



Home Office

# **Guidance on the Foreign Influence Registration Scheme (FIRS): Specified foreign powers or foreign power-controlled entities - Iran**

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Any enquiries regarding this publication should be sent to us at [FIRS@homeoffice.gov.uk](mailto:FIRS@homeoffice.gov.uk).

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# Glossary of key terms

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| <b>FIRS</b>   | Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023.   |
| <b>Arrangement</b>                                      | Any type of agreement, whether formal or informal. This could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement.                   |
| <b>Foreign power</b>                                    | Has the meaning given by Section 32 of the National Security Act 2023.   |
| <b>Political influence activities</b>                   | A communication, public communication or provision of money, goods or services intended to influence a political matter.   |
| <b>Exemption from registration</b>                      | A circumstance in which registration requirements do not apply.  |
| <b>Person</b>   | An individual or other person who is not an individual, such as a company.   |
| <b>Registrant</b>                                       | A person required to register under FIRS.  |
| <b>Information notice</b>                               | A notice issued under section 75 of the National Security Act 2023 requiring the recipient to provide further information related to arrangements or activities registerable under FIRS. |
| <b>Specified foreign power</b>                          | A foreign power which has been specified through regulations under the enhanced tier of FIRS.  |
| <b>Specified foreign power-controlled entity (FPCE)</b> | An entity which is controlled by a foreign power, and which has been specified through regulations under the enhanced tier of FIRS.  |

# Chapter 1: About this Guidance

This guidance provides further detail on the Iranian foreign powers and foreign power-controlled entities who are currently specified under the Foreign Influence Registration Scheme (FIRS).

This guidance is intended for those who wish to know more about these specified foreign powers or foreign power-controlled entities, including those who consider that they may be in a registerable arrangement with either a specified Iranian foreign power or a specified Iranian foreign power-controlled entity to conduct activity in the UK. It may also be useful for a specified Iranian foreign power-controlled entity who may need to register their own activity in the UK with the scheme.

More comprehensive guidance on the enhanced tier of FIRS and its requirements, including exemptions to registration and offences and penalties can be found [here](#). That more comprehensive guidance should be read in conjunction with this guidance.

As foreign powers and foreign power-controlled entities can only be specified under the enhanced tier of FIRS, any guidance contained in this document relates to **the enhanced tier only** and does not apply to the political influence tier. For further information on the requirements of the political influence tier of FIRS, consult the [guidance on the political influence tier](#).

## Chapter 2: Introduction to the scheme

1. FIRS is a two-tier scheme which enables transparency of foreign influence in UK politics and provides greater assurance around the activities of certain foreign powers or entities that may pose a risk to the UK's safety and interests. It is contained within Part 4 of the National Security Act 2023.

### The scheme's requirements (the enhanced tier only)

2. The **enhanced tier** requires the registration of relevant activity in the UK where a person is acting at the direction of specified foreign powers or foreign power-controlled entities. It also requires specified foreign-power controlled entities to register relevant activities which they carry out themselves in the UK.
3. A foreign power or a foreign power-controlled entity can be specified under the enhanced tier of FIRS where this is considered reasonably necessary to protect the safety or interests of the UK.
4. Unless specified otherwise, relevant activity means **any** activity. This includes, but is not limited to, commercial activity, academic and research activity and charitable activity.
5. There will be no fee to register with the scheme and information registered under the enhanced tier of the scheme will only be published where it relates to political influence activities. Further information about the information that is published can be found in the [guidance on the information required at registration and the public register](#).
6. Further details on the scheme's enhanced tier requirements can be found in the [guidance on the enhanced tier](#).

