



Home Office

Sector Specific Guidance on the Foreign Influence Registration Scheme (FIRS): Media

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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. Could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement. It does not include conversations which do not materialise into an agreement or arrangement.
Foreign power	Has the meaning given by Section 32 of the National Security Act 2023. Further details can be found in section 1 .
Political influence activities	A communication, public communication or provision of money, goods or services intended to influence a political matter.
Specified foreign power	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
Relevant activity	A type of activity in scope of registration under the enhanced tier of FIRS.
Exemption from registration	A circumstance in which registration requirements do not apply. Further detail is in section 4 .
Exception to publication	A circumstance in which information registered under FIRS will not be published. Further information is in section 5 .
Registrant	A person required to register under FIRS.
Information notice	A notice requiring the recipient to provide further information related to arrangements or activities registerable under FIRS.

About this Guidance

This document provides additional sector specific guidance on the Foreign Influence Registration Scheme for the media. This includes guidance on the exemption for Recognised News Publishers and their employees and freelance journalists.

It is intended to enable understanding of how the scheme's requirements apply in the context of the sector. Further detail on the scheme's requirements more generally can be found in the [guidance on the political influence tier](#) and [guidance on the enhanced tier](#). Separate guidance has also been produced on the [foreign powers and foreign power-controlled entities specified under the enhanced tier](#).

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 ensure that they comply with the legislation based on their own specific circumstances.

The UK remains open to transparent engagement and co-operation with foreign powers. Those who register fully and accurately are supporting the resilience of the UK and its institutions in the face of state threats. Registration of an arrangement or activity does not in itself mean that it is necessarily illegitimate or undesirable. FIRS does not prevent any activity from taking place; providing the arrangements are transparent, related activities can proceed as normal.

Section 1: Overview of requirements

1. The scheme's requirements are split into two tiers:
 - The **political influence tier**, which requires the registration of arrangements with any foreign power (except the Republic of Ireland) to carry out political influence activities in the UK;
 - The **enhanced tier**, which requires the registration of arrangements to conduct a wider set of activities but only with the foreign powers or foreign power-controlled entities which have been specified in regulations.

Political Influence Tier

2. Individuals and organisations are required to register under the political influence tier if they are directed by a foreign power to carry out, or arrange for others to carry out, political influence activities in the UK.
3. However, there is an exemption from the political influence tier for Recognised News Publishers. Further information on this exemption is available at [section 2](#).
4. Media bodies who are not RNPs should refer to the political tier guidance if carrying out political influence activities.

Enhanced Tier

5. The exemption does **not** apply under the **enhanced tier**. Recognised News Publishers may therefore still need to register under this tier.
6. Individuals and organisations (including news publishers and journalists) are required to register under the enhanced tier if they are directed by a specified foreign power or entity to carry out, or arrange for others to carry out, a broader range of "relevant activities" in the UK. Specified foreign power-controlled entities are also required to register any "relevant activities" that they carry out themselves in the UK.
7. Separate guidance has been produced setting out the [foreign powers and foreign power-controlled entities specified under the enhanced tier](#). This guidance also provides further details of the "relevant activities" which require registration.
8. Registration requirements only apply where there is a "direction" from a specified foreign power, or specified foreign power-controlled entity, to act.
9. "Relevant activities" in the context of the media include, but are not limited to, :
 - Conducting or arranging interviews at the direction of a specified foreign power or specified foreign power-controlled entity;

- Publishing news reports at the direction of a specified foreign power or specified foreign power-controlled entity;
- Creating video reports at the direction of a specified foreign power or specified foreign power-controlled entity;
- Investigative journalism activities at the direction of a specified foreign power or specified foreign power-controlled entity.

10. Where an RNP that undertakes political influencing activities for a specified foreign power, the RNP will need to register under the enhanced tier.
11. Registration of arrangements under the enhanced tier is required within 10 calendar days of the arrangement being made, and before activities are carried out. It is an offence to carry out relevant activities under a registerable arrangement without the arrangement being registered first.
12. Registration is required by the individual or organisation who makes the registerable arrangement with the specified foreign power or specified foreign power-controlled entity.
13. Activity is only registerable where carried out in the UK. As such, any activities carried out abroad would not require registration. However, it is possible that an overseas individual or organisation would need to register if they carry out activities in the UK, or arrange for activities to be carried out in the UK. In the context of the media sector, an article published abroad but intended for a UK audience is considered an UK activity.
14. Registration is a straightforward process and we expect that most registrants will comply with the requirements through the dedicated FIRS online registration service.
15. The maximum penalty for failure to comply with the requirements of the enhanced tier is 5 years imprisonment.
16. Further details on the requirements of this tier can be found in the [guidance on the enhanced tier](#).

