

# Introduction to the Foreign Influence Registration Scheme (FIRS)

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# About this Guidance

This guidance provides an introduction to the Foreign Influence Registration Scheme. It is intended for those who are seeking to understand if they are affected by the requirements.

More detailed guidance is available on the political influence tier and the enhanced tier.

# **Summary**

- 1. The Foreign Influence Registration Scheme (FIRS) is a two-tier scheme which enables transparency of foreign influence in UK politics and provides greater assurance around the activities of the foreign powers that pose the greatest risk to the UK. It is contained within Part 4 of the National Security Act 2023.
- 2. The scheme is made up of a political influence tier and an enhanced tier. The scheme requires individuals and organisations to register their arrangements with foreign powers and certain foreign power-controlled entities where they are directed to carry out certain activities in the UK. Further detail on the requirements of each tier of the scheme is provided below.
- 3. Registration can be completed on the FIRS online registration service.

# Requirements of the political influence tier

- 4. The political influence tier requires individuals or organisations to register where they are directed by any foreign power (except the Republic of Ireland) to carry out, or arrange for someone else to carry out, political influence activities in the UK.
- 5. A foreign power includes:
  - the sovereign or other head of a foreign State,
  - a foreign government, or part of a foreign government (for example, a ministry or department of a foreign government);
  - an agency or authority of a foreign government, or of part of a foreign government (for example, a police force or military of a foreign government),
  - 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);
  - a political party which is a governing political party of a foreign government.
- 6. A "direction" from a foreign power may be given formally (such as by means of a contract) or informally (such as through a quid-pro-quo arrangement).
- 7. Political influence activities include communications made to senior public officials or politicians (for example, emails or meetings), public communications (for example, the publication of an article) or disbursements (for example, the provision of goods or services) which are intended to influence one 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.
- 8. Exemptions from registration under this tier apply to:
  - Foreign powers acting overtly (for example, diplomats acting in their official capacity);
  - Diplomatic family members supporting the work of a diplomat;
  - Lawyers carrying out legal activities;
  - Recognised news publishers;
  - Sovereign wealth funds and public pension funds carrying out political influence activities associated with their investments;
  - Those in an arrangement to which the UK is a party.

- 9. Registration is required within 28 calendar days of the direction being given by the foreign power.
- 10. It is an offence to carry out activities in the UK outside of that 28-day period, unless the arrangement has been registered. Subcontractors, employees and others tasked with carrying out political influence activities under a registerable arrangement should check that the arrangement has been registered.
- 11. Certain information registered under this tier will be included on a public register. However, exceptions to publication will apply in certain circumstances (for example, where publication would involve the disclosure of commercially sensitive information or present a serious risk to an individual's safety).
- 12. Further detail on the requirements of the political influence tier can be found in the guidance on the political influence tier and details of the public register can be found in the guidance on the information required at registration and the public register.

#### Example of a registerable arrangement under the political influence tier

A lobbying firm makes an arrangement with a foreign government. The foreign government directs the firm to lobby UK parliamentarians to convince them to vote in favour of the foreign government's interests. The lobbying firm is required to register.

Employees (and any subcontractors) of the lobbying firm involved in lobbying the parliamentarians as part of the arrangement should also check that the firm has registered within the 28-day registration window.

# Requirements of the enhanced tier

#### 13. The enhanced tier requires:

- a) Individuals or organisations to register where they are directed by a specified foreign power or specified foreign power-controlled entity to carry out, or arrange for someone else to carry out, "relevant activities" in the UK;
- b) Specified foreign-power controlled entities to register any "relevant activities" that they carry out themselves in the UK.
- 14. Details of the foreign powers and entities which have been specified on the enhanced tier are available <a href="here">here</a>.
- 15. A "direction" from a specified foreign power, or specified foreign power-controlled entity may be given formally (such as by means of a contract) or informally (such as through a quid-pro-quo arrangement).
- 16. "Relevant activities" by default means all activities, including but not limited to commercial activities, the provision of goods and services, research activities and attendance at events.
- 17. Exemptions from registration under this apply to:
  - Foreign powers acting overtly (for example, diplomats acting in their official capacity);
  - Diplomatic family members supporting the work of a diplomat;
  - Those providing goods and services that are necessary to support a diplomatic mission (for example, catering or maintenance services to a foreign embassy);
  - Lawyers carrying out legal activities;
  - Those carrying out activities related to funded study arrangements;
  - Government administrative and technical services;
  - Those in an arrangement to which a UK crown body or UK public body is a party.
- 18. Registration is required within 10 calendar days of the direction being given by the specified foreign power or foreign power-controlled entity and before the "relevant activities" commence.
- 19. It is an offence to carry out "relevant activities" in the UK, unless the arrangement has been registered beforehand. Subcontractors, employees and others tasked with carrying out activities under a registerable arrangement should check that the arrangement has been registered before carrying out activities.

- 20. Where an arrangement is in scope of both tiers (for example, where an individual is carrying out political influence activity for a specified foreign power), this only needs to be registered once with the enhanced tier.
- 21. Further detail on the requirements of the enhanced tier can be found in the guidance on the enhanced tier.

#### Example of a registerable arrangement under the enhanced tier

A UK firm selling medical technology receives an order from a specified foreign power from Country A for the purchase of ventilators for state-run hospitals in country A. The firm is required to register within 10 days of receiving the order, and prior to shipping the ventilators.

Employees (and any subcontractors) of the firm that are involved in processing the order should also check that the firm has registered prior to carrying out any tasks related to the order.

# **Further details**

## **Additional requirements**

- 22. Registrants are required to update their registration within 14 days where there is a material change to any of the information that they have provided. For example, if a new type of activity is carried out under a registered arrangement, the registrant is required to update the information provided with details of the new activity.
- 23. Recipients of an information notice are also required to respond to the information notice by the date set out on the notice. These notices may be issued to individuals or organisations who have registered, or to those who are believed to be in registerable arrangements or carrying out activities in scope of FIRS. Please see the <u>guidance on information notices</u> for further details.

#### Scheme administration

- 24. The FIRS Case Management Team within the Home Office is responsible for administration of the scheme. Please see the <u>guidance on scheme administration</u> for further details.
- 25. There is no fee to register with the scheme.

#### **Offences**

26. The scheme contains a number of 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.

