



Home Office

Guidance on the Foreign Influence Registration Scheme (FIRS): Political Influence Tier

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Glossary of key terms

FIRS	Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023.
Arrangement	Any type of agreement, whether formal or informal. This could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement. Further detail is in chapter 3 condition 1 .
Foreign power	Has the meaning given by Section 32 of the National Security Act 2023. Further detail is in chapter 3 condition 1 .
Political influence activities	A communication, public communication or provision of money, goods or services intended to influence a political matter. Further detail is in chapter 3 condition 3 .
Exemption from registration	A circumstance in which registration requirements do not apply. Further detail is in chapter 15 .
Person	An individual or other person who is not an individual, such as a company.
Registrant	A person required to register under FIRS.
Information notice	A notice issued under section 75 of the National Security Act 2023 requiring the recipient to provide further information related to arrangements or activities registerable under FIRS.
Specified foreign power	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
Specified foreign power-controlled entity (FPCE)	An entity which is controlled by a foreign power, and which has been specified through regulations under the enhanced tier of FIRS.

Chapter 1: About this Guidance

The Foreign Influence Registration Scheme (FIRS) is a two-tier scheme which ensures transparency of foreign influence in UK politics and provides greater assurance around the activities of certain foreign powers or entities that may pose a risk to the UK's safety and interests. It is contained within Part 4 of the National Security Act 2023.

This guidance explains the requirements of the political influence tier of FIRS. It is intended for those who may be in scope of the political influence tier of the scheme to help determine whether, and if so how, the registration requirements apply to them.

Additional sector-specific guidance has been provided for [business](#), [media](#), [academia](#), [charities](#) and [defence](#) sectors.

Separate guidance has been produced for the [enhanced tier](#). Where an arrangement would fall within the scope of both the political influence tier and enhanced tier, because it involves carrying out political influence activities on behalf of a specified foreign power, only registration under the enhanced tier is required.

Guidance is also available on the [information required at registration and the public register](#), [information notices](#) and on [how the scheme is administered](#).

This guidance is intended to explain the key requirements of the FIRS scheme, contained within Part 4 of the National Security Act 2023. However, it remains the responsibility of those in scope of the scheme to comply with the legislation based on their own specific circumstances.

Chapter 2: Introduction to the Political Influence Tier

1. The political influence tier aims to increase transparency of foreign power influence in UK political affairs. This tier requires registration of arrangements to carry out political influence activities in the UK at the direction of a foreign power. It applies to arrangements with all foreign powers except the Republic of Ireland.
2. The information provided at registration is important in providing a clear picture of foreign power-directed political influence in the UK.
3. Certain information registered under this tier will be included on a public register. Further details about the public register can be found in the [guidance on the information required at registration and the public register](#).
4. The UK continues to welcome open and transparent engagement from foreign powers. Registration of an arrangement does not, in itself, mean that it is illegitimate or that the political influence activities taking place as part of it are necessarily undesirable. Those who register fully and accurately should not be regarded as a national security risk, but as supporting the resilience of the UK and its institutions in the face of state threats.

Chapter 3: Requirements of the political influence tier

Conditions for registration

5. In accordance with section 69 of the National Security Act 2023, a person is required to register under the political influence tier when **all** of the below four conditions are met. It is recommended that registration is completed on the FIRS online registration portal¹.

Condition 1: A person makes an arrangement (whether formal or informal) with a [“foreign power”](#).

Condition 2: The arrangement involves a [“direction”](#) from the foreign power.

Condition 3: The direction is to carry out [“political influence activities”](#) in the UK (whether by the registrant, or with or through someone else).

Condition 4: That no [exemptions](#) apply to the arrangement or activities.

6. Under the scheme, it is the arrangement that must be registered, not each individual activity that will be carried out. Registrants are required to update their registration when there is a “material change” to the information (see [chapter 9](#)) and to comply with any [information notices](#).

Condition 1 – Arrangement with a “foreign power”

7. An “arrangement” includes, but is not limited to:
 - A formal arrangement such as a contract;
 - A non-legally binding agreement such as an MOU;
 - An order (or similar agreement) for a good or service, to be followed up with a bill or invoice;
 - An informal quid pro-quo agreement.
8. Conversations or correspondence with a foreign power that do not materialise into an arrangement or agreement to carry out registerable activities in the UK do not require registration.

¹ Alternative forms of registration are also available, including for circumstances where a registration would contain sensitive details not suitable for the online registration portal.

9. A foreign power is defined in the National Security Act 2023 (section 32) as any of the following:
 - a) the sovereign or other head of a foreign State,
 - b) a foreign government, or part of a foreign government (for example, a ministry or department of a foreign government);
 - c) an agency or authority of a foreign government, or of part of a foreign government,
 - d) an authority responsible for administering the affairs of an area within a foreign country or territory (for example, a local government authority in a foreign country);
 - e) a political party which is a governing political party of a foreign government.

10. If an arrangement is formed with an employee of one of the above when acting in this capacity, it is treated as an arrangement with a foreign power. For example, if a person enters into an arrangement with a foreign civil servant in relation to their role as a civil servant the condition would be met. A person entering into an arrangement with a foreign civil servant on a matter unrelated to their role as a civil servant (e.g. if they are separately the trustee of a charity) would not meet the condition.

11. An individual member of a governing political party could be considered a foreign power, but only where they hold a position which gives them authority to act on behalf of the party (for example, a party treasurer). Arrangements with them would only be registerable when they are acting in this capacity. For example, an arrangement with a party secretary who is also a director of state-owned enterprise would only need to be registered if it is made in their capacity as party secretary (and not as the director of the state-owned enterprise).

12. The Republic of Ireland, Isle of Man, Channel Islands² and the British Overseas Territories³ are **not** considered foreign powers.

13. Groups of countries or intergovernmental organisations, such as the European Union (EU) and the Association of Southeast Asian Nations (ASEAN) are not considered foreign powers. However, individual countries forming part of these groups or intergovernmental organisations are foreign powers. Accordingly, if a person enters into an arrangement with the EU (including but not limited to the European Parliament, European Council, Council of the EU, the European Commission and decentralised agencies of the EU such as the European Centre for Disease and Prevention Control) this condition would not be met. The condition would be met if the arrangement was with an EU member state.

² The Channel Islands are the Bailiwick of Jersey, Bailiwick of Guernsey and Sark

³ The British Overseas Territories are Akrotiri and Dhekelia, Anguilla, Bermuda, British Antarctic Territory, British Indian Ocean Territory, British Virgin Islands, Cayman Islands, Falkland Islands, Gibraltar, Montserrat, Pitcairn Islands, Saint Helena, Ascension and Tristan da Cunha, South Georgia and the South Sandwich Islands and Turks and Caicos Islands

14. An entity may be considered an “agency or authority of a foreign government” if the entity carries out public functions on behalf of the government, for example:
- the entity is responsible for overseeing the implementation of government decisions, policies or laws (for example, industry regulators or standard-setting bodies); or
 - the entity is responsible for enforcing laws (for example, a police force); or
 - the entity carries out practical or administrative work of government (for example, the issuing of passports or the operation of prisons).
15. Companies which are owned by, or controlled by, foreign governments (as may be the case with a state-owned enterprise) are not foreign powers by virtue of this ownership or control. Arrangements with commercial entities do not require registration, even if these entities are state-owned. Only arrangements with a foreign power are in scope of the FIRS political influence tier. Please see [chapter 11](#) for further details.
16. A political party is a governing political party of a foreign government if either:
- a) Individuals working for the government hold their posts as a result of being members of that political party; or
 - b) The political party directs or controls those working for the government in carrying out their official functions.
17. Foreign political parties which are not the governing party of a foreign country are not foreign powers.
18. Unions or other associations affiliated to a governing political party would not be considered a foreign power simply by virtue of this affiliation. They would need to have been given the authority to act on behalf of the party before they are considered foreign powers.
19. There are no obligations on foreign powers themselves (including people directly employed by foreign powers) to register, providing that they do not make a misrepresentation about their activities or the capacity in which they are acting. Only those who are in an arrangement with a foreign power may be required to register.
20. The conditions at Schedule 13 of the National Security Act 2023 (related to control by a foreign power) have no relevance to the definition of a foreign power and are therefore not relevant to this condition or the political influence tier of the scheme.

Condition 2 – Meaning of a “direction”

21. “A “direction” is an order or instruction to act with which a person is obliged or compelled, whether formally or informally, to comply.

22. The following may be examples of “direction” from a foreign power:

- A contract signed with a foreign power which requires activities to be carried out in the UK;
- Coercion or other pressure by a foreign power to carry out activities in the UK (for example, where there may be negative consequences for not carrying out the activity).

23. A **request** from a foreign power may be considered a direction if, for example, any of the following apply:

- the foreign power has power or authority over the registrant;
- there is an element of control to the request;
- a benefit or reimbursement (for example, payment, compensation, reimbursement of travel expenses or subsistence, employment, academic honours or future favourable treatment) is to be received as a result of the registrant conforming with the request;
- there is coercion or a threat alongside the request; or
- there is a risk of negative consequences associated with a failure to comply with the request (e.g. a significant loss of revenue).

24. There will need to be a link between the direction and the political influence activity ([condition 3](#)) for this condition to be met. For example, if a company receives a general direction or funding from a foreign power and chooses to carry out political influencing not directly connected to the direction or funding then the condition would not be met.

25. The fact that a foreign power **has the ability or right to** direct the activities of an individual or organisation (as may be the case within the legal system of some countries) does not trigger a registration requirement. Only where activities are **actually** directed will this condition be met.

26. Whilst funding from a foreign power does not, in itself, constitute a direction, it may form part of a direction if it has conditions attached for it to be used in a particular way. Unrestricted grants which give the grantee the autonomy to use the funding in a way which they see fit are not considered a direction. Where an individual or organisation applies for form of funding (for example, a grant) from a foreign power, and that grant is approved without specific conditions being placed on the activities, this would not in itself constitute a direction.

