How Did Our Allies Do It?

Case Studies in Banning the Muslim Brotherhood

By Emma Schubart

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The Henry Jackson Society
Millbank Tower
21-24 Millbank
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Registered charity no. 1140489
Tel: +44 (0)20 7340 4520

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Contents

Foreword

When I was posted with the UK Foreign Service to the Middle East, I encountered a regular irritant. Whether it was in Egypt, Saudi Arabia or the United Arab Emirates, my hosts had a habit of becoming less gracious and more critical whenever they raised the issue of Political Islam in Britain. Sometimes they used the outright derogatory term: "Londonistan". The Egyptians in the 1990s, the Saudis 20 years later, and the Emiratis a further decade on, all warned that Islamists, under the guise of peaceful dissidents, were incubating a threat to the Western way of life no less real than the violent threat posed by Al-Qaeda and like-minded groups whom we prioritised as dangerous terrorists.

I think most of us would recognise that British official complacency about the Muslim Brotherhood project was a historic error. The UK belatedly appeared to get serious about it in 2014, when David Cameron commissioned two brilliant friends of mine, Sir John Jenkins and the late Charles Farr, to conduct a review. That review remains the single most important document about the Brotherhood in the UK but it landed badly in 2015. Senior officials and politicians alike left the authors in no doubt that their findings were unwelcome. Nothing was done about them.

On a certain level, we can say that the Saudis, Egyptians and Emiratis were right. And yet, the British retort that those countries do not tolerate political opposition and so force dissidents to seek asylum elsewhere was also true. Neither the UK nor any other Western democracy can apply solutions that work in Arab autocracies. That is why this Henry Jackson Society report is so important, and so well-timed. We are at the start of a long-overdue British pushback against Islamist entryism, which has (tactically unwisely) grown much more visible in the aftermath of the October 2023 Hamas attack on Israel, and now increasingly manifests itself in aggressive antisemitism that is forcing a political response. Calibrating that response requires the intelligent study of how the UK's allies have responded and how applicable those policies might be in Britain. I was with the author, Emma Schubart, at a recent conference in Rome that gathered an extraordinary array of international experts to provide insight and advice on how to address this transnational challenge.

Policy makers should therefore pay attention to this report. One of its key sentences reads: "Allied practice suggests that the most defensible path is a tiered approach: terrorism proscription where the evidence supports it; sanctions and immigration measures against foreign affiliates; and a strengthened domestic regulatory regime for extremist organisations that operate below the terrorism threshold." Based not just on Middle Eastern examples but more relevantly on evolving European experiences and the new, galvanising US move against the Brotherhood, HJS have produced a really valuable guide to the policy options available to the British government, and which might prove effective. In my contacts with British and American officials, I will certainly be commending it to them.

Edmund Fitton-Brown
Former UK Ambassador to Yemen;
Former Coordinator of the UN Analytical Support and Sanctions Monitoring Team concerning the Islamic State, Al-Qaeda, and the Taliban;
Senior Fellow at the Foundation for Defense of Democracies

Executive summary

Across the United Kingdom's allies, policy towards the Muslim Brotherhood has not converged on a single model. Middle Eastern partners such as Egypt, Saudi Arabia, the United Arab Emirates, and Jordan have used full or near-full prohibition models, combining designation, dissolution, criminalisation, office closure, and asset measures. By contrast, Western allies have generally preferred branch-specific terrorism law, association law, administrative dissolution, school and subsidy regulation, financial controls, and intelligence-led monitoring rather than a blanket ban on a global movement whose legal boundaries are contested.

The central lesson is that allied governments usually act against legally visible nodes rather than against "the Brotherhood" as an abstract transnational movement. The United States has designated specific branches as terrorist organisations. France has targeted named institutions, schools, associations and funding vehicles. Germany has relied on intelligence monitoring and entity-specific association law. Israel has treated the Brotherhood problem indirectly through action against Hamas-linked finance and domestic Brotherhood-derived structures.

For the UK, this makes the Brotherhood question a legal-design problem rather than a slogan. Where a terrorism case can be made, proscription, sanctions and immigration powers should remain available. Where it cannot, the more durable route is likely to be lawful indirect incapacitation: targeting support for Hamas, hidden financing, charity abuse, extremist education, public-funding misuse, incitement, foreign-directed influence and anti-democratic organisational activity.

Introduction

The comparative evidence shows that “banning the Brotherhood” can mean several different things. It can mean designating a national branch as a terrorist organisation, dissolving a registered society, freezing the assets of a charity, closing a school, withdrawing a public contract, prohibiting a symbol, refusing foreign funding, monitoring an association through domestic intelligence agencies, or prosecuting individuals for material support to terrorism.

This report examines how the United Kingdom’s allies have banned, restricted or moved to restrict the Muslim Brotherhood and Brotherhood-linked ecosystems. Its purpose is to ask: what legal object did each state target, what instrument did it use, what evidential burden did it face, and what consequences followed?

The cases fall into three broad models. First are full prohibition models, used mainly by Middle Eastern partners. These designate, dissolve or ban the Brotherhood itself and attach criminal, financial and organisational consequences to membership, support, promotion or activity. Egypt, Saudi Arabia, the UAE and Jordan show what comprehensive enforcement can look like when prohibition is paired with asset tracing, office closure and action against fronts or successor bodies.

Second are targeted terrorism and sanctions models. The United States is the clearest example. It has not banned the Muslim Brotherhood as a single global movement. Instead, it has designated specific branches and affiliates where the evidential case is framed around terrorism, Hamas support, armed activity or material-support networks. This model is more relevant to the UK than a Gulf-style ban because it avoids the hardest legal problem: treating a diffuse transnational movement as a single proscribable body.

Third are European regulatory-disruption models. France, Germany and Austria have used public-order, association, education, charity, symbols, funding and intelligence tools to constrain Brotherhood-linked networks without necessarily proscribing the Brotherhood by name. These cases are especially important because they operate inside constitutional systems that protect association, religion, expression, property and due process. They show both what can be done and where overreach becomes vulnerable to litigation, political backlash or evidential collapse.

