



Home Office

Guidance on the Foreign Influence Registration Scheme (FIRS): Information required at Registration and the Public Register

April 2025



© Crown copyright 2025

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/collections/foreign-influence-registration-scheme>

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

Contents

| | |
|--|----|
| Glossary of Key Terms | 2 |
| Chapter 1: About this Guidance | 3 |
| Chapter 2: Information required which relates to registrants (both tiers) | 4 |
| Individual registrants | 4 |
| Body corporate registrants | 5 |
| Unincorporated association registrants | 5 |
| Information related to third-party representatives | 6 |
| Chapter 3: Information required under the political influence tier | 8 |
| Information related to political influence tier arrangements | 8 |
| Information related to communication activities | 9 |
| Information related to public communication activities | 9 |
| Information related to disbursement activities | 10 |
| Chapter 4: Information required under the enhanced tier | 11 |
| Information related to arrangements with specified foreign powers or entities | 11 |
| Information related to activities carried out by a specified foreign power-controlled entity | 13 |
| Chapter 5: The Public Register | 14 |
| Retention of information on the public register | 14 |
| Chapter 6: The level of detail required at registration | 15 |
| Chapter 7: Exceptions to publication | 16 |
| Process for applying exceptions to publication | 16 |
| Chapter 8: Interaction of the FIRS public register with other transparency publications | 21 |
| The UK Parliament Registers of Financial Interests | 21 |

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. |
| Foreign power | Has the meaning given by Section 32 of the National Security Act 2023. |
| Political influence activities | A communication, public communication or provision of money, goods or services intended to influence a political matter. |
| Person | An individual or other person who is not an individual, such as a company. |
| Registrant | A person required to register under FIRS. |
| Specified foreign power | A foreign power 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 other interests. It is contained within Part 4 of the National Security Act 2023.

Those registering with the scheme are required to provide details about themselves or their organisation, details about their arrangement and details about the activities to be carried out. The online registration service will direct registrants to provide the appropriate information according to their own circumstances.

Information registered under FIRS which relates to political influence activities will be included on a public register. The aim of this register is to better inform the public as to the scale and extent of foreign influence in UK political affairs. Those who appear on the public register should be regarded as supporting the transparency aims of the scheme. Appearing on the register does not mean that an individual or entity is doing anything illegitimate.

This guidance provides further details about the information required at registration, and information about the public register, including the specific arrangements which will be published, the circumstances in which exceptions to publication may apply and the length of retention of information on the public register. It is intended for those who may be in scope of either tier of the Scheme, as well as users of the public register.

Separate guidance is available on the requirements of the [political influence tier](#) and the [enhanced tier](#).

Chapter 2: Information required which relates to registrants (both tiers)

1. A registrant can be an individual, a body corporate (such as a limited company) or an unincorporated association (such as a sports club).
2. Certain information related to registrants will be included on the public register, as is indicated in the right-hand column of the below tables. However, information will only be published if the arrangement itself is in scope of publication and no exception to publication applies. Further details of the arrangements which will be published can be found in [chapter 5](#).

Individual registrants

3. Where a registrant is an **individual**, they are required to provide the following information:

| # | Type of information required | Published |
|---|---|--|
| 1 | Full name | Yes |
| 2 | Any former name | |
| 3 | Day and month of birth | |
| 4 | Year of birth | Yes |
| 5 | Nationality | |
| 6 | Residential and correspondence address | Partial (<i>town, city, province, region, and country or territory only</i>) |
| 7 | Telephone number (<i>where available</i>) | |
| 8 | Email address (<i>where available</i>) | |

4. Individual registrants are also required to provide a copy of an identity document, in order for their identity to be verified. The copy of this identity document is for reference of the FIRS Case Management Team only and will not be published. One of the following identity documents should be provided, in order of preference:
 - UK passport;
 - UK driving licence;
 - Overseas passport;
 - ID card issued by an EU or EEA state;
 - EU driving licence;
 - Overseas ID card.

5. Where an individual does not have any of the above documents, then they are required to provide one of the following pieces of information, in order of preference:
 - UK national insurance number
 - Overseas social security number and the country or territory which issued the number.
6. It will not be acceptable for an individual to choose to provide a form of identity documentation which is lower in priority, if they hold a document that is higher in priority. For example, an individual holding a UK passport and a passport from another country must provide a copy of the UK passport.

