



Government Response to the Intelligence and Security Committee of Parliament Report 'IRAN'

September 2025

CP 1403



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Presented to Parliament
by the Prime Minister
by Command of His Majesty

September 2025

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1. INTRODUCTION

The Government is grateful to the Intelligence and Security Committee (ISC) for their report on Iran, published on 10 July 2025. The Prime Minister acknowledged and thanked the Committee for its report in a written ministerial statement on the same day.

The Committee's inquiry began in August 2021 and concluded its evidence-gathering in August 2023, predating the 7 October 2023 Hamas attack and conflicts in the region since. The Committee's report is therefore a reflection of threats and intelligence assessments at the time, and the previous Government's policies.

The Government has since published the National Security Strategy and the Strategic Defence Review in June 2025. Both are clear-eyed about the current risks posed by Iran.

The Government thanks the Committee for its positive evaluation of the vital work our security and intelligence agencies do countering threats posed by states such as Iran. We will take action wherever necessary to protect national security, which is a foundation of our Plan for Change.

The Government considers Iran to be a core security priority, given the ongoing threats it poses, which the Committee rightly identified. Addressing these complex challenges remains a strategic focus for the Government.

We have taken decisive action on Iran across multiple fronts, working closely throughout with our international partners. We have already placed the Iranian state in its entirety on the enhanced tier of the Foreign Influence Registration Scheme (FIRS), meaning that anyone working for or directed by the Iranian state to conduct activities in the UK, such as criminal proxies, must declare that activity or face up to five years in prison. This includes members of the Islamic Revolutionary Guard Corps. FIRS is a critical disruptive tool for the UK.

In addition, we have imposed further sanctions - bringing the total to 450 - targeting individuals and entities linked to Iran and its malign activities.

The Government is committed to tackling state threats. The first convictions under the National Security Act 2023 have taken place. The Government will further strengthen counter state threats legislation, informed by operational needs and recommendations from the Independent Reviewer for State Threats Legislation Jonathan Hall KC, including the creation of a new state threats proscription-style tool.

The Government and Agencies welcome the Committee's independent and robust oversight. The UK intelligence community has remained engaged with the Committee throughout the course of this inquiry. The later stages of this inquiry and publication of the final report were delayed due to the General Election in July 2024, which meant the new Committee was not formed until December 2024.

This document sets out the Government's response to the recommendations and conclusions contained in the report. The Committee's recommendations are in bold, followed immediately by the Government's reply. Where appropriate, we have grouped responses to recommendations and conclusions on the same theme, therefore some may be out of alphabetical order. Several of the Committee's recommendations have had text redacted given they contain classified material. The Government will respond to the Committee on these matters separately.

2. IRANIAN STATE

A. The foundation of the Islamic Republic of Iran in 1979 was a pivotal moment in Iranian history as it moved from an absolute monarchy to a partial theocracy, ruled by the Shi'a clergy.

B. The Supreme Leader of Iran wields tremendous power – he is the ultimate decisionmaker, setting the direction of Iranian foreign and domestic policy. In terms of the threat posed by Iran to the UK and its interests, the Supreme Leader is therefore key.

C. The Iranian threat appears to have increased following the election of Ebrahim Raisi as President, who is more ideologically aligned with the Supreme Leader than his predecessor. This means the regime may act in a more provocative manner with less restraint.

The Government agrees with the Committee's assessment that the Supreme Leader makes key decisions on foreign and domestic policy. We have seen the election of both hardline and reformist presidents in recent years - we remain committed to deterring the Iranian threat no matter who holds office in Iran.

D. The organisations within the Iranian Intelligence Services – primarily the Ministry of Intelligence and Security and the Islamic Revolutionary Guard Corps, representing the republican and revolutionary organs of state – have overlapping remits, which results in fierce competition, tension and disagreement. Whilst the Iranian Intelligence Services operate within a general framework, it appears there is still a certain level of autonomy. Activity may therefore not always be effectively co-ordinated nor centrally authorised.

E. The Committee considers that the relative autonomy of, and factionalism within, the Iranian Intelligence Services increase the risk of unmanaged escalation and contribute to a worrying unpredictability around the Iranian threat to the UK and UK interests in the Middle East. However, increased co-operation and capability-sharing within the Iranian Intelligence Services could also raise the Iranian threat.

The Government agrees with the Committee's assessment that the Iranian system contains silos. We continue to assess and measure the threat from Iran, whether that is from individual entities within the system, or from the system as a whole.

F. The Iranian regime's fundamental objective is to ensure the survival and security of the Islamic Republic: it has an acute historical sense of vulnerability. This shapes – directly or indirectly – all of its actions. This focus on survival means Iran is a pragmatic actor, often driven more by opportunism than ideology (more 'securitocracy' than theocracy).

G. The Iranian regime has three key regional aims: to be a leading regional power; to contain perceived US and Western influence and hostility; and to protect Shi'a communities and holy sites.

H. Whilst Iran favours proportionality in relation to conflict, this is not always achievable or pragmatic as it wants to avoid a full-scale war. It therefore has focused on the development of 'asymmetric' capabilities and a network of aligned militant and terrorist organisations across the Middle East to spread influence and deter potential aggressors.

I. Iran also maintains a fierce ideological, religion-based hostility to Israel, regarding it as its arch enemy. The Supreme Leader is so wedded to this narrative – from the Revolution – that it is now part of the Iranian regime’s DNA.

J. Iran is motivated by both defensive and offensive considerations. Much of Iran’s foreign policy – and the threat it represents to the UK – is borne of a historical sense of its regional importance, a fear of encirclement by better-equipped Western adversaries, a history of perceived foreign interference in Iran, and the formative experience of the Iran–Iraq War.

K. While Iran is fundamentally a rational actor, it does not always appear to act in a coherent way and is prone to misunderstanding actions that others take.

The Government agrees that Iran’s regional ambitions and foreign policy – in particular its continued political, financial and military support to aligned groups across the Middle East and its support for Russia’s illegal war in Ukraine – poses challenges for the UK. Both the Prime Minister and the Foreign Secretary have been clear with their counterparts that Iran must cease its destabilising behaviour. The Government continues to work closely with allies and partners to counter these threats.

3. IRAN - UK RELATIONSHIP

L. Iran and the UK have a complex history. Iran’s leadership perceives the UK to be a significant adversary – a ‘cunning fox’ – opposed to the Iranian regime’s values and, as part of the West, to be seeking regime change in Iran. It therefore believes that the UK poses a military and intelligence threat in the Middle East – although witnesses suggested that the UK would sit behind the US, Israel and Saudi Arabia in any priority list.

M. Iran’s main strategic objectives towards the UK include: reducing the UK’s military presence in the region; undermining the UK’s relationships with the US and Israel; weakening the UK’s security relationships in the Middle East; and silencing criticism of Iran, either from the UK directly or from those residing in the UK.

The Government agrees that Iran’s leadership views the UK as an adversary. Although the bilateral relationship is difficult, we believe that maintaining a diplomatic presence in each other’s countries is one of our most effective channels for making our position clear.

N. The threat posed by Iran is also linked to the state of the bilateral relationship between Iran and the UK. This relationship could change depending on the UK’s international engagement as much as UK-specific actions or policy. The Intelligence Community also noted that Iran’s approach towards the UK is closely linked to its approach to the US – unsurprising given the close alignment between the UK and the US.

O. Whilst Iran’s activity appears to be less strategic and on a smaller scale than Russia and China, Iran poses a wide-ranging, persistent and sophisticated threat to UK national security, which should not be underestimated.

The Government recognises that ongoing Iranian threats put significant strain on the UK-Iran bilateral relationship.

International engagement and cooperation are central to building deterrence. We will continue to work closely with a broad range of international partners to counter the threat from Iran.