This report argues that the British policy challenge is therefore technical rather than rhetorical. The reasons Britain has not yet gone further are not purely legal, although legal definition and evidential thresholds are central: institutional risk-aversion, political reluctance, concern about conflating Islamist organisation with Muslim civic life, and the electoral sensitivity of Muslim voter coalitions have all helped keep the UK response to the Muslim Brotherhood limited. Those domestic constraints are addressed in the follow-up report; this report focuses on what allied practice shows is legally and operationally possible.

A successful UK strategy would need to define the legal target precisely, distinguish Muslim religious life from Islamist political organisation, and build enforceable case files around terrorism support, incitement, clandestine financing, extremist education, public-funding misuse, charity abuse, foreign-directed influence or anti-democratic subversion. The core question is not simply whether “the Brotherhood” can be banned. It is which parts of the Brotherhood-linked ecosystem can be lawfully disrupted now, and under which legal powers.

Scope and method

This report examines countries diplomatically aligned with the United Kingdom that have taken documentable legal, regulatory, intelligence or administrative action against the Muslim Brotherhood or an identified Brotherhood-linked national ecosystem. Countries are included where official action has produced, or is designed to produce, practical consequences: terrorist designation, criminal liability, dissolution, asset freezing or confiscation, school closure, subsidy or contract withdrawal, symbol bans, foreign-funding controls, intelligence monitoring, and formal parliamentary or executive movement toward such measures. This report identifies three distinct categories of action: full prohibition, meaningful restriction, and emerging restriction.

1. Full prohibition refers to systems that ban, dissolve or designate the Brotherhood itself, usually with criminal and financial consequences for membership, support, promotion or organisational activity.

2. Meaningful restriction refers to cases where the Brotherhood has not been banned as a whole, but where states have used enforceable tools against its alleged branches, affiliates, institutions, funding vehicles or public-facing ecosystem.

3. Emerging restriction refers to recent parliamentary motions, draft laws, policy reviews or foreign-funding proposals that have not yet become full legal bans but indicate a clear allied trajectory toward restriction.

The report is selective rather than encyclopaedic. It focuses on cases that illuminate a legal or operational model relevant to the UK.

Country overview

Allied action against the Muslim Brotherhood falls into three broad models.

Model	Countries	Core instrument	Legal effect	UK relevance
Full prohibition	Egypt, Saudi Arabia, UAE, Jordan	Terrorist designation, judicial dissolution, executive ban, asset confiscation	Criminalises membership, support, promotion or organisational activity; enables office closures, asset seizure and prosecution	Shows what comprehensive enforcement looks like, but also why a UK model would need to be narrower: any prohibition would have to satisfy Terrorism Act, survive parliamentary/ judicial scrutiny, and avoid criminalising lawful religious, political or charitable activity
Meaningful restriction	United States, Israel, France, Austria, Germany	Branch-specific designations, association law, public-order law, symbols bans, education regulation, intelligence monitoring, funding controls	Freezes assets, criminalises material support, imposes immigration consequences and financial restrictions, disrupts specific institutions, associations, schools, symbols, funding streams or fronts	Shows how to target identifiable foreign branches without banning the global movement
Emerging restriction	Netherlands, Belgium, Sweden, Australia	Parliamentary motions, draft extremist-organisation laws, foreign-funding controls, prohibited hate-group listing	Creates legal machinery or political mandate; not always Brotherhood-specific	Shows the direction of allied legislative development below terrorism thresholds

The strongest comparative pattern is that whole-movement bans are rare in Western legal systems. Where Western allies act, they tend to avoid treating the Muslim Brotherhood as a single, legally coherent body. Instead, they target specific branches, fronts, institutions, funding vehicles, symbols, schools, charities or affiliated organisations.

Country timeline

The timeline below summarises the major turning points most relevant to a UK-facing analysis. The key point is directional: full bans were consolidated earlier in the Middle East; after 2023, Western democracies accelerated toward more explicit disruption of Brotherhood-linked or analogous Islamist ecosystems, but usually through entity-specific and below-terrorism tools rather than movement-wide proscription.

Date	Country	Development	Significance
2013	Egypt	Brotherhood outlawed and treated as a terrorist organisation after court/government action	Full modern ban (2013): assets seized, activities outlawed, and membership criminalised after the Muslim Brotherhood was formally designated a terrorist organisation. Egypt had previously banned the group in 1948 (briefly) and 1954 (long-term), but without the terrorist designation
2014	Saudi Arabia	Muslim Brotherhood designated as a terrorist organisation	Broad criminalisation of support, sympathy and membership
2014	UAE	Cabinet terrorist list includes the UAE Muslim Brotherhood (al-Islah)	Designation tied to state-security prosecution and asset confiscation
2015	Egypt	Terrorist-entities and anti-terror statutes consolidate the listing/enforcement framework	Turns political ban into financial and prosecutorial machinery
2020	Jordan	Court of Cassation ruling makes final the dissolution of the Brotherhood's registered legal society, leaving it without lawful associational status.	This judicial basis was later used for the 2025 operational ban, office closures and asset-recovery campaign.
2020	Austria	"Operation Luxor" launched against alleged Muslim Brotherhood/Hamas networks, marks the most aggressive European enforcement push against these networks	Later illustrates difficulty of converting broad intelligence claims into sustainable prosecutions
2021	Austria	Anti-terror package creates offence around religiously motivated extremist associations; symbols-ban framework expanded	Most explicit European restriction model
2021	France	"Separatism" law strengthens dissolution, subsidy, association, school and foreign-funding tools	Foundation for later anti-Brotherhood disruption