### Exemptions

7. There are several exemptions from registration under the enhanced tier of FIRS. These include:
  - Anyone acting as part of an arrangement to which a UK Crown Body is a party (for example, those in a multilateral arrangement with both the UK government and specified foreign governments);
  - Individuals acting for a foreign power in their official capacity as employees, for example foreign diplomats based in the UK;

- Family members (including unmarried partners) of staff of diplomatic missions, consular posts or permanent missions of UK-based international organisations, where they are supporting the official activities of their family member;
  - Lawyers, in their provision of legal services to foreign powers (for example, those representing specified foreign powers in a court case);
  - Those providing goods or services which are reasonably necessary to the functioning of a diplomatic mission, consular post or permanent mission of a UK-based international organisation;
  - Anyone acting as part of an arrangement to which a UK public body is a party;
  - Those carrying out activities related to a funded education arrangement (for example, a scholarship);
  - Government administrative and technical services (for example, activities related to the issue of passports or visas).
8. Further information on exemptions can be found in the [guidance on the enhanced tier](#).

## **Offences and Penalties**

9. The scheme contains several offences, including for those who fail to comply with registration requirements, or fail to respond to information notices. Where registration requirements have not been met, there are also offences for those who carry out activities pursuant to a relevant arrangement. Where it is believed that a criminal offence has taken place, the relevant information will be passed onto law enforcement. There are criminal penalties associated with these offences. A person who commits an offence under the enhanced tier is liable on conviction on indictment, to imprisonment for a term not exceeding 5 years or to a fine (or both).
10. Further information on offences and penalties can be found in the [guidance on the enhanced tier](#).

## **Interaction with other government legislation**

11. Some specified foreign powers or foreign power-controlled entities may be subject to other controls by the UK government e.g. sanctions or asset freezes. Registering with FIRS is not an alternative to these controls and it is the responsibility of the person registering to ensure that they are also complying with other UK government legislation.
12. Registrants may also still need to comply with other legal schemes, such as the National Security and Investment Act in addition to FIRS, where relevant. Registering with FIRS does not absolve individuals of the responsibility from registering with these other relevant schemes.

## Chapter 3: Specified Iranian foreign powers and foreign power-controlled entities – Iran

13. The following Iranian foreign powers and foreign-power controlled entities are specified under the enhanced tier of FIRS:
- a. The Supreme Leader of Iran (in their public capacity);
  - b. The Government of Iran (including any part of the government) and all of its agencies and authorities including:
    - i. the Supreme Leader's Office;
    - ii. the Assembly of Experts;
    - iii. the President (in that capacity);
    - iv. the Office of the President;
    - v. the Guardian Council;
    - vi. All Ministers (in that capacity);
    - vii. All Ministries (including the Ministry of Intelligence and Security);
    - viii. The Expediency Council;
    - ix. The Armed Forces, including Artesh and the Islamic Revolutionary Guard Corps (IRGC);
    - x. The Supreme National Security Council (including all sub-committees) and;
    - xi. Any other intelligence services and;
    - xii. All police forces.
  - c. The Islamic Consultative Assembly of Iran;
  - d. The judiciary of Iran.
14. Further detail on these specified Iranian foreign powers and foreign power-controlled entities is provided in [chapter 4](#).

### Relevant Activity

15. Relevant activity in relation to the current list of specified Iranian foreign powers and foreign power-controlled entities means **any** activity. This can include but is not limited to commercial activity, media activity, charitable activity, and academic and research activity.



## In a public capacity

16. The Supreme Leader, President and Ministers of Iran are only specified where they are acting in their public or ministerial capacity.
17. For an arrangement with a specified foreign power to be registerable, the specified foreign power has to be directing registerable activity in their official capacity e.g. as a Minister of the Islamic Republic of Iran. For example, where the Minister of Defence and Armed Forces Logistics of Iran directs an individual to attend a defence industry symposium in the UK and report back on the discussions at the symposium, the individual being directed will need to register with FIRS.
18. Where a specified foreign power is directing someone in their private capacity as an individual, this will not need to be registered with FIRS. For example, if this same Minister visits London on holiday with their family and directs a travel agent in the UK to organise their trip, the travel agent does not need to register with FIRS as the Minister is acting in their private capacity as an individual, as opposed to in their official capacity as the Minister of Defence and Armed Forces' Logistics.

## Individuals representing specified foreign powers or foreign power-controlled entities

19. If an arrangement is formed with an employee of a specified foreign power or foreign power-controlled entity (when acting in this capacity), it is treated as an arrangement with a specified foreign power or entity. For example, if a person enters into an arrangement with a civil servant from a specified foreign power in relation to their role as a civil servant the condition would be met. A person entering into an arrangement with a civil servant from a specified foreign power on a matter unrelated to their role as a civil servant (e.g. if they are separately the trustee of a charity) would not meet the condition.

