



Home Office

Sector Specific Guidance on the Foreign Influence Registration Scheme (FIRS): Academia and Research Sector

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Glossary of key terms

FIRS	Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023.
Arrangement	Any type of agreement, whether formal or informal. Could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement. It does not include conversations which do not materialise into an agreement or arrangement.
Foreign power	Has the meaning given by Section 32 of the National Security Act 2023. Further details can be found in section 1 .
Political influence activities	A communication, public communication or provision of money, goods or services intended to influence a political matter.
Specified foreign power	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
Relevant activity	A type of activity in scope of registration under the enhanced tier of FIRS.
Exemption	A circumstance in which registration requirements do not apply. Further detail is in section 3 .
Registrant	A person required to register under FIRS.
Information notice	A notice requiring the recipient to provide further information related to arrangements or activities registerable under FIRS.

About this Guidance

This document provides additional sector specific guidance on the Foreign Influence Registration Scheme for the research, academia and higher education sector. This includes guidance on arrangements on research projects, funding arrangements, exemptions and the publication of information.

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 Government remains committed to supporting freedom of speech and academic freedom. 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 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. Entities that are owned or controlled by a foreign power, for example state-owned universities, laboratories or research institutes, are not considered foreign powers merely by virtue of this ownership.
5. Registration requirements only apply where there is a "direction" from a foreign power to act.
6. 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).
7. Political influence activities in the research, academia and higher education sector could include:
 - Communications with senior civil servants and ministers in a government department which seek to influence education policy;
 - Appearance at select committees and other parliamentary activities which provide information seeking to influence MPs or peers;
 - The publication of an article which encourages support for a Private Member's Bill, without stating that the publication was directed by a foreign power;
 - The presentation of research outcomes and associated policy proposals to senior civil servants.
 8. 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.
 9. The maximum penalty for failure to comply with the requirements of the political influence tier is 2 years imprisonment.
 10. Further detail on the requirements of this tier can be found in the [guidance on the political influence tier](#).

Enhanced Tier

11. 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.
12. 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.
13. Registration requirements only apply where there is a “direction” from a specified foreign power, or specified foreign power-controlled entity, to act.
14. “Relevant” activities in the context of academia could include:
 - Hosting an event or conference in the UK at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Undertaking a research project directed by a specified foreign power or specified foreign power-controlled entity;

- Sending information from the UK to a specified foreign power or specified foreign power-controlled entity.
15. 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.
16. The maximum penalty for failure to comply with the requirements of the enhanced tier is 5 years imprisonment.
17. Further details on the requirements of this tier can be found in the [guidance on the enhanced tier](#).

Further detail on registration requirements

18. Under both tiers, registration is required by the individual or organisation who makes the registerable arrangement with the foreign power, specified foreign power or foreign power-controlled entity. It is the arrangement that must be registered, not each individual activity that will be carried out. Other individuals or organisations involved in carrying out the activities under a registerable arrangement should check that the arrangement is registered prior to carrying out the activities. Further details can be found in [section 6](#).
19. Activity is only registerable where carried out in the UK. As such, any activities carried out wholly at overseas universities (as may be the case with some research collaborations or transnational education arrangements) would not require registration.
20. 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

21. Where there is a material change to any information registered under FIRS, the information must be updated within 14 calendar days, beginning with the day on which the change takes effect. An example of a material change might be where there is a substantial change in the anticipated start or end date of activities (such as a significant delay or extension to when a research project might start and finish).
22. 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 Influence Tier

Example 1 (registration required): The Department of Education of Country A approaches a UK university to enter into an arrangement to receive more students from Country A. As part of the arrangement, the UK university agrees to lobby the UK Government to create a short-term visa-free study programme for Country A. In return, the Department for Education of Country A offers to promote the university among students within the country and offer specific job opportunities for graduates from the university. The UK university emails the UK Home Secretary, outlining reasons why it considers that this programme should be created.

The **UK university** is required to register. They are in an arrangement with the Department for Education of Country A (**a foreign power**) who offers to promote the university to students in the country if (**direction**) they make a communication to government minister to influence a government decision (**political influence activity**). No exemptions apply.

Example 2 (registration required): The Department of Science of Country B enters into an arrangement with a UK university to provide the university with funding for a research project. As part of the arrangement, the university agrees to contact the UK Government to promote using scientific software created by Country B within the UK armed forces. The university emails the UK Secretary of State for Defence, outlining reasons why it considers that this software should be utilised.

The **UK university** is required to register. They are in an arrangement with the Department of Science of Country B (**a foreign power**), where they would receive funding if (**direction**) they made a communication to a government minister to influence a UK government decision (**political influence activity**). No exemptions apply.

