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Foreign Influence Registration Scheme (FIRS) Committee Training

September 2025



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Aims

By the end of this session you should understand:

- The aim and purpose of the scheme
- What foreign influence looks like, when and how this needs to be reported
- Your responsibilities as committee members





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What We'll Cover Today

- What is FIRS?
- What is registration?
- What needs to be registered?
- The Two Tiers
- What is political influence?
- What is an arrangement?
- What is a foreign power?
- What is a direction?
- What if I don't know?
- When and how to register
- Your responsibilities
- Changes to policy and process
- Examples
- Support and guidance

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What is FIRS?

- Foreign Influence Registration Scheme (National Security Act 2023), came into force 01 July 2025
- Record foreign activity and foreign influence agreements between people in the UK and foreign actors that direct those in the UK to carry out relevant activities in the UK.
- Transparency, not restriction or surveillance
- Freedom of Expression
- Penalties for non-compliance (maximum 2 – 5 years imprisonment)





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What is Registration?

- Public register, no personal information
- Description of activities, purpose, outcome, frequency, people involved, direction
- Doesn't mean illegitimate, undesirable or illegal
- Doesn't prevent activity from taking place
- Done by the SU, with your information

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What needs to be registered?

- Any arrangement with a foreign power to carry out political influence activities in the UK (**Political Influence Tier**)
- Any arrangement with specified foreign powers (Russia, Iran) to conduct a wider set of activities (**Enhanced Tier**)

Registration is required when all of the below four conditions are met:

- There is an arrangement (whether formal or informal) with a “foreign power”
- The arrangement involves a “direction” from the foreign power
- The direction is to carry out “political influence activities” in the UK
- No exemptions apply to the arrangement or activities

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Political Influence Tier

- Requires the registration of arrangements with any foreign power (except the Republic of Ireland) to carry out political influence activities in the UK
- Includes direction of student activity for sake of political influence
- Formal and informal agreements
- Registration within 28 days





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Student Political Campaigning

- Majority of campaigning would not require registration, unless:
 - activities were directed by a foreign power; and
 - activities constituted “political influence activities”
- Registration example: a foreign power directs a student society to campaign against a UK government decision. The student society arranges a protest and seeks to influence their local MP.

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Enhanced Tier

- Requires registration of:
 - arrangements to carry out any activities within the UK at the direction of a specified power or entity (Russia, Iran)
 - activities carried out in the UK by specified foreign power-controlled entities (Russia, Iran)
- Further specified powers may be added
- Activity cannot begin until the activity has been registered, must be registered within 10 days of agreement
- Wider set of activities (organising events, projects, sharing information) with foreign powers



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What is political influence?

- Has to be for the purpose of influencing UK public life
- A 'political influence activity' must meet both of the below criteria:
 1. The activity is one of the following:
 - A communication
 - A public communication
 - The provision of money, goods or services to an individual or entity in the UK
 2. The purpose, or one of the purposes, of the activity is to influence:
 - An election or referendum in the UK, or
 - A decision of a Minister or Government department , or
 - The proceedings of a UK registered political party, or
 - A Member of the House of Commons, House of Lords, Northern Ireland Assembly, Scottish Parliament or Senedd Cymru
- Public communication includes newspaper article, info on website, online posts, public speeches (made in UK publication, or UK intended audience)
- Elections includes all public office positions (local and national)
- Registration only required where activity is carried out in the UK (unless it starts abroad and has effect in the UK).

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Examples

- Is a political influence activity:
 - A letter to a Minister encouraging them to impose tougher regulations on a particular industry;
 - A meeting with a Member of Parliament seeking to persuade them to vote in a particular way in Parliament;
 - An email to a Scottish Minister intended to persuade them to increase the teaching of art and music in Scottish primary schools;
 - A letter to the Head of a political party encouraging them not to make a particular policy commitment;
 - A newspaper article making policy recommendations for the UK; Government, where it is not reasonably clear that it is written or published at the direction of a foreign power;
 - Investing money in an MP's constituency with a view to influencing the actions or votes of the MP.
- Is NOT a political influence activity:
 - An email to a "general enquiries" mailbox of a government department outlining the case why an application should be considered favourably;
 - An article published seeking to influence a UK government decision, where it is clearly labelled that it is written or published at the direction of a foreign government;
 - A meeting with an elected mayor or councillor, intended to influence a local government decision;
 - An article published encouraging British tourists to visit a foreign country;
 - An evening reception intended to encourage UK nationals to invest in a foreign country

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What is an arrangement?