27. Where funding is provided in general support of the work of an organisation, without conditions that it is to be used for a particular purpose, this would not require registration. Similarly, where funding is provided by a foreign power in support of a project or initiative that is happening anyway, and that funding does not influence how the project or initiative is carried out, that does not constitute a direction.

28. Ownership, or part-ownership of an entity by a foreign power, does not necessarily mean that activities of such entities are directed by a foreign power. Entities which are owned by foreign powers should see [chapter 10](#).
29. However, entities may be required to register where they are given a general overall direction by the foreign power, and the carrying out of political influence activities in the UK ([condition 3](#)) form an inevitable part of that direction. For example:
- An entity which is given an overall direction by the foreign power to seek lower trade tariffs for businesses from the country may be required to register, as they inevitably need to carry out political influence activities as part of their overall direction.
 - A state-owned enterprise which is given an overall direction by the foreign power to invest in the UK may not be required to register, as they do not necessarily have to carry out political influence activities to fulfil their overall direction.
30. Communications or liaison between UK political parties and political parties of other countries or political foundations (even where such a party is a foreign power) will not constitute “direction”, if there is no order or instruction to act. For example, joint training involving sister political parties will not be in scope of registration requirements.
31. Cultural, political, language or economic institutes with links to a foreign power may be required to register if the foreign power provides overall direction to the institute to promote a particular agenda, and political influence activities ([condition 3](#)) are an inevitable part of fulfilling their objectives. In these cases, the institute is likely to make a single registration related to their overall arrangement with the foreign power, which it updates if the nature of the arrangement or activities change (please see [chapter 9](#)).

Condition 3 – Definition of “political influence activities”

32. An activity is considered a “political influence activity” (section 70 of the National Security Act 2023) if it meets **both** of the below criteria.

Criterion 1: The activity is one of the following:

- A communication (for example, an email, letter or meeting) to a senior public official or politician (see [Annex A](#))
- A public communication (for example, the publication or production of an article) except where it is reasonably clear that it is made at the direction of a foreign power (for example, if an article is labelled in a way that makes this fact clear, or if the writer mentions this fact in the article itself);

- The provision of money, goods or services to an individual or entity in the UK (for example, providing consultancy services to a UK business).

Activities are only in scope of FIRS if they are carried out in the UK.

Criterion 2: The purpose, or one of the purposes, of the activity is to influence one of the following:

- An election or referendum in the UK;
- A decision of a Minister or Government department (including a Minister or Government department of Wales, Scotland or Northern Ireland);
- The proceedings of a UK registered political party (such as their manifesto commitments);
- A Member of the House of Commons, House of Lords, Northern Ireland Assembly, Scottish Parliament or Senedd Cymru (when acting in their capacity as such).

33. Formal responses to UK government consultations or invitations to tender do not require registration, as they are not a direct communication to a senior public official or politician (see [Annex A](#)). Other communications outside of the formal response may still require registration if they are made to a relevant individual.

34. For the purpose of criterion 1, a public communication could include, but is not limited to:

- An article in a newspaper, magazine or journal (whether available to a wide audience or only to subscribers);
- Information published on a website;
- A document available for download on a website;
- A social media post;
- An online blog post;
- A speech made in a public setting.

The communication would have to be made in a UK publication, or intended at an audience in the UK, before it is considered to be taking place in the UK.

35. For the purpose of criterion 2, an “election” includes:

- General elections and other UK Parliamentary Elections;
- Elections to the Scottish Parliament, Senedd Cymru and the Northern Ireland Assembly;
- Local government elections;
- Elections of Police and Crime Commissioners;
- Combined authority mayoral elections;
- Combined County Authority mayoral elections;
- Local mayoral elections;

- London mayoral and Greater London Authority elections.
36. For the purpose of criterion 2, a “decision” of a Minister or Government department includes, but is not limited to, administrative or operational decisions (for example the decision to approve a visa application) or decisions about Government policy, legislation or spending. It does not include decisions which are beyond the realm of Government, for example, decisions which would ordinarily be made by an independent regulator.
37. For the purpose of criterion 2, a “Government Department” includes ministerial departments and non-ministerial departments, as listed in [departments, agencies and public bodies](#). It also includes the [directorates of the Scottish Government](#), [groups of the Welsh Government](#) and [departments of the Northern Ireland Government](#). It does **not** include other public bodies, such local councils.
38. The following are examples of political influence activities:
- A letter to a Minister encouraging them to impose tougher regulations on a particular industry;
 - A meeting with a Member of Parliament seeking to persuade them to vote in a particular way in Parliament;
 - An email to a Scottish Minister intended to persuade them to increase the teaching of art and music in Scottish primary schools;
 - A letter to the Head of a political party encouraging them not to make a particular policy commitment;
 - A newspaper article making policy recommendations for the UK; Government, where it is not reasonably clear that it is written or published at the direction of a foreign power;
 - Investing money in an MP’s constituency with a view to influencing the actions or votes of the MP.
39. The following are examples of activities which are **not** considered to be political influence activities:
- An email to a “general enquiries” mailbox of a government department outlining the case why an application should be considered favourably (this would not meet criterion 1, as the communication is not made to a senior public official or politician);
 - An article published seeking to influence a UK government decision, where it is clearly labelled that it is written or published at the direction of a foreign government (this would not meet criterion 1 as it is reasonably clear that it is made at the direction of a foreign power);
 - A meeting with an elected mayor or councillor, intended to influence a local government decision (this would not meet criterion 2 unless it were also intended to influence a **national** government decision);
 - An email to a Chief Constable of a police force offering services as a supplier of new security equipment for their police stations (this would not meet criterion 2 as the decisions of police forces are not in scope);

- An article published encouraging British tourists to visit a foreign country (this would not meet criterion 2 as it is not seeking to influence a political matter);
- An evening reception intended to encourage UK nationals to invest in a foreign country (this would not meet criterion 2 as it is not seeking to influence a political matter).

40. Registration is only required where **activity** is carried out in the UK (for example, where a meeting with a Member of Parliament occurs in the UK). It does not matter whether the **arrangement** is made in the UK or overseas, or where the parties of the arrangement are based. Where an activity starts abroad, but has effect in the UK, this may be in scope of registration requirements. For example:

- An email sent from abroad seeking to influence a Minister of the UK Government;
- A payment remitted from abroad to a person in the UK in order to influence a political matter;
- An article, written by an individual abroad for publication by a UK newspaper, seeking to influence the public about a UK election where it is not clear that the article has been written at the direction of a foreign power;
- Information posted on a foreign website but which is clearly targeted at a UK audience (for example, information which is specifically targeted at UK voters);
- A meeting held virtually whereby individuals abroad seek to influence senior civil servants in the UK about a government decision.

41. However, where an activity takes place entirely abroad (for example, a meeting with a UK Minister during a visit overseas), this is **not** in scope of registration requirements. The Republic of Ireland, Channel Islands, Isle of Man and British Overseas Territories count as “abroad” for these purposes.

42. Political influence activities targeted at foreign officials in the UK (for example, the ambassador of a foreign country in the UK) which intend to influence political matters in that country do **not** require registration.

43. Where an organisation is given a general direction to carry out political influence activities across multiple jurisdictions, condition 3 is likely to be met if some of those activities are carried out in the UK. However, in such cases, registration would only be required in relation to activities which are carried out in the UK.

44. It is possible that some activities which seek to influence multilateral policies to which the UK is a party could require registration, given these policies still constitute a decision of the UK Government. However, it would still be necessary for political influence activities to take place in the UK before registration is required.

Condition 4 – Exemptions from the political influence tier

45. There are a number of exemptions from the requirements to register under the political influence tier (these are set out in Schedule 15 of the National Security Act 2023 and in regulations):

- Anyone acting as part of an arrangement to which a UK Crown Body is a party (for example, those in a multilateral arrangement with both the UK government and foreign governments);
- Individuals acting for a foreign power in their official capacity as employees, for example staff of diplomatic missions and consular posts based in the UK;
- Family members (including unmarried partners) of staff of diplomatic missions, consular posts or permanent missions of UK-based international organisations, where they are supporting the official activities of their family member;
- Lawyers, in their provision of legal services to foreign powers (for example, those representing foreign governments in a court case against the UK Government);
- Domestic and international news publishers (providing they meet the definition of a “[Recognised News Publisher](#)”);
- Sovereign wealth funds and public pension funds carrying out political influence activities related to UK investments.

Further information can be found in [chapter 15](#).

Chapter 4: Timing of registration

46. In accordance with section 69 of the National Security Act 2023, registration of ‘foreign influence arrangements’ under the political influence tier must take place within 28 calendar days, beginning on the day the arrangement is made. For example, if an arrangement is formed on 1st January, it must be registered by 28th January. Activities may take place within the 28-day registration window without prior registration. Different timescales apply to the enhanced tier.
47. In the case of a contract or other written agreement which is signed by both parties, the day on which the arrangement is made refers to the date on which the final party signs and returns the contract or agreement.
48. In the case of an informal verbal agreement, the day on which the arrangement is made refers to the date on which the agreement was made to carry out an activity in the UK. Conversations or correspondence which do not materialise into an agreement to carry out activities in the UK are not registerable arrangements.
49. The scheme’s requirements come into force on 1st July 2025. Those that are in ongoing arrangements that commenced prior to that date should see the [Guidance on Pre-Existing Arrangements](#). There is no requirement to register previous arrangements that ended before 1st July 2025.
50. Where an arrangement does not initially meet the conditions for registration under the political influence tier, but subsequently becomes registerable, the arrangement must be registered within 28 calendar days of it becoming registerable. For example, where a direction from a foreign power initially relates to the carrying out of activities which do not meet the definition of political influence activities, but subsequently evolves to include political influence activities, the arrangement will need to be registered within 28 days of the agreement to carry out or arrange political influence activities.
51. Registration is deemed to be completed as soon as it is submitted. There is no need to wait for any further communication or approval from the Government before commencing the activities referred to at registration. However, where a registration is submitted through the online registration service, a confirmation email will be sent to the email address associated with the registrant’s FIRS account at the time of submitting the registration.