RRR. We are concerned by the lack of engagement between the Foreign Secretary and his Iranian counterpart; Ministerial channels can be useful in delivering messaging to deter malign activity, and to reduce the risk of misunderstanding and unintended escalation.

We recognise that this report concerns the period 2021 – 2023. We will not comment on the level of engagement pursued with Iran by a former Government. The Foreign Secretary regularly engages his Iranian counterpart Foreign Minister Araghchi, most recently on 17 July this year.

4. IRAN'S PARTNERSHIPS

P. Iran's acute sense of its position in the region – including its perceived vulnerability – drives its strategy towards its international partnerships.

Q. Iran wants to build a deep alliance with Russia, and the relationship is becoming increasingly close – despite a legacy of distrust and suspicion – particularly since the Russian invasion of Ukraine, with Iran providing weaponry to Russia. The relationship is driven by political expediency rather than ideological connection. It appears likely that their intelligence services co-operate and share intelligence.

R. China is Iran's largest trade and economic partner, and they share a world view driven by preserving regime legitimacy, a sense of grievance in relation to past foreign interference, and a suspicion of the West. Whilst there may well be intelligence exchanges between the two countries, the intelligence relationship is probably of less significance than the economic relationship.

The Government is deeply concerned about Iran's support to Russia's illegal war in Ukraine. Iran's support will prolong the war and cause greater suffering to the Ukrainian people. In November 2024, alongside France and Germany, the UK announced the cancellation of its bilateral air services arrangements with Iran, restricting Iran Air's ability to fly into the UK and Europe. The UK also sanctioned a number of key Iranian and Russian individuals and organisations for their role in facilitating Iran's military support to Russia. The UK has also announced financial sanctions against Iran Air.

Government departments will continue to work closely together to monitor the Iranian - Russian relationship and stand ready to respond to any future developments.

S. Iran has developed a network of complex relationships with militant and terrorist groups across the Middle East to which it provides differing levels and types of support. It maintains these relationships through both the Islamic Revolutionary Guard Corps (IRGC) and the Ministry of Intelligence and Security, but particularly the IRGC Quds Force, which provides training, lethal aid, funding and, in some cases, direction to these groups. This network is part of Iran's doctrine of 'strategic depth', ensuring that it does not enter into conflict with superior conventional powers within its own borders. It provides Iran with a deniable means of threatening its adversaries – such as UK Armed Forces and the

UK's regional allies – and undermining Western interests in the region with minimal risk of retaliation against Iranian territory.

T. The varying level of control that Iran exercises over its network of aligned militant and terrorist groups – and the different interests represented within it – exacerbates the unpredictability of the Iranian-backed threat in the Middle East and risks an escalation of aggression in the region.

U. The transactional arrangement between Iran and the senior leadership of Al-Qaeda (AQ) is concerning. Being based in Iran has allowed AQ to retain some oversight of franchises internationally, creating a complex intelligence landscape, as Iran is a less accessible environment for the West than other parts of the Middle East – which, in turn, may have increased the AQ threat.

GGGGG. The Government should use all the tools at its disposal to degrade the relationship between Iran and groups such as Al-Qaeda and Lebanese Hizbollah, including publicly calling out Iran's attempts to protect such terrorist groups.

The Government agrees with the Committee's assessment that Iran's support for its partners and proscribed terrorist organisations poses a threat to UK interests and the stability of the Middle East. We have long been concerned by Iran's political, financial and military support for these groups, often in violation of relevant UN Security Council resolutions. Both the Prime Minister and the Foreign Secretary have been clear with their counterparts that Iran's political, military and financial support to these groups must cease.

Government departments work closely together to mitigate the risks to the UK's interest and our allies and partners. We have repeatedly identified and exposed Iran's support for these groups, both at international fora and through our own sanctions. In December 2024, UK experts briefed over 50 UN member states on a variety of Iranian advanced conventional weapons, including missiles and Unmanned Aerial Vehicles (UAVs) intercepted in international waters en route to the Houthis. In September, the Foreign Secretary announced sanctions on four IRGC Quds Force members who had a role in supporting Iranian activity in Iraq, Syria, and Lebanon and the UK already sanctions the IRGC in its entirety.

The Government recognises that Iran and its partners have been weakened in the region in the time since the end of the period that the Committee's report concerns. We are aware that Iran will seek to rebuild its influence and regional capability and we continue to work closely with a wide range of our allies and partners to prevent Iran from re-establishing its influence. This will include supporting long-term political solutions and bolstering the stability and capabilities of regional Governments.

5. PHYSICAL THREATS

V. There has been a significant increase over the last 18 months in the physical threat posed by Iran to those residing in the UK. There have been at least 15 attempts at murder or kidnap against British nationals or UK-based individuals since the beginning of 2022. The threat of physical attack on individuals in the UK is currently the greatest threat we face from Iran and is now on a broadly comparable level with Russia.

Y. The Iranian Intelligence Services have shown that they are willing and able – often through third-party agents – to attempt assassination within the UK, and

kidnap from the UK, although in respect of the latter they prefer to lure individuals * to a third country in which the Iranian Intelligence Services can operate more easily, and forcibly repatriate them from there.**

L L L L. The primary mechanism by which the Government responds to the Iranian physical threat is * a police-led process. We note the significant increase in the number of cases considered relating to Iran, and the successes of the operation in providing advice and protection.**

M M M M. The Committee was provided with numerous examples illustrating the increasing intent by the Iranian Intelligence Services to conduct lethal operations in the UK: we commend the efforts of MI5 and the police in response to what is now a serious threat.

The Government has long recognised there is a persistent and growing physical threat to people posed by Iran to the UK. Direct action against UK targets has substantially increased over recent years, particularly after the nationwide protests in Iran that followed the death of Mahsa Amini in September 2022. In October 2024, the Director General of MI5 outlined that since the start of 2022, the UK has responded to 20 Iran-backed plots presenting potentially lethal threats to British citizens and UK residents.

The Government welcomes the Committee's recognition of the seriousness with which the UK police and intelligence and security services take these threats. The Home Office works closely with other Government departments as well as relevant agencies and law enforcement to protect those identified as being at risk. Our intelligence and security services are proactive in identifying and disrupting threats, and, when found, deploying appropriate protective security options at their disposal. This can include a wide range of mutually reinforcing measures, such as protective security guidance, physical and cyber security protective options, through to armed police protection.

We have taken significant steps to ensure the safety of UK citizens and ensure our world-leading law enforcement and intelligence agencies have the tools they need to disrupt and degrade the threats that we face from Iran. The National Security Act 2023 provides a significant new toolkit for the UK to counter state threats. This includes the Foreign Influence Registration Scheme which went live on 1 July 2025. Iran has been specified on the enhanced tier of the scheme. We are committed to taking further action to strengthen this toolkit as required. We will take forward the recommendations of the Independent Reviewer of State Threats Legislation's review comparing counter-terrorism and state threats legislation, and will draw up new powers modelled on counter-terrorism powers in a series of areas to tackle state threats, in particular, the creation of a proscription-like tool for addressing state threats. The Government has imposed sanctions as part of efforts to systematically dismantle the criminal networks and enablers that Iran uses to carry out its work - including the Foxtrot criminal network, sanctioned in April. We have also announced the conclusion of the Transnational Repression Review, established a new cross-Whitehall Joint Unit to tackle state threats and rolled out a new package of training for frontline police officers on state threats.

Government departments work closely together to strengthen the UK's defences against state threats, including close collaboration between the Home Office, Foreign Office, Cabinet Office and Ministry of Defence, as well as with wider departments and security and intelligence agencies. Cross-Government governance structures have been established to facilitate collaboration and oversee the range of state threat activity across policy, security, and intelligence communities.

W. The Iranian physical threat in the UK is focused acutely on dissidents and other opponents of the regime. The targeting of dissidents is one of the Iranian Intelligence Services' highest priorities, and Iran is prepared to assassinate dissidents in the UK.

