



Home Office

Sector Specific Guidance on the Foreign Influence Registration Scheme (FIRS): Charities & Civil Society

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Glossary of key terms

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| 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, for example, a contract, memorandum of understanding (MOU) or quid pro-quo informal 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 details can be found in section 3 . |
| Exception to publication | A circumstance in which information registered under FIRS will not be published. Further details can be found 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 charities and other not-for-profit organisations, such as non-governmental organisations. This includes guidance on how funding scenarios could be in scope of registration requirements and the exception to publication for where an individual's safety could be put at risk.

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 requirements of FIRS exist separately to the rules on campaigning and political activity in charity law. The Charity Commission has published guidance on [campaigning and political activity for charities](#). Compliance with charity law does not negate the requirement to comply with FIRS (and vice versa).

The Government continues to recognise the essential value that civil society brings to enhancing the UK's democracy and values and improving people's lives. The UK also remains open to transparent engagement and cooperation 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 (including charities) 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. A foreign power is 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.
4. Registration requirements only apply where there is a “direction” from a foreign power to act.
5. Political influence activities include certain communication activities, public communication activities or the provision of money, goods or services, where they are intended to influence any 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).
6. Political influence activities in the context of civil society could include:

- A meeting with a senior civil servant to influence the UK Government's response to overseas disasters;
 - A letter to a Member of Parliament which seeks to encourage them to vote against amendments proposed to a piece of legislation;
 - An article published to a UK audience proposing policy changes to reduce child poverty in the UK (where it is not made clear that this article is published at the direction of the relevant foreign power).
7. Arrangements under the political influence tier must be registered within 28 calendar days of the arrangement being made. Activities may take place within that 28-day window without prior registration.
 8. The maximum penalty for failure to comply with the requirements of the political influence tier is 2 years imprisonment.
 9. Further detail on the requirements of this tier can be found in the [guidance on the political influence tier](#).

Enhanced Tier

10. Individuals and organisations 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.
11. 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.
12. Registration requirements only apply where there is a "direction" from a specified foreign power, or specified foreign power-controlled entity, to act.
13. "Relevant" activities in the context of civil society could include:
 - Fund-raising campaigns carried out at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Hosting an event in the UK to raise awareness of a particular cause, at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Disseminating messaging to a UK audience on social media, at the direction of a specified foreign power or specified foreign power-controlled entity.
14. 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.

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 detail on registration requirements

17. Under both tiers, registration is required by the individual or organisation who makes the registerable arrangement with the foreign power, specified foreign power or specified foreign power-controlled entity. It is the arrangement that must be registered, not each individual activity that will be carried out. In the case of a charity in a registerable arrangement, the trustees of the charity are collectively responsible for registering. Further details can be found in [section 6](#).

18. 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.

19. Registration is a straightforward process and we expect that most registrants will comply with the requirements through the dedicated FIRS online registration service.

Further requirements

20. Where there is a material change to any information provided at registration, the information must be updated within 14 calendar days, beginning with the day on which the change takes effect.

21. 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: Examples of registerable and non-registerable arrangements

Political Tier

Example 1 (registration required) (communication): The Government of Country A is aware that a Member of the House of Lords intends to table a Private Members Bill (PMB) which would limit the amount of overseas aid that can be provided to countries which have a poor human rights record, including Country A. A diplomat from Country A meets with a trustee of a charity, whose purposes are for the global relief of poverty, and which had already expressed concern about the PMB, and requests that they encourage the Member of the House of Lords to drop the PMB. In return, the diplomat offers the charity considerable donations and offers to promote their work via their UK embassy. The trustee of the charity meets with the Member of the House of Lords and proposes alternative ways for how the objectives of the PMB could be achieved.

The **charity** is required to register. They are in an arrangement with the Government of Country A (**foreign power**) where conditional benefits are to be received (**direction**) if they make a communication to a Member of the House of Lords to influence their decision to introduce a PMB (**political influence activity**). No exemptions apply.

Example 2 (registration required): An NGO based in Country B receives funding from the Ministry of Foreign Affairs of Country B for a project on promoting gender equality in education across Europe and as part of this is told to advocate for policy change on this in the UK. The NGO decides to allocate 10% of this funding to a UK charity so the UK charity can conduct advocacy on this matter with the UK government. The UK charity uses this funding to set up meetings with senior civil servants in the Department of Education about proposed changes to UK government policy.

The **NGO** is required to register, as it has entered into an agreement with the Ministry of Foreign Affairs of Country B (**foreign power**), and will receive conditional funding (**direction**) to arrange for the UK-based charity to engage with the UK Government to influence policy (**political influence activity**). No exemptions apply.

The **UK charity** is **not** required to register, as the NGO is not a **foreign power**. However, the UK charity should check that the NGO has registered prior to carrying out the political influence activities.

Example 3 (registration not required) (no direction from a foreign power): The Government of Country C is hosting a conference in the UK to bring together policy makers and industry to discuss how to reduce child poverty worldwide. It invites a charity to present on a topic of their choosing at the conference, which is attended by UK senior civil servants and special advisers. The charity makes the speech and suggests policy initiatives which attending governments could adopt to alleviate child poverty.