2023 - 2025	France	School-contract withdrawals, endowment-fund action and administrative scrutiny of Brotherhood-linked ecosystem	Shows entity-specific regulatory enforcement
April 2025	Jordan	Interior Ministry bans all activities of the dissolved Brotherhood; offices closed and assets pursued	Transition from legal dissolution to operational enforcement
May -June 2025	Sweden	Government launches expert scrutiny of Islamist movements and proposes foreign-funding restrictions	Emerging financial-control model
July 2025	Belgium	Government approves preliminary draft law to ban extremist organisations, with the Brotherhood cited as a target	Emerging administrative-ban model
Sept 2025	France	Government dissolves Institut Européen des Sciences Humaines (Brotherhood-linked Islamic seminary) by decree under Article L212-1	Concrete use of association-dissolution powers
Jan 2026	United States	Egyptian, Jordanian and Lebanese Brotherhood branches designated as terrorist organisations	Major Five Eyes shift toward branch-specific counter-terror designations
Jan 2026	France	National Assembly passes non-binding resolution urging EU designation of the Brotherhood	Political escalation; not itself a legal ban
March 2026	Netherlands	House of Representatives adopts motion calling for ban on Brotherhood and affiliated organisations	Parliamentary mandate without completed legal prohibition
March 2026	Australia	Hizb ut-Tahrir becomes the first organisation listed under Australia's new prohibited hate-group framework. Hizb ut-Tahrir was founded in 1953 by Sheikh Taqiuddin al-Nabhani al-Falastani, who broke from the Brotherhood milieu in favour of a more uncompromising, caliphate-centred and revolutionary political project[1]	New hate-group model below terrorism threshold
March 2026	United States	Sudanese Muslim Brotherhood designated, citing links to Islamic Revolutionary Guard Corps	Further branch-specific expansion

1 Zeyno Baran, Hizb ut-Tahrir: Islam's Political Insurgency (Washington, DC: The Nixon Center, December 2004), pp. 1–2, accessed 10 June 2026, https://www.bits.de/public/documents/US_Terrorist_Attacks/Hizbut-ahrirIslam'sPoliticalInsurgency.pdf.

This timeline shows a clear post-2023 acceleration. Before 2023, Western democracies largely relied on monitoring, terrorism laws against violent offshoots, and case-by-case regulatory action. Since 2023, the direction of travel has changed: France, the Netherlands, Belgium, Sweden, Australia and the United States have all moved toward more explicit legal or policy restrictions on Brotherhood-linked networks, even where they have yet to implement a whole-movement ban.

The key UK question is therefore no longer whether allied states have acted — indeed they already have. The question is which model is most legally applicable: a US-style branch-specific terrorism/sanctions model, a France-style regulatory-disruption model, an Austria-style criminal/symbols model, or a new civil-extremism regime closer to the Australian and Belgian proposals.

Country case studies

United States: branch-specific terrorism designation and sanctions

Status: The United States has not banned the Muslim Brotherhood as a single global movement at the federal level. Federal action has instead focused on specific national branches and linked terrorism-support structures. Separately, state-level action has gone further: In 2025, Texas designated the Muslim Brotherhood and CAIR as foreign terrorist organisations and transnational criminal organisations under state law, triggering enforcement measures and restrictions on land acquisition. The designation remains in effect but is currently subject to ongoing litigation.[2] The Texas designation is therefore a significant sub-federal precedent.

Legal instrument used: The United States has used two principal mechanisms: designation as a Specially Designated Global Terrorist under Executive Order 13224, and designation as a Foreign Terrorist Organisation under section 219 of the Immigration and Nationality Act. The legal route was opened by Executive Order 14362 of 24 November 2025, which directed the State and Treasury Departments to consider designation of specified Brotherhood chapters. In January 2026, Treasury and State designated the Egyptian and Jordanian Muslim Brotherhood branches as Specially Designated Global Terrorists (SDGTs) and designated the Lebanese Muslim Brotherhood, also known as al-Jama'a al-Islamiyya, as both a Foreign Terrorist Organisation and Specially Designated Global Terrorists.[3] In March 2026, the US State Department designated the Sudanese Muslim Brotherhood as SDGTs.[4] US materials described the Sudanese Muslim Brotherhood as comprising the Sudanese Islamic Movement and its armed wing, the al-Baraa Bin Malik Brigade. The Brigade had already been sanctioned in September 2025 under Executive Order 14098, a Sudan-specific sanctions authority targeting actors involved in destabilising Sudan and undermining its democratic transition.[5]

How it works technically: An SDGT designation freezes property and interests in property under US jurisdiction and generally prohibits US persons from dealing with the designated entity. An FTO designation adds further criminal and immigration consequences: knowingly providing material support or resources becomes a US criminal offence, and members or representatives may face immigration inadmissibility or removal consequences. The US model therefore converts the Brotherhood question into a financial, immigration and material-support problem, rather than trying to prohibit a transnational ideology.

Lesson: The strength of the US model is precision. It avoids the weakest point of an all-Brotherhood ban: proving that the movement is one coherent legal entity. It instead designates specific branches for specified conduct, especially alleged support for Hamas (the self-described Palestinian branch of the Muslim Brotherhood) or armed activity. Its limitation is

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2 Office of the Attorney General of Texas, "Attorney General Ken Paxton Takes Legal Action in Lawsuit Involving the Terrorist Organization CAIR," press release, 23 December 2025, https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-takes-legal-action-lawsuit-involving-terrorist-organization-cair.

3 US Department of the Treasury, 'Treasury and State Departments Designate Muslim Brotherhood Branches as Terrorist Organisations', press release, 13 January 2026, accessed 10 June 2026, https://home.treasury.gov/news/press-releases/sb0357.

4 US Department of State, Office of the Spokesperson, 'Terrorist Designation of the Sudanese Muslim Brotherhood', press statement, 9 March 2026, accessed 10 June 2026, https://www.state.gov/releases/office-of-the-spokesperson/2026/03/terrorist-designation-of-the-sudanese-muslim-brotherhood/.

5 U.S. Department of the Treasury, Office of Foreign Assets Control, "Counter Terrorism Designations; Sudan-related Designation Update," 9 March 2026, https://ofac.treasury.gov/recent-actions/20260309.

that it depends on a credible terrorism nexus and does not address Brotherhood-linked civic, charitable or advocacy bodies operating below that threshold.

France: ecosystem disruption through association, education and finance law

Status: France has not formally banned the Muslim Brotherhood as a single national organisation. It has, however, built the most developed European model for disrupting Brotherhood-linked structures through administrative, educational, association-law and financial measures. The French Interior Ministry's 2025 report, *Frères musulmans et islamisme politique en France* (Muslim Brotherhood and Political Islam in France), uses the term *mouvance fériste* (the Muslim Brotherhood milieu) to describe the wider Brotherhood-oriented ecosystem in France: not only formal members of the Brotherhood, but also associations, mosques, schools, charities, funds and local networks influenced by its ideological and organisational tradition.[6] The report identifies a national *fériste* (Muslim Brotherhood) ecosystem centred on Musulmans de France, formerly the Union des Organisations Islamiques de France, which has historically been part of the wider European Brotherhood-linked institutional network associated with the Federation of Islamic Organisations in Europe, now generally referred to through successor European structures. The French Interior Ministry's report identifies around 280 associations linked to the Brotherhood milieu and 21 Muslim schools as linked or close to the Brotherhood movement as of September 2023.