Chapter 5: Who the registration requirements fall upon

52. Where the conditions for registration under the political influence tier are met, it is the individual or organisation which is in the arrangement with the foreign power that is required to register (referred to as “P” in the National Security Act 2023).
53. The individual or organisation in the registerable arrangement may entrust a third party to complete the registration form if they wish; however, that does not transfer the legal responsibility for compliance.
54. Where there are multiple direct parties to a registerable arrangement, each party will need to register separately. For example, where two separate organisations are both parties to an arrangement with a foreign power, they will both need to register separately. However, this does not mean that multiple employees involved in a registerable arrangement for a single organisation will all have to register; a single registration made by the organisation will suffice in these cases.
55. Where an organisation makes an arrangement with a foreign power, it is the organisation (rather than their employees) which has the legal responsibility to register. The registration form may be completed by any employee within the organisation who is authorised to do so. In the event of non-compliance, the criminal liability will fall upon the entity rather than the individual who completed the registration form (although see sections 35 and 81(1) of the National Security Act 2023 which provide that an officer of a company could be liable for the actions of the company in some circumstances). Please see [chapter 13](#) for further details. Employees of the entity should see [chapter 6](#).
56. Where an employee of an organisation makes an arrangement with a foreign power that is outside of the scope of their employment, it is the employee who has the legal responsibility to register as an individual. For example, a company employee who is also a blogger in their private capacity may have to register if they make an arrangement which relates to their blogging activities.

Chapter 6: Guidance for employees and subcontractors carrying out activities in scope of FIRS

57. The responsibility to register lies with the individual or entity that makes the arrangement with the foreign power (see [chapter 5](#)). However, where an arrangement has not been registered on time (see [chapter 4](#)), it is an offence for anyone to carry out political influence activities pursuant to that arrangement.
58. Employees and subcontractors who have been tasked with carrying out an activity pursuant to a registerable arrangement should first check with their employer or contracting body if they have registered the arrangement. Employees or subcontractors may also check the public register; however they should bear in mind that registrations are not published immediately and, in some circumstances, exceptions from publication may apply. There are safeguards in the legislation where the person has taken all reasonable steps open to them to check whether or not the arrangement is registered and believed that it was (see section 71 of the National Security Act 2023).
59. Any employees or subcontractors that believe that inaccurate or misleading information has been provided at registration should contact the registrant to request that they correct or update the information provided at registration. They should not proceed with activities until this information has been updated or corrected.
60. There is no specific duty on any employees, subcontractors or other persons carrying out activities to proactively carry out due diligence into who is directing the activity. The key is whether the people carrying out the activities have knowledge or information available to them which suggests that they are acting pursuant to a registerable arrangement – and if they have such knowledge or information, then they should check that the arrangement is registered.
61. Employees or subcontractors would not commit an offence if they had no way of knowing that they were acting pursuant to a registerable arrangement; for example, where:
- The employees or subcontractors know that the entity with whom they are working is state-owned, state-controlled or otherwise closely linked to the state, but have no reason to know that the state has actually directed the political influence activities that they are carrying out; or
 - The objectives that they are seeking to achieve through their activities are not strategic or political objectives of the state, but rather the objectives of

the specific entity that they are working with, and they have no information to suggest that the state has directed these activities.

62. Different provisions exist in relation to employees and subcontractors carrying out activities registerable under the enhanced tier of the scheme. Employees and subcontractors will therefore need to establish which tier of the scheme the activity they are carrying out relates to, if they believe that the activity forms part of a registerable arrangement.

Chapter 7: Examples of arrangements requiring (and not requiring) registration under the political influence tier

Example 1 (registration required) (communication): A diplomat of Country A contacts a consultant, who has a wide range of senior contacts within the UK Civil Service. The diplomat encourages him to present a case to senior civil servants for nationals of Country A to be granted visa-free status to visit the UK. In return, the diplomat offers the consultant the opportunity to attend (with all expenses paid) a government-organised conference in Country A, helping to build his profile with high-ranking businessmen. The consultant sends an email to a senior civil servant within the Home Office setting out the case for visa-free status for nationals of Country A.

Condition 1 is met as the diplomat, with whom the consultant is in an arrangement, is an official of a foreign power (the Government of Country A).

Condition 2 is met as the diplomat encourages the consultant to seek visa-free status for nationals of Country A, and offers him a reward for doing so.

Condition 3 is met as the consultant makes a communication to a member of the Senior Civil Service for the purpose of influencing a decision of a government department.

Condition 4 is met as no exemptions apply.

The consultant is therefore required to register.

Example 2 (registration required) (communication): A lobbying firm signs a contract with the Ministry of Security from Country B. As part of that contract, the lobbying firm agrees to lobby the UK Government to provide weapons to a war-torn state. The lobbying firm subsequently contacts a UK Minister outlining a proposal for the provision and shipment of weapons to the country.

Condition 1 is met as the Ministry of Security from Country B, with whom the lobbying firm is in an arrangement, is a foreign power.

Condition 2 is met as a contract is signed between the Ministry of Security and the lobbying firm.

Condition 3 is met as the lobbying firm makes a communication to a Minister to influence a decision to be made by them.

Condition 4 is met as no exemptions apply.

The lobbying firm is therefore required to register.

Example 3a (registration required) (communication): A charity is provided funding by the Department for Rural Affairs of Country C to lobby UK political parties to take further action related to wildlife conservation. The charity, whose purposes are wildlife support and conservation, subsequently arranges for a wildlife expert to meet with the Heads of Policy of each of the UK's main political parties with a view to persuading them to include a section on their election manifesto about their policies for wildlife conservation.

Example 3b (registration not required) (no direction from a foreign power): The Department for Rural Affairs of Country C provides regular donations in support of the work of a charity but does not set conditions on how the donations are to be used. The charity, whose purposes are wildlife support and conservation, is carrying out a campaign to seek to raise awareness of their work among UK political parties. The charity arranges for a wildlife expert to meet with the Heads of Policy at each of the UK's main political parties with a view to persuading them to include a section on their election manifesto about their policies for wildlife conservation.

Condition 1 is met in both examples as the Department for Rural Affairs of Country C, with whom the charity is in an arrangement, is a foreign power.

Condition 2:

is met in example 3a as the charity is provided funding by the Department for Rural Affairs and directed to use it in a specific way.

is **not** met in example 3b as, while the Department for Rural Affairs provides regular donations to the charity, they are not being directed to use it in a specific way.

Condition 3 is met in both examples as the wildlife expert makes a communication to the head of a political party to influence the party's proceedings (in this case, the policy that the party will adopt).

Condition 4 is met as no exemptions apply.

In example 3a, **the charity** is required to register. The wildlife expert is not required to register, but should check that the charity has registered the arrangement if they know, or reasonably ought to know, that they are acting pursuant to an arrangement with a foreign power.

Registration is **not** required in example 3b as condition 2 is not met.

Example 4 (registration required) (communication): An official from the Ministry of Security of Country D approaches an individual in the UK, who is a high-profile member of the diaspora of Country D. They require the individual to engage with MPs in order to influence their contributions in a parliamentary debate with implications for the UK's relationship with Country D. The individual's father remains in Country D, and there is an implied threat that he would suffer consequences at work if the request is not complied with. The individual engages with a range of MPs seeking that they take a view sympathetic to Country D's interests.

Condition 1 is met as the Ministry of Security of Country D, with whom the individual is in an arrangement, is a foreign power.

Condition 2 is met as the foreign power makes a request of an individual, with implied consequences for their father upon failure to comply.

Condition 3 is met as the individual is making a communication to an MP to influence them.

Condition 4 is met as no exemptions apply.

The individual is therefore required to register.

If publication of this registration presented a significant risk of serious harm to the individual's father, or another individual, then an exception to publication would apply.

Please see the guidance on the [information required at registration and the public register](#) for further details.

Example 5 (registration required) (communication): An envoy from Country E, who is formerly a high-ranking member of the Government, is asked by the Head of State of Country E to promote a Free Trade Agreement (FTA) between the UK and Country E. The envoy attends a conference and speaks to a UK Minister about the benefits of an FTA. All expenses related to attending the conference are covered by the Government of Country E.

Condition 1 is met as the Head of State of Country E, with whom the envoy is in an arrangement, is a foreign power.

Condition 2 is met as the Head of State asks the envoy to make a speech and the Government of Country E covers the expenses.

Condition 3 is met as the envoy makes a communication to a Minister to influence a decision of theirs.

Condition 4 is met as no exemptions apply.

The envoy is therefore required to register.

Example 6 (registration required) (communication): An entity in Country F is responsible for putting into effect a fraud prevention scheme in the country and is responsible to a government department for its progress. The entity enters into a contract with a lobbying firm, which agrees to lobby government ministers to seek the case for similar fraud prevention schemes to be created in the UK.

Condition 1 is met as the entity, with whom the lobbying firm is in an arrangement, exercises public functions on behalf of government (related to a fraud prevention scheme), therefore constituting an agency or authority of a foreign government.

Condition 2 is met as the lobbying firm enters into a contract with a foreign power.

Condition 3 is met as the lobbying firm communicates with government ministers to influence decisions of the UK Government.

Condition 4 is met as no exemptions apply.

The **lobbying firm** is therefore required to register.

Example 7 (registration required) (communication): A language and cultural foundation which is affiliated to the Government of Country G receives funding from the Government to promote the teaching of the language of Country G in UK secondary schools. The foundation makes contact with senior officials from the Department of Education seeking to influence them to increase the teaching of the language of Country G in UK secondary schools, and offering them resources to do so.