The charity is **not** required to register, as it has not received a direction from a foreign power. However, if the Government of Country C had directed the charity to deliver a particular message with a view to influencing UK Government policy, then they would be required to register.

Enhanced Tier

Example 4 (registration required) (direction from a specified foreign power): The Government of Country D has been specified under the enhanced tier, with all activities constituting “relevant activities”. A UK charity receives a grant from the Government of Country D related to promoting increased water consumption across schools. They set up a series of initiatives in schools in the UK.

The **UK charity** is required to register. They are in an **arrangement** with a **specified foreign power** and have received conditional funding related to being asked (**direction**) to promote increased water consumption across schools (**relevant activities**). No exemptions apply.

Example 5 (registration not required) (activities taking place independently of the specified foreign power or any specified foreign power-controlled entity): The Government of Country E has been specified under the enhanced tier, with all activities constituting “relevant activities”. A poverty-relief charity based in Country E receives regular funding from the Government of Country E, however the Government does not stipulate how the funding should be used. A UK children’s charity enters into an arrangement with the poverty-relief charity from Country E to provide breakfast to UK children.

Neither charity is required to register.

The **UK children's charity** is not required to register as their arrangement is with another charity and not with a specified foreign power or foreign power-controlled entity. The **poverty-relief charity from Country E** is not required to register as, while they receive some funding from a specified foreign power, they are not being directed to use the funding to carry out activities in the UK.

Section 3: Exemptions from registration

22. Exemptions from registration apply to:

- 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 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).

23. In addition to these exemptions, any public communication activities, -for example an article on a website- where it is reasonably clear that the activity has been made at the direction of a foreign power would not require registration under the political influence tier, because they would not meet the definition of a “political influence activity”. Therefore, any published article which intended to influence a political process would not require registration under the political influence tier, if it was clear on the article that it was completed as part of an arrangement with a foreign power. It may still require registration under the enhanced tier, if carried out at the direction of a specified foreign power or specified foreign power-controlled entity.

24. 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 4: Common scenarios in the charities sector where registration may (or may not) be required

Funding

25. Registration is only required where there is a “direction” to carry out certain activities in the UK. Further information about what constitutes a ‘direction’ can be found in the [guidance on the political influence tier](#) and [guidance on the enhanced tier](#).
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.
27. General donations and unrestricted grants which give the recipient charity the autonomy to use the funding in a way which they see fit are not considered a direction. Where a charity applies for or requests a form of funding (for example, a grant or donation) from a foreign power, and that funding is provided without specific conditions being placed on its use, this would not in itself constitute a direction. This would be the case even if the funding was sought in relation to a very specific project as the decision to limit the use of the funds is being made by the charity and not the foreign power.
28. 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 by the charity, that does not constitute a direction.

Example 6 (registration required) (political influence tier): A disaster relief charity that has headquarters in Country F enters into a grant agreement with the Ministry of Foreign Affairs of Country F. As part of this grant agreement, the charity is given money and tasked with using this to lobby the UK Government to increase the amount of support that it provides to Country F, following a serious earthquake in the country. The charity writes to the UK Foreign Secretary about increasing UK disaster relief support in Country F and arranges some face-to-face meetings to discuss.

The **charity** is required to register. They are in an arrangement with the Ministry of Foreign Affairs of Country F (**a foreign power**), where they have received money with conditions attached (**direction**) to lobby the UK Government to increase the amount of support provided to Country F (**political influence activity**). No exemptions apply.

Example 7 (registration not required) (political influence tier): An NGO based in Country G receives regular funding from the Ministry of Foreign Affairs of Country G to raise awareness about discrimination affecting the country's nationals. No further stipulations are given to the use of the funding. The NGO uses the funding to launch an event to which it invites UK parliamentarians and seeks to persuade them to introduce legislation with tougher penalties for those who commit racist abuse against the country's nationals in the UK.

The NGO is **not** required to register. Whilst they are carrying out political influence activities in the UK, they are not being directed to do so by a foreign power. This is because the funding provided by the foreign power does not come with conditions necessitating the carrying out of political influence activities in the UK.

Example 8 (registration not required) (political influence tier): A charity focussed on raising awareness about mental health conditions applies for a grant from the Ministry of Health of Country H, stating that it will use the funding to lobby UK politicians about the need for increased protections in employment law for those who suffer from a particular condition. The Ministry of Health of Country H approves the grant application, providing funding to be used in accordance with the terms set out by the charity. The charity then hosts an event, to which it invites a number of MPs, and sets out the issues with the existing legal protections and proposes means of strengthening them.

The charity is **not** required to register. Whilst they are carrying out political influence activities using funding from a foreign power, the funding has not influenced the way that the activities have been carried out, which are in the charity's own interest.

The charity would also not be required to register even if the funding came from a specified foreign power. This is because the funding has not influenced the way that the activities have been carried out.

