

## **FIRS FAQs**

### **What is the Foreign Influence Registration Scheme?**

The National Security Act 2023 introduced the Foreign Influence Registration Scheme (FIRS), which came into force on 1 July 2025.

It aims to 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 United Kingdom.

The scheme is not intended as a register of people or organisations for surveillance purposes. It is also not designed to prevent or discourage any of the activities that require reporting. The government's aim is to improve transparency around activities directed by foreign powers.

### **What is registration?**

A public record of the arrangement. Personal information can be redacted.

### **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**)

### **When is registration required?**

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

### **Who's responsible for registration?**

It's the SU's responsibility to register arrangements, but we can only do this with the information you provide.

### **Does registration of an arrangement mean that an activity cannot go ahead?**

FIRS does not prevent any activity from taking place; providing the arrangements are transparent, related activities can proceed as normal.

### **What are the two tiers?**

**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

This includes any arrangement made by a foreign power to direct student activity for the sake of political influence (e.g. attempts to influence UK elections, referenda or governmental decisions). Direction could take the form of financial support or other benefits promised by foreign powers in exchange for carrying out political influence activities. This could be a formal agreement (e.g. a contract) or an informal agreement (e.g. an email or other correspondence). Arrangements under the Political Influence Tier need to be registered within 28 days of the arrangement being made, or within 28 days of the introduction of the scheme for pre-existing arrangements.

**Enhanced Tier:** Requires the registration of:

- arrangements to carry out any activities within the UK at the direction of a specified power or entity (currently Russia and Iran)
- activities carried out in the UK by specified foreign power-controlled entities.

More specified powers may be added. Activity cannot begin until the formal or informal agreement governing the activity has been registered, and it must be registered within 10 days of the agreement being made.

### **What about political campaigning?**

The majority of student political campaigning would not require registration, but political campaigning activities would have to be registered under the political influence tier if:

- Those activities were directed by a foreign power; and
- Those activities constituted “political influence activities”.

For 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.

### **What is a political influence activity?**

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

Examples of political influence activities:

- 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;
- 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.

### **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;
- 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 (e.g. a ministry or department 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 (e.g. a local government authority in a foreign country);
- a political party which is a governing political party of a foreign 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.

### **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

It is not enough for a foreign power to fund an activity. Generic requests, joint collaboration, or simply an alignment of views, absent this power relationship, will not meet the test for direction

### **What about funding?**

Whilst funding from a foreign power does not, in itself, constitute a direction, it may form part of a direction if it has conditions attached for it to be used in a particular way.

Funding for education arrangements are exempted under the enhanced tier. Where a student receives financial assistance from a specified foreign power while completing education in the UK, they 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

### **What are my responsibilities as a committee member?**

You must inform the SU 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.

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 outcomes- 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.

If you're not sure, ask!

### **Who can I contact for support?**

Your coordinator, [activities@thesu.org.uk](mailto:activities@thesu.org.uk), or [henry.massimo@thesu.org.uk](mailto:henry.massimo@thesu.org.uk).