X. Iran does not view attacks on dissident, Jewish and Israeli targets in the UK as attacks on the UK. It rather sees the UK as collateral in its handling of internal matters – i.e. removing perceived enemies of the regime – on UK soil.

NNNN. Given that Iran does not view attacks on dissident, Jewish and Israeli targets in the UK as constituting attacks on the UK, we encourage the Government and its international partners to make it clear to Iran – at every opportunity – that such attacks would indeed constitute an attack on the UK and would receive the appropriate response.

As the Committee notes, the Iranian regime targets dissidents, Persian-language media organisations and journalists. There is also a long-standing pattern of targeting Jewish and Israeli people internationally by the Iranian Intelligence Services. These plots are a conscious strategy of the Iranian regime, including a concerted effort to silence its critics abroad. We have been clear that such threats are unacceptable. The Government consistently raises our concerns with Iran in the strongest possible terms. As ever, and as explained above, we continue to work closely with our international partners to identify, deter and respond to such threats. On 31 July, the UK published a joint statement with international partners on Iranian state threats in Europe and North America.

Z. The Iranian Intelligence Services are increasingly using organised criminal gangs to undertake hostile activity abroad. Some of the criminal groups used by Iran to conduct operational activity have links to Russia. The use of such gangs provides deniability for Iran. In addition, the wide range of organisations used means a broad pool of suspects – adding a further layer of unpredictability.

We know that the Iranian Intelligence Services have developed close relationships with organised criminal gangs to expand the capability of its networks and obscure their involvement in malign activity. We continue to work with our allies to better understand, expose and condemn Iranian actions – and bring Iranian-linked criminals to justice wherever in the world they may be.

Any criminal networks committing criminal offences on behalf of a state will be treated as a national security threat and the full force of the UK's law enforcement and national security apparatus will be used to disrupt them. We have already placed both Russia and Iran on the enhanced tier of the new Foreign Influence Registration Scheme, meaning anyone working for those states in the UK – including criminal proxies – will need to declare their activities or risk prosecution and imprisonment.

We have also used sanctions to dismantle the criminal networks and enablers that Iran uses to carry out its work. On 14 April 2025, the UK sanctioned the Iranian-backed, Swedish-based Foxtrot criminal network and its leader, Rawa Majid, for their role in attacks against targets across Europe.

6. NUCLEAR

AA. Nuclear proliferation around the world, including in the Middle East, is a critical threat to the UK on a number of levels. Iran proceeding with its nuclear weapons programme therefore poses a threat both to UK nationals in the region and to the UK mainland – and to global security more broadly if it led to regional nuclear proliferation and exacerbated regional instability.

BB. It appears that Iran has not yet developed a nuclear weapon nor taken a decision to produce one, but it maintains the option of developing one – largely as the ‘ultimate security guarantee’. It is difficult to determine what would trigger such a decision by the Supreme Leader: it is plausible that Iran’s intent is to maintain a state of ‘nuclear ambiguity’ at the threshold of weaponisation; however, it may choose to weaponise if it feels it is facing an existential threat.

The Government agrees with the Committee’s assessment that Iran’s nuclear programme poses a serious threat to both international and UK security. The UK’s position is unequivocal: Iran must never be allowed to develop a nuclear weapon.

Iran has repeatedly failed to provide credible assurances that its nuclear programme is exclusively peaceful. While recent US and Israeli military actions have set back Iran’s nuclear programme, significant concerns remain.

Iran continues to hold a substantial stockpile of high enriched uranium – for which there is no credible civilian justification – and has suspended its cooperation with the International Atomic Energy Agency (IAEA). Without IAEA access, the international community cannot verify the peaceful nature of Iran’s nuclear activities, increasing the risk of a return to conflict and undermining global non-proliferation efforts.

The Government dedicates significant resource to alleviating this threat across a wide range of departments and their work is informed and supported by the security and intelligence agencies. The UK, France and Germany (E3) maintain that a diplomatic solution is the only sustainable way to resolve the Iran nuclear issue - one that verifiably ensures Iran cannot develop a nuclear weapon.

Since September 2024, senior FCDO officials have held talks with Iranian Deputy Foreign Ministers, in coordination with French and German counterparts, to address ongoing concerns.

Since the June 2025 Iran-Israel conflict, Iran has increased its rhetoric on its perceived right to enrich uranium and its threats to leave the Non-Proliferation Treaty.

CC. Whilst the 2015 Joint Comprehensive Plan of Action nuclear agreement had its limitations, the Intelligence Community believes that – before the US’s withdrawal in 2018 – Iran was broadly compliant with the restrictions on its nuclear programme; this appears to have reduced the Iranian nuclear threat, if only in the short term.

DD. Since the US’s withdrawal from the Joint Comprehensive Plan of Action, the Iranian nuclear threat has increased as Iran has taken steps in developing its nuclear programme. While it appears that it is still short of the ‘weaponisation’ phase, the potential timelines have reduced over the last few years and Iran has the capability to arm in a relatively short period – possibly * to produce a testable device and *** to develop a deliverable nuclear weapon.**

EE. Given the increase in the Iranian nuclear threat, negotiating a form of de-escalation between Iran and the international community must be a priority. This may be a limited successor to the Joint Comprehensive Plan of Action, a broader multilateral agreement dealing with regional security or separate bilateral agreements with Iran: all would serve to reduce the current high tension.

The Government agrees with the Committee that negotiating a form of de-escalation between Iran and the international community must be a priority. The Government has been clear that a return to conflict is in nobody's interest.

The UK, alongside France and Germany, has upheld its commitments under the Joint Comprehensive Plan of Action (JCPOA). Since Iran began violating the JCPOA in 2019, the UK has invested significant time and effort to try to bring Iran back into compliance. This includes triggering the Dispute Resolution Mechanism in 2020 as well as months of negotiations in 2021-22, where the JCPOA Coordinator twice tabled a revised JCPOA text, which Iran refused to accept. In July 2025, the E3 offered Iran an extension to the Snapback deadline in return for Iran resuming negotiations with the US and fulfilling its legal obligations to cooperate with the IAEA. However, Iran did not engage on this offer and fell well short of meeting these asks.

On 28 August, France, Germany and the United Kingdom triggered the "snapback" mechanism enshrined in UNSC Resolution 2231. We continue to urge Iran to engage with the E3 offer of snapback extension and remain committed, along with our partners, to find a diplomatic solution to Iran's nuclear programme

Following the June 2025 Iran-Israel conflict, which began while Iran-US negotiations were ongoing, Iran's trust in negotiations with the West has highly likely deteriorated further.

AAAAA. We recognise that the Iranian nuclear programme, though one of the most difficult elements of work on Iran, is also the most important.

BBBBB. The Community have * in their understanding of *** weaponisation and *** the initial stages of weapons development. The UK – and perhaps the rest of the international community – may therefore have *** notice period before Iran is able to conduct a nuclear weapons test. *** is a priority across the entire Intelligence Community.**

CCCCC. GCHQ and SIS reporting has provided crucial insights into *, directly informing the tactics and policies pursued by HMG: their continuing insight is essential as the UK seeks to discourage Iranian nuclear escalation.**

DDDDD. The Intelligence Community seeks * Iran's nuclear programme ***. While we appreciate that such activity is difficult, and must be carefully considered, we found this surprising because of the *** priority given to Iran's nuclear programme in the National Security Council Iran Strategy.**

The Government agrees with the Committee that finding a diplomatic solution to Iran's nuclear programme is a priority. Iran has developed its nuclear programme beyond any credible civilian justification. The Government dedicates significant resource to alleviating this threat across a wide range of departments and their work is informed and supported by the security and intelligence agencies.

7. ESPIONAGE

FF. Iran poses a significant espionage threat to the UK and its interests, projected primarily via cyber capabilities, but also via human agents. Whilst as a target, the UK appears to remain just below the US, Israel and Saudi Arabia, this prioritisation could change depending on geopolitical developments and the relationship between Iran and the UK.