Body corporate registrants

7. Where a registrant is a **body corporate**, they are required to provide the following information:

| # | Type of information required | Published |
|---|---|-----------|
| 1 | Full name and any trading name | Yes |
| 2 | [Where applicable] Registered company number and the name of the public register which they are registered in (for example, Companies House); | Yes |
| 3 | Date of incorporation | |
| 4 | Country or territory of incorporation | Yes |
| 5 | Registered address or address of the principal office | Yes |
| 6 | Correspondence address | |
| 7 | Telephone number | |
| 8 | Email address | |

8. Where a registrant is a body corporate, information related to one officer of the entity is also required. This should relate to a director, member of the committee of management, chief executive, manager, secretary or other similar officer of the organisation. They do not necessarily need to be the same individual as the one completing the form. None of their details will be included on the public register.
9. The information required from this officer will align with the information required from [individual registrants](#). The provision of this information ensures that responsible individuals are identifiable and prevents abuse of the scheme by shell companies.

Unincorporated association registrants

10. Where a registrant is an **unincorporated association**, they are required to provide the following information:

| # | Type of information required | Published |
|---|---|-----------|
| 1 | Name of the unincorporated association | Yes |
| 2 | [Where applicable] Registered number and the name of the public register which they are registered in (for example, Companies House); | Yes |
| 3 | Date of formation | |
| 4 | Country or territory of principal office | Yes |
| 5 | Principal address | Yes |
| 6 | Correspondence address | |
| 7 | Telephone number | |
| 8 | Email address | |

11. Where a registrant is an unincorporated association, information related to one officer of the association is also required. This should relate to a person who is involved in the management or control of the association. They do not necessarily need to be the same individual as the one completing the form. None of their details will be included on the public register.

12. The information required from this officer will align with the information required from [individual registrants](#). The provision of this information ensures that responsible individuals are identifiable and prevents abuse of the scheme by shell companies.

Information related to third-party representatives

13. Registrants may entrust third party representatives to complete the registration form on their behalf. In these circumstances, certain information about the representative is required, in addition to information about the registrant.

14. This section does **not** apply to an employee who is registering for their own company. In this scenario, the registrant is a body corporate.

15. Details related to third-party representatives are **not** published; only details about registrants themselves are to be published.

16. A third-party representative could be an individual, or it could also be a body corporate (for example, a law firm) or an unincorporated association. The information required will depend on whether the representative is an individual, body corporate or unincorporated association.

17. Where a third-party representative is an **individual**, they are required to provide the following information about themselves:

| # | Type of information required | Published |
|---|------------------------------|-----------|
| 1 | Full name | |

Guidance on the Foreign Influence Registration Scheme: Information required at Registration and the Public Register

| # | Type of information required | Published |
|---|--|-----------|
| 2 | Any former name | |
| 3 | Residential and correspondence address | |
| 4 | Telephone number | |
| 5 | Email address | |

18. Where a third-party representative is a **body corporate**, the following information is required about the body corporate:

| # | Type of information required | Published |
|---|---|-----------|
| 1 | Full name and any trading name | |
| 2 | Registered address or address of the principal office | |
| 3 | Correspondence address | |
| 4 | Telephone number | |
| 5 | Email address | |

19. Where a third-party representative is an **unincorporated association**, the following information is required about the unincorporated association:

| # | Type of information required | Published |
|---|---------------------------------|-----------|
| 1 | Full name and any trading name | |
| 2 | Address of the principal office | |
| 3 | Correspondence address | |
| 4 | Telephone number | |
| 5 | Email address | |

Chapter 3: Information required under the political influence tier

20. Those registering an arrangement under the political influence tier are required to provide details of their arrangement with the foreign power and details of their political influence activities. Political influence activities can be any of the following:

- Communication activities;
- Public communication activities;
- Disbursement activities (the provision of money, goods or services).

21. Most information related to registrations under the political influence tier will be included on a public register, unless an exception to publication applies.