Legal instrument used: The main legal architecture comes from the 2021 law *confortant le respect des principes de la République*, often called the anti-separatism law, alongside existing powers in the Internal Security Code. France has used school-contract rules, association dissolution powers, public-subsidy conditions, foreign-funding scrutiny and endowment-fund controls against the *fériste* (Muslim Brotherhood) ecosystem. The key legal tools are:

- Article L212-1 of the Internal Security Code, allowing dissolution by decree of associations or de facto groups meeting specified public-order, incitement, hatred, violence or terrorism-related criteria;
- Article L227-1, allowing closure of places of worship where messages or activities provoke violence, hatred, discrimination or terrorism;
- the *contract d'engagement républicain*, requiring associations receiving public subsidies or approvals to commit to republican principles;
- Strengthened foreign-funding controls for religious and cultic associations.

France has also used these powers against specific institutions. The government dissolved the European Institute of Human Sciences, an imam-training institution alleged to be connected to Brotherhood-linked networks, by decree on 3 September 2025 under Article L212-1.[7] The decree alleged links to Musulmans de France and the wider Brotherhood-oriented milieu, and cited grounds including incitement to violence, discrimination, hatred and terrorism-related concerns.

6 Ministère de l'Intérieur, 'Publication du rapport "Frères musulmans et islamisme politique en France"', dossier de presse, 21 May 2025, accessed 10 June 2026, https://www.interieur.gouv.fr/actualites/dossiers-de-presse/publication-du-rapport-freres-musulmans-et-islamisme-politique-en-france.

7 Décret du 3 septembre 2025 portant dissolution de l'association « Institut Européen des Sciences Humaines (IESH) », NOR INTD2524595D, *Journal officiel de la République française*, no. 0205, text no. 4, 4 September 2025, accessed 10 June 2026, https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000052182608.

How it works technically: France's model does not require the state to prove that "the Muslim Brotherhood" is a single terrorist body. Instead, the state builds administrative records against particular schools, associations, mosques, endowment funds or educational bodies. Evidence may include foreign financing, governance opacity, curriculum concerns, extremist materials, incitement, failure to respect republican obligations, or incompatibility with public-funding requirements.

In the education sphere, the French state has targeted institutions through ordinary regulatory chokepoints rather than through a Brotherhood-wide ban. In France, private schools may operate under a *contrat d'association* (association agreement) with the state, giving them public funding and recognised status in exchange for compliance with national educational, financial and civic obligations. The Interior Ministry report states that, as of September 2023, France had 74 Muslim confessional schools, of which 21 were identified as linked or close to the Brotherhood-oriented milieu, including 18 directly and three regarded as close. The same report says the Averroès school in Lille had its state association contract terminated in December 2023 after findings concerning illicit financing and serious deficiencies in pedagogical materials, and that a further suspension challenge was rejected in July 2024. It also states that the Al Kindi school in Lyon faced similar contract-withdrawal proceedings in 2025, with concerns including financial opacity, non-compliant teaching and materials contrary to republican values.

The same logic appears in finance. French *fonds de dotation* are endowment-style vehicles that may collect and distribute funds for public-interest purposes. The Interior Ministry report states that several *fonds de dotation* linked to the *mouvance fRériste* were suspended, and that the Al-Wakf fund, described as the most important fund of the French Brotherhood milieu, was dissolved by the Bobigny judicial court in July 2024, after findings including illicit financing of religious activities, support to movement institutions and unauthorised online fundraising.

Lessons: France demonstrates the most developed European ecosystem-disruption model. Its model shows how a state can materially constrain a diffuse Islamist network without relying on a single terrorism-proscription decision. It does so by regulating concrete institutions and legal persons: schools, associations, funds, places of worship and subsidy recipients. Its weakness is litigation and political contestation: administrative measures against schools, associations and religious bodies must be carefully evidenced, because courts can scrutinise procedure, proportionality and evidential sufficiency.

Austria: criminal association and symbols-ban model

Status: Austria has gone further than most European states. Austria is often described as having "banned" the Muslim Brotherhood. Technically, the Austrian model is better described as a combination of criminal-law, association, anti-terror and symbols-law measures rather than a simple UK-style proscription order.

Legal instrument used: In 2021, Austria adopted an anti-terror package creating a criminal offence around participation in a religiously motivated extremist association and expanded its symbols-ban regime. The model gives prosecutors a tool against support for qualifying extremist associations before a completed terrorist act is proved.

How it works technically: Austria's model is broader than classic terrorism law. It allows liability to attach to participation in or support for a qualifying extremist association before the state proves a completed terrorist act. The symbols-ban element gives police and prosecutors a lower-level enforcement tool against public propaganda, flags, slogans and organisational insignia.

This should be understood within Austria's post-war tradition of restricting extremist symbols: Nazi insignia and propaganda have long been prohibited under Austria's denazification-era legal framework, including the Prohibition Act 1947 and the Insignia Act. Austria's later Symbols Act extends a comparable public-order logic to a wider range of extremist movements, including Islamist, ethno-nationalist, far-right and terrorist-linked organisations.[8] In that sense, the Brotherhood-related measure is not an isolated innovation, but part of an established Austrian and wider European practice of treating extremist symbols as infrastructure for recruitment, intimidation and ideological normalisation.

Lessons: Austria shows that a European state can create a legal handle on Islamist extremist association below the completed-terrorism threshold. Its weakness is evidential durability. The clearest example is the failure of parts of Operation Luxor to survive judicial scrutiny. Operation Luxor was Austria's flagship November 2020 counter-extremism raid operation against alleged Muslim Brotherhood and Hamas-linked networks; its subsequent legal difficulties became the key test of whether Austria's "political Islam" framework could be sustained evidentially. In 2021, the Higher Regional Court of Graz upheld complaints against the raids, finding the suspicion too thin and rejecting the premise that the Muslim Brotherhood could be treated wholesale as a terrorist organisation.[9] In subsequent proceedings, investigations against figures and entities linked to the operation, including Farid Hafez and the Anas Schakfeh foundation[10], were dropped or discontinued for lack of sufficient evidential basis. The lesson is that a broad statutory tool can still fail if intelligence assessments, association claims and financial allegations cannot be converted into precise, individualised and court-ready case files.