GG. The espionage threat is focused on supporting Iran's primary objective of regime stability: it is substantially narrower in scope and scale, and less sophisticated, than that posed by Russia and China. In the UK, the Iranian Intelligence Services prioritise targeting opponents of the regime, HMG and sectors that may provide the Iranian regime with a strategic advantage such as academia and defence. However, the Iranian espionage threat may not necessarily follow a set strategic plan – there is more of an opportunistic element in its targeting.

OOOO. The use of tools such as protective briefings and disruptive immigration measures has been successful in demonstrating to Iran that the UK is a hard operating environment. However, that has not stopped it from seeking to operate agent networks here.

PPPP. The Iranian espionage threat manifests itself acutely in the cyber domain, since cyber espionage represents an easier way for Iran to gain information which it would not necessarily be able to obtain within the UK due to the difficult operating environment.

The Government shares the Committee's concerns about the espionage threat Iran poses to the UK. Any attempt by a foreign power to conduct espionage in the UK will not be tolerated. Anyone seeking to conduct such hostile acts against the UK or steal our information for commercial advantage is liable to prosecution for offences under the National Security Act 2023.

In addition, the Home Office continues to robustly apply our Immigration Rules to protect UK national security, and we do not hesitate to refuse or revoke the immigration status of those who may pose a threat. Existing immigration powers have been used to protect the country from state threats and where proportionate we will continue to use these powers for this purpose.

Iran continues to pose a threat to the UK and our allies, with the UK facing a heightened threat of cyber espionage from Iranian cyber actors. Iran is an aggressive and capable actor in cyberspace. Cyber espionage is almost certainly a core and enduring objective of Iranian state-linked cyber activity, which presents the most persistent Iranian cyber threat to UK interests including individuals, as well as organisations worldwide.

The Government is committed to calling out malicious cyber activities, including by Iran, which threaten the UK's national interests. We work round the clock with our international partners to counter these cyber attacks and bolster our resilience. The National Cyber Security Centre (NCSC) continues to work closely with Government, industry and international partners to understand and mitigate the cyber threat from Iran.

II. While both the Iranian Embassy and the Islamic Centre of England have legitimate roles supporting the Iranian diaspora community, given their close links to the Iranian regime they are also likely to provide a permissive environment for Iranian Intelligence Services agent recruitment and intelligence gathering in the

UK. We encourage the Intelligence Community not to underestimate the potential espionage threat they pose.

ZZ. Whilst the Islamic Centre of England and other cultural and educational centres supported by Iran have legitimate roles supporting the Iranian diaspora, there are grounds to suggest that they have been used to promote violent and extremist ideology. This threat must not be underestimated.

ZZZZ. Whilst we are reassured that the Home Office is now investigating the threat posed by Iranian-aligned cultural groups – particularly the Islamic Centre of England – it is important that the Home Office’s research is followed up with specific and timely action to ensure any threat from radicalisation, promotion of extremist material, and intimidation of UK-based students and diaspora is addressed.

The Government welcomes the Committee's observation and notes that the espionage threat from Iran is an area of concern. It is important we address the threat from malign influence in our democratic society.

We are conducting extensive work to understand and degrade Iranian interference or malign influence activity in the UK, looking at potential vectors of concern including cultural centres and educational facilities, that may have links to the Iranian regime or support their political objectives. Where there is evidence that Iranian-linked or aligned organisations are undertaking unacceptable activity, the Government will respond accordingly.

The Foreign Influence Registration Scheme (FIRS), which went live on 1 July this year, is a critical disruptive tool. FIRS provides crucial additional powers to protect our democracy, economy and society. It is a two tier scheme: the political tier requires registration of any arrangements to carry out political influence activities in the UK on behalf of a foreign power; an enhanced tier can be applied to activities directed by foreign powers considered to pose a risk to the UK’s safety or interests. The whole of the Iranian state has been placed on the enhanced tier. This requires the registration of all arrangements to carry out activities directed by the Iranian state in the UK. Anyone who does not register faces up to five years in prison.

While FIRS is crucial, we are clear that our response must be a whole of society effort. The Charity Commission is an independent regulator of charities in England and Wales and provides a vital service on behalf of the public. The Government welcomes the Charity Commission’s statutory inquiries into both the Islamic Centre of England and the Al-Tawheed Charitable Trust.

The promotion of extremist views in any organisation is unacceptable and we are committed to tackling those who spread views that oppose the values we share as a society and sow divisions between communities. We are working closely with a range of partners, including operational partners and other Government departments, to tackle extremism and malign state-backed influence in our society.

8. CYBER

JJ. Iran is an aggressive cyber actor with extensive capabilities. Whilst Iran does not possess the same sophisticated capability as Russia and China, the cyber threat posed by Iran is significant.

KK. The Iranian cyber threat landscape is complex, with cyber groups ranging from state-controlled actors responding to direct tasking, to private cyber actors working for personal gain or perceived state intelligence requirements. The complexity of this environment appears to make it more difficult to identify accurately the motivation behind Iranian cyber activity and the level of state control.

LL. Whilst Iranian cyber actors often use simple computer network exploitation techniques, they use them very effectively, exploiting basic vulnerabilities that many organisations have, including in the UK. They do this for the purpose of gathering intelligence, undertaking interference operations and enabling offensive (disruptive and destructive) cyber operations.

MM. The ever-increasing interconnectivity of global technology and developments in Artificial Intelligence may exacerbate the Iranian cyber threat.

NN. Iran generally favours proportionality, responding in a similar way to perceived aggression. Where that is not achievable or realistic, it uses asymmetric capabilities – of which offensive cyber is a prime example.

OO. Offensive cyber – by which we mean both destructive and disruptive cyberattacks – allows Iran to attack and contain Western and regional adversaries without resorting to conventional military action. It also provides Iran with a deniable tool with which to attack its enemies, respond to perceived aggression and project power in the region – and globally.

PP. Although Iran does not possess the same sophisticated cyber capability as Russia and China, it is an aggressive cyber actor, with a relatively high risk appetite. However, at present, it appears that the UK is not a top priority for Iranian offensive cyber activity and, in the current environment, Iran may not attempt an offensive cyberattack specifically to damage the UK. Nevertheless, we note that this could change rapidly in response to regional or geopolitical developments: the likelihood has increased, for example, in connection with the recent protests in Iran.

QQ. Due to multinational trade and the interconnectedness of IT networks, it is likely that any global increase in Iranian offensive cyber activity increases the risk to UK entities – for example, through collateral damage resulting from broader activity. Iran both recognises and accepts that risk.

RR. If Iran decided to conduct an offensive cyber-attack against an adversary such as the UK, the petrochemical, utilities and finance sectors could be at risk. According to the National Cyber Security Centre, it is unlikely that all UK entities are able to detect or defend against Iranian offensive cyber activity.

SS. We were told that Iranian cyber actors ***. *** they could *** attempt to cause *** disruption by targeting *** Critical National Infrastructure.

TT. Whilst ultimately unsuccessful, we noted with particular concern that Iranian cyber actors reportedly targeted water facilities in Israel. When we questioned whether the Industrial Control Systems installed in Israel are similar to that used throughout Critical National Infrastructure globally, including in the UK, we concluded ***.

The National Cyber Security Centre (NCSC) has for some time judged that Iran poses one of the most acute state threats to the UK and our allies in cyberspace. The Government agrees with the Committee that Iran is an aggressive and capable actor in cyberspace and has achieved success in many countries.

Cyber espionage is almost certainly a core and enduring objective of Iranian state-linked cyber activity, which presents the most persistent Iranian cyber threat to UK interests including individuals, as well as organisations worldwide. Iranian-linked cyber actors also have access to several powerful disruptive and destructive tools at their disposal.

