

## Foreign Influence Registration Scheme (FIRS)

*Please note: This summary provides a summary of 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. It is not a request for permission or approval; it is a process for 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.

### **Key Dates and Timelines**

- **Go-live is 1 July 2025 / Existing arrangements as of 1 July need to be registered by 1 October.**
- 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.
- 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.

### **Points to Note**

- 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 with the scheme 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.

- There are some agreed exceptions to registerable activity, including on the political influenced 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.***

### **Specific Guidance for the 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 their 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.

### **Further Guidance from the Home Office**

[Introduction to FIRS](#) / [FIRS Factsheet](#)

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](#) / [Registration Checker](#)

[Academic/Research Sector Guidance](#)

[UofG FIRS webpage](#)

### **Contacts:**

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*Please keep checking the UofG web page as information or support arrangements may change.*