Example 3 (registration required): The Department of Science of Country C enters into an arrangement with an academic of a UK university, and provides them with funding for their own private research, from which the academic would be retaining the profits themselves. As part of the arrangement, the academic agrees to use their UK government contacts to promote the use of scientific software created by Country C within the UK armed forces. The academic emails the UK Secretary of State for Defence, outlining reasons why they consider that this software should be utilised.

The **academic** is required to register. They are in an arrangement with the Department of Science of Country C (**a foreign power**) in relation to their own work, where they have an arrangement with a financial benefit (**direction**) to make a communication to a government minister to influence a UK government decision (**political influence activity**). No exemptions apply.

In this circumstance, the academic has made the arrangement independently of the university that they work for, so it is the academic who is personally responsible for compliance and not the university as an organisation. This applies even if the academic uses their university email address for this arrangement.

Enhanced Tier

For the purposes of the below examples, it is assumed that “relevant activities” means all activities.

Example 4 (registration required): The Department of Education of Country E has been specified under the enhanced tier. The Department of Education of Country E enters into an arrangement with a UK university to promote a placement year abroad in Country E for their UK students, and in return the university will receive grant funding.

The **UK university** is required to register. They are in an arrangement with the Department of Education of Country E (**a specified foreign power**) where they are offered grant funding (**direction**) to promote Country E to UK students for a placement year abroad (**relevant activity**). No exemptions apply.

Example 5 (registration required): The Ministry for Science of Country F has been specified on the enhanced tier. The Ministry for Science approaches a UK university, with whom it signs a non-disclosure agreement and memorandum of understanding, and the two agree to hold discussions about a potential future research programme to be funded by the Ministry and carried out at the UK university. The Ministry for Science directs the university to sponsor the visas for its officials to visit the UK and agree terms for the research programme.

The UK university is required to register. They are in an arrangement with the Ministry for Science of Country F (**a specified foreign power**) to sponsor visas and discuss terms for a potential research programme (**relevant activities**). There are potential future opportunities for the university associated with the programme, meaning that this constitutes a **direction**.

Whilst at this stage, a formal agreement on the research programme has not been signed, the more informal arrangement (backed up by a non-disclosure agreement and memorandum of understanding) to hold discussions in the UK and sponsor visas in itself constitutes a registerable arrangement.

Example 6 (registration required): The Government of Country G has been specified under the enhanced tier. A student from Country G is studying a human rights course at a UK university, which includes modules on repression by the Government against an ethnic group within the country. The embassy of Country G in the UK contacts the student and obliges them to change course, threatening to not renew their passport and force them to leave the UK if they do not oblige. The student complies with the embassy's obligations and changes onto a different course.

The student is required to register as they have been obliged, with coercive measures used (**direction**), by the embassy of Country G (**specified foreign power**) to change onto a different university course (**relevant activities**).

Example 7 (registration required): An academic is invited to a conference hosted by the Ministry of Technology & Innovation of Country H, which has been specified on the enhanced tier. While at the conference, an official of the Ministry engages with the academic, who agrees to carry out a research project in the UK and present at a future event. In return, the Ministry offers him the opportunity to promote and sell his book at the event and to engage with other industry experts to raise his profile

The academic is required to register. They have been requested, with future opportunities offered (**direction**), by the Ministry of Technology & Innovation of Country H (**specified foreign power**) to carry out a research project in the UK (**relevant activities**).

Example 8 (registration not required): A UK university is organising a conference on medieval literature. They invite a Country F-based organisation to attend the conference, and sponsor their UK visas. The Government of country F has been specified under the enhanced tier but does not have any involvement in the organisation's attendance at the conference.

The **UK university** is not required to register. While they are in an arrangement with an organisation from Country F, that organisation is not part of the specified foreign power, nor is the specified foreign power directing the university to carry out any activities.

Example 9 (registration not required): The Government of Country H has been specified on the enhanced tier. All universities within the country are owned by the Government, although their day-to-day operation is independent. A UK university enters into a partnership with a university, which has not itself been specified on the enhanced tier, in Country H. The two establish an exchange programme to allow students from each university to do study-abroad programmes and for engagement between researchers.

Registration is not required as the university in Country H, which the UK university is in an arrangement with, is not a specified foreign power-controlled entity. Whilst the Government of Country H has been specified, this does not mean that all entities owned or controlled by the Government are automatically specified.

Section 3: Exemptions from registration

23. 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);
- Certain funded education arrangements (enhanced tier only);
- Certain government administrative services (enhanced tier only).

24. In addition to these exemptions, any public communication activities 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 research which intended to influence a political process would not require registration under the political influence tier, if it was clear on the research report 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.

25. Summaries of the exemptions most likely to be relevant to the academia, higher education and research sectors are set out below. Further detail on all of the exemptions can be found in the [guidance on the political influence tier](#) or [guidance on the enhanced tier](#).