The NCSC has persistently called out - and will continue to do so - malicious cyber activity by Iranian state-linked actors and encouraged individuals and organisations to be vigilant to the threat from these such actors.

QQQQ. It is essential to 'raise the resilience bar': if there is good cyber security and resilience across the UK, then it is less likely that Iran's * cyber-attacks will be successful. The National Cyber Security Centre's work to illuminate the tools and techniques used by Iranian cyber groups, and to warn UK organisations that they are being targeted, is therefore key to defending the UK**

RRRR. The Committee has previously expressed concerns about Government complacency in allowing Russian pre-positioning for an attack through widespread penetration of UK Critical National Infrastructure. It is vital that the same mistakes are not made in relation to Iran – particularly given Iran's proven capability to cause serious disruption to essential services.

SSSS. The UK must raise the cost to Iran of it launching a cyber-attack on the UK, so as to deter it from doing so: public attribution of attacks is a valuable tool (albeit not without risk).

The UK has an established cyber deterrence policy, and we draw on all tools available to deter the threat – including public attributions. Having strong defences and resilient systems remains the best way of countering malicious cyber activity carried out against us. However, when necessary, we strengthen our defences by making it clear any malicious cyber activity will be met with meaningful consequences. The UK will call out such behaviour and work with our international partners to impose cost.

We always respond strategically, at a time of our choosing, and in a manner of our choosing but the UK and our allies will continue to expose those that aim to do us and our institutions harm. This ensures malicious actors, whether Iranian or otherwise, cannot act with impunity in the shadows.

TTTT. The National Cyber Force was established in 2020 with specific responsibility for offensive cyber activity. Such operations have *. The Committee recognises the time and resource required in mounting such operations.**

UUUU. The Committee was surprised to hear that the Intelligence Community had successfully concluded * counter-cyber operations against Iran (i.e. operations to disrupt Iranian cyber-attacks) in the 12 months ***.**

The Government does not routinely comment on operational matters.

9. INTERFERENCE

UU. The Iranian regime believes it is engaged in an active information conflict with its adversaries and refers to interference activity as ‘cognitive warfare’.

VV. Iran draws on the full range of state capability to conduct interference operations. This includes the Iranian Intelligence Services, state media, the Iranian Ministry of Foreign Affairs and Iranian-funded organisations. They use different platforms – both overt and covert – such as traditional media, social media and networks of purportedly ‘independent’ news websites, to spread their own narratives in the UK.

WW. Whilst the UK is a high priority target for Iranian interference activity due to its role in multilateral negotiations relating to Iran and the presence of several Iranian language news outlets in the UK which are critical of the regime, it is not as important as the US, Israel, Saudi Arabia or other Middle Eastern states.

XX. Overall, HMG considers that Iran’s interference operations (which seek to suppress critical voices, promote views that align with its own geopolitical narratives and religious ideology, weaken confidence in British institutions, undermine the US–UK relationship, and exacerbate wider social divides) have had a negligible effect on UK public opinion and decision-makers, including in relation to UK elections.

The Government shares the Committee’s concerns about Iran’s attempts to interfere in the UK but agrees that this has had a negligible effect on UK public opinion. It is, and always will be, an absolute priority to protect the UK against foreign interference. The National Security Act 2023 provides the security services and law enforcement agencies with the tools they need to deter, detect, and disrupt modern-day state threats, including new offences for foreign interference and assisting a foreign intelligence service. Iran has also been specified on the enhanced tier of the Foreign Influence Registration Scheme (FIRS) which requires the registration of arrangements to conduct activity at Iran’s direction.

YY. The focus of Iran’s interference operations – and of most concern – are the attempts to intimidate Iranian dissidents and those working for media organisations such as Iran International in the UK and beyond. Some reports suggest Iran’s efforts to intimidate the regime’s perceived opponents have had a significant impact on the Iranian diaspora community in the UK: targets of this intimidatory behaviour have limited their social contact with other Iranians, particularly those within Iran, moderated their criticism of Iran, and reduced their advocacy for contentious Iranian topics. We note and encourage ongoing efforts to support Iran International’s return to the UK. However, we are concerned as to whether this means the UK is not a sufficiently hard operating environment for Iran, and whether HMG is taking sufficient proactive action to protect UK-based media organisations.

The Government continually assesses potential threats in the UK, and takes the protection of individuals’ rights, freedoms, and safety very seriously – wherever those threats may originate. We do not tolerate intimidation or threats to life towards any individuals living in the UK, and through our intelligence agencies and police services we will continue to use all of the tools at our disposal to address any threat.

The Government welcomes the Committee’s recognition of the extensive protective security support provided to Iran International following the severity of the threats

towards UK-based journalists working for the Persian language news channel and their families in 2023. The Government, working closely with our partners in the Metropolitan Police, put in place a robust range of security measures to protect Iran International and its staff, which included the presence of armed police officers. The police response led to the conviction in 2023 of the Chechen-born Austrian national, Magomed-Husejn Dovtaev, who was imprisoned for conducting surveillance on Iran International's UK headquarters.

The UK condemns the targeting of media organisations and journalists and is committed to the promotion of media freedom. It is paramount that all media professionals are free to work without fear and journalists must be able to investigate and report independently.

The Defending Democracy Taskforce has conducted and concluded a comprehensive review of Transnational Repression (TNR) to assess the UK's understanding and response to this issue. The review was conducted in close collaboration with lead Government departments, law enforcement, intelligence agencies, and international partners. It concluded that the UK has the tools and system-wide safeguards in place to robustly counter this threat. These include legislative tools such as the National Security Act, as well as non-legislative measures including diplomatic engagement and operational coordination.

The review found that TNR in the UK tends to be targeted and specific, where perpetrating states particularly focus on individuals whom they perceive as threats or otherwise seek to control, such as vocal critics, dissidents, or activists opposed to their regime. Anyone who thinks they might be a victim should report incidents or suspicious activity to the police via 101, a local police station, or 999 in emergencies. The Review team worked with Counter Terrorism Policing to develop new state threats training, now offered to all 45 territorial police forces across the UK. To support this, the Security Minister wrote to Chief Constables encouraging take-up of the offer.

On 14 May, the Security Minister issued a Written Ministerial Statement to Parliament, signalling the conclusion of the TNR Review, and providing an overview of the Review's key findings and recommendations. The statement also announced the launch of new public guidance on GOV.UK, providing practical safety advice for individuals who believe they may be at risk of TNR, both physically and online. The Security Minister also provided detailed oral evidence to the Joint Committee on Human Rights on 21 May as part of its inquiry into TNR. The Committee published their report on TNR on 30 July this year. We will consider the findings and recommendations of the report carefully as part of our ongoing efforts to strengthen the UK's resilience to transnational repression.

VVVV. There are a number of boards, taskforces, working groups and reviews all working on the Government response to state interference. We question whether all are required: inevitably there will be duplication of time, effort and money. The Committee notes the tendency for there to be too many bodies co-ordinating at the expense of those bodies doing the actual front-line work.

WWWW. The Committee has yet to see the outcomes which the Defending Democracy Taskforce has been established to achieve, nor any indication that it has the authority to drive these outcomes forward across Government. It is unclear whether it truly represents a step forward in the Government's approach or simply yet another co-ordinating structure. We recommend that the Taskforce should set out its objectives and achievements in an annual statement to Parliament.

Policy issues that are relevant for tackling the threat from Iran to the UK sit across a wide range of departments and agencies working to deliver against shared objectives. The

National Security Council is the ultimate decision-making body on strategic national security issues, including the Government's approach to Iran.

Protecting the integrity and security of UK democracy, including elections from threats of foreign interference is a priority across Government. Since the current Government came into power, the Prime Minister has given the Defending Democracy Taskforce a mandate to coordinate and drive forward a whole of Government response to the full range of threats to our democracy, including from foreign interference. The Taskforce reports to the National Security Council, and works across Government and with parliament, the UK's intelligence community, the devolved administrations, local authorities, the private sector, and civil society on the full range of threats facing our democratic institutions.