Information related to political influence tier arrangements

22. Those registering under the political influence tier are required to provide the following information in all circumstances:

| # | Type of information required | Published |
|---|---|-----------|
| 1 | Description of the nature and form of the arrangement (for example, a contract) | Yes |
| 2 | Name of the foreign power (for example, Governing Party of Country A) | Yes |
| 3 | Date the direction was given | Yes |
| 4 | <i>[Where those carrying out the activities are not the same as the registrant ["P"]]</i> The names of the persons to carry out the activities (or a description of the persons to carry out the activities), their role in the activities and their relationship to the registrant (for example, consultants forming part of X network, which the registrant is also part of, who are involved in the parliamentary lobbying activities) | Yes |
| 5 | <i>[Where those carrying out the activities are not the same as the registrant ["P"]]</i> Email address, telephone number and residential address of those carrying out the activities (where available) | |
| 6 | Date(s) on which political influence activities occurred or will commence | Yes |
| 7 | Whether the activities are to be carried out on a one-off basis or are to be repeated | Yes |
| 8 | Estimated end date of political influence activities (or a statement stating that the activities will continue indefinitely or their end date is unknown) | Yes |

23. The information at row #4 above does **not** require registrants to provide details of all employees of a company involved in registerable activities. Where the activities

are to be carried out by a company, the name of the company and the relationship of the company to the registrant is sufficient.

Information related to communication activities

24. Those registering communication activities are also required to provide the following information.

| # | Type of information required | Published |
|---|---|-----------|
| 1 | <p>Role of the person to whom communication is made (for example, Deputy Director of Immigration Enforcement)</p> <p>Where an individual recipient of the communication cannot be individually identified, either:</p> <ul style="list-style-type: none"> • The category of person to whom the communication will be made (for example, Member of Parliament); or • A description of the types of persons to whom the communication is made (for example, senior civil servants responsible for immigration in the Home Office) | Yes |
| 2 | Name of the person to whom communication is made (where known) | |
| 3 | Nature and (where known) form of the communication (for example, emails) | Yes |
| 4 | Purpose and sought outcome of the communication (for example, to influence MPs to ensure an amendment to legislation X is defeated) | Yes |

25. Where political influence activities are targeted at identifiable individuals, the Government intends to notify them ahead of publication of the registration.

Information related to public communication activities

26. Those registering public communication activities are also required to provide the following information.

| # | Type of information required | Published |
|---|---|-----------|
| 1 | Nature and (where known) form of the communication (for example, newspaper article) | Yes |
| 2 | Intended audience of the communication (if known) (for example, UK businessmen in the field of AI) | Yes |
| 3 | Purpose and sought outcome of the communication (if known) (for example, to encourage the Government to reverse their recent policy decision on X matter) | Yes |

Information related to disbursement activities

27. Those registering disbursement activities are also required to provide the following information:

| # | Type of information required | Published |
|---|--|-----------|
| 1 | Nature of the money, goods or services to be distributed (for example, consultancy services about investment opportunities in wind energy projects in country X) | Yes |
| 2 | Value of goods or services to be distributed | Yes |
| 3 | Name of the person receiving the goods or services (where known) | |
| 4 | <p>Role or capacity of the person in which the person receiving the goods or services is acting (for example, Deputy Director of Immigration Enforcement)</p> <p>Where an individual recipient of the money, goods or services cannot be individually identified, a description of the types of persons to whom the disbursement is made is acceptable (for example, senior civil servants responsible for immigration in the Home Office)</p> | Yes |
| 5 | Purpose and sought outcome of the disbursement (for example, to encourage the Government to approve an export license for X company) | Yes |

Chapter 4: Information required under the enhanced tier

28. Those registering under the enhanced tier could either be:

- A person in an arrangement with a specified foreign power or entity;
- A specified foreign power-controlled entity registering their own activities.

Information related to arrangements with specified foreign powers or entities

29. Where an arrangement is to be registered under the enhanced tier, the following information is required:

| # | Type of information required | Published (political influence activities) | Published (other activities) |
|---|---|---|------------------------------------|
| 1 | Description of the nature and form of the arrangement (for example, non-legally binding MOU) | Yes | |
| 2 | Name of the specified person | Yes | |
| 3 | Date the direction was given | Yes | |
| 4 | <i>[Where those carrying out the activities are not the same as the registrant ("P")]</i> The names of the persons to carry out the activities (or a description of the persons to carry out the activities), their role in the activities and their relationship to the registrant (for example, consultants forming part of X network, which the registrant is also part of, who are involved in providing advice on managing risks in X project) | Yes | |
| 5 | Email address, telephone number and residential address of those carrying out the activities (where available) | | |
| 6 | A description of the types of relevant activities to be carried out (for example, marketing activities, to take place via TV advertisements and in person events for stakeholders in X industries) | Yes | |

| # | Type of information required | Published (political influence activities) | Published (other activities) |
|----|--|---|------------------------------------|
| 7 | The purpose and sought outcome of the activities (for example, to raise awareness and increase applicant numbers to X opportunities) | Yes | |
| 8 | The date on which the activities are expected to commence | Yes | |
| 9 | Whether the activities are carried off on a one-off basis or are to be repeated | Yes | |
| 10 | Anticipated end date of activities (or a statement stating that the activities will continue indefinitely or their end date is unknown) | Yes | |

30. The information at row #4 above does **not** require registrants to provide details of all employees of a company involved in registerable activities. Where the activities are to be carried out by a company, the name of the company is sufficient.