Germany: intelligence classification and the legal-object problem

Status: Germany has not banned the Muslim Brotherhood. Instead, constitutional-protection agencies monitor Brotherhood-linked networks as part of the "legalistic Islamist" spectrum, the German category of *legalistischer Islamismus*, referring to Islamist actors that pursue anti-constitutional objectives through formally lawful association, education, media and political-influence work rather than overt jihadist violence.[11]

Legal instrument used: Germany relies on the Federal Office for the Protection of the Constitution and state-level constitutional-protection agencies, plus ordinary association-law tools where a specific legal entity can be shown to violate constitutional order or support prohibited activity. The "protection of the constitution" offices are domestic intelligence bodies; their function is to monitor threats to Germany's free democratic basic order.[12] By contrast, the Federal Constitutional Court has a specific constitutional remit, including the exclusive power to declare a political party unconstitutional under Article 21 of the Basic Law. Non-party

8 Republic of Austria, Symbole-Gesetz, BGBl. I Nr. 103/2014, as amended, § 1, Rechtsinformationssystem des Bundes, version current as of 19 February 2026, accessed 10 June 2026, https://ris.bka.gv.at/NormDokument.wxe?Abfrage=Bundesnormen&Anlage=&Artikel=&FassungVom=2026-02-19&Gesetzesnummer=20009040&Paragraf=1&Uebergangsrecht=.

9 Anna Thalhammer, 'Operation Luxor: Razzia laut OLG Graz rechtswidrig', *Die Presse*, 3 August 2021, accessed 10 June 2026, https://www.diepresse.com/6016465/operation-luxor-razzia-laut-olg-graz-rechtswidrig.

10 European Court of Human Rights, Gemeinnützige Privatstiftung Anas Schakfeh v Austria, Application no. 37777/22, admissibility decision, 30 January 2024, reproduced in Rechtsinformationssystem des Bundes, ECLI:AT:AUSL000:2024:00BSW037777.22.0130.000, accessed 10 June 2026, https://www.ris.bka.gv.at/Dokumente/Justiz/JJT_20240130_AUSL000_000BSW37777_2200000_000/JJT_20240130_AUSL000_000BSW37777_2200000_000.html.

11 Deutscher Bundestag, Ausschuss für Inneres und Heimat, "Wortprotokoll der 17. Sitzung," Protokoll-Nr. 20/17, 4 July 2022, p. 32, https://www.bundestag.de/resource/blob/910474/20-4-103-I.pdf.

12 Federal Office for the Protection of the Constitution, *Protecting the Constitution: The German Civil Domestic Intelligence Services — Interesting and Useful Facts About Us and Our Work*, July 2022, accessed 10 June 2026, https://www.verfassungsschutz.de/SharedDocs/publikationen/EN/general/2024-07-18-faq.pdf?__blob=publicationFile&v=4.

associations are handled differently: they may be banned by federal or state interior ministries under association law, subject to judicial review.

How it works technically: Germany separates monitoring from prohibition. Intelligence classification can justify surveillance, public reporting and reputational exclusion, but banning an association requires proving legal grounds against a specific association. The state therefore treats the Brotherhood problem as a network of legal persons, milieus and influence structures, not as a single bannable national organisation.

Lessons: Germany has a specialist constitutional-protection architecture shaped by its post-war "militant democracy" tradition, under which the state may monitor or restrict organisations judged hostile to the liberal democratic basic order before they commit a completed act of terrorism. Even so, Germany's model is legally cautious. It avoids overclaiming and produces a public evidential record through annual intelligence reporting. Its weakness is operational speed. Monitoring and public classification can expose and constrain a network, but they do not automatically close institutions, freeze assets or criminalise support.

Netherlands: parliamentary mandate without legal implementation

Status: The Netherlands has not banned the Muslim Brotherhood. In March 2026, however, the Dutch House of Representatives adopted a motion calling on the government to ban the Muslim Brotherhood and affiliated organisations. The motion was not legally binding or self-executing: it requested that the Dutch government prohibit the Muslim Brotherhood and affiliated organisations but did not itself create a ban.

Legal instrument used: The Dutch development is parliamentary rather than operative law. The motion, proposed by Partij voor de Vrijheid (PVV) MPs Maikel Boon and Geert Wilders, passed the Tweede Kamer by 76 votes to 74, narrowly clearing the 75-vote threshold in the 150-seat chamber.[13] The motion cited the 2025 French government report and concerns about long-term infiltration by the Muslim Brotherhood, whose alleged objective is to establish an Islamic order based on sharia.[14]

How it works technically: This motion is not legally binding nor self-executing: it requested that the Dutch government ban the Muslim Brotherhood and affiliated organisations, but did not itself create an operative prohibition. It pressures the government to explore legal and executive steps. Its significance is therefore political rather than juridical: it demonstrates parliamentary majority support for exploring a ban, not the existence of one.

Lessons: The Dutch case is important as a political signal rather than an enforcement precedent. It demonstrates how parliamentary pressure can generate a mandate for government action. However, as of June 2026, the government has not yet taken concrete steps to implement the March 2026 motion, underscoring how quickly such initiatives return to difficult questions of legal definition, evidence thresholds, and institutional competence.

13 Votes For: VVD 22, PVV 19, JA21 9, FVD 7, Groep Markuszower 7, BBB 3, ChristenUnie 3, SGP 3, 50PLUS 2, Keijzer 1; 76 total. Votes Against: D66 26, GroenLinks-PvdA 20, CDA 18, DENK 3, PvdD 3, SP 3, Volt 1; 74 total.

14 Tweede Kamer der Staten-Generaal, 'Motie van de leden Boon en Wilders over de Moslimbroederschap en daaraan gelieerde organisaties verbieden', Kamerstuk 32 824, no. 491, proposed 9 March 2026, adopted 17 March 2026, accessed 10 June 2026, https://www.tweedekamer.nl/kamerstukken/moties/detail?did=2026D10782&id=2026Z04726.