The work of the Taskforce is organised into three pillars:

1. Ensuring the **safety and security of political and electoral processes**, including planning for local and national elections.
2. Ensuring **democratic institutions are safe and secure by combating interference**, including through cyber-attacks or foreign interference.
3. Strengthening our **democratic society including building resilience to interference** such as in the online information environment.

The Taskforce has provided updates, where appropriate, to Parliament on the progress of its work. This includes, for example, the Written Ministerial Statement laid by the Security Minister on 14 May on the Transnational Repression Review.

XXXX. Work to tackle disinformation and work to protect the security of the UK's democratic processes is clearly linked. The Committee considers that Parliament should be provided with a clear statement as to the work that will be completed ahead of the next General Election, with the associated classified material being provided to this Committee.

YYYY. The Committee recommends that the Government strengthen guidance to Parliament on vetting of staff employed in MPs' offices, in the context of recent high profile allegations of espionage carried out by Parliamentary staffers.

The Government agrees with the Committee's assessment of the link between work to tackle disinformation and work to protect the UK's democratic processes. The Government works at pace to identify and counter foreign state-linked disinformation (and wider information operations) targeting the UK and international audiences, and has strong tools to defend against interference in our democracy. This includes the Defending Democracy Taskforce, and the Joint Election Security and Preparedness Unit (JESP). These structures provide a coordinated effort across Government departments, law enforcement, and the security and intelligence agencies, to monitor and mitigate risks relating to the security of elections, including AI and mis/disinformation.

As a result of the increased threat picture in the UK, the Government Security Group is reviewing vetting policy to provide greater assurance for all individuals, including parliamentary staffers, applying for national security vetting.

10. THREATS IN THE MIDDLE EAST

AAA. The UK has substantial security and commercial interests in the Middle East, which are at risk from Iranian hostile activity, including a physical threat to UK nationals in Iran, a threat to UK maritime and commercial interests in the region,

and a security threat in respect of terrorism, increased migration and nuclear proliferation.

BBB. Iran has a broad range of tools it could deploy, including missiles and drones (which it could use against Israel, regional US bases – where UK forces are co-located – and Gulf energy infrastructure), its network of militant and terrorist forces, chemical weapons, offensive cyber and disruption of shipping in the Gulf.

EEE. The threat of collateral damage to UK Armed Forces stationed in the region (resulting from misidentification or miscalculation) is the main physical risk to British nationals in the Middle East – outside of Iran – due to their sizeable number and co-location with the more heavily targeted US forces.

FFF. In addition to launching physical or cyber-attacks on UK economic interests in the Middle East, Iran has the capability to disrupt or attack commercial shipping in the region – primarily in the Strait of Hormuz: although it practises its capability to close the Strait, it would be a major step for Iran to do so.

GGG. The US killing of General Qasem Soleimani in 2020 appears to be contributing to increased regional instability. The Iranian regime may still be seeking revenge and his death * Iran's control over its network of aligned militant and terrorist groups. Given the risks of misidentification and collateral harm, we believe that this continues to pose a particular danger for UK troops co-located with US forces in the region.**

FFFFF. We note that work to * and are reassured that ***.**

The Government agrees with the Committee's assessment that Iran's activity poses a broad range of threats to UK interests in the Middle East. Both the Prime Minister and the Foreign Secretary have been clear with their counterparts that Iran's threatening behaviour must cease.

Government departments work closely together to mitigate the risks to the UK's interest and our allies and partners. We have repeatedly identified and exposed the Iranian threat to UK interests, both through its direct actions and through its support for non-state actors.

The Government has also repeatedly taken sanctions action against Iranian individuals and entities involved in Iran's destabilising action in the Middle East, support for Russia's illegal war in Ukraine and the development of its advanced conventional weapons.

Although Iran views the death of Soleimani as an event that it has not yet fully responded to, Iran would likely prioritise reciprocal actions. However, given regional tensions and aligned groups in the region, there is a continued threat against regionally based UK forces. Iran's forward defence strategy to keep engagements with Israel away from the Iranian homeland includes ties with regional Iranian-aligned groups. This strategy has proven somewhat unsuccessful given direct Iran-Israel exchanges in April and October 2024 and direct conflict in June 2025. This is likely to prompt Iran to re-prioritise its conventional military capabilities. Despite this renewed focus on conventional capabilities, and the degradation of Iranian-aligned groups in various conflicts since October 7, there is almost certainly an enduring threat from Iran and its aligned groups against UK personnel co-located with US troops in the region.

HH. There is a collateral threat to the UK associated with Iran's targeting of regional networks and multilateral organisations. Given Iran's focus on the Middle East, Iranian cyber actors in the region are particularly active. This increases the

risk to the UK if it were to share sensitive data with those whose networks may be a target of the Iranian Intelligence Services.

We agree that Iran-based actors' targeting of regional and multilateral organisations represents a threat to UK interests, including to sensitive data shared with regional networks that are targeted by Iranian Intelligence Services. Iran-based threat actors remain aggressive in cyberspace and continue to achieve their objectives through less sophisticated cyber techniques (including prolific use of spear-phishing), but also targeting industrial control systems. The FCDO and National Cyber Security Centre (NCSC) work closely with wider Government, industry and international partners to understand and mitigate this cyber threat and ensure data flows with these regional networks are secure and trusted, in line with national security legislation and data protection standards.

CCC. The Iranian physical threat to UK nationals in the Middle East has increased in the last two years as a result of the internal protests in Iran. Detention remains the primary physical threat to British citizens in Iran, and is heightened in relation to dual nationals – particularly because dual nationality is not recognised by Iran. The threat of arbitrary detention has increased since the recent protests in Iran.

The Government agrees with the Committee's assessment that British nationals were at greater risk during the protests of 2022-23.

We have long advised against all travel to Iran, and Travel Advice further indicates that British nationals and British-Iranian dual nationals are at significant risk of arbitrary arrest, questioning or detention in Iran. The Committee is correct that Iran does not recognise dual nationality; this means that it does not grant UK officials consular access to dual British national detainees.

It remains in Iran's gift to release any British national who has been unfairly detained. We continue to urge the Government of Iran to stop its practice of unfairly detaining British and other foreign nationals, and we will continue to work with like-minded partners to that end. We provide consular support to the families of British nationals detained in Iran when they request it.

DDD. Whilst it appears relatively unlikely, the British Embassy in Tehran is a potential target for an attack. It may well also be the epicentre of protests in the absence of other Embassies.

The Government agrees with the Committee's assessment that the British Embassy in Tehran is a potential target for protests.

We continue to prioritise the protection of our Embassy staff and platform. As an example, during the 12-day Israel-Iran conflict, we took the precautionary measure to withdraw UK staff from British Embassy Tehran temporarily. They returned when we assessed that it was safe to do so.

EEEE. Given the volatility of the situation, the potential for misunderstanding and miscalculation by Iran, and the possibility for rapid escalation, it is not unrealistic to think that at some point it could become necessary to evacuate UK nationals in the region. The Committee notes the importance of proper preparation for a possible evacuation. * the Government must ensure that it has learnt the lessons from recent evacuation operations such as the withdrawal from Afghanistan.**

The Government advises against all travel to Iran. In addition, FCDO Travel Advice states that in an emergency, for example if there is serious violence, unrest or a deterioration in the security situation, the UK Government will not be able to provide help nor face-to-face assistance to British nationals if they get into difficulty, nor will we be able to evacuate.

During the recent 12-day Israel-Iran conflict, Iran and Israel travel advice was updated to reflect developments to keep British nationals informed. The Government continues to monitor the situation in the Middle East and we continue to assess the need to update Travel Advice for each country in the region.