Further requirements

17. 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.
18. The scheme also enables the Secretary of State to issue information notices to those who have registered, or others who are believed to be involved in, registerable arrangements or activities. Recipients of information notices must respond with the information required by the notice by the date specified. Further details can be found in the guidance on [information notices](#).

Section 2: Exemption from the Political Influence Tier for Recognised News Publishers

19. Recognised News Publishers are exempt from registration under the political influence tier (see paragraph 4 of Schedule 15 of the National Security Act 2023). This exemption also applies in relation to employees of registered news publishers, when acting in their capacity as an employee.

20. 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 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.

21. 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.

22. 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.

23. Entities which do not meet **all** of the above conditions may still need to register under the political influence tier, even if **some** of the conditions are met.

24. However, it should be noted that public communication activities do not require registration if the arrangement with the foreign power is reasonably clear from the communication. For example, a journalistic article which clearly stated that it was directed by a foreign power would not require registration, even if the entity publishing it did not qualify as a Recognised News Publisher.

Guidance for employees of recognised news publishers and freelance journalists

25. Journalists benefit from the exemption for Recognised News Publishers under the political influence tier if:

- a) They are employed directly by a Recognised News Publisher and, as part of their employment, act pursuant to an arrangement made between a foreign power and the publisher; or
- b) They are a freelance journalist and act pursuant to an arrangement made between a foreign power and a Recognised News Publisher.

26. Journalists would, however, be required to register under the political influence tier if they carry out political influence activities pursuant to an arrangement with a foreign power and:

- a) Their employer does not meet the definition of a Recognised News Publisher; or
- b) They act outside of their capacity as an employee of a Recognised News Publisher; or

- c) They are a freelance journalist who make an arrangement with a foreign power to carry out political influence activities, and the Recognised News Publisher with which this work is associated is not a party to this arrangement.

Section 3: Examples of registerable and non-registerable arrangements

Political Tier

Example 1 (registration not required) (exemption applies): A Recognised News Publisher is directed by the Ministry of Foreign Affairs (MFA) of country M to publish an article which seeks to influence UK Government policy, without declaring that it was written at the direction of the MFA. The article is written by a journalist employed by the publisher.

The exemption applies as the Recognised News Publisher is exempt from registration under the political influence tier and the journalist writing the article is directly employed by the publisher.

Example 2 (registration not required) (exemption applies): A Recognised News Publisher is directed by the Ministry of Foreign Affairs (MFA) of country M to publish an article which seeks to influence UK government policy, without declaring that it was written at the direction of the MFA. The article is written by a freelance journalist who is the foreign correspondent of the publisher in the UK.

The Recognised News Publisher (as an entity) benefits directly from the exemption and the journalist is not acting pursuant to a registerable arrangement (as the publisher is exempt). Therefore, neither the Recognised News Publisher nor the journalist are required to register.

Example 3 (registration required) (Recognised News Publisher is not a party to the arrangement with the foreign power): The correspondent of a Recognised News Publisher in the UK is a freelance journalist who is not directly employed by the publisher. The **journalist** is directed by the Ministry of Foreign Affairs (MFA) of country M to write an article for publication which seeks to influence UK government policy. The Recognised News Publisher itself is not a party to the journalist's arrangement with the MFA. The journalist writes the article, which is then published and does not state that it is written at the direction of a foreign power.

The **journalist** is therefore required to register. This is because, whilst they are a correspondent of a Recognised News Publisher, they make an arrangement with a foreign power independently of the publisher, and as part of this arrangement they are directed by the foreign power to carry out political influence activities in the UK.

If the journalist had declared in the article that it was written at the direction of the MFA of Country M, then they would not be required to register. Similarly, if the arrangement with the MFA had been made by or on behalf of the Recognised News Publisher, then they would also not be required to register.