## Chapter 4: Further detail on specified Iranian foreign powers and foreign power-controlled entities

20. This section of the guidance provides further information on each of the specified Iranian foreign powers and foreign power-controlled entities. This provides those who may be in arrangements with these powers and entities further information to enable them to know whether they need to register with the scheme.

### Iran as a specified foreign power

#### Supreme Leader of Iran (in their public capacity)

21. The Supreme Leader is the constitutional head of State in Iran and is the highest political authority of the country. They are chosen by the Assembly of Experts. The Constitution of Iran accords them the role of Supreme Commander of the armed forces and gives them a number of powers and duties, including supervising the execution of general policies of Iran, declaring war and peace and appointing and dismissing a number of key roles including the Head of the Judiciary and the Chief Commander of the Islamic Revolution Guards Corps<sup>1</sup>.

### The Government of Iran and all of its agencies and authorities

22. The Government of Iran are the groups of people who officially control Iran.

23. The below list is designed to provide further detail on what is meant by the Government of Iran and its agencies and authorities. This list is not meant to be exhaustive as there are numerous agencies and authorities in Iran, and it is not possible to list them all in this guidance. Moreover, the names of these are subject to change over time.

#### The Supreme Leader's Office<sup>2</sup>

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<sup>1</sup> [Constitution of the Islamic Republic of Iran \(ecnl.org\)](http://ecnl.org)

<sup>2</sup> [The Office of the Supreme Leader :: Leader.ir](http://Leader.ir)

24. This is the office of the Supreme Leader which is used to communicate and administer orders from the Supreme Leader to various other organisations (including military, cultural, economic and political organisations).

**Example of a registerable arrangement with the Supreme Leader's Office:**

The director of an Iranian technology company is travelling to the UK to attend a conference on the future of artificial intelligence. The director is directed by the Supreme Leader's Office to take notes about the conference and its attendees and pass these to the Iranian Ministry of Science, Research and Technology. While the director is not paid to do this, they know that fulfilling a direction from the Supreme Leader's Office will benefit them should they carry it out, knowing they will be offered better access to Iranian government contracts as a result. Conversely, the director also knows that not carrying out this direction is likely to be to their detriment, including to their business, due to the power wielded by the Supreme Leader.

This is a registerable arrangement as the director of the tech company is being directed by a specified foreign power (the Supreme Leader's Office) to carry out activity in the UK (take notes at a UK conference and pass these to the Iranian Ministry of Science, Research and Technology).

The director of the technology company should register this arrangement within 10 days and cannot attend the conference and take the notes until the arrangement has been registered.

**The Assembly of Experts<sup>3</sup>**

25. The Assembly of Experts is a group of elected jurists that has the constitutional authority to appoint and/or remove the Supreme Leader.

**The President of Iran (In their public capacity) and the Office of the President**

26. As head of the Government, the President is the second highest ranking constitutional official in Iran<sup>4</sup>. They are responsible for setting economic policies and heads the Supreme National Security Council. The Office of the President supports the President in carrying out these functions.

**The Guardian Council<sup>5</sup>**

27. The Guardian Council determines whether laws passed by parliament are constitutional and align with the teachings of Islam. They also decide whether candidates can stand for the Assembly of Experts, parliament and the presidency.

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<sup>3</sup> [Assembly of Experts \(Iran\) | Role, Powers, Function, & Election | Britannica](#)

<sup>4</sup> [The Islamic Republic's Power Centers | Council on Foreign Relations \(cfr.org\)](#)

<sup>5</sup> [The Islamic Republic's Power Centers | Council on Foreign Relations \(cfr.org\)](#)

The Guardian Council has 12 members (6 of whom are appointed by the Supreme Leader and 6 who are nominated by the judiciary and chosen by parliament).