11. STRATEGY AND POLICY RESPONSE

HHH. The Government's policy on Iran has suffered from a focus on crisis management, driven by concerns over Iran's nuclear programme, to the exclusion of other issues.

III. 'Fire-fighting' has prevented the Government from carrying out longer-term thinking and developing a real understanding of Iran and the complexity of the problem. The Government must stop its short-termist, reactive approach: 'longer-term' must mean the next 5, 10 and 20 years, not 6 to 12 months.

JJJ. We welcome the increased focus on Iran in the 2023 Integrated Review Refresh. However, as with our previous Inquiries into national security issues relating to China and Russia, the Government appears to over-complicate governance structures and strategies – with the attendant risk of too much talking, at the expense of action.

KKK. There is no sense from anyone we spoke to of: how the National Security Council Iran Strategy relates to the Integrated Review Middle East and North Africa sub-strategy; which of them takes precedence; and whether the National Security Council Iran Strategy has taken account of the changes in the Integrated Review Refresh. It is concerning that these strategies appear not to have been aligned.

LLL. It remains difficult to determine accountability for the National Security Council Iran Strategy – as with any strategy, it should be clear who is responsible for driving implementation, and whose performance rating and pay rewards will be determined by its success or failure.

MMM. We note with concern that the National Security Council met * to discuss Iran. If the National Security Council is to have an 'Iran Strategy', then it should be ensuring implementation of it, through regular discussions with the officials responsible.**

As the Committee notes, the National Security Council is the principal forum through which the Government's objectives with regard to national security are collectively discussed and agreed upon. This group is not limited by timeframes, and considers short, medium and long-term approaches to geostrategic challenges. Iran is no different, and has been considered at NSC. The Government regularly tackles international crises while ensuring ongoing strategy work continues. In addition to the NSC's consideration of the Iran Strategy, senior officials meet frequently to progress activities and drive implementation.

The Committee is right to point to the importance of understanding Iran in order to effectively approach the complex problem. The Government continues to recruit people with diverse backgrounds and expertise to deliver HMG priorities. Government departments work closely together - collating a broad range of knowledge and skills - in order to deter the threat from Iran.

Since the end of the evidence-gathering period, the Government has published the Strategic Defence Review, which is clear-eyed about the risk from Iran. That is one of the reasons why the Review recommends the Middle East and Indo-Pacific as the next priority regions (after the Euro-Atlantic) for Defence engagement. We have also published the National Security Strategy 2025 which calls out 'years of aggressive and destabilising activity by the Iranian regime which has included activity specifically targeted against UK interests at home and overseas.' Our approach to ensuring UK's security against this threat is at the heart of our National Security Strategic Framework.

The NSC is responsible for ensuring coherence of national strategy and its delivery. The Cabinet Office is responsible for coordinating cross-Government strategy across a range of issues, including Iran, while departments implement and deliver the strategy itself.

The Government is confident that the NSC-directed Iran Strategy and its objectives are well understood across departments, and that its implementation is regularly considered by groups in the governance structure set out by the Committee. The NSA Iran Small Group noted in the report is one example of Cabinet Office coordination of the strategy.

NNN. The Counter-State Threats Strategy has taken four years to develop – whilst this is an extraordinarily long time to wait for such a key piece of work, the Committee cannot provide Parliament or the public with any assurance that it was worth the wait: the Government failed to provide the Committee with the Strategy. We regard this as completely unacceptable: this Committee has been given the statutory responsibility to oversee such matters, and we question what the Government's reasons are for withholding it.

Since the evidence-gathering phase of the ISC's Iran inquiry concluded, the Government has provided the Committee with the classified Counter-State Threats Strategy.

OOO. While we recognise that there will be some elements of the state threats from China, Russia and Iran that are broadly similar and which will benefit from an actor-agnostic approach, there will be fundamental differences which could be overlooked. The Iranian threat is quite different in many respects and it is essential that it receives sufficient priority, and that Russia and China do not dominate the Government's focus.

YYY. The Government's response to the Iranian threat appears to be wrapped up with state threats or the Middle East. This may be positive if it means that Iran will benefit from synergies with work to counter other – perhaps more prominent – state threats. However, the risk is that this instead results in a less tailored and therefore less effective response to the Iranian threat.

Whilst the Counter State Threats Strategy adopts a thematic approach to building resilience and addressing common vulnerabilities across various threat actors, the Government is also committed to dedicated action against Iran. This includes a dedicated Iran strategy, with a specific pillar focused on countering the Iranian threat to the UK, which develops actor-specific approaches to countering the Iranian threat. Through the Intelligence Outcomes Prioritisation (IOP) process, the Government

monitors and prioritises intelligence gathering, seeking to balance wider Government priorities, taking into account other state actors.

The Government is committed to ensuring that the Iranian threat receives the specific attention it warrants, whilst also recognising the benefits of a coordinated approach. This is why, alongside the dedicated Iran strategy and dedicated Iran-specific expertise, we draw upon the range of actor-agnostic capabilities identified in the Counter State Threats Strategy. We will continue to monitor the effectiveness of our approach, working closely with the UK Intelligence Community and partners, to ensure a balanced and effective response to the Iranian threat.

PPP. The Intelligence Outcomes Prioritisation Plan – which sets the requirements for GCHQ and SIS – * ‘coverage’ *** ‘effects’. We recognise the need to prioritise *** and the relatively ***. Nevertheless, proper consideration must be given to ***.**

QQQ. It is a step in the right direction that the Intelligence Outcomes Prioritisation Plan in 2022 introduced a requirement to provide greater understanding of Iran’s *.**

Prioritisation of GCHQ and SIS overseas intelligence effort is agreed through the Intelligence Outcomes Prioritisation (IOP) process, overseen by the Cabinet Office and approved through the senior official Joint Prioritisation Committee (JPC), and finally by the National Security Council. The process to prioritise intelligence collection is rigorously focussed on where effort can achieve impact on the highest priority policy objectives, and is completed with the involvement of all relevant agencies, and a wide range of Government departments with national security interests. The UK intelligence Community is fully integrated into cross-government structures and work on national security topics which enables them to effectively identify opportunities for joint working, reinforcement of relationships and areas for deconfliction with policy departments. New requirements can be added to respond to an increased policy. Any new requirement must also be agreed at the JPC (or escalated to Ministers as appropriate), and rigorously prioritised.

SSS. We are surprised at the relative infrequency of meetings between the Foreign Secretary and the Heads of GCHQ and SIS, compared to the greater engagement by previous Foreign Secretaries.

Government departments and the Agencies work closely together to deter the threat from Iran and will continue to do so.

12. RESOURCING

TTT. Resourcing on Iran has fluctuated over the past decade, supporting the concern that the response to the Iranian threat has been short-termist. * resourcing did not then increase following *** – given that Iran has consistently reduced its compliance since then.**

UUU. We have previously made reference to the fact that the Agencies do not have unlimited resources, and therefore hard choices on resourcing and prioritisation must be made during national security crises. It is clear to us that the situation during the conflict in Ukraine, for example, is no different.

VVV. GCHQ in particular recognises that its drawdown in resourcing * had significantly affected *** While GCHQ argued that it was doing ‘more for less’, this is nevertheless concerning.**

WWW. MI5 has still not been given the additional funding and resources that we called for in our Extreme Right-Wing Terrorism Report. Without a commensurate increase in resources, MI5 cannot be expected to absorb responsibility for an increased range of issues, without other areas of work suffering as a consequence.

The Agencies continue to give their full attention to the threat emanating from Iran, flexing effort and resource in response to events and on the basis of evidence and data. For example, in October 2024, the Director General of MI5 outlined that since January 2022, the UK has responded to 20 Iran-backed plots presenting potentially lethal threats to British citizens and UK residents. This response has been strengthened by the National Security Act, which became law in July 2023 and has helped make the UK a harder operating environment for hostile actors. Events in the Middle East have focused the Agencies’ attention to the risk of an increase in, or broadening of, Iranian state hostility, and the Agencies continue to respond accordingly.

