | PR24 final determinations allowed/support around £104bn investment over 2025-30 | c. 0.04 water companies | c. £264m five-year investment | Ofwat Annual Report 2024-25; Ofwat PR24; C-MeX/D-MeX report |
| Ofcom | 1,557 average FTE employees (2024-25) | 406,390 Wireless Telegraphy Act spectrum licences in issue in 2024-25; broader remit includes telecoms, broadcasting, post, spectrum and online safety | UK telecoms sector generated £34bn revenue in 2024. Note: excludes much broadcasting/postal/online safety value. | c. 261 spectrum licences | c. £22m telecoms revenue | Ofcom Annual Report 2024-25; Communications Market Report 2025 |
| Gambling Commission | 416 employees (as at 31 Mar 2025) | 2,179 gambling operators; 3,086 licensed activities; 8,234 licensed gambling premises | £16.8bn gross gambling yield in Great Britain, Apr 2024-Mar 2025 | c. 5 operators | c. £40m GGY | Gambling Commission Annual Report 2024-25; Industry Statistics 2024-25 |

Table C. Latest available figures, prepared 13 May 2026. Money metrics are indicative and not perfectly like-for-like

As the table shows, the Charity Commission is unusually stretched compared to other regulators in terms of staffing per entity they must regulate. In fact, the headline numbers obscure an important fact. In 2023/24, the Charity Commission stated in its annual accounts that it had concluded 3710 regulatory concern cases, with 55 cases closed per Full-Time Equivalent (FTE) employee. This gives us a figure of 67.5 FTE employees overseeing over 170,000 charities. The problem is obvious: there is simply no way that the Charity Commission is capable of meaningful enforcement against rogue charities except in the most egregious cases.