



Home Office

Guidance on the Foreign Influence Registration Scheme (FIRS)

Consultation response

April 2025



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Any enquiries regarding this publication should be sent to us at FIRS@homeoffice.gov.uk.

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Introduction

1. Between 8 September 2023 and 1 December 2023, the Home Office held a public consultation which sought views on draft guidance on the Foreign Influence Registration Scheme (FIRS) and to inform the development of regulations.
2. Over the same period, the Home Office also held four consultation panels with representatives from the media, legal, business and academia sectors. A further round of engagement was also held with these sectors in December 2024 to seek feedback on draft sector-specific guidance,
3. FIRS is contained within Part 4 of the National Security Act 2023. The two-tier scheme is designed to provide greater transparency about the influence of foreign powers in UK politics and provide greater assurance around the activities of specified foreign powers or entities which pose the greatest risk to the UK. It requires individuals or entities to register when they form certain arrangements with foreign powers or carry out certain activities in the UK.
4. The consultation sought feedback on specific aspects of the draft guidance, including the use of a four-condition model to help readers determine whether registration requirements applied to their circumstances and the guidance on “direction”, exemptions and the circumstances constituting a material change.
5. In order for the scheme to achieve its transparency benefits, certain information registered under the scheme will be included on a public register. The consultation sought feedback on circumstances in which exceptions to publication should apply and on retention of information on the public register. It also sought views on whether any additional exemptions from registration are required.
6. The scheme’s requirements will come into force on 1 July 2025. A revised version of the [guidance](#), which has taken into account feedback from the consultation, has been published alongside this consultation response. This [guidance](#) is intended to help those who may be affected by the scheme’s requirements to understand their obligations.

Responses received

7. The Government is grateful for the responses received. The feedback from this consultation has been useful in ensuring that the guidance can reflect real-life scenarios to more clearly explain when registration requirements apply.

8. A total of 18 responses were received to the public consultation from the following sectors:
 - Research, academia & higher education: 5
 - Charities & humanitarian organisations: 2
 - Legal sector: 3
 - Business, finance and public relations: 6
 - Media: 1
 - Other: 1

Draft guidance

Consultation questions

- 1) Does the drafting of the four conditions on pages 4 and 22 of the guidance help you understand the circumstances in which registration is required?
- 2) Does the drafting of the definition of “direction” in paragraphs 22-29 (political influence tier) and paragraphs 61-64 (enhanced tier) assist you in understanding the scope of registration requirements?
- 3) Are there any scenarios in which you are not clear whether registration will be required?
- 4) Does the guidance help you understand how the exemptions apply to the scheme?
- 5) Does the guidance assist you in understanding the circumstances which constitute a “material change”, in which information registered under the scheme will need to be updated?
- 6) How could the guidance further enhance your understanding of the scheme?

Summary of consultation responses

9. The majority of respondents felt that the structure of the guidance, which set out a four-condition model to explain when registration requirements applied, was useful. However, one organisation warned that making the guidance too simplistic could mean that some under-interpret the requirements and do not read up on the detail that would bring an arrangement in or out of scope.
10. A number of questions were raised regarding the guidance on “direction”. Some organisations suggested that the guidance expanded the scope of the legislation. Others asked for further clarity about how it applied to specific scenarios, in particular ownership structures and funding arrangements.
11. Many respondents requested additional clarity around the definition of key terms within the guidance, such as “the agency or authority of a foreign government”, an “election” and a “decision” (of a minister or government department). Respondents also requested further clarity on the list of foreign powers or entities to be specified under the enhanced tier (at the time of consultation none had been announced). Some respondents also requested clarity on the circumstances in which activities taking place abroad may require registration.
12. There was a general understanding among respondents about the requirement to register a “material change” and on how exemptions applied, though additional questions were raised about the circumstances which constituted a “material change” and the “UK arrangement” exemption. (For the purpose of guidance, the

Home Office has since renamed this exemption to “UK Crown Bodies Arrangement” exemption to aid understanding).

13. A number of respondents raised questions about who the responsibility for registration fell upon where the four conditions were met and on practical requirements for employees and subcontractors acting pursuant to a registerable arrangement.
14. Some respondents also asked practical questions about compliance, such as the timescales in which registration was required, whether they would need to wait for confirmation from the case management team before their arrangement is considered registered, whether there would be a grace period and whether they would need to register any retroactive arrangements.
15. Some respondents requested guidance to be presented in alternative forms to aid understanding and for bespoke guidance related to their sector.