UK Crown Body Arrangements (both tiers)

26. Arrangements do not need to be registered when the United Kingdom is a party to that arrangement. This includes arrangements where any individual acting on behalf of the Crown (for example, a civil servant), or any entity which holds crown status, are a party.

27. For example, where an arrangement exists between a foreign power and a UK university, and a UK government department is also a party to that same arrangement, this exemption will apply. The exemption will not apply if the UK university is in two separate arrangements – one with a foreign power and one with a UK government department.

Example 10 (exemption applies) (political influence tier): The Department for Net Zero of Country Z, together with the UK Government, jointly provide funding to a UK research institute to carry out a research project on the impact of high emission vehicles on health and, subsequently, to present findings to parliamentarians in both countries to influence their vote on a piece of legislation which would prohibit new sales of these vehicles.

Whilst this would constitute political influence activities carried out at the direction of a foreign power (the Department for Net Zero of Country Z), the fact that a UK government department has jointly funded the arrangement means that the exemption applies.

Example 11 (exemption applies) (enhanced tier): A state-owned national academy of Country A, which has been specified under the enhanced tier, together with the UK Government, provide funding to a UK university for them to carry out a research project into factors influencing anxiety among students from lower socio-economic backgrounds.

As a UK Government department has jointly funded the project, the exemption applies and registration is not required.

UK public bodies arrangements (enhanced tier only)

28. Arrangements do not need to be registered when a UK public body (including UK Research & Innovation (UKRI)) is a party to that arrangement. This includes arrangements where any individual acting on behalf of the UK public body (for example, an employee) is a party.
29. This exemption does **not** apply to arrangements to which local government public bodies and maintained schools, academy schools and further and higher education institutions are party.
30. The exemption only applies when the UK public body is an actual party to the arrangement with the specified foreign power (for example, if it were a multilateral agreement involving both the UK public body and the specified foreign power). The involvement of a UK public body in the activities alone does not mean that the exemption applies.
31. Similarly, where a UK public body is only a party to part of an arrangement, the other part of the arrangement would still need registration. For example, where an arrangement with a specified foreign power has both formalised and informal elements, and the UK public body is only party to the formalised element, the informal elements of the arrangement may still require registration if all conditions are met.

32. Even if a UK public body is party to the arrangement, it will be necessary for a person in an arrangement with a foreign power (including a specified foreign power) to register with FIRS where this arrangement involves them being directed to carry out political influence activity in the UK.

Example 12 (exemption applies): A UK public body and a specified agency of a foreign power jointly fund a collaborative research project between a UK university and a foreign university and an MOU exists between these four parties. Much of the activity involves conducting research in the UK, as well as meetings held in the UK between the UK and foreign university. As the UK public body is party to the arrangement (as they are jointly funding the project with the specified agency of the foreign power), the UK university and the foreign university do not need to register this arrangement with FIRS.

Example 13 (exemption applies): A UK public body that conducts research is invited to a conference in the UK hosted by a specified foreign power with the implication that if they attend, there may be further research opportunities offered by the specified foreign power. The UK public body does not need to register this arrangement with FIRS as they are party to it.

Example 14 (exemption does not apply): A UK public body and a specified agency of a foreign power jointly fund a collaborative research project between a UK university and a foreign university. Outside of this collaborative research project, the specified agency of a foreign power unilaterally funds the UK university to conduct separate research outside of the collaborative research project. The UK university will have to register this separate arrangement with the specified foreign power as the UK public body is not party to it.

Funded education arrangements (enhanced tier only)

33. Where someone is in an arrangement with a specified foreign power where the foreign power is providing them with financial assistance while they are completing a course of further or higher education in the UK, they will **not** need to register where they are being directed by that foreign power to carry out activities that are reasonably necessary to ensure the student will:
- Continue or complete the course of education, fully participate in the course and devote sufficient time to it (for example, requiring a student to attend a welcome event at their place of study).
 - Uphold the reputation of the provider of the financial assistance or the education (for example, acknowledging the provider of the assistance in any articles they publish as a result of their funding). This does not cover promoting or defending the reputation of a specified foreign power (for

- example, publishing material to distribute on campus that promotes the foreign policy of the specified foreign power).
- c. Meet the standards of conduct reasonably expected by the provider of the financial assistance or the education (for example, adhering to UK law, or notifying any person, such as the provider of the assistance, of certain details such as their contact details, information required to monitor their progress towards completing their course).
34. Where someone providing higher or further education is in an arrangement with a specified foreign power to facilitate an arrangement described above, that person is also exempt from registering with FIRS.
35. Just because someone is in an exempt education arrangement does not mean that they are exempt from registering any arrangement with FIRS. For example, where someone in an exempt scholarship arrangement is directed by a specified foreign power or foreign power-controlled entity to conduct activity that falls outside the activity covered by the exemption, such as organising a protest at a university campus in the UK, they will have to register this with FIRS.
36. The [Academic Technology Approval Scheme](#) (ATAS) applies to certain foreign students and researchers, who must obtain ATAS clearance before commencing postgraduate level study or research in sensitive technology-related fields in the UK. The Foreign, Commonwealth & Development Office (FCDO) administers the scheme and issues ATAS certificates. Where a student needs an ATAS certificate before starting a course that is covered by a scholarship arrangement, the scholarship exemption above will only apply if an ATAS certificate has been obtained before they start that course.

