

Submission to the 2027 Post-Implementation Review of the Civil Contingencies Act 2004

Response to the Cabinet Office Call for Views from the Muslim Council of Britain – October 2026

Executive Summary

The Muslim Council of Britain (MCB) supports the Civil Contingencies Act 2004 as a sound framework for civil protection. We also support the Government's goal, set out in the UK Government Resilience Framework and the 2025 Resilience Action Plan, of whole-of-society resilience. That goal cannot be met while the voluntary, community and faith sector (VCFS) sits outside the statutory architecture of Part 1 of the Act.

Mosques are civic infrastructure. Mosques and Muslim-led community centres – as well as the many Councils of Mosques that co-ordinate them in many towns, cities, boroughs and regions - are open daily, hold halls and kitchens, are run by trusted staff and volunteers who reach often underserved households. At Grenfell, during the COVID-19 pandemic and in the disorder of summer 2024, they acted as rest centres, food hubs, providing a surge workforce, acting as public health messengers and anchors of calm.

Goodwill is not enough. This contribution often depends on personal relationships, not statutory design. It is uneven between areas, lost when key officers move on, and largely absent from Risk Registers, Local Resilience Forum (LRF) plans and exercises. The duty in Regulation 23 to “have regard” to voluntary organisations is too weak to change this.

A national network is ready to help. In terms of Muslim community sector bodies, several already provide expertise that LRFs can draw on: the **Muslim Charities Forum** (humanitarian and charity coordination), the **Consortium of Muslim Professional Networks** (professional skills and volunteers), the **British Islamic Medical Association** (clinical expertise and trusted health messaging), **Regional Councils of Mosques** (rapid reach into local congregations) and the **National Burial Council** (faith-compliant funeral sector management).

Our principal recommendations for this Review are:

1. Amend Regulation 23 so Category 1 responders must “establish and maintain” partnerships with the VCFS, as the Grenfell Tower Inquiry recommended, deliverable through recognised infrastructure and umbrella bodies.
2. Require a funded Faith and Community Sector Liaison on every Local Resilience Forum (LRF), and VCFS representation in LRF governance.
3. Standardise culturally competent risk assessments and make faith-compliant aspects of emergency response (e.g. burial / funeral sector management, as was seen during the COVID-19 pandemic) part of standard planning assumptions.
4. Formally include trusted faith leaders in warning, informing and disinformation response.
5. Fund a national faith resilience training and exercising programme, and a voluntary scheme recognising suitable places of worship as emergency rest centres and distribution hubs.
6. Engage specialist Muslim sector bodies as standing partners in national and local planning for health, death management, humanitarian response and community reach.

These measures are proportionate, consistent with subsidiarity and would benefit every community that turns to its local civic institutions in a crisis.

About the Muslim Council of Britain

A.1 The Muslim Council of Britain (MCB), founded in 1997, is the United Kingdom's largest Muslim umbrella body, with more than 500 member mosques, charities, schools, professional networks and regional councils. We work for the common good of society as a whole and encourage British Muslims and Muslim-led organisations to play a full part in public life. Through our Vision 2050 strategy, the MCB's goals are to unite British Muslims for effective action, inspire communities to excel, and serve both Muslim communities and wider society.

A.2 The MCB responds to this Call for Views as a voluntary, community and faith sector (VCFS) organisation operating across the United Kingdom. Our membership includes places of worship that have opened their doors as rest centres, food distribution points and places of refuge during floods, heat waves, the COVID-19 pandemic and periods of civil disorder. Within these spaces there are tens of thousands of staff and volunteers who are often ready to contribute as a surge workforce to support civic response. This submission draws on these community insights and builds directly on the MCB's response to the Cabinet Office's Strengthening Partnerships Consultation (September 2025)¹.

A.3 This document sets out our position in five substantive sections, followed by concise answers mapped to the questions in the online Call for Views.

1. Core mandate: whole-of-society resilience

1.1 The MCB supports the Civil Contingencies Act 2004 (CCA 2004)² as a sound foundation for civil protection, and supports the Government's ambition, set out in the UK Government Resilience Framework and the 2025 Resilience Action Plan, to build a whole-of-society approach to resilience³. Our central argument is that this ambition cannot be realised while the voluntary, community and faith sector remains outside the statutory architecture of Part 1 of the Act. A whole-of-society system must be designed around the civic institutions that society actually turns to in a crisis.