Government response

16. The Government has published a revised version of the [guidance](#), having taken into consideration the feedback received through this consultation. The Government has separated the guidance into a number of separate products, rather than one long product, to enable better accessibility.
17. Further detail has been added to this guidance to explain in detail who the responsibility for registration falls upon, the time limits in which registration is required and the responsibilities of employees and subcontractors acting pursuant to a registerable arrangement.
18. New case studies have been added to the guidance to aid understanding of the ways in which a person may be considered to be “directed”, including where there is a threat, or where consequences may be suffered if a request is not complied with. New sections have been added to the guidance to explain how direction may apply to funding arrangements and to state-owned enterprises.
19. Additional clarification has been included in the guidance to explain key terms within the definitions of a “foreign power” and “political influence activities”, to further explain the “UK crown bodies arrangement” exemption and to provide examples of where activities taking place outside of the UK could trigger registration requirements. The Government has also provided further guidance for those working with entities with close links to foreign powers, such as state-owned enterprises.
20. Additional case studies have been added to the guidance to further explain the scenarios where registration is, and is not, required. This includes in the context of those hosting, presenting at or attending policy discussions, conferences and roundtables. Examples of compliance have also been included to set out where a single registration may amount to compliance, or where registered information may need to be updated where there is a material change.

21. The Government has also published guidance on the foreign powers and foreign power-controlled entities which have been specified under the enhanced tier. The Government has also clarified that all activities carried out at the direction of the foreign powers and foreign power-controlled entities specified at the time of go-live of the scheme will require registration (subject to any exemptions applying). The Government will keep this position under review, both for the foreign powers and entities currently specified and for any future specifications.
22. Further guidance has also been provided on how the requirements apply to pre-existing arrangements. Where an arrangement was made before, but is still in force on, 1 July 2025, this arrangement will need to be registered by 1 October 2025. This applies to both arrangements under the political influence tier and the enhanced tier.
23. Additional sector-specific guidance has also been published for the media sector, business sectors, research and academia, charity sector and defence sector. This contains guidance on specific scenarios and case studies relevant to each sector where registration requirements apply. This guidance has been produced having taken into account feedback from the consultation panels carried out in September-December 2023 and December 2024. The feedback to some of these changes have been positively received in the December round of engagement.
24. The 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.

Exceptions to publication

Consultation questions

- 7) Are the proposed exceptions from publication sufficiently clear?
- 8) Do you anticipate any issues or challenges with the proposed model for considering and approving exceptions to publication? If so, how do you think the model could be improved?
- 9) Are there any kinds of information that will be registered under the scheme that will not be covered by the exceptions to publication, but you would still consider to be damaging if disclosed?
- 10) Are there any other circumstances where you think that information should not be published?

Summary of consultation responses

25. Most respondents felt that the proposed exceptions to publication, and the model for applying them, were appropriate.
26. Additional questions were raised about the exceptions for commercially sensitive information and where an individual's safety would be put at risk. Concerns were raised about whether the individual safety exception would apply to those working in fields such as human rights, where they or their family or associates could be put at risk in their home country. An additional question was raised about whether this exception would apply to scenarios where there was a significant risk to an individual's mental or emotional health, including where they may suffer harassment or stalking as a result of publication.
27. One respondent also suggested that an exception should apply where publication would be prejudicial to the furtherance of a charitable purpose, however they did not provide evidence about when this may occur.

Government response

28. The Government has decided to broadly retain the same approach with regards to the exceptions to publication proposed in the consultation document.

Exceptions

29. However, the Government will broaden the exception related to national security to cover circumstances where publication would be prejudicial to the safety or interests of the UK. This is intended to ensure that sensitive information which could

be harmful to a broader range of UK interests, including national security, economic interests, defence interests, will not be revealed through publication.

30. Similarly, the Government will also introduce another exception where publication would be prejudicial for the prevention or detection of crime, a criminal investigation or criminal proceedings. This ensures that publication does not interfere with the work of law enforcement or the UK judicial system.
31. Whilst the Government does not intend for the scheme to interfere with charities' ability to campaign, we are not aware of any circumstances where publication would be prejudicial to the furtherance of a charitable purpose and so does not intend to provide for an additional exception.