Condition 1 is met as the Government of Country G, with whom the political and cultural foundation is in an arrangement, is a foreign power.

Condition 2 is met as the Government of Country G has given an overall direction to the foundation to promote a cause, which inevitably involves carrying out political influence activities in the UK.

Condition 3 is met as the foundation makes a communication to senior civil servants in order to influence decisions of a government department.

Condition 4 is met as no exemptions apply.

The **language and cultural foundation** is therefore required to register.

Example 8 (registration required) (public communication): A lobbying firm enters into a contract with the Ministry for Environmental Affairs of Country H, which hopes to persuade the UK Government to introduce a new policy. As part of the contract, the lobbying firm is directed to prepare and publish articles outlining the case for this new policy. They write the articles, without referring to their arrangement with the Ministry for Environmental Affairs.

Condition 1 is met as the Ministry for Environmental Affairs of Country H, with whom the lobbying firm is in an arrangement, is a foreign power.

Condition 2 is met as a contract is signed between the Ministry for Environment Affairs and the lobbying firm.

Condition 3 is met as the lobbying firm makes a public communication to influence a government decision (and it is not reasonably clear that the communication is made at the direction of a foreign power).

Condition 4 is met as no exemptions apply.

The **lobbying firm** is therefore required to register. If they clearly stated on the articles that their publication had been directed by the Ministry for Environmental Affairs, then they would not need to register.

Example 9 (registration required) (provision of money, goods or services): An entrepreneur in the UK is contacted by the Foreign Affairs Office of Country I who request that he leverage relationships to influence legislation on trade matters which will affect investment from Country I in the UK. The Foreign Affairs Office offer him substantial amounts of money for doing so, which he invests into the construction of a new cultural centre, which has been a long-standing ambition of the local MP. The entrepreneur intends that, by doing so, he nurtures a relationship with the MP in order to influence voting on the matters which concern Country I in the legislation.

Condition 1 is met as the Foreign Affairs Office of Country I, with whom the entrepreneur is in an arrangement, is a foreign power.

Condition 2 is met as the Foreign Affairs Office makes a request of the entrepreneur and offers money to support his activities.

Condition 3 is met as the entrepreneur provides goods and services to individuals in the MP's constituency with intent to influence the MP.

Condition 4 is met as no exemptions apply.

The **entrepreneur** is therefore required to register.

Example 10 (registration not required) (no direction from a foreign power): A foreign student receives a scholarship funded by the Government of Country J to study a PhD in the UK. While in the UK, the student collaborates with a think-tank, assisting them to develop a series of public policy recommendations, which they present to the UK Government at a conference.

Condition 1 is met as the Government of Country J, with whom the student is in an arrangement, is a foreign power.

Condition 2 is **not** met as, whilst the foreign power is funding the PhD studies, the student has not been directed by the foreign power to participate in the think-tank activity.

Condition 3 is met as the student (in conjunction with the think tank) makes a communication to the UK Government to influence government decisions and policy changes.

Condition 4 is met as no exemptions apply.

As condition 2 is not met, the student is **not** required to register.

Example 11 (registration not required) (no arrangement with, or direction from, a foreign power): A private foreign business is seeking to invest in the UK and wishes for UK regulation in the industry in which it operates to be reduced. It signs a contract with a lobby firm, on the agreement that the lobby firm will seek to influence the UK Government into relaxing regulations in the industry. The lobby firm engages with a Minister and Special Adviser at an industry conference and highlights the issues posed by the regulations.

Condition 1 is **not** met as the lobby firm is in an arrangement with a private foreign business, not a foreign power.

Condition 2 is **not** met as there is no direction from a foreign power, but rather a private foreign business.

Condition 3 is met as the lobby firm makes communications to a Minister and Special Adviser in order to influence government decisions on regulations.

Condition 4 is met as no exemptions apply.

As conditions 1 and 2 are not met, the lobby firm is **not** required to register.

Example 12 (registration not required) (no arrangement with, or direction from, a foreign power): A multi-lateral organisation is hosting a conference in the UK, with the aim of encouraging attending governments to develop more effective policies to tackle food waste. The multilateral organisation collaborates with a think tank to agree policy recommendations to be presented at the conference. It then invites a representative of the think tank to make a speech and outline these policy recommendations for attending governments (including the UK Government), in return for a one-off payment.

Condition 1 is **not** met as the multi-lateral organisation is not a foreign power.

Condition 2 is **not** met as, whilst the multilateral organisation is directing the representative from the think tank, there is no direction from a foreign power.

Condition 3 is met as the think tank representative makes a communication to the UK Government to influence decisions on policy.

Condition 4 is met as no exemptions apply.

As conditions 1 and 2 are **not** met, the representative of the think tank is not required to register.

Example 13 (registration not required) (no direction from a foreign power): A food manufacturing company is invited to a conference hosted by the embassy of Country K in the UK related to the health risks of certain types of foods. The company speaks to the UK Minister of State for Agriculture and Food (who is also attending the conference) highlighting the health benefits of their own brands and seeking to ensure that further regulation against their industry is not imposed.

Condition 1 is met as the embassy of Country K, with whom the food manufacturing company is in an arrangement, is a foreign power.

Condition 2 is **not** met as, while the conference is hosted by a foreign power, there is no direction from the foreign power to carry out political influence activities.

Condition 3 is met as the food manufacturing company makes a communication to a Minister seeking to influence a government decision related to regulation on the food industry.

Condition 4 is met as no exemptions apply.

As condition 2 is not met, the company is **not** required to register.

Example 14 (registration not required) (activities not taking place in the UK)

A consultant enters into an arrangement with the Department of Health in Country L, who are seeking to raise awareness globally about a disease affecting children in the country. The consultant agrees to lobby contacts globally and would be paid commission if he successfully negotiated the international roll-out of a vaccine to prevent the spread of the disease. The consultant attends a conference in Country L at which UK and other government ministers are present and presents on why the vaccine should be used as a standard vaccine for new-born babies within state-run health services.

Condition 1 is met as the Department of Health in Country L, with whom the consultant is in an arrangement, is a foreign power.

Condition 2 is met as the consultant is directed to raise awareness about the disease and is paid commission for their activities.

Condition 3 is **not** met as the political influence activities are carried out in Country B and not in the UK.

Condition 4 is met as no exemptions apply.

As condition 3 is not met, the consultant is **not** required to register. However, if there were any follow-up political influence activities that were carried out in the UK, then condition 3 would be met and the consultant would be required to register.

Chapter 8: Information required at registration

63. The information required at registration (as provided for in regulations) is set out on the guidance on the [information required at registration and the public register](#). The information required will depend on the exact circumstances of the registrant, the arrangement and the activities being carried out. The online registration form will direct registrants to provide the information required according to their own circumstances.

64. The following information will be required in all cases:

- A description of the nature and form of the arrangement;
- The name of the foreign power directing the activity;
- A description of the activities to be undertaken, including their nature, purpose and any sought outcomes;
- Details of the start and end dates of the activities;
- Details of the individuals or entities who will carry out the activities; and
- Details related to the registrant (including address and contact details).

Chapter 9: Requirements to update registration when there is a “material change”

65. In accordance with section 74(5) of the National Security Act 2023, where there is a material change to a registered arrangement, the information provided at registration must be updated within 14 calendar days, beginning with the day on which the change takes effect. For example, if the change takes effect on 1st January, the change must be registered by 14th January.

66. However, this requirement does not necessarily mean that registrations need to be updated every time new activity is arranged or carried out. Where an activity is repeated and conducted in the same way and for the same purpose as the original activity registered, that does not trigger a requirement to register a material change.

67. The following are examples of circumstances which constitute a material change:

- A change in the nature or form of the arrangement, for example where an informal quid pro quo arrangement is formalised through a contract.
- Where a new type of activity (within those listed in criterion 1 of [condition 3](#)) is being carried out. For example, where a registered arrangement originally only related to communication activities, but subsequently evolved to also include the provision of money, goods or services.
- A change in the matters or persons which the activity is seeking to influence (for example, where registered activities related specifically to an individual piece of legislation, but subsequently evolved to include a different area of policy).
- A change in the individual or entity which is carrying out the activities.
- A substantial change in the anticipated start or end date of activities (for example, a significant delay or extension to activities, when considering the overall length of the activities).
- An additional foreign power from a different country becomes a party to the arrangement.

68. The following circumstances do **not** constitute a material change:

- Communication to a public official’s successor, where communication to the original public official had already been registered.
- An additional public official is copied into, or included in, a communication activity which has already been registered.
- A different type of communication on the same matter (for example, where email correspondence evolves to include a face-to-face meeting).
- A different form of disbursement (for example, where monetary payments evolve to also include the provision of services).

- Transfer of the arrangement from one part of the foreign power to another, where both parts of the foreign power are in the same country (for example, transfer of the arrangement from Government Department A of Country X to Government Department B of Country X).

69. The purpose of the requirement to update information when there is a material change is to ensure that information remains accurate and complete. Changes to a registerable arrangement or activities would therefore not require the registrant to update a material change, if the information provided at registration still remains accurate and complete. For example, minor changes to the details of the arrangement do not trigger a requirement to update a material change, if the overarching description of the arrangement provided at registration remains accurate. When registering, it is recommended that you take into account how activities may evolve over time when describing your activities, to ensure that the information does not easily become outdated.

Examples of compliance

Case 1 (one-off registration with no updates required) (based on example 1 of [chapter 7](#)):

The consultant registers his arrangement with the diplomat of Country A, providing the following information at registration:

Nature and form of the arrangement: Informal quid-pro quo arrangement with the offer of an opportunity to attend an all-expense paid conference in Country A.

Activities to be carried out: Communication with senior civil servants by email.

Purpose and sought outcome of the activities: To set out the case for visa-free status for nationals of Country A.