### All Ministers (in their capacity as Ministers)

28. Ministers are members of the Government of the Islamic Republic of Iran and are in charge of ministries (government departments). These include<sup>6</sup>:

- a. Minister of Education
- b. Minister of Communications and Information Technology
- c. Minister of Intelligence
- d. Minister of Economic Affairs and Finance
- e. Minister of Health and Medical Education
- f. Minister of Cooperatives, Labour and Social Welfare
- g. Minister of Agricultural Jihad
- h. Minister of Foreign Affairs
- i. Minister of Justice
- j. Minister of Defence and Armed Forces Logistics
- k. Minister of Roads and Urban Development
- l. Minister of Industry, Mines and Trade
- m. Minister of Science, Research and Technology
- n. Minister of Islamic Culture and Guidance
- o. Minister of Interior
- p. Minister of Cultural Heritage, Handicrafts and Tourism
- q. Minister of Petroleum
- r. Minister of Energy
- s. Minister of Sports and Youth Affairs

### All Ministries

29. The ministries of Iran are the government departments which are responsible for the day-to-day administration of areas of government responsibility<sup>7</sup>. There are a number of these at any given time and they currently include:

- a. **Ministry of Education**- responsible for the oversight of education in Iran;
- b. **Ministry of Communications and Information Technology**- responsible for postal services, telephones and information technology;
- c. **Ministry of Intelligence and Security (MOIS)**<sup>8</sup>- responsible for collecting, analysing, producing and categorising internal and external intelligence and uncovering conspiracy, subversion, espionage, sabotage and sedition against the independence, security and territorial integrity of Iran;

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<sup>6</sup> [cabinet \(president.ir\)](http://cabinet.president.ir)

<sup>7</sup> [cabinet \(president.ir\)](http://cabinet.president.ir)

<sup>8</sup> [IRAN'S MINISTRY OF INTELLIGENCE AND SECURITY: A PROFILE \(fas.org\)](http://iran's%20ministry%20of%20intelligence%20and%20security%3A%20a%20profile/fas.org)

- d. **Ministry of Economic Affairs and Finance-** responsible for managing the Iranian treasury, regulating Iran's economy and implementing financial policies, implementing and enforcing tax policies and directing the banking and commercial insurance sector of Iran;
- e. **Ministry of Health and Medical Education;** responsible for almost all decisions regarding general goals, policies and allocation of health and medical education resources. It also oversees, licences and regulates activities of the private health sector;
- f. **Ministry of Cooperatives, Labour and Social Welfare-** responsible for the oversight of cooperative businesses and the implementation of policies applicable to labour and social affairs, including overseeing social welfare;
- g. **Ministry of Agricultural Jihad-** responsible for the oversight of agriculture in Iran;
- h. **Ministry of Foreign Affairs-** responsible for managing Iran's relationship with foreign countries;
- i. **Ministry of Justice-** responsible for coordination between judicial branch and other branches of government;
- j. **Ministry of Defence and Armed Forces' Logistics-** responsible for the planning, logistics and funding of the Armed Forces of Iran. It does not have operational command of the armed forces which is held by the General Staff, a separate institution under command of the Supreme Leader of Iran;
- k. **Ministry of Roads and Urban Development-** responsible for providing and regulating Iran's transport infrastructure (including roads, railways, shipping lanes and airways), as well as setting policies for the housing sector and construction industry;
- l. **Ministry of Industry, Mines and Trade-** responsible for the regulation and implementation of policies applicable to domestic and foreign trade and to the industrial and mine sectors;
- m. **Ministry of Science, Research and Technology-** responsible for the direct supervision and accreditation of state run, non-medical universities;
- n. **Ministry of Islamic Culture and Guidance-** responsible for managing access to media that in the view of the Iranian government, violates Iranian ethics and promotes values alien to Iranian culture;
- o. **Ministry of Interior-** responsible for a number of areas including carrying out, supervising and reporting on elections, overseeing policing and to

provide and protect domestic security across the country including protecting borders;

- p. **Ministry of Cultural Heritage, Handicrafts and Tourism**- is responsible for overseeing a number of museum complexes across Iran and administers a number of organisations including the Iran Tourism and Touring Organisation;
- q. **Ministry of Petroleum**- responsible for all issues pertaining to exploration, extraction, exploitation, distribution and exportation of crude oil and oil products;
- r. **Ministry of Energy**- regulates and manages the implementation of policies applicable to energy, electricity, water and wastewater services;
- s. **Ministry of Sports and Youth Affairs**- responsible for youth affairs and sport.