Belgium: proposed administrative ban on radical organisations

Status: Belgium has not yet banned the Muslim Brotherhood, but in July 2025 its federal government approved a preliminary draft law designed to ban activities of radical organisations.[15] Belgian Minister of the Interior, Bernard Quintin, explicitly named the Muslim Brotherhood as a potential target: "there is no place in our country for extremism or radicalism, whether it is Islamist or of any other nature. There is no place for hate preachers who want to divide our society and threaten coexistence. That applies also within our democratic institutions. For the sake of clarity, I count the Muslim Brotherhood in this category."[16]

Legal instrument used: The Belgian proposal would create a mechanism to prohibit organisations posing a serious threat to national security and democratic order. The government described the measure as targeting direct participation in, or logistical, material or financial support for, acts of violence, sabotage, terrorism or crimes against humanity; glorification of terrorist activities; clandestine infiltration of public institutions; and repeated incitement to hatred, discrimination or segregation.

How it works technically: The Belgian model is an emerging executive/administrative prohibition regime. It is not limited to terrorism in the strict sense; it reaches radical organisations that threaten constitutional order or democratic institutions through violence-support, clandestine influence or incitement.

Lessons: The law is not yet a proven enforcement model. Its strength is that it directly addresses the gap between terrorism law and nonviolent extremist organisation. But its potential for vulnerability lies where a loosely drafted executive ban could be attacked as punishing lawful association or controversial expression rather than demonstrable extremist conduct.

Sweden: foreign-funding and anti-democratic influence controls

Status: Sweden has not banned the Muslim Brotherhood. It has moved toward a funding-control and influence-scrutiny model after the French 2025 report highlighted Sweden as a country where Brotherhood activity required assessment.

Legal instrument used: In May 2025, the Swedish government appointed a special investigator to propose rules prohibiting or otherwise countering foreign funding of religious communities and other activities in Sweden linked to Islamism, extremism and other anti-democratic interests.[17] The mandate requires legislative proposals and was due to report by 29 May 2026. As of mid-June 2026, the report has not yet been published.

How it works technically: Sweden's emerging model is not a ban. It targets money flows: foreign donations, financial support from overseas organisations or states, and funding routes that may strengthen extremist or anti-democratic environments.

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15 News.belgium, 'Cadre légal relatif à l'interdiction administrative d'organisations radicales', press release, 25 July 2025, accessed 10 June 2026, https://news.belgium.be/fr/cadre-legal-relatif-linterdiction-administrative-dorganisations-radicales.

16 Chambre des représentants de Belgique, Compte rendu intégral avec compte rendu analytique traduit / Integraal verslag met vertaald beknopt verslag, CRIV 56 PLEN 043, séance plénière / plenumvergadering, 22 May 2025, accessed 10 June 2026, https://www.lachambre.be/doc/PCRI/PDF/56/ip043.pdf.

17 Government Offices of Sweden, Ministry of Justice, Ett regelverk för att motverka utländsk finansiering av verksamheter med antidemokratiska syften, Committee Terms of Reference Dir. 2025:52, published 28 May 2025, accessed 10 June 2026, https://regeringen.se/rattsliga-dokument/kommittedirektiv/2025/05/dir.-202552.

Lessons: Sweden potentially illustrates a financial-control model that may be easier to defend than a whole-movement ban. The likely limitation will be that funding controls do not directly criminalise domestic activity where groups can operate through local donations, volunteers or informal networks.

Australia: prohibited hate-group listing below the terrorism threshold

Status: Australia has not banned the Muslim Brotherhood. It has created a new prohibited hate-group framework that may be relevant to extremist organisations operating below the terrorism threshold.

Legal instrument used: Australia's prohibited hate-groups framework was introduced as part of the urgent legislative response to the Bondi Beach antisemitic terrorist attack of 14 December 2025. The attack was the immediate catalyst for the January 2026 Combatting Antisemitism, Hate and Extremism legislative package, which created a new mechanism for listing organisations that engage in, prepare, assist or advocate hate crimes on the basis of race, national origin or ethnicity.[18] On 5 March 2026, Hizb ut-Tahrir became the first organisation listed under the framework; the regulations came into effect on 6 March.[19] The Australian Parliamentary Joint Committee on Intelligence and Security stated that the framework enables the government to list organisations that promote violence or hatred and activates offences relating to membership, recruitment, provision of funds and support.[20]

How it works technically: This model fills the gap between ordinary hate-crime law and terrorist-organisation proscription. It is aimed at organisations engaged in hate, division or radicalisation but not necessarily meeting a terrorism-listing threshold.

Lessons: Australia provides the clearest Five Eyes example of a legal category below terrorism proscription. It is not Brotherhood-specific, but it shows how an allied democracy has created a new organisational listing regime for extremist groups outside the ordinary terrorist-organisation framework.

Israel: selective incapacitation, unlawful-association and terror-finance tools

Status: Israel has not banned the Muslim Brotherhood as a single global organisation. Its approach has instead been indirect and entity-specific. Israel has acted against Hamas, the self-described Palestinian branch of the Muslim Brotherhood; against the Northern Branch of the Islamic Movement in Israel; against Al-Aqsa mobilisation groups such as the Murabitat and Mourabitoun; and against Hamas-linked charitable and financial networks, including the Union of Good. The Southern Branch of the Islamic Movement, by contrast, has not been outlawed as such and has continued to operate through parliamentary politics. This makes Israel an important comparator: it has treated Brotherhood-derived structures as a security problem

18 Australian Government Attorney-General's Department, 'Exposure Draft of the Combatting Antisemitism, Hate and Extremism Bill 2026', publication, 13 January 2026, last updated 28 January 2026, accessed 10 June 2026, https://www.ag.gov.au/crime/publications/exposure-draft-combatting-antisemitism-hate-and-extremism-bill-2026.

19 Australian National Security, 'Hizb ut-Tahrir', listed prohibited hate groups, last updated 16 May 2026, accessed 10 June 2026, https://www.nationalsecurity.gov.au/what-australia-is-doing/prohibited-hate-groups/listed-prohibited-hate-groups/hizb-ut-tahrir.