The consultant then carries out the activities below:

The consultant sends an email to a senior civil servant within the Home Office setting out the case for visa-free status for nationals of Country A. This activity is explicitly mentioned at registration, so no further action is required to comply with FIRS.

Following the email, the senior civil servant agrees to meet with the consultant to discuss the issue of visas for nationals of Country A. Whilst this activity is not explicitly mentioned at registration, the general type and purpose of the activity aligns with the information provided at registration. This is therefore not a material change, so no further action is required to comply with FIRS.

Following the meeting, the consultant writes a letter to a senior civil servant and special advisor in the Foreign, Commonwealth and Development Office, outlining the benefits that visa-free status for nationals of Country A. This activity is explicitly mentioned at registration, so no further action is required to comply with FIRS.

In this example, a single one-off registration (with no updates to registration or repeat registrations) amounts to compliance.

Case 2 (updates to the arrangement and activities) (based on example 2 of [chapter 7](#)):

The lobbying firm registers their arrangement with the Ministry of Security from Country B, providing the following information at registration:

Nature and form of the arrangement: A contract with £3200 to be paid upon completion of activities.

Activities to be carried out: Communication to ministers and politicians through letters, emails and meetings.

Purpose and sought outcome of activities: To set out the need for the UK to support the war efforts of Country X.

The lobbying firm then carries out the activities below:

The lobbying firm writes to the Secretary of State for Defence outlining the threat faced by Country X and the weapons that the UK could provide to counter that threat. This activity is explicitly mentioned at registration, so no further action is required to comply with FIRS.

The lobbying firm is aware that the opposition political party is supportive of the war efforts of Country X. The firm therefore wishes to seek to influence the UK electorate to vote for that political party. It therefore writes an article for publication in the UK newspaper setting out how voting for the opposition in an upcoming election would enhance UK national security. It does not state in the article that it is in an arrangement with a foreign power. As this is a new type of activity which is now seeking to influence a different matter (an election), the lobbying firm is required to update the information provided at registration.

A new employee joins the lobbying firm and is designated as the lead lobbyist for the contract. Whilst this represents a change in the individuals carrying out the activities, it does not represent a change in the entity carrying out the activities. There is therefore no further action required to comply with FIRS.

The lobbying firm and the Ministry of Security from Country B agree to extend the contract by a further year. The lobbying firm must update the end date of the arrangement provided at registration.

In this example, the lobbying firm is required to update the information provided at registration at appropriate points.

Chapter 10: Guidance for state-owned enterprises

70. This section is for state-owned enterprises and similar entities. Those working in partnerships with state-owned enterprises should see [chapter 11](#).

71. Ownership, funding or another means of control by a foreign power does not in itself trigger a registration requirement for the state-owned enterprise, nor does it make the state-owned enterprise a foreign power. Only where a state-owned enterprise is directed by a foreign power to carry out, or arrange, political influence activities in the UK will they be required to register.

72. Where employees of a foreign power (for example, civil servants) form part of the board of the company, and the board (as a whole) directs the enterprise to carry out political influence activities:

- Registration is not required if those political influence activities are in the state-owned enterprise's own commercial interests and there is no explicit direction from the foreign power.
- Registration may be required if those political influence activities are principally to further the interests of the foreign power.
- Registration may be required if the political system of the country of the state-owned enterprise allows the Government effective control over the board (for example, if the Government members of the board can override the votes of the other members of the board), and the Government actually exercises this control to direct activities in the UK or the threat of them exercising this control influences the decision of the board.

73. Where a state-owned enterprise carries out activities which it determines itself, with no direction from a foreign power, registration is not required.

Example 15a (registration not required) (direction from the board not constituting direction from a foreign power): A state-owned enterprise from Country M has its main business as the production and installation of solar panels. The UK Government has recently announced a new scheme allowing households to receive funding for solar panels on their homes, which would be fitted by a government-approved supplier. The board, which has members from the Government of Country M on it, instructs the company to bid to become a supplier for the scheme. The state-owned enterprise submits its bid and, separately, writes to the Secretary of State for Energy Security & Net Zero to outline how the company would provide an outstanding service.

Example 15b (registration required) (direction from the board constituting a direction from the foreign power): A state-owned enterprise from Country M has its main business as the production and installation of solar panels and employees of the Government of Country M sit on the board of the company. These employees of the Government of Country M instruct the company to lobby the UK Government to remove sanctions against Country M, and the rest of the board agrees. An employee of the company then writes to the Foreign Secretary setting out the case for sanctions to be lifted.

Condition 1 is met in both examples as the state-owned enterprise is owned by, and is therefore in an arrangement with, the Government of Country M is a foreign power.

Condition 2:

- Is **not** met in example 15a as the direction comes from the board as a whole, rather than specifically the Government of Country M, and the activities are principally in the state-owned enterprise's own commercial interests;
- Is met in example 15b as the direction comes from the members of the board who are part of the government and is for the government's interests rather than the company's.

Condition 3 is met in both examples as the state-owned enterprise makes a communication to UK Government ministers to influence Government decisions.

Condition 4 is met as no exemptions apply.

In **example 15b**, the state-owned enterprise is required to register. Registration is not required in example 15a as condition 2 is not met.

Example 16 (registration not required) (no direction from a foreign power): An enterprise, which is owned by the Government of Country O but operates independently of it, attends a conference in the UK at which UK senior policy makers are present. At the conference, representatives from the state-owned enterprise speak to a UK Minister to highlight an issue in UK regulation affecting their industry and suggests possible policy changes.

Condition 1 is met as the enterprise is owned by, and therefore in an arrangement with, the Government of Country O, which is a foreign power.

Condition 2 is **not** met as the state-owned enterprise operates independently of the foreign power. Ownership or funding by a foreign power does not, in itself, amount to direction.

Condition 3 is met as representatives of the state-owned enterprise make a communication to a UK Minister in order to influence a decision of theirs related to regulations.

Condition 4 is met as no exemptions apply

As condition 2 is not met, the state-owned enterprise is **not** required to register.

Chapter 11: Guidance for those working with state-owned enterprises and other entities with close links to foreign powers

74. Those being directed by state-owned enterprises to carry out political influence activities in the UK do not have to register. They would only have to register if they were being directed to do so by a **foreign power**.

75. Further guidance on what constitutes a foreign power can be found at chapter 3 (see [condition 1](#)).

76. Those acting pursuant to a foreign influence arrangement between a foreign power and a state-owned enterprise should see [chapter 6](#).

Example 17 (registration not required) (arrangement with a state-owned enterprise):

A state-owned enterprise in Country P is responsible for the manufacture and sale of components for the construction of railways. It enters into a contract with a consultant, who agrees to lobby UK Government ministers to make the case for the state-owned enterprise's involvement in a UK high-speed rail project.

Condition 1 is **not** met as the consultant is in an arrangement with a state-owned enterprise, rather than a foreign power.

Condition 2 is **not** met as the direction comes from a state-owned enterprise, rather than a foreign power.

Condition 3 is met as the consultant applies to communicate with UK Government ministers to influence Government decisions surrounding the high-speed rail project.

Conditions 4 is met as no exemptions apply.

As conditions 1 & 2 are not met, the consultant is **not** required to register.

Chapter 12: Guidance related to policy-making conferences and roundtables

77. Those delivering presentations or making speeches at policy-making roundtables or conferences may be considered to be carrying out political influence activities, if a senior public official or politician is in the audience.

78. However, they would only need to register under the political influence tier if the presentation or speech came as part of a wider arrangement with a foreign power to influence UK Government policy (or another political matter). They would need to know, or reasonably expect, that a senior public official or politician was in the audience and intend for them to be influenced as part of that wider agreement before registration requirements applied.

Example 18 (registration required) (attendance at roundtable comes as part of a wider registerable arrangement): The UK-based embassy of Country Q has formally commissioned a UK think tank to carry out a paid research project, which proposes possible AI regulation options for the UK government. As Country Q has a large AI industry, the embassy hopes that the project will convince the government to take more targeted measures against specific areas of AI, rather than regulating the industry as a whole. The think tank presents their research findings to the UK senior civil servants at a conference hosted by the embassy.

Condition 1 is met in as the UK-based embassy of Country Q, with whom the think tank is in an arrangement, is a foreign power.

Condition 2 is met as the think tank is formally commissioned to carry out a paid research project.

Condition 3 is met as the think tank communicates to senior civil servants to influence AI regulation.

Condition 4 is met as no exemptions apply.

The **think tank** is therefore required to register their wider arrangement (to carry out research and present it to senior civil servants to influence AI regulation).

Example 19 (registration not required) (no direction from a foreign power): The UK-based embassy of Country R is hosting a conference in the UK on AI regulation, to which it invites UK senior officials and a think tank to deliver presentations. During the think tank's presentation, they present on findings from their recent research and propose possible AI regulation options for attending governments.

Condition 1 is met as the UK-based embassy of Country R, with whom the think tank is in an arrangement, is a foreign power.

Condition 2 is not met as the think tank is simply invited to deliver a presentation, rather than being directed to influence the UK Government in a particular way.

Condition 3 is met as the think tank makes a communication to UK senior officials to influence AI regulation.

Condition 4 is met as no exemptions apply.

As condition 2 is not met, the think tank is not required to register.

Third party conference facilitators

79. Third party organisers of conferences for foreign powers may have to register under the political influence tier if they play an active role in arranging political influence activities, for example, if they were to arrange speakers to deliver presentations for the purposes of conducting political influence activity in the UK.

80. Third party organisers of conferences that merely provide a platform for the conference (for example, through organising a venue, catering services and general facilities) would not need to register under the political influence tier.

Example 20a (registration required) (conference facilitator arranging for political influence activities to take place): The UK-based embassy of Country S contracts a conference facilitator to organise an event with governments, regulators and businesses in the financial services industry, in order to discuss how to prevent future financial crises. The conference facilitator identifies a number of speakers to present at the conference and, in conjunction with the embassy, contacts the speakers to agree presentation topics. The speeches are to include the presentation of policy proposals and UK senior civil servants are to attend the conference.