Example 15 (exemption applies to a student): The Ministry of Education of Country V has been specified under the enhanced tier. A student enters into an arrangement with the Ministry of Education of Country V where they receive funding to complete a university degree in the UK. As part of the conditions of this funding, they are directed to carry out a number of activities in the UK including attending classes at the UK university and providing an annual update to the foreign power on the progress of their course. The student does not need to register this arrangement with FIRS.

Example 16 (exemption applies to a UK university): The Ministry of Education of Country V has been specified under the enhanced tier. They send 7 students from the country of the specified foreign power to a UK university to study. The Ministry of Education of Country V directs the UK university to send an annual report on the students' academic progress. The UK university does not need to register this arrangement with FIRS so long as its purpose was to facilitate an arrangement for providing financial support to the students.

Example 17 (exemption does not apply): The Ministry of Education of Country V has been specified under the enhanced tier. A student enters into an arrangement with the Ministry of Education of Country V where they receive funding to complete a university degree in the UK. Two years into their course, the student is contacted by UK-based embassy officials from Country V and is directed to organise a protest against a visiting speaker who is critical of Country V. Whilst their university degree is exempt, the student is required to register the direction to organise a protest with FIRS.

Section 4: Common scenarios affecting the higher education & research sector

Political Influence Tier

Research projects for (or in collaboration with) foreign powers

37. The vast majority of research arrangements do not need to be registered under the political influence tier. They may still require registration under the [enhanced tier](#) if directed by a foreign power or foreign power-controlled entity that is specified under the enhanced tier.
38. Registration would only be required under the political tier if the research formed part of an intentional effort by a foreign power to influence the UK's democracy, for example, a specific area of government policy. This could be the case if, for example:
- The foreign power directs researchers to propose specific policy or legislative changes as part of the research report;
 - The foreign power explicitly directs researchers to present the research to UK government senior decision makers in order to influence a policy decision; or
 - The foreign power directs an academic to submit written or oral evidence to a bill or select committee.
39. Provided that academics or researchers have complete discretion about the research conclusions, outcomes or recommendations presented in a research report (without influence by a foreign power), the research project will not require registration under the political influence tier.
40. Individual academics, researchers or students involved in a research project would only be in scope of the FIRS political influence tier if they are involved in the carrying out or arranging of political influence activities. Where their role is solely the carrying out of research, they are not required to register under this tier and are not at risk of committing a criminal offence.
41. Academics carrying out a peer review of another study would not be required to register under the political influence tier.

Example 18a (registration required) (foreign power directs political influence activities carried out as part of research):

A foreign power provides funding for a UK university to carry out a research project into the impacts of tree-planting on the environment, and sets conditions on how the research is to be carried out. The foreign power instructs the university to include a section of the research report which proposes policy changes in order to allow additional trees to be planted in the UK. The university carries out the research and publishes it without declaring that the research has been directed by the foreign power.

The **UK university** is required to register. It has been given funding from a **foreign power** with conditions (**arrangement** and **direction**) which include publishing a research report which is intended to influence a Government policy decision (**political influence activities**), without stating in the published report that it was directed by a foreign power. If the university had made it clear on the published report that it was directed by a foreign power, then they would not be required to register (see [section 3](#)).

Example 18b (registration not required) (research is directed by a foreign power, but not the political influence activities):

A foreign power provides funding for a UK university to carry out a research project into the impacts of tree-planting on the environment, and sets conditions on how the research is to be carried out. The UK university carries out the research according to these conditions and publishes a final report (over which it has complete editorial control) which includes recommendations for new policies which the UK can adopt to enable additional tree planting. The report is presented to the UK Government and highlights of it are presented at oral evidence sessions to MPs.

Registration is not required as, whilst the university is carrying out political influence activities, these are not directed by a foreign power. This is because the UK university has complete discretion about the recommendations presented within the report, without influence from a foreign power.