1.2 For many British Muslims, and for the neighbourhoods around them, that institution is the local mosque. Mosques and Muslim-led community centres – as well as the many Councils of Mosques that co-ordinate them in many towns, cities, boroughs and regions – are open daily, hold large halls and kitchens, operated by trusted staff and volunteers, communicate in community languages, and reach households that statutory services often struggle to reach. During the Grenfell Tower fire, the Al-Manaar Muslim Cultural Heritage Centre (MCHC) in North Kensington became a de facto rest centre and distribution hub within hours. Many faith-led organisations mobilised to support flood-relief efforts during Storm Desmond⁴ and similar local crisis events. And during the COVID-19 pandemic, mosques ran food banks, provided a Nightingale Mosque staffed with medics for surge capacity, delivered medicines, hosted vaccination clinics and carried public health messaging^{5,6}.

¹ Muslim Council of Britain. *Submission to the Strengthening Partnerships Consultation by the Cabinet Office (Voluntary, Community and Faith-Based Sector and Emergency Responders)*, September 2025. <https://mcb.org.uk/resources/consultations-submissions>

² Civil Contingencies Act 2004. <https://www.legislation.gov.uk/ukpga/2004/36/contents>

³ Cabinet Office. *The UK Government Resilience Framework*, December 2022, <https://www.gov.uk/government/publications/the-uk-government-resilience-framework>; Cabinet Office, *UK Government Resilience Action Plan*, 2025, <https://www.gov.uk/government/publications/uk-government-resilience-action-plan>

⁴ Muslim Council of Britain. *Muslims Help with Flood Relief*. 2015. <https://mcb.org.uk/storm-desmond-floods/>

⁵ Muslim Council of Britain. *Together in Tribulation: British Muslims and the COVID-19 Pandemic*, November 2020 <https://mcb.org.uk/covid-report/>

⁶ Muslim Charities Forum. *The Neighbours Next Door research report: The Story of Muslim Organisations Responding to COVID-19*, August 2020 <https://www.muslimcharitiesforum.org.uk/resources/the-neighbours-next-door-research-report/>

1.3 Disproportionate impacts are foreseeable and must be planned for. National emergencies do not fall evenly. During the COVID-19 pandemic, the Government's own analysis of disparities found markedly higher risks of death among several ethnic minority groups, including British Bangladeshi and Pakistani communities, driven by overcrowded and multigenerational housing, frontline occupations, deprivation and pre-existing health inequalities.⁷ The same structural factors shape exposure to flooding in low-lying urban areas, to heat in high-density housing, and to fire in high-rise blocks. Because these patterns are known in advance, they should be addressed in risk assessment and planning, not discovered during response. The UK Covid-19 Inquiry in 2025 also found similar themes⁸.

1.4 Death management and faith-compliant burial in future mass disease events should now be better understood following Covid-19. In common with other faith groups, Islamic practice requires a prompt burial, ritual washing and the avoidance of cremation. Excess-death and mass-fatality plans should include early engagement with Muslim burial societies and funeral providers⁹, arrangements for timely release of the deceased, coroner and registration capacity outside normal hours, and assured burial capacity. During the pandemic, concerns that powers over the disposal of bodies could override religious wishes caused acute distress and had to be addressed through changes during the passage of emergency legislation.¹⁰ Pre-planning would prevent that distress recurring.

1.5 That contribution has, however, often depended on goodwill and personal relationships rather than on statutory design. It is therefore uneven between areas, fragile when key individuals move on, and largely invisible in Risk Registers, LRF plans and exercises. The current duty in Regulation 23 of the Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005,¹¹ to "have regard" to the activities of relevant voluntary organisations, is too weak to correct this.

1.6 The MCB therefore asks the Review to:

- implement the Grenfell Tower Inquiry recommendation by amending Regulation 23 to require Category 1 responders to "establish and maintain" partnerships with the VCFS, delivered primarily through recognised infrastructure bodies so that small, volunteer-led organisations are not overburdened;
- require every Local Resilience Forum (LRF) to designate a Faith and Community Sector Liaison and to include faith sector representation in its governance and exercises;
- embed faith-informed and culturally competent aspects into emergency response planning, such as death management, food provision, language access and trusted communication, in risk assessment and planning guidance; and
- fund the faith sector's preparedness through a co-funded national training, exercising and recognised-hub programme.

1.7 These measures are proportionate. They strengthen the existing partnership model and the principle of subsidiarity rather than replacing them, and they would improve outcomes for every community that relies on its local institutions in an emergency, not only Muslim communities.