Example 20b (registration not required) (provision of facilities not constituting the arrangement of political influence activities): The UK-based embassy of Country S contracts a conference facilitator to organise an event with governments, regulators and businesses in the financial services industry, in order to discuss how to prevent future financial crises. The conference facilitator organises the logistics for the event, providing presentation facilities and catering services, however the speakers and topics are organised by the embassy of Country S.

Condition 1 is in both examples as the embassy of Country S, with whom the conference facilitator is in an arrangement, is a foreign power.

Condition 2 is met in both examples as the embassy signs a contract with the conference facilitator.

Condition 3:

Is met in example 20a as the conference facilitator arranges for communications to take place, with senior civil servants in the audience, which are intended to influence Government policy.

is **not** met in example 20b as the provision of conference facilities does not amount to the arrangement of political influence activities.

Condition 4 is met in both examples as no exemptions apply.

In **example 20a**, the conference facilitator is required to register. Registration is **not** required in example 20b as condition 3 is not met.

Chapter 13: Offences and penalties

81. The following offences under the political influence tier are punishable by up to 2 years imprisonment and/or a fine:
- Failure to register a registerable arrangement (section 69(5) of the legislation);
 - Carrying out political influence activities, or arranging for others to carry out these activities, pursuant to a registerable arrangement, where registration requirements have not been met (section 71);
 - Carrying out unregistered political influence activities for a foreign power while acting under a misrepresentation (section 72);
 - Failure to update a registration within 14 days where there is a material change to the information registered (section 74(8));
 - Failure to comply with an information notice (section 75(8));
 - The provision of false, inaccurate or misleading information (section 77);
 - Carrying out political influence activities, or arranging for others to carry out these activities, pursuant to a registerable arrangement, where false, inaccurate or misleading information has been provided (section 78(2)).
82. The offence under section 69(5) only applies where the person required to register knows that the arrangement is of a kind that requires registration. Where the person did not know that this was the case (for example, if they did not know that the person with whom they were in the arrangement was a foreign power), then they will not commit the offence.
83. The offence under section 71 only applies where the person carrying out or arranging political influence activities knows, or having regard to other matters known to them reasonably ought to know, that the political influence activities form part of a registerable arrangement.
84. In court proceedings related to the offences under sections 71 and 72, it is a defence for the person in question to demonstrate that they took all steps reasonably practicable to check that the arrangement or activities are registered and, as a result, they reasonably believe that it is registered. Further details can be found in [chapter 6](#).
85. The offences under section 77 only apply when the person providing the information knows, or having regard to other matters known to them reasonably ought to know, that the information is false, inaccurate or misleading in a material way.
86. The offence under 78(2) only applies where the person knows, or having regard to other matters known to them reasonably ought to know, that the arrangement is of a kind that requires registration and that false, inaccurate or misleading information has been provided. If the person could not have known that the information provided was false, inaccurate or misleading, then they will not commit the offence.

The offence would not apply if the information was in the process of being updated within the 14-day window for updating a material change.

Chapter 14: Interaction between the Scheme and the Transparency of Lobbying Act 2014 / Register of Consultant Lobbyists

87. The requirements of FIRS and those of the Transparency of Lobbying Act 2014 are separate and distinct. The political influence tier of FIRS requires the registration of arrangements with foreign powers to carry out political influence activity in the UK, whereas the Transparency of Lobbying Act 2014 requires individuals or organisations to register if they wish to undertake paid consultant lobbying on behalf of any third party.
88. The Registrar of Consultant Lobbyists is an independent office holder who is responsible for keeping and publishing the Register of Consultant Lobbyists and further guidance can be found on the [Office of the Registrar of Consultant Lobbyists website](#).
89. Where an individual or entity's arrangements or activities meet the requirements of both schemes, they need to register with FIRS and the Register of Consultant Lobbyists separately.

Chapter 15: Exemptions from registration

90. As set out in Schedule 15 of the National Security Act 2023, exemptions from registration may apply in the following circumstances.

Exemption 1: Those who are party to a UK Crown Body arrangement (Schedule 15 paragraph 1)

91. Arrangements do not need to be registered when the United Kingdom is a party to that arrangement. This includes arrangements where any individual acting on behalf of the Crown (for example, a civil servant), or any entity which holds crown status, are a party, including:

- the UK Government,
- a devolved government (including the Scottish, Welsh or Northern Ireland governments),
- a department of the UK or devolved Government (including non-ministerial departments such as the National Crime Agency and Serious Fraud Office),
- a UK or devolved government official.

92. This exemption does **not** apply to arrangements with public bodies which do not have Crown Status (such as UK Research & Innovation).

93. The exemption only applies when the United Kingdom is an actual party to the **arrangement** with the foreign power (for example, if it were a multilateral agreement involving both the UK and the foreign power). UK Government involvement in the activities does not mean that the exemption applies, unless the UK Government is also a party to the arrangement.

94. Similarly, where a UK Crown Body is only a party to part of an arrangement, the other part of the arrangement may still need registration. For example, where a arrangement with a foreign power has both formalised and informal elements, and the UK Crown Body is only party to the formalised element, the informal elements of the arrangement may still require registration if all conditions are met.

Examples of circumstances where this exemption applies

Example 21 (exemption applies): The Head of State from Country T is invited to make a state visit to the UK, accompanied by a business delegation. The Ministry of Commerce from Country T invites an automotive company to be part of the business delegation, with an expectation that it uses the opportunity to speak to UK senior civil servants and special advisers about the need for policy changes to allow for the roll-out of self-driving vehicles on UK motorways. The UK Government endorses the invitation for representatives of the automotive company to be part of the business delegation. Whilst the automotive company is being directed to carry out political influence activity by a foreign power, the UK is party to this arrangement, and the automotive company is therefore not required to register.

Example 22 (exemption applies): The annual forum of a multilateral organisation is being held in the UK, with UK ministers and senior officials in attendance. The UK Government requests all attending Governments to nominate attendees and speakers to represent them. The Government of Country U nominates an NGO focussed on the relief of child poverty to present at the forum, requesting that they lobby attending Governments for additional aid. This nomination is accepted by the UK Government. The NGO presents at the forum highlighting the suffering of children in Country U and setting out the case why governments (including the UK government) should provide additional aid. Whilst the NGO has been directed to carry out political influence activity by a foreign power, the UK is party to this arrangement, and the NGO is therefore not required to register.

Example 23 (exemption does not apply): The Ministry of Security of Country V enters into a contract with a think tank, who agrees to present the case to the UK Government as to why a separatist group in Country V should be proscribed by the UK Government as a terrorist group. The think tank sends a recent piece of research carried out on the separatist group to a UK Minister, who accepts an invitation to meet with the think tank to discuss their research. Whilst the UK Minister has accepted the invitation to a meeting with the think tank and is a party to the *activities*, they are not a party to the *arrangement* between the think tank and the Ministry of Security of Country V, so the exemption does not apply.

Exemption 2: Foreign powers (Schedule 15 paragraph 2)

95. Foreign powers (as well as their employees and office holders) are not required to register their own activities, providing that they are open and honest about who they

represent. See [chapter 3 condition 1](#) of this guidance for the definition of a foreign power.

96. This exemption does not apply where a person acting for the foreign power makes a misrepresentation about who they are, or the capacity in which they act. A misrepresentation includes where the individual purports to be someone else, represent someone else or be in a role which is different to the one in which they are in. It may be made by making a statement or by any other kind of conduct (including an omission), and may be express or implied. It could also include presenting information in a way which amounts to a misrepresentation, even if some or all of the information is true. This could be the case if, for example, if someone were open that they worked for a foreign power, but did not mention that they were an intelligence officer.

97. Activities which are carried out directly by UK-based diplomatic missions, consular posts and permanent missions of foreign states to a UK-based international organisation, as well as the official activities of their diplomats and locally engaged staff members, are covered by this exemption.

Examples of circumstances where this exemption applies

Example 24 (exemption applies): An official of an agency of the Government of Country W communicates with UK senior officials, seeking to influence a visa decision for a high-profile individual of Country W to visit the UK. Whilst this constitutes political influence activity, no registration is required as the activity is carried out by the foreign power itself.

Example 25 (exemption does not apply): A covert intelligence officer working for the Government of Country X attends a conference in the UK and presents himself as a businessman for a private company. He speaks to Members of the House of Lords at the conference and seeks to influence their voting decision on a piece of legislation currently being considered by Parliament. Whilst the officer is employed by a foreign power, he is not open and honest about the capacity in which he is acting, so the exemption does not apply.

Exemption 3: Spouses, partners and family members of staff of diplomatic missions, consular posts and permanent missions to UK-based international organisations (Schedule 15 paragraph 3(2)-(5))

98. This exemption applies to an individual where **both** conditions A and B are met.

Conditions for application of the exemption

Condition A: The individual is a member of the family (including an unmarried partner in an enduring family relationship) of a “principal person”.

Condition B: The individual makes an arrangement to support the official activities or duties of the principal person.

A “principal person” is a member of staff of a diplomatic mission, consular post or the permanent mission to a UK-based international organisation of a country which is a member of the organisation.

99. This exemption would not apply where the family member makes an arrangement when acting in their personal capacity, or as part of any other work that they carry out which is unrelated to that of the principal person.

Examples of circumstances where this exemption applies

Example 26 (exemption applies): An ambassador of a foreign government in the UK holds a reception which is attended by his partner, as well as a number of UK senior officials and special advisers. During the event, the ambassador’s partner (on behalf of the ambassador) speaks to the senior officials and special advisers, seeking to secure funding from the UK Government for a joint research project into 6G technology. Whilst the ambassador’s partner is carrying out political influence activity on behalf of a foreign power, they are not required to register as an exemption applies.

