

Foreign Influence Registration Scheme (FIRS)

Purpose: to increase the transparency of activity taking place in the UK at the direction of a foreign power or foreign power-controlled entity and protect the safety interests of the UK



FIRS: Two Tiers

Please note: these slides provide a summary that paraphrases government guidance. Guidance should be consulted directly for a more complete understanding.

New UK Government requirement under the National Security Act 2023 requiring online registration for certain arrangements/activities (formal e.g., a contract or MOU or informal/quid pro-quo). The Scheme is not limited to research or research-related activities. Registration is not a request for permission or approval; it is a registration ONLY.

There are two tiers:

- **the political influence tier**: individuals and organisations are required to register activities / arrangements if they are directed by a foreign power (except the Republic of Ireland) to carry out, or arrange for others to carry out, political influence activities in the UK.
- **the enhanced tier** requires the registration of arrangements to conduct a wider set of activities (currently all activities not exempted) but only with the foreign powers or foreign power-controlled entities specified in regulations [currently, Russia and Iran].
- Where an arrangement is registerable under both tiers, only registration under the enhanced tier is required.

FIRS: Academic/Research Sector

- Registerable activities are those which take place in the UK and therefore TNE activities carried out wholly at overseas universities should be broadly exempt.
- 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”.
- Further, 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.
- Students receiving funding for their programmes from a foreign power (enhanced tier) do not need to register so long as they are activities are in line with those that support the completion of their programmes. The University would also not need to register such an arrangement.
- Other processes such as ATAS or export control are entirely separate.

FIRS: Registration / Key Dates

- Go-live is 1 July 2025
- Registration is required by the individual or entity/organisation who makes the registerable arrangement.
- ***New Arrangements (from 1 July) 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.
- ***New Arrangements (from 1 July) under the enhanced tier must be registered 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.
- ***Existing arrangements as of 1 July need to be registered by 1 October***.
- It is the arrangement that must be registered, not each individual activity that will be carried out.
- 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.

FIRS: Registration

- 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.
- You must comply if you know or reasonably ought to know that you are acting for a foreign state.
- Information provided for the political influence tier will appear on a public register after review by the FIRS team. There are a few exemptions to publication which may be requested as part of the registration process, e.g. information that is commercially sensitive.
- There are some agreed exceptions to registerable activity, including on the political influence tier for certain legal and media activities, on the enhanced tier where UK Public Bodies (e.g. UKRI) are party to the arrangement, or on both tiers where UK Crown Bodies are party to the arrangements.
- An information notice is a request for information pertaining to a registerable arrangement or activity under FIRS. Recipients of information notices are legally obliged to respond by the date specified on the notice. An information notice does not necessarily imply that the recipient is suspected of a criminal offence or is doing anything undesirable.
- ***Failure to comply is an offence with maximum penalties of up to 5 years imprisonment.***

FIRS: How to Register

- Use the [registration checker](#) to determine if you are required to register for FIRS.
- In order to register, you require a [Gov.UK One Login](#) (requires [identity verification](#) to register)
 - create a personal FIRS account in your name
 - select that you are registering as an individual in an arrangement or that you are registering an entity as part of an arrangement
 - If the latter, provide details for your entity and assign a Senior Responsible Officer (SRO)* to the registration
 - [provide details about the arrangement / activity in this arrangement](#)
 - You can save, save and submit, or update a registration/arrangement
 - You may download a copy of your registration or add other registered individuals to your registration
- You can give anyone with a FIRS account, including colleagues and third-party representatives, access to specific registrants on your FIRS account. When you add a user to a registrant on your FIRS account, they will receive an invitation. They must accept the invitation through their own FIRS account. When they have accepted, they have permission to submit registrations on behalf of the registrant and view all submitted registrations for the registrant.

FIRS: Links to Guidance

- [Introduction to FIRS / FIRS Factsheet](#)
- Contact email: FIRS@homeoffice.gov.uk
- Guidance on the two tiers with glossaries, exemptions, examples:
 - [Guidance on the Political Influence Tier](#)
 - [Guidance on the Enhanced Tier](#)
- [How to Register](#)
- [Information Required to Register](#)
- [Academic/Research Sector Guidance](#)
- [UofG FIRS webpage](#)
- UofG contact: compliance-support@glasgow.ac.uk