31. Where an arrangement is registerable under both the enhanced tier and the political influence tier, registration under the enhanced tier only is required. Where political influence activities are to be carried out as part of an arrangement registered under the enhanced tier, the information required by the [political influence tier](#) about those activities is also required.

32. Information registered under the enhanced tier will **not** be published, unless the arrangement relates to, or includes, the carrying out of political influence activities. In these circumstances, the information which is to be published will align with that which is published under the [political influence tier](#). For example, where an arrangement covers both political influence and other registerable activities, only the information regarding the political influence activities will be published.

Example (enhanced tier publication):

The Government of Country A has been specified under the enhanced tier, with all activities constituting “relevant activities”. A UK-based consultancy firm signs a contract with the Government of Country A to provide advice to businesses from Country A on how to invest in the UK. The consultancy firm is also directed by the Government of Country A to lobby the UK Government to reduce import tariffs for goods from Country A.

Information related to activities carried out by a specified foreign power-controlled entity

33. Where a specified foreign power-controlled entity registers their own activities, they are required to provide the following information:

| # | Type of information required | Published (political influence activities) | Published (other activities) |
|---|---|--|------------------------------|
| 1 | A description of the types of relevant activities to be carried out (for example, cultural promotion activities to showcase the art of 18th century artists from Country X among university students) | Yes | |
| 2 | The purpose and sought outcome of the activities (for example, to increase knowledge of the culture of Country A and enhance understanding of the cultural differences between the UK and Country A) | Yes | |
| 4 | The date on which the activities are expected to commence | Yes | |
| 5 | Whether the activities are carried off on a one-off basis or are to be repeated | Yes | |
| 6 | Anticipated end date of activities (or a statement stating that the activities will continue indefinitely or their end date is unknown) | Yes | |

34. Where a specified person registers political influence activities, they are also required to provide the information that would be required by the [political influence tier](#) about those activities.

35. Details of activities registered by specified persons will **not** be published, unless those activities are political influence activities. In these circumstances, the information which is to be published will align with that which is published under the [political influence tier](#). Where an arrangement covers both political influence and other registerable activities, only the information regarding the political influence activities will be published.

Chapter 5: The Public Register

- 36. Information registered under FIRS which relates to political influence activities will be included on a public register. The aim of this register is to better inform the public as to the scale and extent of foreign influence in UK political affairs.
- 37. Those who appear on the public register should be regarded as supporting the transparency aims of the scheme. Appearing on the register does not mean that an individual or entity is doing anything illegitimate.
- 38. Information is published on the register as soon as it is reasonably practicable once it has been processed by a FIRS caseworker. It is not published at scheduled intervals; rather it is a live register which is updated on a regular basis.
- 39. Exceptions to publication apply in some circumstances, as outlined in [chapter 7](#). Information will not be included on the public register when these circumstances apply.
- 40. In some circumstances, information provided at registration may be summarised on the public register, rather than published in full. This is to ensure that entries on the public register have a consistent amount of detail and to ensure that only information which is relevant to the transparency aims of the scheme is published. For example, if a registrant provided information which was irrelevant to their arrangement or activities in scope of FIRS within the same answer as the information that was required of them, the irrelevant information would not be published.

Retention of information on the public register

- 41. Information is retained on the public register for 10 years after the stated end date of an arrangement. Where an end date has not been provided at registration, the information will be retained on the register indefinitely.
- 42. Individuals or entities are able to update their information via the online registration portal at any point to inform that an arrangement has ended.
- 43. The FIRS Case Management Team will also regularly review published information to identify if it should continue to appear on the register.
- 44. Where the Case Management Team has reason to believe an open-ended arrangement has ceased they may mark it as such on the public register and they may remove an open ended arrangement from the register where they have reason to believe the arrangement ceased more than 10 years ago.