Example 27 (exemption does not apply): A spouse of a diplomat within the UK-based embassy of Country Y is employed by a consultancy firm specialising in the AI industry. The consultancy firm works in close association with the Ministry of Science & Technology of Country Y, who provides it funding to carry out research and engagement activities in the UK. The Ministry of Science & Technology of Country Y directs the consultancy firm to lobby special advisors in the Department for Health & Social Care, with a view to influencing the roll-out of AI within brain surgery. The lobbying activities are carried out by the spouse of the diplomat, however the exemption does not apply as the activities are not in support of the duties of the diplomat.

Exemption 4: Legal activities (Schedule 15 paragraph 6)

100. Where an arrangement with a foreign power or specified entity relates to the carrying out of legal activity by a lawyer, this arrangement will be exempt from registration requirements.
101. Where a lawyer carries out non-legal activity, for example in their personal capacity, this will not benefit from this exemption. Similarly, where an arrangement relates to the carrying out of legal activity by an individual who does not meet the definition of a “lawyer”, the exemption will not apply.
102. A “Lawyer” means (see paragraph 6(3)):
- a) a person who for the purposes of the Legal Services Act 2007 is an authorised person in relation to an activity that constitutes a reserved legal activity (within the meaning of that Act),
 - b) a solicitor or barrister in Northern Ireland,
 - c) a solicitor or advocate in Scotland, or
 - d) a person who is a member, and entitled to practise as such, of a legal profession regulated in a jurisdiction outside the United Kingdom.
103. “Legal activity” means (see paragraph 6(4)):
- a) in England and Wales, a legal activity within the meaning of section 12 of the Legal Services Act 2007,
 - b) in Northern Ireland, a legal activity within the meaning of that section, but reading the reference to an activity which is a reserved legal activity as a reference to an activity corresponding to a reserved legal activity,
 - c) in Scotland, the provision of legal services within the meaning of section 3 of the Legal Services (Scotland) Act 2010, or
 - d) acting as an arbitrator or mediator.

Examples of circumstances where this exemption applies (and does not apply)

Example 28 (exemption applies): A high-profile individual of Country Z has recently had his UK visa revoked by the Home Office. The Government of Country Z instructs a lawyer to appeal the decision. To commence the appeal, the lawyer writes to the relevant Home Office senior officials and ministers setting out that he intends to launch a judicial review against the decision, arguing why it was incorrectly made. Whilst the lawyer is carrying out political influence activity at the direction of a foreign power, they are not required to register as they benefit from an exemption.

Example 29 (exemption does not apply): The Ministry of Security of Country A meets with a lawyer who is residing in the UK and is a friend of the UK's National Security Advisor. They request that he speak to the National Security Advisor to seek to persuade him of the need for the UK to provide weapons for use by Country A in a regional war, offering money if he successfully secures a deal. The lawyer meets with the National Security Advisor over dinner and sets out the case why such weapons should be provided. Whilst the individual making the arrangement with the foreign power is a lawyer, the activities being carried out are not legal activities and the exemption therefore does not apply.

Exemption 5: Recognised news publishers (Schedule 15 paragraphs 4-5)

104. Recognised news publishers are exempt from registering any arrangements which they make with foreign powers to carry out political influence activities. This exemption also applies in relation to employees of registered news publishers, when acting in their capacity as an employee.
105. Recognised New Publishers or their employees do not have a specified exemption under the enhanced tier and may still be required to register under that tier if relevant conditions are met. Please consult the [enhanced tier guidance](#) for further details.
106. A “recognised news publisher” includes the British Broadcasting Corporation, Sianel Pedwar Cymru, and the holder of a licence under the Broadcasting Act 1990 or 1996 who publishes news-related material in connection with the broadcasting activities authorised under the licence. It also includes any entity which meets all of the below conditions.

Conditions for status as a “recognised news publisher”

Condition A: The entity has as its principal purpose the publication of news-related material, and such material— (i) is created by different persons, and (ii) is subject to editorial control.

Condition B: The entity publishes such material in the course of a business (whether or not carried on with a view to profit).

Condition C: The entity is subject to a standards code.

Condition D: The entity has policies and procedures for handling and resolving complaints.

Condition E: The entity has a registered office or other business address which it publishes.

Condition F: The entity has legal responsibility for material published by it in the United Kingdom.

Condition G: The entity publishes its name, address, registered number (if any) and the name and address of any person who controls the entity (including, where such a person is an entity, the address of that person’s registered or principal office and that person’s registered number (if any)).

Condition H: The entity is not an “excluded entity” or “sanctioned entity” (see below).

An “excluded entity” is an entity which is a proscribed organisation under the Terrorism Act 2000, or an entity whose principal purpose is to support a proscribed organisation under that Act.

A “sanctioned entity” is an entity which is designated under sections 1 or 13 of the Sanctions and Anti-Money Laundering Act 2018.

107. For the purpose of condition A, “news-related material” means material consisting of:

- news or information about current affairs,
- opinion about matters relating to the news or current affairs, or
- gossip about celebrities, other public figures or other persons in the news.

108. For the purpose of condition C, a “standards code” means:

- a code of standards that regulates the conduct of publishers, that is published by an independent regulator, or
- a code of standards that regulates the conduct of the entity in question, that is published by the entity itself.

Example of a circumstance where this exemption applies

Example 30 (exemption applies): A recognised news publisher enters into an arrangement with the Government of Country B, who directs them to publish an opinion article containing criticism of UK government spending on overseas aid. The foreign government intends that, by doing so, the UK Government may direct its funding to a particular country for economic reconstruction work following a civil war. Whilst the recognised news publisher is carrying out political influence activity at the direction of a foreign power, it is not required to register as it benefits from an exemption.

Exemption 6: Sovereign wealth funds and public pension funds

109. Sovereign wealth funds and public pension funds are exempt from registration, where they carry out political influence activities related to their UK investments. The exemption would not apply if they carried out political influence activities unrelated to their investments.
110. The exemption also only applies to arrangements between a sovereign wealth fund, or public pension fund, and their home foreign power. Arrangements between a fund and a foreign power from a different country would not be exempt.
111. To qualify for the exemption, a sovereign wealth fund would need to meet all of the below conditions (including either condition 1a or 1b):

Conditions to qualify for the exemption

Condition 1A: The foreign power:

- holds, directly or indirectly, 100% of the shares in the Fund; or
- holds, directly or indirectly, 100% of the voting rights in the Fund, or
- holds the right, directly or indirectly, to appoint or remove a majority of the officers of the Fund.

OR

Condition 1B: The foreign power directs or controls the activities of a trust, partnership, unincorporated association or other entity, which:

- has the right to direct or control, or actually direct or control, the Fund's activities (in whole or in part); or

- hold, directly or indirectly, 100% of the shares in the Fund; or
- hold, directly or indirectly, 100% of the voting rights in the Fund; or
- hold the right, directly or indirectly, to appoint or remove a majority of the officers of the Fund.

AND all of

Condition 2 is that the main activity of the Fund is to make or manage investments, including in other countries or territories.

Condition 3 is that the funds for the overseas investments are either partially or wholly provided by the foreign power.

Condition 4 is that the purpose of the overseas investments is to either:

- Benefit the foreign power (for example, to raise funds for the Government); or
- Enable the payment of pensions to citizens of the foreign power.

A Fund meeting all of these conditions would only be exempt if their political influence activities related to their UK investments.

112. Investment holding or advisory entities carrying out political influence activities related to investments for an exempt sovereign wealth fund will not be required to register, and they will be able to continue with their activities without restriction. This applies even if their own entity is out of scope of the exemption. These entities would only be required to register if they were themselves in an arrangement with a foreign power (independently of an exempt sovereign wealth fund) and if they carried out political influence activities at the direction of that foreign power.

Examples of circumstances where this exemption applies (and does not apply)

Example 31 (exemption applies): A sovereign wealth fund (meeting all the conditions set out above) from Country C is directed by the Government of Country C to lobby ministers and senior civil servants in HM Treasury to provide additional funding to support the Fund's investment in a nuclear power plant. Whilst these constitute political influence activities, registration is not required as the sovereign wealth fund is exempt as their activities are related to their UK investments.

Example 32 (exemption applies): A sovereign wealth fund (meeting all the conditions set out above) from Country D is directed by the Government of Country D to lobby ministers and senior civil servants in HM Treasury to provide additional funding to support the Fund's investment in a nuclear power plant. An advisory entity which is owned by the sovereign wealth fund is tasked with managing the Fund's investment, and writes to the Chancellor of the Exchequer setting out the case why the UK Government should support the investment.

Neither the sovereign wealth fund, nor the advisory entity, are required to register, as an exemption applies to the arrangement between the foreign power and the sovereign wealth funds.

Example 33 (exemption does not apply): A sovereign wealth fund (meeting all the conditions set out above) from Country E is directed by the Government of Country E to lobby ministers and senior civil servants to make the case for nationals of Country E to be given visa-free travel to the UK.

Whilst the Fund meets all of the conditions set out above, the exemption does not apply as their political influence activities are not related to the Fund's investments.

Example 34 (exemption does not apply): A public pension fund (meeting all of the conditions set out above) from Country F is directed by the Government of Country G, which is a close ally of Country F, to make the case for sanctions against Country G to be dropped. The fund then writes to the Chancellor, making the economic case why sanctions should be dropped.

Whilst the Fund meets all of the conditions set out above, the exemption does not apply as they are being directed by a foreign power that is not from their own country, and their political influence activities are not related to the Fund's investments.

Public communication activities where the arrangement with the foreign power is already transparent

113. Whilst not an "exemption" in legislation, any public communication activities where it is reasonably clear that they have been made at the direction of a foreign power would not require registration, as they would not meet the definition of "political influence activities". Please see [chapter 3 condition 3](#) for further details.