Registration and The Public Register

32. The Government has decided that registrations under the enhanced tier will **not** be published, unless they relate to the carrying out of political influence activities. This will ensure that confidentiality of information is respected with regards to, for example, commercial activities registered under the enhanced tier. Where political influence activities are carried out at the direction of a foreign power specified under the enhanced tier, the relevant information will still be published.
33. The Government has published guidance on the information required at registration and the public register. This includes details of the specific information that will be published and the scope and application of the exceptions to publication. Following consultation responses, the Government has clarified in this guidance that the "individual safety" exception applies in the context of human rights defenders where they, or their family or associates, may come to harm in their home country as a result of publication.
34. The information that will be published on the public register will be high-level descriptions of the arrangements in place and the activities that take place under them. In many cases, it will not be necessary for a registrant to provide a level of detail which risks revealing commercially sensitive information, with general descriptions of activities being sufficient instead of any confidential details. However, the Government has set out further detail in guidance how the exception to publication for commercially sensitive information will apply for circumstances where this level of detail is necessary to convey an accurate picture of the arrangement or activities. The Government acknowledges that this exception could, for example, apply in circumstances where disclosure of the mere existence of a registerable arrangement would seriously prejudice an organisation's commercial interests.
35. Regulations to legislate for exceptions to publication have now been laid in parliament and will be subject to the affirmative procedure.

Retention of information on the public register

Consultation questions

11) Are there any circumstances where you think that information should be retained on the public register for a shorter or longer period than 10 years?

Summary of consultation responses

36. Few responses were received about the proposed retention period of information on the public register. However, some respondents felt that the proposal to retain information on the register indefinitely if an end date was not provided may be disproportionate. One respondent raised that this period may result in irrelevant information related to companies which had been dissolved since their registration remaining on the register.

Government response

37. The Government has decided to proceed with the proposal set out on the consultation document. Information will be retained on the public register for ten years after the stated end date of the arrangement, or indefinitely where no end date is provided. This retention period has been set out in regulations on the publication of information, which have been laid in Parliament and subject to the affirmative procedure.

38. Whilst the Government recognises the proportionality concerns about these retention periods, they are considered necessary to fulfil the transparency aims of the scheme. This is because information will need to remain on the public register for long enough for trends of foreign influence to be monitored, including how these may vary around election periods in the UK or in terms of the countries directing the activity.

39. Furthermore, the Government believes that some “foreign influence arrangements” may continue over multiple years. In order to ensure that the register provides a full picture of influence activities, where an end date has not been provided, we will assume that an arrangement is still ongoing and the information will therefore be retained on the register. However, registrants will be able to inform the Government at any point that an arrangement has ended, in order to start the clock for their information to be removed from the register. The FIRS Case Management Team will also keep under review any open-ended registrations and may take action to update the register where it has evidence that an open-ended arrangement has ceased.

Exemptions from registration

Consultation questions

12) Do you think that the exemptions from registration are appropriate? Are there other exemptions that you think should be included or excluded?

Summary of consultation responses

40. A number of additional exemptions from registration were proposed.

41. Some respondents suggested that the Government should exempt those acting in an overt manner for a foreign power from having to register under the political influence tier. They suggested that private communication activities should not be registerable where the target of the communication knows that the person is acting at the direction of a foreign power.

42. Furthermore, some respondents suggested that an exemption should apply for those who had already provided information to the government under another scheme (such as the Lobbying Act 2014, National Security & Investment Act 2021, export controls or the Academic Technology Approval Scheme).

43. One respondent suggested that there should be an exemption for activities which are funded using Official Development Assistance finance from foreign governments.

44. Some respondents also suggested that the scope of “relevant activities” under the enhanced tier should be narrowed to avoid capturing activities which did not pose a risk to UK national security.

45. Some respondents also set out concerns that FIRS may deter certain academic, research or commercial activities from taking place.

Government response

46. The Government has introduced new exemptions to ensure that the scheme’s requirements remain proportionate and to respond to concerns raised as part of this consultation. These exemptions apply to:

- Sovereign wealth funds (political influence tier);
- Government administrative processes (enhanced tier);
- Study activities (enhanced tier);
- Public body arrangements (enhanced tier).

47. All exemptions, including those set out in primary legislation and those newly introduced, have been applied to only a narrow set out activities. The Government

considers it necessary to limit the scope and application of the exemptions, to ensure that the scheme does not contain loopholes which will be exploited by the foreign powers who wish to cause harm to the UK. The Government has therefore not extended these exemptions to additional activities raised to ensure the scheme can still achieve its benefits. For example, while the Government recognises the importance of Official Development Assistance finance for furthering causes that are positive for society, it is believed that such an exemption would provide such a loophole.

Sovereign Wealth Funds

48. The exemption for sovereign wealth funds has been designed to ensure that, where an arrangement between a sovereign wealth fund and a foreign power is already transparent, registration of that arrangement is not required. However, it only applies where a sovereign wealth fund carries out political influence activities that are directly related to its investments, therefore preventing this exemption from being used by a foreign power seeking to influence a wider range of political matters in the UK.