Chapter 6: The level of detail required at registration

45. Chapters 3 and 4 set out the information required at registration under both tiers.

46. Registrants should provide enough detail at registration to ensure that the Government has a clear picture of the activities that they have been directed to carry out or arrange, and the means through which they will do this. Vague statements such as “I communicate with the Government to influence policy” or “I sell goods and services” will not be sufficient. However, it is possible to provide information about the nature and purpose of the activities, without detailing the “who, what, when, where, why and how” for every aspect of the activities. For example, registration of each email sent as part of political influencing activity, or each individual sale made or meeting held under a project, will not be necessary. 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.

47. Registrants are not required to provide information which they are entitled to refuse to disclose in legal proceedings on grounds of legal professional privilege (in Scotland, confidentiality of communications). Similarly, they 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).

Chapter 7: Exceptions to publication

48. There are limited circumstances where exceptions to publication apply. When registering an arrangement, the registrant will be asked to state as part of the registration process whether they believe an exception applies.
49. Exceptions to publication apply in the following circumstances:
- **Exception 1:** Where there is a risk that publication would prejudice the safety or interests of the UK.
 - **Exception 2:** Where there is a risk that publication would prejudice the prevention or detection of crime, a criminal investigation or criminal proceedings;
 - **Exception 3:** Where there is a significant risk that publication would put any individual's safety seriously at risk.
 - **Exception 4:** Where publication would involve the disclosure of commercially sensitive information.

Process for applying exceptions to publication

50. Registrants that believe that an exception to publication applies should provide supporting evidence when making the registration. The online registration service provides the opportunity for registrants to do so after submitting the registration.
51. The FIRS Case Management Team will inform the registrant if the exception has been applied. In some circumstances, the FIRS Case Management Team may request further evidence from the registrant. If the evidence to support an exception to publication is unsatisfactory, or does not meet the criteria for any of the exceptions, then the registrant will be notified of the date on which the information will be published. If the registrant provides further evidence that an exception to publication applies ahead of this date, then publication will be delayed while the additional evidence is considered. If an exception is not granted, the registrant will be given one opportunity to request a reconsideration.
52. Exceptions to publication can apply to a registration as a whole, or to only part of the registration. In the latter cases, the registration will be published, but with the relevant information redacted. For example, with registrations where only some of the information is commercially sensitive, the registration will be published but with the commercially sensitive information redacted.
53. Exceptions **cannot** be claimed for scenarios where information on the public register would cause reputational damage alone.

54. There is no need to pause activities when an exception to publication is being considered. The decision on whether an exception applies has no bearing on whether the activities may or may not continue.
55. Exceptions to publication can apply retrospectively, meaning that a registration, or information as part of a registration, can be removed from the public register after it has already been published. This might be the case if, for example, there has been a change in circumstances since the registration was made and an exception has begun to apply.
56. If you believe that an exception to publication should apply to a registration that has already been published, you should contact the Case Management Team and provide evidence to support your claim that an exception applies.
57. Information should only be withheld from publication for the time that the exception applies. For example, there may be information that is excepted due to it being commercially sensitive while a contract is being negotiated. If, once the contract is signed, the information is no longer sensitive the registrant must notify the Case Management Team so the register can be updated.

Exception 1: Prejudicial to the safety or interests of the UK

58. This exception applies where publication would be prejudicial to the safety or interests of the UK.
59. Examples of situations where this exception may apply are as follows:
- Where publication would reveal details of sensitive communications involving the UK Government (for example, on defence-related issues);
 - Where publication could assist a foreign power or entity specified under the enhanced tier of FIRS in acting against the UK's interests;
 - Where publication would present a risk to UK infrastructure or Government assets.

Exception 2: Prejudicial to criminal investigations and proceedings

60. This exception applies where publication would be prejudicial to:
- i) The prevention or detection of crime;
 - ii) Criminal proceedings; or
 - iii) A criminal investigation.
61. Examples of situations where this exception may apply are as follows:
- Where publication could reveal information which would make it easier for a crime to be committed (e.g. if it could reveal the location at which controlled substances were being sold illegally);

- Where publication could reveal information which formed part of a criminal investigation.

Exception 3: Put an individual's safety at risk

62. This exception applies where there is a significant risk that publication would put any individual's safety at risk of serious harm.

63. Examples of situations where this exception may apply are as follows:

- Where publication would present a risk to an individual's life;
- Where publication would present a risk to an individual's physical health (for example, a risk that they may sustain a serious injury, including through domestic violence);
- Where publication would present a serious risk to an individual's mental or emotional health (for example, a risk that they may suffer harassment or stalking).