30. Universities administered by the Government Ministries in Iran are not considered the foreign power and therefore those being directed by these universities to carry out activity in the UK do not need to register with the scheme. For example, a university in the UK that is being directed by a university in Iran does not need to register with the scheme. The universities themselves only need to register where they are being directed by Iran to carry out activity in the UK. Where they are carrying out activity of their own volition, this does not need to be registered with the scheme.

### The Expediency Council<sup>9</sup>

31. Appointed by the Supreme Leader for a five-year term, the Expediency Council mediates between the Islamic Consultative Assembly (Parliament) and the Guardian Council.

### The Armed Forces

32. The Iranian Armed Forces is the combined military forces of Iran and is responsible for defending Iran's border, maintaining internal order and protecting the Islamic system<sup>10</sup>. It includes:

- the Islamic Republic of Iran Army, or Artesh, is responsible for defending Iran's borders and maintaining internal order in Iran. The Islamic Republic of Iran's Army currently consists of the following arms: the Ground Force, Navy, Air Force and Air Defense Force.

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<sup>9</sup> [The Islamic Republic's Power Centers | Council on Foreign Relations \(cfr.org\)](https://www.cfr.org/iran/the-islamic-republics-power-centers/p23777)

<sup>10</sup> [Profile: Iran's Revolutionary Guards - BBC News](https://www.bbc.com/news/world-middle-east-47384444)

- the Islamic Revolutionary Guard Corps (IRGC) which is responsible for protecting the Islamic system in Iran. The IRGC are made up of the following arms: the Ground Force, the Navy, the Aerospace Force, the Quds Force which specialises in unconventional warfare and military intelligence operations and the Basij, which is a paramilitary organisation.

### **Example of a registerable arrangement with the Iranian Armed Forces**

A member of the Basij contacts an individual in the UK and directs them to set up a holding company in the UK. In exchange, the individual is paid.

This is a registerable arrangement as the individual is being directed by a specified foreign power (the Iranian Armed Forces - Basij) to carry out activity in the UK (setting up a holding company).

The individual should register this arrangement within 10 days and cannot carry out any activity pursuant to an agreement (such as registering the company or recruiting employees), until the arrangement has been registered.

### **The Supreme National Security Council (including all sub committees)<sup>11</sup>**

33. This council (established by Article 176 of the Constitution) is led by the President and includes the parliamentary speaker, chief justice, the commander in chief of the Armed Forces, the ministers of the interior, foreign affairs and intelligence, as well as two personal representatives of the Supreme Leader. The Constitution provides that it is responsible for setting policies related to defence and security and responding to both foreign and domestic threats.

### **Any other intelligence services**

34. Intelligence services are “specialised state agencies responsible for producing intelligence relevant to the security of the state and its people”<sup>12</sup>. All of these Iranian agencies, including the Ministry of Intelligence (MOIS) and the Islamic Revolutionary Guard Corps Quds Force, are specified.

### **All police forces**

35. This includes Law Enforcement Command, the national police force, which is commonly abbreviated as FARAJA and the Guidance Patrol which is part of the national police force and is responsible for enforcing Islamic law.

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<sup>11</sup> [Constitution of the Islamic Republic of Iran \(ecnl.org\)](https://ecnl.org/)

<sup>12</sup> [DCAF\\_BG\\_12\\_Intelligence\\_Services.pdf](#)

**Example of an arrangement that needs to be registered:**

A UK based social media influencer is contacted by an official working in the Iranian Ministry of Foreign Affairs who directs them to make and upload a series of TikToks about Iranian cultural traditions in exchange for this being shared on the Ministry of Foreign Affairs social media.

This is a registerable arrangement as the influencer is being directed by a specified foreign power (the Iranian Ministry of Foreign Affairs) to carry out activity in the UK (make and upload a series of TikToks about Iranian cultural traditions).

