

Guidance on Pre-Existing Arrangements under the Foreign Influence Registration Scheme

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About this Guidance

The Foreign Influence Registration Scheme (FIRS) 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.

The scheme contains two tiers, each with separate requirements. Further details about these requirements can be found in the <u>guidance on the political influence tier</u> and <u>guidance on the enhanced tier</u>.

The scheme's requirements come into force on **1 July 2025**. This guidance sets out the requirements for arrangements that are already in place on 1 July 2025.

Timing of registration for pre-existing arrangements

- Where a registerable arrangement is already in place on 1 July 2025, there is a 3-month grace period to register this arrangement. This grace period applies to both arrangements made under the political influence tier and arrangements made with specified foreign powers or entities under the enhanced tier.
- 2. Therefore, arrangements which were made before 1 July 2025, and which are continuing beyond that date, must be registered by 1 October 2025.
- 3. Any arrangements made on or after 1 July 2025 do not benefit from the 3-month grace period and must be registered within the timeframes relevant to each tier. Further information can be found in the <u>guidance on the political influence tier</u> and <u>guidance on the enhanced tier</u>.
- 4. Arrangements which no longer have effect on 1 July 2025 do not require registration. Therefore, if activities taking place under a registerable arrangement have completely ceased by 1 July 2025, the arrangement does not need to be registered.

Implications for employees, subcontractors and other persons carrying out activities

- 5. Where registration is not yet due, it is not an offence to carry out activities under a registerable arrangement.
- Employees, subcontractors, and other persons carrying out activities during the 3-month grace period (1 July 2025 1 October 2025), which are pursuant to an arrangement made before the scheme's requirements come into force, may therefore continue with their activities during this period without prior registration being required.