Example 19a (registration required) (direction from a foreign power):

A UK research institute is writing a policy brief about the roll-out of self-driving cars on UK motorways. A foreign power, whose country is leading in the development of self-driving technology, is aware that this brief is being made. The foreign power contacts the research institute and instructs it to input specific information into the brief, implying that failure to do so would jeopardise a separate existing commercial arrangement. The policy brief is presented to ministers and senior civil servants in the Department for Transport and makes recommendations for policy changes.

The **UK research institute** is required to register. The **foreign power** instructs the research institute to include specific information with a threat of negative consequences if they do not comply (**arrangement** and **direction**). The policy brief is then communicated to influence UK Government policy (**political influence activity**). No exemptions apply.

Example 19b (registration not required) (no direction from a foreign power): A UK research institute is writing a policy brief about the roll-out of self-driving cars on UK motorways. It consults a foreign power who already has rolled out self-driving cars in their own country for input on their experience. The foreign power provides details about its experiences and data from its own studies to inform the brief. The research institute analyses the information provided and selects the information that it considers most relevant for inclusion in the brief. The policy brief is presented to ministers and senior civil servants in the Department for Transport and makes recommendations for policy changes.

Registration is not required as, whilst the foreign power has provided information to support the brief, they have not directed the political influence activities. This is because the research institute has complete discretion over the recommendations made in the report.

Policy workshops and conferences

42. Those organising or participating in policy-making workshops, conferences or other events may be considered to be carrying out political influence activities, if a senior public official or politician is in the audience and they communicate with them (either directly or via a speech to the whole audience) at the event.
43. However, they would only need to register under the political influence tier if their participation at the event came as part of a wider direction from a foreign power to influence UK Government policy (or another political matter). They would need to know, or reasonably expect, that a senior public official or politician was in the audience and intend for them to be influenced as part of that wider agreement before registration requirements applied.

Example 20a (registration required): A UK university has been formally commissioned by the Ministry of Agriculture of Country A to carry out a research project into the effect of UK import tariffs on agricultural goods, and to present findings to the UK Government with a view to influencing future UK government spending. An academic within the university presents on their research findings at a policy workshop at which senior civil servants are in the audience, outlining the case why import tariffs should be reduced.

The UK university is required to register. They have been formally commissioned (**direction**) by the Ministry of Agriculture of Country A (**foreign power**) to communicate with senior civil servants to influence a decision about import tariffs (**political influence activities**).

Example 20b (registration not required): A UK university has been formally commissioned by the Ministry of Agriculture of Country A to carry out a research project into the effect of UK import tariffs on agricultural goods. An academic within the university discusses the findings at a workshop with other academics and industry experts.

Registration is not required as no political influence activities take place.

Student political campaigning activities

44. While the majority of student political campaigning would not require registration, students would have to register political campaigning activities under the political influence tier if:

- Those activities were directed by a foreign power; and
- Those activities constituted “political influence activities”.

45. In such cases the registration requirement falls on those who enter into the arrangement with the foreign power. Students carrying out political influence activities pursuant to an arrangement between a student body, society or association and a foreign power are not required to register individually, but, where they ought reasonably to know about the foreign power arrangement, are required to check that the student body, society or association which is in the arrangement with the foreign power has registered.

46. Political campaigning activities (including protests or lobbying, even if they do not directly target UK politicians or decision makers) may require registration under the enhanced tier if it is directed by a specified foreign power or specified foreign power-controlled entity (see the [guidance on the enhanced tier](#)).

Example 21a (registration required): A student society at an UK university is directed by the Government of Country P to sign a petition and campaign against a UK government decision to limit imports and exports to and from Country P. The Students’ Society organises a protest at the university, and invites their local MP to attend. At the protest, the Students’ Society seeks to influence the MP into joining their cause to change the UK government’s position.

The **student society** is required to register as they are in an arrangement with the Government of Country P (**foreign power**) from whom they receive funding (**direction**) to undertake campaigning activities to influence a government decision (**political influence activities**).

Example 21b (registration not required) (no arrangement with a foreign power): A student society within a UK university launches a petition against a recent UK government decision to limit imports and exports to and from Country P. They also write to their local MP seeking to persuade him to support their cause.

The student society is **not** required to register, as they are not in an arrangement with a foreign power.

Example 21c (registration not required) (no political influence activities carried out):

The Government of Country P directs a student society within a UK university to carry out campaigning activities within the university, including on-campus demonstrations and speeches against a visiting speaker who is critical of Country P.

The student society is **not** required to register, as they do not undertake political influence activity. However, this would require registration under the enhanced tier if the Government of Country P had been specified.