20 Australian National Security, 'Listed Prohibited Hate Groups', last updated 28 May 2026, accessed 10 June 2026, https://www.nationalsecurity.gov.au/what-australia-is-doing/prohibited-hate-groups/listed-prohibited-hate-groups.

where they connect to Hamas, incitement, unlawful association or terror financing, but has not adopted a whole-of-movement Brotherhood ban.

Legal instrument used: Israel's model combines terrorist-organisation designation, unlawful-association powers, executive security decisions, police enforcement, asset freezing and terror-finance disruption. Israel's Brotherhood-related domestic action has been selective. In September 2015, Defence Minister Moshe Ya'alon declared the Murabitat and Mourabitoun illegal organisations, citing their role in escalating tension and violence around the Temple Mount. In November 2015, Israel outlawed the Northern Branch of the Islamic Movement after security authorities alleged links to Hamas and the Muslim Brotherhood: offices were closed, affiliated bodies were targeted, bank accounts were frozen and organisational activity became exposed to criminal liability.[21] [22] Israel has also used finance-focused tools against Hamas-linked charitable networks. The Union of Good, chaired by Yusuf al-Qaradawi and described by the US Treasury as an organisation created by Hamas leadership to transfer funds to Hamas, had already been blocked from operating in the West Bank and Gaza and was banned by Israel in 2008.[23]

How it works technically: Israel's model does not require the state to prove that "the Muslim Brotherhood" is one legally coherent transnational entity. Instead, it attaches legal consequences to specific operational manifestations of the wider Brotherhood-derived ecosystem. The key mechanism is therefore selective incapacitation. This is perhaps the clearest example of the "Al Capone" approach, a reference to the prosecutorial logic associated with Al Capone: where the state may struggle to secure conviction or prohibition on the most politically salient allegation, it pursues the concrete, documentable and legally provable offences that sustain the wider enterprise. In the Brotherhood context, this means not trying to criminalise an ideology, a religious current, or an amorphous transnational milieu. Instead, the state targets the legally visible infrastructure through which that milieu is alleged to operate: bank accounts, charities, companies, schools, offices, trustees, publications, fundraising networks, nominee-held assets, incitement platforms, foreign transfers and organisational fronts.

Lessons: Israel's experience suggests that a state may be able to disable Brotherhood-linked infrastructure more effectively through finance, front-organisation and ancillary enforcement than through an abstract ideological ban. The point is not that such enforcement should be pretextual; rather, it is that financial transfers, hidden control, charitable diversion, incitement networks, successor organisations and unlawful association are often more legally tractable than the global Brotherhood label itself.

21 Israel Ministry of Foreign Affairs, 'Behind the Headlines: Northern Faction of the Islamic Movement Organisation Outlawed', 17 November 2015, accessed 10 June 2026, https://www.gov.il/en/pages/behind-the-headlines-northern-faction-of-the-islamic-movement-organization-outlawed-17-november-2015.

22 Judah Ari Gross, 'Ya'alon Outlaws Islamic Groups Who Abuse Visitors on Temple Mount', The Times of Israel, 9 September 2015, accessed 10 June 2026, https://www.timesofisrael.com/yaalon-outlaws-islamic-groups-who-abuse-visitors-on-temple-mount/.

23 US Department of the Treasury, 'Union of Good', press release HP-1267, 12 November 2008, accessed 10 June 2026, https://home.treasury.gov/news/press-releases/hp1267.

Jordan: judicial dissolution followed by operational executive ban

Status: Jordan has imposed one of the strongest formal bans among UK allies. The Brotherhood's legal society was dissolved by final court ruling in 2020, and in April 2025 the Interior Ministry announced a sweeping operational ban.

Legal instrument used: Jordan's model combines judicial dissolution, associations law, executive public-order enforcement and asset recovery. On 23 April 2025, Interior Minister Mazen Farraya announced that the disbanded Muslim Brotherhood would be treated as an illegal society; all activities were banned; membership was illegal; promotion of its ideology was prohibited; offices would be closed; and publications by the group were prohibited.[24][25]

How it works technically: Jordan's case is a two-stage model. First, a court dissolution removed the group's legal status. Second, the executive operationalised the dissolution through office closure, asset confiscation, restrictions on publications and investigation of financial networks. Jordanian authorities also warned individuals holding Brotherhood assets that they could face legal action, including money-laundering charges, if they failed to regularise assets held for the dissolved society.[26]

Lessons: The 2020 dissolution alone appears not to have ended the Brotherhood's practical activity. The 2025 shift mattered because it paired legal illegality with enforcement: offices, assets, publications, membership and nominee-held property.

United Arab Emirates: terrorist designation plus state-security prosecution

Status: The UAE formally designated the Muslim Brotherhood and domestic affiliates as terrorist organisations in 2014 and has used state-security law, corporate confiscation and prosecution against Brotherhood-linked structures.

Legal instrument used: The UAE Cabinet's 2014 list of designated terrorist organisations, issued under Federal Law No. 7 of 2014 on combating terrorist crimes, included "The UAE Muslim Brotherhood" and al-Islah (as the Muslim Brotherhood is known in the UAE).

How it works technically: The UAE model links designation, prosecution and financial enforcement in one system. Once an organisation is designated, prosecutors can pursue organisational, financing, corporate-front and state-security offences. The state can dissolve companies, confiscate assets and imprison leaders or members.

Lessons: The UAE illustrates a high-incapacitation model: designation combined with criminal prosecution, corporate dissolution and asset confiscation. Its transferability is limited because it rests on a broader state-security framework and executive discretion than would be available in the UK.

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24 Ahram Online, 'Jordan bans Muslim Brotherhood group and closes its offices', Ahram Online, 23 April 2025, accessed 10 June 2026, https://english.ahram.org.eg/News/545080.aspx.

25 The Jordan Times, 'Interior minister announces ban of activities by Muslim Brotherhood, says it is illegal', 23 April 2025, accessed 10 June 2026, https://jordantimes.com/news/local/interior-minister-announces-ban-activities-muslim-brotherhood-says-it-illegal.

26 Ibid.

Saudi Arabia: executive terrorist designation and broad support criminalisation

Status: Saudi Arabia designated the Muslim Brotherhood as a terrorist organisation in March 2014.