The social media influencer will need to register this arrangement within 10 days. They should not carry out any activity pursuant to this arrangement such as filming and uploading content until this arrangement has been registered.

**Example of an arrangement that does not need to be registered:**

A UK-based charity which runs sports classes for primary and secondary school aged children in the UK receives frequent donations from the Ministry of Sport and Youth Affairs of Iran. Although the donations are used by the charity to support its work, the Ministry do not give directions on how these donations should be used.

The charity does not have to register this with FIRS as they are not being directed by the Ministry to conduct relevant activity in the UK even though they receive donations.



## Specified Iranian foreign power-controlled entities

36. The responsibility for registering the entity's activities lies with the specified entity and not its individual employees. If multiple employees of the entity are involved in a relevant activity, a single registration completed by the entity will suffice; individual employees are not required to register separately. Entities are not required to list all of the individuals involved in delivering the activities.
37. These entities also have to register with the scheme themselves where they are carrying out any relevant activities in the UK.
38. Where a person is in an arrangement with these entities where the entities are directing them to carry out relevant activities in the UK (either themselves or through someone else) and that person is not exempt from registration, they will need to register with the scheme. More details on the requirements for persons in an arrangement with a specified foreign power or foreign power-controlled entity can be found in the [guidance on the enhanced tier](#).

## The Islamic Consultative Assembly of Iran

39. Also referred to as the Majles, or Iranian Parliament, the Islamic Consultative Assembly of Iran (ICA) is the national legislative body of Iran. The ICA has a wide range of responsibilities, which are provided by the Iranian constitution including drafting legislation, ratifying international treaties and examining and approving the annual budget.

## The judiciary of Iran

40. The judiciary of Iran is responsible for applying the rule of law through resolving litigation and settling disputes, supervising the enforcement of laws and uncovering crimes through enacting the penalties and provisions of the Islamic penal code. It includes:
  - a. **The Head of the Judiciary-** The Head of the judiciary is appointed by the Supreme Leader and is responsible for establishing the organisational structure of the judiciary, drafting judiciary bills and appointing, dismissing and assigning judges. They also nominate the Minister of Justice, the Chief of the Supreme Court and the Prosecutor General.
  - b. **The Chief of the Supreme Court-** The head of the Supreme Court.
  - c. **The Prosecutor General-** As the head of the Prosecutor General's office, they supervise the prosecutor's offices in Iran.

- d. **The Supreme Court-** The highest court in Iran, the Supreme Court supervises the correct implementation of Iranian laws by the courts and ensures uniformity of judicial procedures.
- e. **Courts of Justice-** These are divided into Preliminary Courts and Appellate Courts. Preliminary courts are further sub-divided into civil courts, criminal courts, family courts and criminal courts of province which deal with specific crimes e.g. press crimes and political offences, as well as crimes with penalties of capital punishment and life imprisonment. Appellate Courts hear appeals on preliminary courts' decisions (except in the case of criminal courts of province whose decisions can be appealed to the Supreme Court). There are also juvenile courts for dealing with minor offences committed by children under the age of eighteen and Dispute Settlement Councils.
- f. **Military Courts-** These Courts investigate crimes committed in connection with military or security duties by members of the Army, Law Enforcement Command and the Islamic Revolutionary Guard Corps.
- g. **Court of Administrative Justice-** Investigates complaints, grievances and objections made against government officials, state organs and statutes.
- h. **The National General Inspectorate-** Also referred to as the General Inspection Organisation of Iran and the State Inspectorate Organisation of Iran, this body supervises the proper conducting of affairs and the correct implementation of laws by the administrative organs of government.
- i. **The Revolutionary Courts-** These courts have a wide jurisdiction including all smuggling and drug crimes, all crimes threatening national security and inciting sedition (conduct or speech inciting people to rebel against the authority of a state) and conspiring against the regime, staging armed attacks or assassinating officials.
- j. **The Supreme Disciplinary Court for Judges-** Sometimes called the High Tribunal for Judicial Discipline, this courts deals with disciplinary offences carried out by judges.