Enhanced Tier

Research grants, university-level consultancy and other funding arrangements

47. Universities that are in receipt of funding from a specified foreign power or specified foreign power-controlled entity are required to register under the enhanced tier if the funding has conditions attached for it to be used in a particular way. For example, if funding has been provided by a specified foreign power and they have directed that it be used for the purpose of a specific research project, it would be registerable.
48. It makes no difference what proportion of the total funding is contributed by the specified foreign power. It is possible that a project that is only partially funded by a specified foreign power requires registration, if the funding is provided with conditions for it to be used in a particular way.
49. However, unrestricted grants which give the grantee the autonomy to use the funding in a way which they see fit are not considered a “direction” and therefore do not require registration. Similarly, funding which is provided for generic research purposes within a particular field, but without conditions that it is to be used in a particular way or to achieve a specific outcome, is not registerable.
50. Where funding is provided by a specified foreign power or entity 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, that does not constitute a direction.
51. Registration requirements apply regardless of the discipline in which the research is being conducted.

Example 22 (registration required): A UK university receives a grant from a specified foreign power, who directs the university to use the funding to carry out a research project on the utility of AI within the healthcare sector.

The **UK university** is required to register. They are in an **arrangement** with a **specified foreign power** and receive funding with conditions attached (**direction**) to carry out a research project (**relevant activity**). No exemptions apply.

Example 23 (registration not required): A UK research institute, which specialises in medical research, receives a donation from a specified foreign power to support its research. There are no specific conditions attached to the donation, other than it is intended to be used for medical research.

The UK research institute is **not** required to register. The funding has been provided in support of the university's work in general, but does not have conditions attached that it is to be used in a particular way.

Example 24 (registration not required): A UK research institute receives a grant from an overseas university, which is controlled by a specified foreign power, but which has not been specified itself. The grant includes conditions that it be used to carry out a specific research project which seeks to understand the impact of climate change on UK agriculture. There is no indication of any involvement of the specified foreign power in the provision of the grant funding.

The UK research institute is **not** required to register. Whilst the overseas university is controlled by a specified foreign power, they are not themselves a specified foreign power-controlled entity.

Example 25 (registration not required): A UK university has an overseas campus in Country X, whose government has been specified on the enhanced tier. The overseas campus is a separate legal entity to the UK university. The overseas campus receives a grant from the Government of Country X, which includes conditions for it to be used on a research project on the impact of sport in the rehabilitation of prisoners. The whole of the research project is carried out in Country X.

Neither the UK university, nor their overseas campus, are required to register, as the activities are carried out entirely outside of the UK.

Philanthropic donations

52. UK universities are not required to register any philanthropic donations which are provided as general support for a university's work. They would only be required to register if the donation was provided by a specified foreign power or entity, and was accompanied with conditions for it to be used in a particular way.

53. Philanthropic donations provided by alumni who now work for a government which has been specified do not require registration by the university, if they are provided in the alumni's private capacity.

Example 26a (registration required by a UK university): A UK university receives a philanthropic donation from a specified foreign power, provided via an alumni who now works for that foreign power. The donation makes clear that it has come from the specified foreign power and is intended to be used to make provision for better support for students from the country.

The UK university is required to register, as they have been provided a donation with conditions attached (**direction**) by a **specified foreign power** for investment in student support services (**relevant activities**).

Example 26b (registration not required): A UK university receives a philanthropic donation from an alumni who now works for a specified foreign power. The donation is from the alumni as an individual in their private capacity and the university is directed to use the funding to improve teaching in the faculty in which the alumni previously studied.

Registration is not required as the donation has come from an individual in their private capacity, and without direction from a specified foreign power.

Academic visitors and students from countries whose government has been specified

54. The fact that an academic visitor to the UK is travelling from a country whose government has been specified does not trigger a requirement for them, or any UK university who is hosting them, to register. Outbound visits from the UK are not "relevant activities" given that the activity does not occur in the UK and therefore there is no requirement to register such an arrangement.
55. Visitors to the UK would only be required to register if they had been directed by a specified foreign power, or specified foreign power-controlled entity, to carry out relevant activities in the UK. In these circumstances, a UK university should check that the visitor had registered with FIRS prior to hosting them. However, if the university had no means of knowing that the visitor had been directed by a specified foreign power, then the university would not commit an offence.
56. Academic visitors who are in receipt of scholarship funding from a specified foreign power may benefit from the exemption for funded education arrangements, so neither they nor the university receiving them are required to register in relation to the activities covered by the exemption.

Example 27a (registration required): A professor from a university in Country B, whose government has been specified, visits the UK for research collaboration work and is hosted by a UK university. The professor's research has been funded by the Government of Country B, and the link between them is well documented and publicised, including the fact that he should engage with UK researchers on the subject.

The **professor** is required to register prior to engaging with UK researchers as he is in an arrangement with the Government of Country B (**specified foreign power**) under which he is funded with conditions attached (**direction**) to engage with UK researchers (**relevant activities**). The UK university (aware that he is acting pursuant to a direction from a specified foreign power) should check that he has registered prior to hosting him.