Enhanced Tier

Example 4 (registration required) (direction from a specified foreign power): The Government of Country X has been specified under the enhanced tier and the production of media reports constitutes a “relevant activity”. There has recently been extensive media reports of repression against a particular ethnic group within country X by its government. The UK-based embassy of Country X is seeking to rebut these claims and, as such, enters into an arrangement with a UK newspaper who agrees to publish an article outlining the position of the government of country X with regards to the reported repression. The newspaper is paid by the embassy for the production and publication of the article and this is made clear in the article itself.

The **UK newspaper** is required to register. They are in an arrangement with the UK-based embassy of Country X (**a specified foreign power**) for which they are paid (**direction**) to publish an article in the UK (**relevant activities**). No exemptions apply. As the arrangement is registerable under the **enhanced tier**, the fact that the journalist has declared the article was written at the direction of the foreign power does not negate the need to register.

Example 5 (registration not required) (no direction from a specified foreign power):

The Government of Country X has been specified under the enhanced tier and the production of media reports constitutes a “relevant activity”. A UK newspaper is writing an article regarding repression of a particular ethnic group within country X by its government. It contacts the UK-based embassy of country X for a statement, which it includes in the article.

The UK newspaper is **not** required to register. Whilst they form an arrangement with a specified foreign power, they are not being directed by that specified foreign power as the article that the newspaper is publishing is a self-directed activity.

Example 6 (registration required) (exemption does not apply): A Recognised News Publisher is directed by the Ministry of Foreign Affairs (MFA) of country M- a specified foreign power- to publish an article which seeks to influence UK Government policy, without declaring that it was written at the direction of the MFA. The article is written by a journalist employed by the publisher.

The exemption **does not** apply as the Recognised News Publisher is undertaking political influencing activity at the direction of a specified foreign power.

Section 4: Exemptions from registration

27. The most relevant exemption for the media sector is the Recognised News Publisher exemption, as detailed in [section 2](#).

28. The other exemptions from the scheme are as follows:

- UK crown body arrangements (both tiers);
- Foreign powers acting overtly (both tiers);
- Diplomatic family members (both tiers);
- Legal activities carried out by a lawyer (both tiers);
- Recognised news publishers (political influence tier only);
- Sovereign wealth funds and public pension funds carrying out investment-related activities (political influence tier only);
- Activities that are reasonably necessary to support diplomatic missions (enhanced tier only);
- UK public body arrangements (enhanced tier only);
- Scholarships and education providers (enhanced tier only);
- Government administrative processes (enhanced tier only).

29. Further detail on all of the exemptions can be found in the guidance on the [political influence tier](#) or guidance on the [enhanced tier](#).

Section 5: The public register and exceptions to publication

30. Certain information registered which relates to arrangements to carry out political influence activities will be included on a public register. This includes arrangements registered under the political influence tier, as well as any arrangements registered under the enhanced tier which relate to the carrying out of political influence activities. Other registrations under the enhanced tier (for example, those which relate to reporting which does not seek to influence a UK political process) will not be published.
31. Not all information provided at registration is published. Please see the guidance on the [information required at registration and the public register](#) for further details.
32. Exceptions to publication apply in the following scenarios:
 - Where there is a risk that publication would prejudice the safety or interests of the UK.
 - Where there is a risk that publication would prejudice the prevention or detection of crime, a criminal investigation or criminal proceedings;
 - Where there is a significant risk that publication would put any individual's safety seriously at risk.
 - Where publication would involve the disclosure of commercially sensitive information.
33. Exceptions to publication may apply to a registration as a whole (meaning that no details are published) or to only certain information within a registration (meaning that the registration is published but with that information redacted).
34. Registrants who believe that an exception to publication applies will be given the opportunity to provide evidence to demonstrate that the exception applies as part of the registration process.
35. The exceptions which are most likely to be relevant to the media sector is the exception for where publication would put an individual at risk of serious harm and where it would involve the disclosure of commercially sensitive information. Further details about the other exceptions to publication can be found in the guidance on the [information required at registration and the public register](#).
36. Risks which are purely hypothetical in nature without evidence to support them will not meet the threshold for this exception to apply. For example, a hypothetical risk that identification of an individual via the public register could lead to them being subject to harassment would not be sufficient, if no evidence of harassment

occurring to that individual, individuals belonging to the same group, or individuals carrying out similar activities had been identified.

Commercially sensitive information

37. Media bodies who believe that the exception for commercially sensitive information applies should provide evidence when submitting their registration to demonstrate that:

- Information that would be published is confidential; and
- Its publication is highly likely to seriously prejudice the commercial interests of any individual or entity.