Legal instrument used: Saudi Arabia's Interior Ministry list, following a royal decree, designated the Muslim Brotherhood alongside al-Nusra Front, al-Qaida branches and other groups.[27]

How it works technically: The Saudi model is a broad executive designation regime. It criminalises support, sympathy and promotion, not only operational terrorist conduct.

Lessons: The model is clear and forceful but not easily transferable to the UK. It is effective as a state-security deterrent, but it lacks the procedural detail and rights safeguards that would be required in the UK.

Egypt: full terrorist-entity model and financial compliance machinery

Status: Egypt outlawed the Muslim Brotherhood after the country's 2013 political rupture. After the Arab Spring, the Brotherhood's political arm, the Freedom and Justice Party, became Egypt's leading elected Islamist force, and Mohamed Morsi, a Brotherhood member, served as president from 2012 until his removal by the military amid mass protests in July 2013.[28] Egypt's subsequent criminalisation of the Brotherhood therefore reflected not only counter-terrorism logic, but the state's view that the movement had posed a direct challenge to the Egyptian constitutional and security order. Egypt declared the Brotherhood a terrorist organisation in December 2013 and then consolidated the ban through terrorist-entities and anti-terror legislation in 2015.

Legal instrument used: Egypt's model rests on terrorist-entity listing and anti-terror statutes, particularly Law No. 8 of 2015 on terrorist entities and Law No. 94 of 2015 on combating terrorism.

How it works technically: Egypt's model turns designation into financial and prosecutorial machinery. Listing produces consequences for assets, banking compliance, prosecution and organisational activity. The strength of the system is that it embeds the ban into ordinary compliance structures: financial institutions, prosecutors, police and administrative agencies all act from the listing.

Lessons: Egypt shows how designation can become systemic rather than symbolic. Its weakness, for comparative purposes, is legitimacy and transferability: broad definitions, limited adversarial safeguards and the post-2013 political context make it a poor procedural model for a UK democracy, even where its compliance machinery is instructive.

27 Deutsche Welle, 'Saudi Arabia names Muslim Brotherhood as terror group', DW, 7 March 2014, accessed 10 June 2026, https://www.dw.com/en/saudi-arabia-names-muslim-brotherhood-as-terror-group/a-17482621.

28 Encyclopaedia Britannica, 'Mohamed Morsi', last updated 24 April 2026, accessed 10 June 2026, https://www.britannica.com/biography/Mohamed-Morsi.

What the cases show

Across the cases examined, the most effective approaches, at least when it comes to applicability in the UK, were those that translated concern about the Brotherhood into legally actionable targets: named branches, registered associations, schools, charities, endowment funds, companies, office-holders, donors, bank accounts, property vehicles and successor organisations. Three patterns stand out.

First, entity specificity. France's action against particular schools, associations and funds; Jordan's action against specific offices, assets and nominee-held property; and the UAE's action against companies and identified committees all avoided the central definitional problem of outlawing a global movement in one stroke.

Second, financial traceability. The strongest enforcement systems compiled evidence about money, ownership, fundraising, foreign donations, beneficial control, asset-holding and nominee arrangements. In these cases, the decisive questions were "who funds this network, who controls it, who benefits from it, and what legal structure carries its activity?"

Third, front and successor sensitivity. Jordan and the UAE treated front entities, companies and asset-holding arrangements as central to enforcement. France's official analysis similarly describes a diffuse ecosystem of schools, associations, mosques and funds. A restriction that applies only to one named entity, but not to aliases, successor bodies, controlled charities, informal committees or nominee-held assets, is vulnerable to evasion.

The failure modes were also consistent. Austria shows the danger of broad raid-led enforcement where intelligence claims cannot be converted into sustainable individual or entity-level cases. Germany demonstrates the legal-object problem: movement-level bans are difficult where the state cannot identify a single coherent organisation capable of being prohibited. Egypt and Saudi Arabia show that broad anti-terror frameworks can produce rapid control, but at the cost of serious concerns about breadth, reviewability and the distinction between violent terrorism and nonviolent but objectionable ideology. France shows a more transferable middle path, but one that still requires careful procedure and evidence to avoid successful challenge or public backlash.

The broad comparative conclusion is that UK allies have not converged on a single model. Middle Eastern partners have used full prohibition. The United States has used branch-specific terrorism designations. France has used regulatory disruption. Austria has used criminal and symbols-law tools. Germany has emphasised monitoring and entity-specific law. The Netherlands, Belgium, Sweden and Australia illustrate a newer trend: movement toward legal categories below classic terrorism proscription. Together, these cases show that "banning the Brotherhood" is not one policy choice but a spectrum of legal techniques, each with different evidentiary burdens, enforcement consequences and rule-of-law risks.

Conclusion

For the UK, any whole-movement proscription would have to satisfy the Terrorism Act 2000 test: a legally identifiable organisation, evidence that it is “concerned in terrorism”, and a proportionate case for proscription. Where that threshold can be met, especially against specific foreign branches or affiliates linked to Hamas or armed activity, terrorism proscription, sanctions, immigration exclusions and asset freezes should remain available.

But the wider allied lesson is that the most durable strategy is likely to be tiered: targeted terrorism action where the evidence supports it; financial and immigration measures against foreign-linked actors; regulatory disruption of charities, schools, companies, public contracts and funding vehicles; and, perhaps most importantly, a civil-extremism regime aimed at anti-democratic organisational conduct below the terrorism threshold. Such a regime would need to be tightly drafted around extremist (as opposed to strictly terrorist) facilitation, support for violence, clandestine financing, systematic incitement, intimidation, radicalisation, foreign-directed influence, institutional capture or anti-democratic subversion—not ordinary religious conservatism or lawful political advocacy—and protected by notice, reasons, appeal rights, periodic review and clear safeguards against community-wide suspicion.

This report examines how Britain’s allies have acted. This will be followed by a report by the Henry Jackson Society, “How to Ban the Brotherhood in the UK,” which will turn these comparative lessons into a practical British roadmap: what can be done now under existing law, what would require new legislation, which institutions would need to act, and how a UK ban or restriction regime could be made legally durable, operationally meaningful and politically defensible.

Title: “How Did Our Allies Do It? Case Studies in Banning the Muslim Brotherhood”
By Emma Schubart

The Henry Jackson Society
Millbank Tower
21-24 Millbank
London SW1P 4QP

henryjacksonsociety.org

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