An arrangement includes, but is not limited to:

- A formal arrangement such as a contract;
- A non-legally binding agreement such as an MOU (memorandum of understanding);
- An order (or similar agreement) for a good or service, to be followed up with a bill or invoice;
- An informal quid pro-quo agreement.



What is a foreign power?

A foreign power is defined as any of the following:

- the sovereign or other head of a foreign State,
- a foreign government, or part of a foreign government;
- an agency or authority of a foreign government, or of part of a foreign government,
- an authority responsible for administering the affairs of an area within a foreign country or territory;
- a political party which is a governing political party of a foreign government.

An entity may be considered an “agency or authority of a foreign government” if the entity carries out public functions on behalf of the government, for example:

- the entity is responsible for overseeing the implementation of government decisions, policies or laws; or
- the entity is responsible for enforcing laws; or
- the entity carries out practical or administrative work of government.

A political party is a governing political party of a foreign government if either:

- Individuals working for the government hold their posts as a result of being members of that political party; or
- The political party directs or controls those working for the government in carrying out their official functions.

Foreign political parties which are not the governing party of a foreign country are not foreign powers.





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What is a direction?

- A direction is an order or instruction to act with which a person is obliged or compelled, whether formally or informally, to comply.
- A request from a foreign power is considered a direction if any of the following apply:
 - The foreign power has power or authority over the person
 - There is an element of control or expectation to the request
 - A benefit is to be offered as a result of conforming with the request
 - There is coercion or a threat alongside the request
- Power relationship is key- funding, requests, collaboration, or alignment of views is not enough.
- Link between direction and political influence required.

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Funding

- Funding, in itself, does not constitute a direction, but may form part of a direction if it has conditions attached for it to be used in a particular way
- Unrestricted grants and funding without conditions placed on activities, are not considered directions
- Individual student financial assistance from foreign powers for their education, don't need to register activities that are reasonably necessary to:
 - Continue or complete their course and participate fully
 - Uphold the reputation of the financial provider or educational institution
 - Meet standards of conduct reasonably expected by the provider

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What if I don't know?

- There are safeguards in place for individuals who have no way of knowing they're acting under a registerable arrangement
- This applies when:
- Activities are solely academic with no suggestion of foreign power direction
- They're working with a state-linked entity but have no reason to know of state direction
- The objectives aren't strategic or political objectives of a state



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When and how to register

Registration is required when all of the below four conditions are met:

- There is an arrangement (whether formal or informal) with a “foreign power”
- The arrangement involves a “direction” from the foreign power
- The direction is to carry out “political influence activities” in the UK
- No exemptions apply to the arrangement or activities

It's the arrangement, not the activity that must be registered.

In the political influence tier, this must be within 28 days. In the enhanced tier, this must be within 10 days (and the activity cannot begin until it's registered)

Registration checker first, if conditions met, register online.

The SU makes the registration, with the information you provide.

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Your responsibilities

- As the SU's clubs, societies and groups are not separate legal entities to the organisation, it is the SU's responsibility to register any arrangements.
- You must inform us of any arrangement, or proposed arrangement, that may meet the criteria of the scheme
- If registration is required, you must provide all the necessary details for registration, and any changes or updates in the future
- Society members must be informed of any registered arrangements
- If you're not sure, ask!
- Please contact your coordinator or activities@thesu.org.uk



Changes to policy and process

- As a result of the requirements of the scheme, you will now be required to declare if any event, activity, or guest speaker that you are planning involves an arrangement with a foreign power to carry out political influence activities in the UK (and if it doesn't, why)
- If you are unsure, consider the funding for the event, and the intended outcome- do these meet the criteria for a direction or political influence activities?
- When you affiliate, you will be required to declare if there are any arrangements that are, or need to be, registered, and any external funding





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Example- 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 society organises a protest at the university, and invites their local MP to attend. At the protest, the society seeks to influence the MP into joining their cause to change the UK government's position. The 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).

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Examples- Registration Not Required

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

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Support and guidance

- FIRS page on committee hub
- FAQs
- Any questions, or if you're unsure, please email your coordinator, activities@thesu.org.uk, or henry.massimo@thesu.org.uk

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