⁷ Public Health England. *Disparities in the risk and outcomes of COVID-19*, June 2020, <https://www.gov.uk/government/publications/covid-19-review-of-disparities-in-risks-and-outcomes>.

⁸ UK Covid-19 Inquiry. *Faith groups and places of worship Roundtable Summary Report*. 2025. <https://covid19.public-inquiry.uk/roundtables/faith-groups-and-places-of-worship-roundtable-summary-report/>

⁹ Muslim Council of Britain. *COVID-19 Muslim Burial Resources*, <https://mcb.org.uk/covid-19-muslim-burial-resources/>.

¹⁰ Coronavirus Act 2020. Schedule 28 (powers relating to the transportation, storage and disposal of dead bodies). <https://www.legislation.gov.uk/ukpga/2020/7/contents>

¹¹ The Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 (SI 2005/2042), Regulation 23. <https://www.legislation.gov.uk/uksi/2005/2042/contents>

2. Formalising Category 1 partnerships: the Grenfell and Regulation 23 context

2.1 The MCB strongly endorses statutory partnership. The Grenfell Tower Inquiry recommended amending Regulation 23 so that Category 1 responders must “establish and maintain” partnerships with the VCFS, replacing the existing duty to “have regard” to relevant organisations.¹² The MCB supports that amendment without qualification and urges the Review to carry it into the revised Regulations, rather than relying only on non-statutory levers.¹³ A duty to “have regard” is satisfied by consideration; a duty to establish and maintain is satisfied only by a functioning relationship. That distinction is precisely what Grenfell exposed.

2.2 The structural barriers faced by faith and minority communities. In our experience, and that of many across our membership, the barriers are not a lack of willingness on either side but a lack of structure and co-design::

- **Relationship-dependent communication.** Engagement often rests on a single named contact in a council or police team. When that person moves post, the relationship, and the local knowledge it carries, is lost.
- **Late or reactive engagement.** Faith organisations are frequently contacted during a response, when needs are already acute, rather than during risk assessment and planning, when their capabilities could be mapped and tested.
- **Invisibility in planning documents.** Places of worship are rarely recorded in Risk Registers or LRF capability registers as assets, despite the ability of many to function as rest centres and distribution points.
- **Unclear entry points.** There is no consistent route for a mosque staff or volunteers to find out who leads VCFS engagement on its LRF, what is expected of it, or how to raise concerns.
- **Capacity asymmetry.** Most mosques are volunteer-led. As the MCB told the Strengthening Partnerships Consultation in 2025, only a relatively small fraction of Muslim-led organisations have staff dedicated to resilience, so engagement designed solely around weekday day-time only working patterns can unintentionally exclude them.
- **Public communications** - The COVID inquiry Module 2 report¹⁴ outlined that in public communications around emergency scenarios, it is important for public authorities to strike a balance between fear/caution and optimism. It also spoke of the value of co-design community messaging and that having an understanding of inequalities “*can help to inform the design of more targeted interventions and allow for more tailored information to be provided to communities at greater risk.*”

2.3 Informal goodwill fails when it is needed most. Goodwill performs adequately in short, local incidents. It does not survive prolonged or acute crises, in which responders are rotated, priorities shift and the volume of decisions overwhelms personal networks. The COVID-19 pandemic illustrated this: where LRFs had pre-existing faith partnerships, messaging, food provision and later vaccine uptake were faster and better targeted; where they did not, relationships had to be built from scratch under extreme pressure. Collaboration must therefore be embedded in structures that are resilient to personnel change.

2.4 What “establish and maintain” should mean in practice. The MCB proposes that statutory guidance accompanying an amended Regulation 23 should define the duty as requiring, at minimum:

¹² Grenfell Tower Inquiry. *Phase 2 Report*, September 2024, <https://www.grenfelltowerinquiry.org.uk/phase-2-report>; as summarised in Cabinet Office, *Civil Contingencies Act 2004 Post-Implementation Review 2027: Call for Views*, 2026, section 3.

¹³ Cabinet Office. *Strengthening Partnerships Consultation: Outcome Report*, December 2025, <https://www.gov.uk/government/consultations/strengthening-partnerships-consultation/outcome/outcome-report-html>.