Public Bodies

49. The exemption for arrangements to which UK public bodies are party is designed to ensure that where a UK public body is party to an arrangement with a specified foreign power or foreign power controlled entity to carry out activity in the UK (excluding political influence activity), this does not need to be registered with FIRS. UK public bodies are operationally independent, the majority of them are accountable to UK Government Ministers and Parliament so these arrangements should already be largely transparent. However, local governments do not have the same accountability to UK Government Ministers or Parliament. Therefore, this exemption does not apply to arrangements to which local governments are party.

Funded Education Arrangements

50. The exemption for scholarships and education providers in the enhanced tier of FIRS has been designed to apply where those who are carrying out certain study activity in the UK which is funded by a specified foreign power do not have to register that arrangement with FIRS. However, it does not apply to arrangements between students and specified foreign powers where the activity has no clear relationship to studying in the UK, such as organising protests on campus. It also applies to UK education providers who are in arrangements with specified foreign power to facilitate certain study activity.

Government Administrative Process

51. The exemption for government administrative processes in the enhanced tier of FIRS has been designed to ensure that where individuals are being directed by a specified foreign power to carry out UK activity as part of complying with certain routine administrative processes (such as applying for a visa, filing a tax return or

registering a marriage) is not registrable. This exemption only applies where the specified foreign power gives direction to carry out activity in the UK that is reasonably necessary to complete that administrative process.

Other exemptions considered

52. The primary legislation already sets out that, where it is reasonably clear that it is made at the direction of a foreign power, a public communication is not in scope of registration requirements. The Government has considered whether it is possible to adopt a similar approach for private communication activities, where it is reasonably clear that the communication is made at the direction of a foreign power. However, there are two issues with this potential approach. Firstly, whilst it may be reasonably clear to the target of a communication that it is made at the direction of a foreign power, it may not be clear to the public at large. Removing overt private communication activities from the definition of “political influence activities” would therefore not allow the scheme to achieve the transparency benefits of a public register. Secondly, it would lead to evidential challenges at prosecution. This would mean that proxies of foreign powers who wish to cause harm in the UK may seek to falsely claim they had made it clear in a verbal communication that they are acting at the direction of a foreign power. Conversely, it may also increase the risk for those delivering legitimate overt communications, as, in many circumstances, they would not be able to prove that they had made clear that they were acting at the direction of a foreign power. The Government has therefore decided against introducing such an exemption.
53. Consultation respondents also highlighted that a registerable arrangement under FIRS, or the activities which are carried out beneath the arrangement, may also require notification to the Government under another scheme, such as the Lobbying Act 2014, National Security & Investment Act 2021, export controls or Academic Technology Approval Scheme. The Government aims to keep the registration burden for FIRS as low as possible and, as such, has not adopted an approach where registered activity has to be approved by the case management unit before it can commence. However, an exemption from FIRS for activities registered or approved under another government scheme would mean that the FIRS public register does not have a complete picture of the activities being carried out at the direction of foreign powers. Furthermore, other Government schemes seek to achieve different objectives, have differing scope to FIRS and require registration of different information.
54. The Government has set out in guidance that, for the foreign powers and foreign power-controlled entities specified at the go-live of the scheme, all activities carried out in the UK at the direction of these foreign powers and entities will require registration. The Government considers that it is necessary to require registration of a broad range of activities under the enhanced tier, in order to provide assurance around the full range of activities directed by states who are of national security risk to the UK (the aim of the enhanced tier of the scheme). However, the Government will keep this position under review, in particular for any future specifications.

Next steps

55. The Government has laid a number of regulations in parliament, which will need to be approved for the scheme to come into force. These include regulations setting out the information required at registration (subject to the negative procedure in Parliament), the information that will be published (affirmative procedure), and the foreign powers and foreign power-controlled entities which have been specified under the enhanced tier and associated “relevant activities” (affirmative procedure).
56. Subject to approval of the regulations, the scheme’s requirements will come into force on 1 July 2025. The online registration service will be available from this date to enable those affected to comply with the requirements.
57. The Government has also published revised versions of the [guidance](#), as well as sector-specific guidance for the media sector, businesses and industry bodies, research and academia, charity sector and defence sector. This guidance has been produced with input from the relevant sectors and intends to assist those in scope of the requirements to understand their obligations. The Government will keep the guidance under review as the scheme is implemented. As FIRS is a new scheme, the Government understands that the guidance may need to be updated or further guidance needed as the scheme beds in.
58. The Government plans to run a comprehensive communications and engagement campaign to ensure that those who may be impacted by the scheme are aware of their obligations. Alongside the public guidance mentioned above, the Government intends to hold briefings and webinars with key sectors who may be impacted by FIRS, as well as providing a suite of sharable material, such as posters, leaflets and factsheets. Finally, the Government will also raise awareness of the scheme and signpost to information about the scheme on traditional and social media outlets.