64. 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.

65. The exception is also likely to apply to scenarios where coercion has been used by a foreign power as part of a direction to an individual, as further coercive or punitive measures could be taken by the foreign power as a result of appearance on the public register.

66. The exception may be more likely to apply to those engaged in controversial work, for example, animal experimentation, weapons research, abortion treatment or those operating covertly within law enforcement or security services. However, if publication did not reveal (implicitly or explicitly) the types of work in which they were engaged, then the exception would not automatically apply even if an individual named on the registration worked in one of these fields.

67. Evidence to support this exception should, where possible, include evidence of a serious 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. There must, however, be evidence of a causal link between the publication and the risk to the individual.

68. 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 foreign intelligence agency) that puts you 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.

69. 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.

70. 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.

Exception 4: Commercially sensitive information

71. This exception applies where publication would result in the disclosure of commercially sensitive information.

72. Examples of types of information that could be considered commercially sensitive include:

- capital expenditure and operating expenses;
- pending mergers and acquisitions; and
- trade secrets, patents and other intellectual property

73. In order to claim that the exception for commercially sensitive information applies, evidence will need to be provided 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.

74. 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, suppliers or business 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).

75. 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.
76. It is possible that the mere existence of an arrangement could in itself be commercially sensitive, however it would be necessary for a registrant to provide evidence to demonstrate that this is the case. In these circumstances, the entire registration will not be published.
77. 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,
78. It is also possible that explanations alone, without documentary evidence, could be used to demonstrate that the exception applies, particularly for informal arrangements. However, the registrant should ensure that they provide sufficient detail to demonstrate **both** that the information is confidential, **and** that its publication would be highly likely to seriously prejudice commercial interests.
79. 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 company.
80. 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 the publication of an arrangement would lead to commercial advantage being given to a competitor would not be sufficient, if there was no explanation or evidence of why the information being published would be of sufficient value to a competitor.

Chapter 8: Interaction of the FIRS public register with other transparency publications

81. The FIRS political influence tier requires individuals or organisations to register where they are directed by a foreign power to carry out or arrange political influence activities. This could include communications or disbursements to Parliamentarians, ministers, and senior government officials which intend to influence them.
82. There are a number of other government and parliamentary transparency publications which record details of meetings with and gifts/donations given to Parliamentarians, Government Ministers, special advisers and senior civil servants; some information on the FIRS register may therefore also appear on these registers.
83. However, it is important to recognise that, whilst there may be some overlap, the purpose, scope and requirements of FIRS are fundamentally different to the other registers and publications. It is possible for information on the FIRS public register to not be registerable or in scope of the other registers or publications. Similarly, it is also possible for information in scope of another public register to not be in scope of FIRS. It will not always be clear from information included on other registers, whether the activity would fall in scope of FIRS.
84. The FIRS public register is also a live register, where registrations (subject to any exceptions) are made public as soon as is reasonably practicable once they have been processed by a FIRS caseworker, whereas other registers are published at scheduled intervals. It is therefore possible for information to appear on one register before the other.
85. The FIRS public register will provide, in one single place, a comprehensive picture of political influence activity carried out at the direction of foreign powers.

The UK Parliament Registers of Financial Interests

86. The Register of Members' Financial Interests requires Members of Parliament to provide information about any financial interest which they have, or any benefit which they receive, which others might reasonably consider to influence their actions, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament. Similar requirements apply to Members of the House of Lords.
87. The Register of Members' Financial Interests in the House of Commons is updated approximately on a fortnightly basis, or monthly when Parliament is not sitting. The

Register of Interests for Members of the House of Lords is updated daily when the House is sitting.

88. In circumstances where a communication or disbursement is made to a member of either House of Parliament by a person who has been directed by a foreign power and intends to influence them, the arrangement with the foreign power to which that communication or disbursement relates would also be registerable under FIRS. However, it would need to be registered by the person being directed by the foreign power, rather than by the Member of Parliament or Member of the House of Lords. Differing levels of information would be required under FIRS and the timings of publication may also not align.
89. FIRS does not place any reporting duties upon Parliamentarians that are the targets or recipients of political influence activities. The scheme instead requires the person or persons being directed to make, or arrange, those communications or disbursements, to register their activity on the public register.
90. Similarly, appearance on the FIRS public register does not mean that a Parliamentarian needs to make an entry under the UK parliament register of interests, except where they have, for example, received a gift or hospitality that is registrable under the parliamentary rules.