Example 27b (registration not required): A professor from a university in Country B, whose government is specified, visits the UK for research collaboration work and is hosted by a UK university. Whilst the university in Country B is controlled by the government, the research collaboration work in the UK is taking place independently of any direction from the specified foreign power. Therefore, neither the professor nor the UK university are required to register.

Example 27c (registration not required): A student from Country B receives scholarship funding from the Government of Country B, which has been specified. The terms of the scholarship include that the student must write a mid-year and end-of-year report on progress. Whilst the student has been directed by a specified foreign power, they do not have to register as their activities are exempt (see [section 3](#)). The UK university is similarly not required to register.

If the student were directed by the government of country B to carry out additional activities unconnected to their studies, then they would be required to register.

Partnerships with state-controlled universities

57. Where a foreign power is specified under the enhanced tier, that does not mean that all organisations, institutes or universities which are controlled by that foreign power are also specified. These entities would only be considered specified if they are named in regulations as a specified foreign power-controlled entity. Therefore, those carrying out relevant activities in the UK at the direction of universities controlled by a specified foreign power would only have to register if the universities were themselves specified.
58. Where someone has reason to believe that they are acting pursuant to a registerable arrangement (for example, an arrangement between a foreign power and a state-owned university), then they should check that the arrangement is registered. However, in the majority of cases, those carrying out academic research activities would have no reason to know that they were acting pursuant to a registerable arrangement.

Example 28 (registration not required): A UK university agrees with an overseas university in Country Y to work collaboratively on a joint research project in the field of architecture. The Government of Country Y has been specified on the enhanced tier but, while the overseas university is controlled by the Government, the university has not been specified itself. The Government of Country Y has also not directed the research project.

Neither the UK nor the overseas university are required to register, as there is no direction from a specified foreign power to carry out activities in the UK. The specification of a foreign power does not automatically mean that all entities controlled by that foreign power are also specified.

Section 5: The public register and exceptions to publication

59. Certain information registered which relates to arrangements to carry out political influence activities will be included on a public register. This includes arrangements registered under the political influence tier, as well as any arrangements registered under the enhanced tier which relate to the carrying out of political influence activities. Other registrations under the enhanced tier (for example, those which relate solely to research activities) will not be published.
60. 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.
61. 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.
62. 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).
63. 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.
64. The exception which is most likely to be relevant to the academia sector is the exception for where publication would involve the disclosure of commercially sensitive information. Further details about the other exceptions to publication can be found in the [guidance on the information required at registration and the public register](#).

Commercially sensitive information

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

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

66. Information is considered confidential if:

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

67. 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.

68. 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.

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

Section 6: Additional matters of relevance to the sector

Requirement to update a registration when there is a material change

70. Where there is a material change to information provided at registration, the university must update the information provided at registration within 14 days of the material change. The following constitute a material change:

- A change in the end date of the activities (for example, where a project which is registerable gets extended)
- New researchers or academics becoming involved in registerable activities, where they are external to the organisation which has registered;
- New activities to be carried out under an existing arrangement, where those activities are also registerable under FIRS.

71. It is important to note that these requirements only apply to registerable activities. Where a university is undertaking a project where only a subset of that work is carried out as part of a registerable arrangement then only changes relating to that registerable subset of work need to be updated. Changes to the wider scope of aspects of the project would not fall to be registered where not related to the registerable arrangement.

72. Minor changes to the research approach, methods or scope do not constitute a material change.

Case 1 (based on example 22 of [section 4](#)) (updates to registration required):

The UK university registers their arrangement with the specified foreign power, providing the following information:

- **Nature and form of the arrangement:** A grant is provided to the UK university from the specified foreign power to carry out a research project on the utility of AI within the healthcare sector.

- **Activities to be carried out:** A research project which forms a subset of a wider project on technology within the healthcare sector being carried out by the university.

The university then carries out the following activities:

- The university begins their research project into the utility of AI within the healthcare sector. *As this research forms part of the activities mentioned at registration (the research project), no further action is required to comply with FIRS.*

- Mid-way through the project, the specified foreign power requires that the UK university present their interim findings at a conference hosted by their embassy in the UK. ***As this represents a change in the nature and form of the activities, the university must update the registration.***
- The university agrees a 6-month extension to the project. ***As this represents a change in the arrangement, namely a new end date, the university must update the registration.***
- The university decides to include a new project on nanotechnologies and incorporate it as a subset of the wider project on technologies in healthcare. *Whilst this is related to the wider project, it is separate to the registerable activities and so no action is required.*