¹⁴ UK Covid-19 Inquiry. *Module 2, 2A, 2B, 2C Report – Core decision-making and political governance*. 2025. <https://covid19.public-inquiry.uk/documents/module-2-full-report/>

1. a written VCFS partnership agreement for each LRF area, reviewed at least every three years;
2. named, role-based (not person-based) points of contact on both sides, with documented handover arrangements;
3. VCFS and faith sector participation in risk assessment, planning, exercising and debriefs, not only in response;
4. a register of VCFS and faith capabilities, including places of worship able to act as rest centres or hubs; and
5. an annual statement in the LRF's assurance return on the state of VCFS partnership.

2.5 Proportionality and delivery through infrastructure bodies. To avoid placing unmanageable burdens on small, volunteer-led organisations, the duty should be capable of being discharged through recognised infrastructure and umbrella bodies: the Voluntary and Community Sector Emergencies Partnership (VCSEP)¹⁵, local VCS emergency partnerships, regional Councils of Mosques or equivalent organisations where they exist¹⁶. This can help give responders a clear point of contact and gives faith organisations a single, supported route into the system.

3. Operationalising faith infrastructure for resilience

3.1 Faith-led tools are already providing blueprints. The MCB's Mosque Security Framework shows what hyper-local resilience looks like when it is designed with communities rather than for them. Together they equip mosque management teams and trustees to assess their own risks, prepare continuity and evacuation plans, protect congregations and premises, and connect with emergency responders before an incident, not during it. Such tools are naturally aligned with the subsidiarity principle of the CCA 2004: they build capability at the level closest to the people affected while connecting it to the multi-agency system. The Review should recognise community-designed tools of this kind in statutory guidance and encourage LRFs to adopt and adapt them.

3.2 Expanded multi-agency exercising. Faith leaders and VCFS partners should be routinely included in LRF exercises and in national exercises such as Exercise Pegasus.¹⁷ Including them tests what plans assume about community behaviour, trust and communication; reveals gaps in culturally competent provision such as death management and food supply; and builds the relationships that responders rely on in real events. The MCB recommends that national exercise programmes include at least one faith-sector participant in each scenario affecting community welfare, and that LRFs include the VCFS in at least one exercise in each exercise cycle.

3.3 Recognised emergency shelter and distribution hubs. Larger mosques and Islamic centres already have halls, kitchens, washing facilities, parking and volunteer workforces, or the networks to mobilise volunteer workforces. Such 'surge workforces' are often mobilised in non-emergency scenarios, for example mobilising thousands of healthcare workers to deliver free CPR training (on top of their busy day jobs) in the annual BIMA Lifesavers campaign¹⁸ as well as stewarding and volunteer management at large events or festivals like Eid. The MCB proposes a voluntary designation scheme under which suitable places of worship can be assessed and recognised by their LRF as emergency rest centres, warm spaces or distribution hubs. Recognition should come with:

1. a written memorandum of understanding setting out activation, roles, costs and duration;
2. a pre-activation site assessment covering accessibility, safety and capacity;
3. clarity on insurance, indemnity and reimbursement of reasonable costs; and

¹⁵ Voluntary and Community Sector Emergencies Partnership. <https://vcsep.org.uk>

¹⁶ Muslim Council of Britain. *Local Muslim Representation: Empowering Council of Mosques and Local Umbrella Organisations*. 2022. <https://mcb.org.uk/resources/local-muslim-representation-2022/>

¹⁷ Exercise PEGASUS, the UK-wide Tier 1 pandemic preparedness exercise held in autumn 2025. See NHS England, *Pandemic preparedness and Exercise Pegasus*, <https://www.england.nhs.uk/long-read/pandemic-preparedness-exercise-pegasus/>, and the Written Ministerial Statement of 4 November 2025 (HCWS1015).

¹⁸ British Islamic Medical Association. *Life Savers Campaign*. <https://britishima.org/work/lifesavers/>

4. small capital grants for resilience equipment such as generators, bedding and communications.

3.4 Data and situational awareness. With appropriate data protection safeguards, LRFs should be able to draw on mapped faith and community assets, contact cascades and anonymised needs intelligence held by trusted community bodies. A shared, role-based contact directory, maintained jointly by the LRF and the relevant infrastructure body, would reduce dependence on individuals.