MI5’s deployment of resource and effort is kept under constant review by the MI5 Executive Team. In terms of the decisions it makes in prioritising threats to national security, it is operationally independent of Government, but aligns its strategic direction to Government priorities as set by the National Security Council.

National security is the first duty of government. In the Spending Review earlier this year, the government has taken the decisions required to make the country safer, more secure, and more resilient. The settlement for the intelligence and security agencies provides total funding of £5.4 billion by 2028-29. This is equivalent to an annual average real terms growth rate of 2.7% over the Spending Review period. The settlement represents continued major investment in the UK’s national security resources and capabilities.

XXX. Across Government, there is a lack of Iran-specific expertise and seemingly no interest in building a future pipeline of specialists, beyond mention in a Strategy campaign. We were particularly struck by the critique, “if you have people running policy in the Foreign Office who don’t speak a word of Persian, then that is a fat lot of good, to be honest”.

The Civil Service has a number of schemes to attract and retain the right talent, skills and expertise across Government. The Government continues to recruit people with diverse backgrounds and expertise to deliver HMG priorities, including to deter the threat from Iran.

13. UK’S INTERNATIONAL PARTNERSHIPS

ZZZ. The Agencies’ partnerships with the US * on the Iranian threat are of critical importance, and the *** countries operate with an exceptionally high level of trust.**

AAAA. The Agencies’ close collaboration with the US and other international partners in relation to the Iran threat appears to be one of their greatest assets: it yields great value and lessens burdens. However, it also appears to be a potential vulnerability, in that if this arrangement were to cease, it is doubtful whether the

Intelligence Community would be able to respond to the Iranian threat anywhere near as effectively.

BBBB. Most countries – even our closest allies – will operate under different legal and ethical constraints to the UK. However, to protect the UK we have no choice but to work with other countries. The framework under which our Agencies engage is therefore of the utmost importance. The evidence we have received reassures us that where HMG engages in a joint operation, UK ‘red lines’ are made clear to ensure that legal and policy boundaries are observed and that, wherever possible, appropriate due diligence is carried out to ensure that information is not obtained via prohibited methods. However, we note that that cannot be guaranteed.

CCCC. We recognise the benefits of sharing intelligence *. The Community have taken steps ***.**

The Government acknowledges the importance of the Agencies’ international partnerships as a key enabler of the UK’s ability to respond to the Iranian threat. As the Committee acknowledges, the Agencies operate within a strict legal framework to ensure that any operations which partners do not cross any legal and policy red lines. The Agencies expend considerable efforts to ensure the robustness of these partnerships and their ability to withstand critical challenge as the Agencies enforce those red lines. These partnerships bring benefits for all sides. While HMG does not envisage these arrangements ceasing - if that were to happen - there would also be costs on all sides including from partners’ losing access to UK sovereign capabilities.

14. INTELLIGENCE COVERAGE

DDDD. Iran is a hard intelligence target, comparable to Russia and China. The regime appears to be highly sensitised to the threat of foreign intelligence work against it (the Committee noted in particular the regime’s domestic monitoring system, *). The Intelligence Community’s access to Iran is ***.**

EEEE. While SIS continues to *, the tight control the regime exercises ***.**

FFFF. Overall, the Intelligence Community have * coverage of Iran’s capability, *** understanding of its intent, particularly in relation to Iran’s ***. Given the potential for misunderstanding and miscalculation between Iran and Israel, this is of the utmost concern.**

We recognise the Committee’s observation around Iran’s alertness to counter-intelligence work set against its regime. As set out elsewhere in this response, the Government continues to develop a comprehensive understanding of Iran’s intent and capability.

15. LEGISLATION, PROSCRIPTION AND SANCTIONS

GGGG. We welcome the new National Security Act 2023, which will fill important legislative gaps in tackling state threats. However, other gaps will remain unless the Official Secrets Act 1989 is reformed. The Government now appears to be backtracking on its commitment to Parliament to take this forward: this is of significant concern given the problems with the current regime.

When introducing the National Security Bill to Parliament in May 2022, the then-Government chose not to reform the Official Secrets Act 1989 as part of that legislation. This was because reform would be complex, require proper consideration and would need to engage a wide range of interests.

The current Government is committed to ensuring that legislation which is used to counter state threats and protect official information relating to national security, remains robust and fit for purpose. We will keep the legislative framework under regular review to ensure it continues to meet the evolving threat.

HHHH. No decision has yet been taken as to whether Iran would be designated under the Enhanced Tier of the Foreign Influence Registration Scheme. While there are processes to be followed, we would nevertheless be surprised if Iran were not deemed worthy of inclusion under the Enhanced Tier – if it were not, it is hard to see which countries would be.

The whole of the Iranian state, including Iran's intelligence services, the Islamic Revolutionary Guard Corps (IRGC) and Ministry of Intelligence and Security (MOIS), has now been placed on the enhanced tier of the new Foreign Influence Registration Scheme (FIRS). This measure was announced by the Security Minister in March 2025.

This means that anyone working for Iran, or directed by Iran to conduct activities in the UK, such as criminal proxies, must declare that activity or face up to five years in prison. FIRS is a critical disruptive tool for the UK and went live on 1 July 2025.

IIII. The UK has imposed financial sanctions on 508 individuals and 1,189 entities relating to Iran. The majority of these are companies involved with the nuclear programme, but they also include sanctions for human rights issues.

JJJJ. Given the scepticism we heard from External Experts as to the efficacy of sanctions, the Government should reconsider whether sanctions will in practice deliver behavioural change, or in fact unhelpfully push Iran towards China.

Sanctions are a vital foreign policy tool, used to deter and disrupt malign activity and demonstrate our readiness to defend international norms. We will continue to strengthen our sanctions implementation and enforcement and work closely with our international partners to maximise the impact of sanctions. The Government has used sanctions to tackle the criminal networks and enablers that Iran uses to carry out its work.

In 2023, the Government created a new sanctions regime in response to additional threats posed by Iran to the UK, which was updated last September to expand controls on goods which can be used for UAVs and ballistic missiles. This was last used in April of this year against the *Foxtrot* criminal network and its leader. To date, the UK has sanctioned more than 450 Iranian individuals and entities (32 designations have been imposed since the government came into office), in response to the regime's human rights violations, nuclear weapons programme and malign influence internationally. The government will continue to hold the Iranian regime and those acting on its behalf to account.

KKKK. We recognise the complexities inherent in a decision of whether or not to proscribe the Islamic Revolutionary Guard Corps. It is clear that such a decision would come with diplomatic implications: it appears that the real problem is that the Government is paralysed by the legal and practical difficulties around proscription of a state organisation – given that membership of an organisation

proscribed in the UK carries a custodial sentence, which would apply to around a quarter of the Iranian Cabinet. The Government should fully examine whether it would be practicable to proscribe the Islamic Revolutionary Guard Corps and, if so, detail the competing arguments in a full statement to Parliament.

The Government recognises the serious threat posed by the Islamic Revolutionary Guard Corps and shares the ISC's concerns. We do not comment on whether or not an organisation is being considered for proscription. However, as the Independent Reviewer of Terrorism and State Threats Legislation, Jonathan Hall KC's review published on 19 May highlighted, there are certain parts of the UK's counter-terrorism legislation not well-suited to address state entities. That is why we are committed to implementing Mr Hall's recommendation to create a new State Threats Proscription-like Tool. This bespoke mechanism will be designed to address the unique legal and operational challenges of proscribing state entities, ensuring maximum operational benefit. While we do not comment on individual proscription decisions, this new tool will directly address the threat posed by such entities. Legislation will be brought forward when parliamentary time allows.

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