Annex A: List of public officials and politicians

Schedule 14 of the National Security Act 2023 lists the individuals, communications to whom may be considered political influence activities. They are:

Ministers

- A Minister of the Crown.
- A Northern Ireland Minister.
- A Scottish Minister.
- A Welsh Minister.

MPs etc

- A Member of either House of Parliament.
- A Member of the Northern Ireland Assembly.
- A Member of the Scottish Parliament.
- A Member of Senedd Cymru.
- An employee or other member of staff of a person of any of the above individuals.

Local government

- The Mayor of London.
- The Mayor of Cambridgeshire & Peterborough.
- The Mayor of Greater Manchester.
- The Mayor of Liverpool City Region.
- The Mayor of North of Tyne.
- The Mayor of South Yorkshire.
- The Mayor of Tees Valley.
- The Mayor of the West Midlands.
- The Mayor for the West of England.
- The Mayor of West Yorkshire.
- The Mayor of the North East.

Other mayors not included in the above list are not in scope.

Political parties

- An officer, trustee or agent of a UK registered political party.
- A Member of such a political party who exercises executive functions on behalf of the party (for example, members who are directly involved in organising or delivering campaigns for the party).

Election candidates

Candidates for any of the following elections:

- General elections and other UK Parliamentary Elections;
- Elections to the Scottish Parliament, Senedd Cymru and the Northern Ireland Assembly;
- Local authority elections;
- Elections of Police and Crime Commissioners;
- Combined authority mayoral elections;
- Combined County Authority mayoral elections;
- Local mayoral elections;
- London mayoral and Greater London Authority elections.

Civil servants

- A member of the Senior Civil Service (for example, a Permanent Secretary, Director General or Deputy Director of a UK government department). This also includes a senior civil servant in the Governments of Scotland or Wales;
- A member of the Northern Ireland Senior Civil Service;
- A member of the Senior Management Structure of His Majesty's Diplomatic Service.
- A special adviser⁴ within the UK Civil Service.
- A special adviser within the Northern Ireland Civil Service.

Military personnel

- An armed forces officer who is of or above the rank of commodore, brigadier or air commodore.

⁴ A Special Advisor is someone who is appointed personally by a Minister and who meets the conditions that are set out in section 15 of the Constitutional Reform and Governance Act 2010, including that their term of appointment is directly linked to the Minister's term.

Police

- The chief constable or deputy chief constable of a police force.
- A police and crime commissioner.
- The Commissioner, Deputy Commissioner, Assistant Commissioner or Deputy Assistant Commissioner of Metropolitan Police.
- The Commissioner or Assistant Commissioner of Police for the City of London.
- The chief constable or deputy chief constable of the Police Service of Northern Ireland.
- The chief constable or a deputy chief constable of the Police Service of Scotland.
- The chief constable or a deputy chief constable of the Ministry of Defence Police.
- The chief constable or deputy chief constable of the British Transport Police Force.
- The chief constable or deputy chief constable of the Civil Nuclear Constabulary.
- A Director General, Director or Deputy Director of the National Crime Agency.

The scheme does not impose any requirements on those towards whom communications are made or to whom money, goods or services are provided.

The fact that a registration has been made related to communications targeted at one of the above individuals does not mean that they have done anything wrong. It is possible that they have not engaged with the communication.

Annex B: Table of examples

The table below sets out all of the examples included in the above guidance, including whether registration is required or not and which of the relevant conditions are met.

Example	Summary	Conditions met				Registration required
		1	2	3	4	
Chapter 7 (general examples)						
1	Consultant in an arrangement with foreign power to carry out activities to convince the UK Government to grant visa-free status for nationals of Country A who are visiting the UK.	Yes	Yes	Yes	Yes	Yes
2	Lobbying firm in an arrangement with a foreign power to lobby the UK Government to provide weapons to a war-torn state.	Yes	Yes	Yes	Yes	Yes
3a	Charity in an arrangement with a foreign power to arrange for a wildlife expert to influence a UK political party's manifesto commitments.	Yes	Yes	Yes	Yes	Yes
3b	A charity is provided funding by a foreign power, but its political influence activities are not directly connected to the conditions of the funding.	Yes	No	Yes	Yes	No
4	Individual in an arrangement with foreign power to influence MP's contributions in a parliamentary debate, with potential consequences for failing to comply.	Yes	Yes	Yes	Yes	Yes
5	Envoy in an arrangement with a foreign power to promote the idea of a free trade agreement between the UK and Country E to a UK Minister.	Yes	Yes	Yes	Yes	Yes
6	Lobbying firm in an arrangement with an agency of a foreign government to lobby the UK Government to put in place a fraud prevention scheme.	Yes	Yes	Yes	Yes	Yes

7	Language and cultural institute in an arrangement with a foreign power to promote the teaching of the language of Country G in UK secondary schools.	Yes	Yes	Yes	Yes	Yes
8	Lobbying firm in an arrangement with a foreign power to make public communications to influence UK Government policy.	Yes	Yes	Yes	Yes	Yes
9	Entrepreneur in an arrangement with a foreign power to make investments to influence legislation affecting trade with Country I.	Yes	Yes	Yes	Yes	Yes
10	PHD student carries out political influence activities which are not connected to the direction from the foreign power.	Yes	No	Yes	Yes	No
11	Lobby firm in an arrangement with a private foreign business to influence the UK Government to relax regulations affecting their sector.	No	No	Yes	Yes	No
12	Think tank in an arrangement with a multilateral organisation to propose policy recommendations to the UK Government at a conference.	No	No	Yes	Yes	No
13	Food manufacturing company attending a conference hosted by a foreign power and carrying out political influence activities at the conference which are not directed by the foreign power.	Yes	No	Yes	Yes	No
14	Consultant in an arrangement with a foreign power to negotiate the roll-out of a vaccine, but all political influence activities are carried out outside the UK.	Yes	Yes	No	Yes	No
Chapter 10 (state-owned enterprise)						
15a	State-owned enterprise being directed by its board to bid to become a supplier for a UK Government scheme, but with no direction from the foreign power.	Yes	No	Yes	Yes	No

15b	State-owned enterprise being directed by a foreign power through its board to lobby the UK Government to remove sanctions against the country.	Yes	Yes	Yes	Yes	Yes
16	State-owned enterprise proposing regulation changes to UK Government ministers, with no direction from the foreign power.	Yes	No	Yes	Yes	No
Chapter 11 (those working with state-owned enterprises)						
17	Consultant in an arrangement with a state-owned enterprise to lobby the UK Government to relax regulations in the industry.	No	No	Yes	Yes	No
Chapter 12 (policy-making conferences and roundtables)						
18	Think tank in an arrangement with a foreign power to present AI regulation options to the UK Government at a conference.	Yes	Yes	Yes	Yes	Yes
19	Think tank attending conference hosted by a foreign power and presenting AI regulation options to the UK Government, but without direction from the foreign power.	Yes	No	Yes	Yes	No
20a	Conference facilitator in an arrangement with a foreign power, and arranging for political influence activities to be carried out as part of that arrangement.	Yes	Yes	Yes	Yes	Yes
20b	Conference facilitator in an arrangement with a foreign power and providing facilities for a conference, but not arranging the political influence activities.	Yes	Yes	No	Yes	No
Chapter 15 (exemptions from registration)						

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21	Automotive company in an arrangement with a foreign power to be part of a business delegation and communicating with UK senior civil servants and special advisors regarding policy on self-driving vehicles, and the UK Government endorsing their involvement in the delegation.	Yes	Yes	Yes	No	No
22	NGO in an arrangement with a foreign power to lobby the UK Government to provide aid to Country U at a multi-lateral conference being hosted in the UK, and the UK Government endorsing their involvement in the conference.	Yes	Yes	Yes	No	No
23	Think tank in an arrangement with a foreign power to persuade the UK Government to proscribe a separatist group as a terrorist group.	Yes	Yes	Yes	Yes	Yes
24	An official of a foreign power communicating with UK senior civil servants to influence a visa decision.	No	No	Yes	No	No
25	Covert intelligence officer of a foreign power presenting himself as a businessman and seeking to influence the voting decisions of members of the House of Lords. <i>This is an example of a misrepresentation which requires registration, regardless as to whether conditions 1 & 2 are met.</i>	No	No	Yes	Yes	Yes
26	Partner of an ambassador communicating with senior officials and special advisors to seek funding for a joint research project into 6G technology.	Yes	Yes	Yes	No	No
27	Spouse of a diplomat communicating with senior officials to influence the roll-out of AI in brain surgery, but acting as part of their role in a consultancy firm, rather than to support the diplomat's official duties.	Yes	Yes	Yes	Yes	Yes

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28	Lawyer in an arrangement with a foreign power to set out the case for the UK to provide weapons to Country A.	Yes	Yes	Yes	No	No
29	Lawyer in an arrangement with a foreign power to persuade the Home Office to commence negotiations in a mutual legal assistance treaty.	Yes	Yes	Yes	Yes	Yes
30	Recognised news publisher in an arrangement with a foreign power to persuade the UK Government to provide funding for economic construction work following a civil war in Country B	Yes	Yes	Yes	No	No
31	Sovereign wealth fund directed by its home foreign power to lobby ministers and senior civil servants to provide funding to top up investment in a nuclear power plant.	Yes	Yes	Yes	No	No
32	Sovereign wealth fund directed by its home foreign power to arrange for an advisory entity to lobby ministers and senior civil servants to provide funding to top up investment in a nuclear power plant.	Yes	Yes	Yes	No	No
33	Sovereign wealth fund directed by the Government of Country E to lobby ministers and senior civil servants to enable visa-free travel to the UK for nationals of Country E. Exemption does not apply as the political influence activities are not related to the Fund's UK investments.	Yes	Yes	Yes	Yes	Yes
34	Public pension fund from Country F in an arrangement with the Government of Country G to make the case for sanctions against Country G to be dropped. Exemption does not apply as the arrangement is not with the Fund's home foreign power.	Yes	Yes	Yes	Yes	Yes