4. A ready-made network: signposting to specialist Muslim organisations

4.1 LRFs and national planners do not need to build faith-sector capability from scratch. In the context of the British Muslim community, the sector already has numerous specialist national and regional bodies whose expertise maps directly onto the planning gaps identified above. The MCB recommends that Category 1 responders, LRFs and lead government departments engage the organisations such as those outlined in the table below:

Organisation	What it brings to resilience	Where LRFs and planners should engage it
Muslim Charities Forum ¹⁹	Infrastructure body for Muslim charities, with humanitarian, relief and community-service expertise	Humanitarian assistance, rest centres, food and welfare distribution, recovery, VCFS co-ordination
Consortium of Muslim Professional Networks ²⁰	Networks of Muslim professionals across sectors, providing skills, volunteers and specialist advice	Skilled volunteer surge, legal, engineering, IT and communications support, workforce and professionalisation
British Islamic Medical Association (BIMA) ²¹	Clinical expertise and trusted, faith-sensitive health messaging, as shown during the COVID-19 pandemic	Pandemic and public health planning, vaccine and health communications, health equity and mental health
Regional Councils of Mosques	Direct, rapid reach into local mosques and congregations, and local knowledge of buildings and volunteers	Warning and informing, community tension monitoring, rest centres and hubs, local exercises
National Burial Council ²²	Co-ordination of Muslim burial and funeral organisations and expertise in faith-compliant death management	Excess deaths and mass-fatality planning, mortuary, coroner and registration arrangements, burial capacity

4.2 Other bodies can support specific needs, including the Federation of Student Islamic Societies (FOSIS)²³ for students and young people, the National Zakat Foundation (NZF)²⁴ for emergency financial hardship, and Muslim mental health organisations for psychosocial recovery²⁵.

¹⁹ Muslim Charities Forum, www.muslimcharitiesforum.org.uk.

²⁰ Consortium of Muslim Professional Networks, www.consortiumgb.org

²¹ British Islamic Medical Association, www.britishima.org

²² National Burial Council, www.nbc.org.uk

²³ Federation of Student Islamic Societies, www.fosis.org.uk

²⁴ National Zakat Foundation, www.nzf.org.uk

²⁵ Muslim Mental Health Hub, www.muslimmentalhealthhub.org

5. Concluding policy recommendations

5.1 The MCB asks the Review to adopt the following thirteen recommendations.²⁶

No.	Recommendation	Mechanism
1	Amend Regulation 23 so that Category 1 responders must “establish and maintain” partnerships with the VCFS, as recommended by the Grenfell Tower Inquiry	Amendment to the 2005 Regulations
2	Allow the duty to be discharged through recognised infrastructure bodies to protect volunteer-led organisations from disproportionate burden	Regulations and statutory guidance
3	Mandate a Faith and Community Sector Liaison for every LRF, with a role-based remit, protected time and funding	Regulations and LRF funding settlement
4	Include VCFS and faith sector representation in LRF governance, including a standing seat or formal sub-group	Statutory guidance
5	Standardise a culturally competent risk assessment methodology for Community Risk Registers, using local demographic, language and faith data alongside the National Risk Register ²⁷	National guidance and templates
6	Make faith-compliant death management, food provision, prayer space and language access standard planning assumptions where local need is indicated	LRF planning guidance
7	Publish transparent national guidelines for VCFS co-production of plans, exercises and debriefs	Cabinet Office guidance
8	Establish a co-funded national faith resilience training programme, delivered through infrastructure bodies	Resilience Action Plan funding
9	Require VCFS participation in at least one LRF exercise per cycle, and include faith participants in relevant national exercises	Exercising guidance
10	Create a voluntary designation scheme recognising suitable places of worship as emergency rest centres and distribution hubs, with MoUs, cost reimbursement and capital grants	Guidance and grant scheme
11	Report annually on the state of VCFS partnership in each LRF area, and assess equality impacts in all emergency regulations made under Part 2	LRF assurance and Part 2 safeguards
12	Engage specialist Muslim sector bodies – including the Muslim Charities Forum, ConsortiumM, BIMA, regional Councils of Mosques and the National Burial Council – as standing partners in relevant planning	Statutory guidance and LRF partnership agreements

5.2 The MCB would welcome the opportunity to contribute to the wider engagement planned alongside this Call for Views, and support the Cabinet Office, regional combined authorities, the devolved governments and LRFs on the design and piloting of these measures.

ENDS.

²⁶ Cabinet Office. *Civil Contingencies Act 2004 Post-Implementation Review 2027: Call for Views*, July 2026, open 14 July to 5 October 2026.

²⁷ Cabinet Office. *National Risk Register 2025*, <https://www.gov.uk/government/publications/national-risk-register-2025>.