38. Information is considered confidential if:

- It is not generally known by, or available to, individuals external to your organisation, unless they need access to the information to fulfil their roles (as may be the case with certain contractors or research partners); and
- It is subject to measures to prevent it from being disclosed outside of these closed circles (for example, access restrictions in the area where the information is stored; or contractual agreements which prohibit the disclosure of the information).

39. For this exception to apply, there must be a clear link between publication and damage to commercial interests. This could include, for example, where there are particular details which would be published which would be highly advantageous to a competitor.

40. Whilst the evidence acceptable to demonstrate an exception will vary in each case, the following types of evidence could be provided (if appropriate and relevant):

- Copies of Non-disclosure Agreements or details of contractual obligations,
- Patent applications or other intellectual property protection documents,
- Expert assessments of the commercial value of the information.

41. A risk of reputational damage occurring as a result of publication does not, in itself, mean that the exception to publication applies. Evidence would need to be provided as to how that reputational damage would be caused by publication and how it would seriously prejudice the commercial interests of the organisation.

Individual's safety

42. This exception may apply, in particular, to those reporting on human rights issues, where they, their families or their colleagues could be put at risk in their home country as a result of appearance on the public register, or where publication could give rise to a death threat or a threat of a life-threatening injury. Certain mental health risks may reach the threshold of serious harm, for example, where publication could give rise to coercion, harassment or stalking.

43. The exception applies where the risk of harm applies to **any** individual- this includes, but is not limited to, the registrant, any other individuals named in the registration, or their family, friends or associates. This can include a threat to people abroad.
44. Evidence to support this exception should, where possible, include evidence of a risk to a named individual. However, in some circumstances, evidence of risks to a specific group resulting from similar activities in the past may be acceptable supporting evidence.
45. Acceptable evidence could include, but is not limited to, the following:
- a police incident number if a previous attack has taken place;
 - documentary evidence of a threat or attack, such as photos or recordings;
 - examples of circumstances in which individuals belonging to the same group or carrying out similar activities have been subjected to personal safety risks (this could include news reports of these circumstances);
 - evidence of employment at an organisation (for example, a human rights organisation) that puts an individual at particular risk;
 - evidence of possessing a certain characteristic or belonging to a certain group (for example, a religious group) that puts you at particular risk.
46. It is possible that explanations alone, without documentary evidence, could be used to demonstrate that this exception applies. However, the explanation would need to provide sufficient detail to demonstrate the level of risk, the person or types of person that would be put at harm, the nature of harm that could be caused and why publication could lead to this harm.

Section 6: Additional matters of relevance to the sector

Confidential journalistic material

47. Where registration is required, registrants will not be required to disclose “confidential journalistic material” (as defined by section 264 of the Investigatory Powers Act 2016) or to identify or confirm a source of journalistic information (as defined by section 263 of the Investigatory Powers Act 2016). Registrants are not required to provide this information even if it would be a natural answer to a question on the registration form or on an information notice.
48. Material constitutes “confidential journalistic material” if it is both held in confidence and it is created or acquired for the purposes of journalism. It includes material which has been sent to someone else, providing that the sender intends for the recipient to hold the information in confidence.
49. Material is considered to be held in confidence if either:
- a) the person holds it subject to an express or implied undertaking to hold it in confidence (for example, a formal non-disclosure agreement or an informal terms of reference requiring information to be held in confidence), or
 - b) the person holds it subject to a legal restriction on disclosure or legal obligation of secrecy contained in an enactment (for example, if there is a law in place which states that material of this type may not be disclosed).
50. A “source of journalistic information” is an individual who provides material intending the recipient to use it for the purposes of journalism or knowing that it is likely to be so used.

Case study (based on example 4 of [section 3](#)): Whilst the UK newspaper would be required to register and provide details of the arrangement with the UK-based embassy of Country X and their activities, they would not be required to disclose at registration any information which was provided by the embassy for journalistic purposes and was intended to be held in confidence. The UK newspaper would also not be required to provide any details of the individual within the embassy who provided them with this information.

However, this does not mean that the UK newspaper is exempt from registering. They would still be required to provide a description of their arrangement with the embassy and of the activities that they are to carry out, while omitting the details which constituted “confidential journalistic material”.