Trustees from a foreign power

29. If a trustee of a charity is a foreign power (for example, a foreign diplomat in the UK), this does not, in itself, make the charity a foreign power or trigger a requirement to register.
30. However, a charity would need to register where they are directed by a foreign power via that trustee to carry out political influence activities in the UK.
31. Where a foreign diplomat is a trustee of a charity in a completely separate capacity to their role as a foreign power, and where there is no direction from a foreign power, this does not constitute an arrangement with a foreign power so registration would not be required.

Example 9a (registration required): A foreign diplomat from Country I is a trustee of a UK charity, which focusses on supporting sufferers of a particular medical condition. The UK-based embassy of Country I, leveraging the diplomat's role in the charity, directs the charity to lobby the UK Government to increase research funding into the medical condition. The charity then approaches a Minister in the Department for Health & Social Care, outlining the current research gaps and suggesting how they could be filled with UK Government funding.

The charity is required to register. They are in an arrangement with a foreign diplomat (**foreign power**) to communicate with a UK Government minister to influence decisions on UK Government spending (**political influence activities**).

Example 9b (registration not required): A foreign diplomat from Country I is a trustee of a UK charity, which focusses on supporting sufferers of a particular medical condition. The foreign diplomat's involvement in the charity is motivated by his own personal experience of the medical condition and is not linked to his role as a diplomat. The diplomat trustee instructs the charity to approach a Minister in the Department for Health & Social Care, outlining current research gaps in the condition and suggesting how they could be filled with UK Government funding.

The charity is **not** required to register. Whilst they are in an arrangement with a foreign diplomat and are carrying out political influence activities, the diplomat is not acting in his capacity as a foreign power but rather in a completely separate capacity.

Section 5: Exceptions to publication

32. 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 will not be published.
33. 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.
34. 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.
35. 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).
36. Registrants who believe that an exception to publication applies will be given the opportunity to provide evidence to demonstrate that the exception applies at the end of the registration process.
37. The exception which is most likely to be relevant in the context of civil society is the exception for where publication would put an individual's safety seriously at risk. Further details about the other exceptions to publication can be found in the [guidance on the information required at registration and the public register](#).

Individual's safety

38. This exception may apply, in particular, to those campaigning 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.

39. 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.
40. 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.
41. 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.
42. 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.
43. 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.

Section 6: Who the registration requirements fall upon and responsibilities of employees and subcontractors carrying out activities

44. Where the conditions for registration under either tier of FIRS are met, it is the individual or organisation which is in the arrangement with the foreign power (political influence tier) or specified foreign power or entity (enhanced tier) that is required to register (referred to as “P” in the legislation).
45. In the case of a charity in a registerable arrangement, the trustees of the charity are collectively responsible for registering.
46. Other individuals (for example, agents or volunteers) or organisations (for example, local charities within a federation) involved in carrying out the activities under a registerable arrangement do not have to register, but they should check that the arrangement is registered prior to carrying out the activities. This should be done by requesting the official confirmation of the registration from the registrant, which can then be verified via the case management team or online registration service.
47. There are safeguards in the legislation to protect individuals who have no way of knowing that they are acting pursuant to a registerable arrangement. For example, individuals who are acting in the interests of a charity, without knowledge that a foreign power or specified foreign power or entity has directed the activities, would have no reason to know that they are acting pursuant to a registerable arrangement. There are also similar safeguards 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 67 of the National Security Act 2023). 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](#).
48. In the case of a charity with a federated structure that is in a registerable arrangement, registration is required by the part of the charity that is directly a party to the registerable arrangement. For example, where a central organisation is in the registerable arrangement, but activities are carried out by a localised charity, the central organisation is responsible for registering the arrangement. The localised charity should check that the arrangement is registered prior to carrying out activities.

Case study 1 (political influence tier): A UK charity focussed on climate change forms an arrangement with the Ministry of Environmental Affairs of Country B to lobby UK Parliamentarians to bring forward a ban on the sale of new petrol and diesel vehicles. The charity then organises a campaign, encouraging their donors to write to their MP to make the case for the ban to be brought forward. The charity does not inform the donors about the registerable arrangement and, given the campaign is in the charity's own self-interest rather than principally the interest of a foreign power, there is also no indication that the campaign has been directed by a foreign power.

The **UK charity** is required to register (and the trustees of the charity are jointly responsible for this).

The donors do not have to register. They also have no means of knowing that they are acting pursuant to a registerable arrangement, so do not need to take any action to comply with FIRS.

Case study 2 (enhanced tier): A UK charity is formed of a central federation and a number of other localised charities. The central federation forms an arrangement with the UK-based embassy of Country X, which has been specified under the enhanced tier, to raise awareness of the benefits of teaching art and music UK schools. The federation then provides funding to the local charities to approach a number of UK schools with materials to assist in teaching these subjects, and provides them with details of the arrangement with the UK-based embassy of Country X.

The **central federation** is required to register (and the trustees of this federation are jointly responsible for this).

The local charities do not have to register. However, given they are aware that they are acting under a registerable arrangement, they should check that the arrangement has been registered prior to approaching any schools.