Who the registration requirements fall upon

73. 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).
74. Therefore, where a university forms a registerable arrangement with a foreign power, it is the university as an entity that has the legal responsibility to register.
75. A university would not be held liable for circumstances where arrangements are made without their knowledge or involvement, for example:
- Where a registerable arrangement is formed by an individual academic in their own name (for example, private research or consultancy work): The academic is responsible for registration;
 - Where a registerable arrangement is formed by a spinout company formed of academics from a university: The spinout company is required to register;
 - Where a registerable arrangement is made by a subsidiary of the university: The subsidiary is required to register;
 - Where a registerable arrangement is made by a student society of a university: The society is required to register.
76. Whilst arrangements could be made by academics using their university email address, and activities may be carried out on a university campus, this does not in itself transfer responsibility for registration onto the university.
77. Where a university is in a registerable arrangement, the registration form may be completed by any employee of the university. In these circumstances, the personal details of one officer of the university are required. This officer should be a member of the senior management of the university, such as a vice-chancellor. They do not necessarily need to be the same individual as the one completing the form. These details are collected for the purpose of ID verification, to ensure that a registration is not being made fraudulently in the name of someone else or another organisation.

78. Individual academics or researchers who are involved in carrying out activities that they reasonably know are pursuant to a registerable arrangement formed by the university should check to see whether the university has registered the arrangement before carrying out activities. This can be done by requesting a confirmation of the registration from the registrant which can then be verified by contacting the FIRS Case Management Team.
79. There are safeguards in the legislation to protect academics, researchers or others involved in activities, where they have no way of knowing that they are acting pursuant to a registerable arrangement, for example:
- Their activities are solely academic in nature, with no information to suggest that they have been directed by a specified foreign power or entity;
 - They know that the entity with whom they are working is state-owned, state-controlled or otherwise closely linked to the state, but have no reason to know that the state has actually directed the activities that they are carrying out;
 - The objectives that they are seeking to achieve through their activities are not strategic or political objectives of the state, but rather the objectives of the specific entity that they are working with, and they have no information to suggest that the state has directed these activities.
80. 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).
81. There is no specific duty on any employees, subcontractors or other persons carrying out activities to proactively carry out due diligence into who is directing the activity. The key is whether they have knowledge or information available to them which suggests that they may be acting pursuant to a registerable arrangement – and if they have such knowledge or information, then they should check that it is registered.

Case study 1 (enhanced tier): A UK university enters into an arrangement with an overseas government agency which has been specified under the enhanced tier, agreeing to carry out a research project into the impact of climate change on food security.

The UK university involves researchers from a separate research institute in a specific aspect of the project, without declaring that the study had been funded by a specified foreign power.

The **UK university** is required to register, as they are directly in an arrangement with a specified foreign power.

The **research institute** is not required to register, as they are not a direct party to the arrangement with the specified foreign power. There is also no indication that the specified foreign power has directed the research, given the university has not told them this and there is no other reason to know that they would.

Case study 2 (enhanced tier): A UK university enters into an arrangement with the Ministry of Education of Country Y, which has been specified under the enhanced tier, and agrees to produce annual reports for the Ministry on the degree programmes studied by students from Country Y at the university.

The UK university works with a statistical consulting firm to produce the annual reports and the consulting firm is involved directly in reviewing drafts of the report, which include an executive summary outlining that they are produced for the Ministry of Education of Country Y.

The **UK university** is required to register, as they are directly in an arrangement with the specified foreign power.

The **statistical consulting firm** is not required to register, as they are not a direct party to the arrangement with the specified foreign power. However, there is information clearly available to them in the executive summary of the report which shows that they are acting pursuant to a registerable arrangement, so they must check that the UK university has registered the arrangement prior to carrying out activities.

Interaction with other Government schemes

82. The requirements of FIRS, the National Security and Investment Act (NSIA), UK strategic export controls and the Academic Technology Approval Scheme (ATAS) are separate and distinct. Registration, or approval, under one of these schemes is not equivalent to compliance with them all.
83. The enhanced tier of FIRS requires registration (but not approval) of arrangements with specified foreign powers or entities to carry out activities in the UK, as well as registration of relevant activities carried out by specified entities.
84. The [National Security & Investment Act](#) gives the Government powers to scrutinise and intervene in acquisitions in the UK economy, such as business takeovers, to protect national security. As part of this, acquirers must notify and get approval from the Government for certain types of deal involving entities operating in particularly sensitive sectors of the economy.
85. [UK strategic export controls](#) requires those who export or transfer certain types of goods, software or technology to apply for an export licence prior to exporting or transferring them.

86. The [Academic Technology Approval Scheme](#) (ATAS) applies to certain foreign students and researchers, who must obtain ATAS clearance before commencing postgraduate level study or research in sensitive technology-related fields in the UK. The Foreign, Commonwealth & Development Office (FCDO) administers the scheme and issues ATAS certificates.
87. In circumstances where registration or approval is required under multiple schemes, these will need to be processed separately.