

Foreign Influence Registration Scheme (FIRS)	
Enabling Policy Statement; Executive Owner; Approval Route:	Our Operations - Chief Operating Officer - Operations Committee
Is the Procedure for internal use only (Non- disclosable)?	Disclosable
Associated Policy Statements:	Our Colleagues – Chief Operating Officer Our Partners and Reputation – Vice-President Global Our Students – Chief Student Officer Our Research and Innovation - PVC, Research and Innovation - Executive Board
Authorised Owner:	Will Davies, Chief Operating Officer (COO)
Authorised Co-ordinator:	Governance Officer
Effective date:	12.05.2026
Due date for full review:	12.05.2028
Sub documentation:	FIRS Registration Guidance on the University’s internal webpages: FIRS SurreyNet FIRS SharePoint Declaration: FIRS Declaration Form

Approval History

Version	Reason for review	Approval Route	Date
1.0	Creation of new FIRS Procedure to meet requirements under the Foreign Influence Registration Scheme legislation.	Executive Board > Operations Committee	12 May 2026

1. Purpose

1.1. The purpose of this Procedure is to establish the compliance framework for the University of Surrey and its staff, students, and anyone acting on its behalf, for the UK Government's Foreign Influence Registration Scheme (FIRS), introduced under the National Security Act 2023, effective from Tuesday 1 July 2025¹, ensuring legal obligations are met and reputational risks are managed.

1.2. This Procedure is essential given the University of Surrey's role as a research-intensive and internationally connected institution. This Procedure exists to:

- Ensure compliance with statutory obligations for the University and its members.
- Offer consistent processes for identifying, assessing, and registering relevant arrangements with foreign powers through the UK Government's FIRS online service².
- Provide clear responsibilities and processes for tracking, monitoring, and reporting.
- Facilitate appropriate consultation with stakeholders and ensure effective communication across the University.
- Ensure integrity, transparency, and accountability in lawful international engagement.
- Secure the freedom of speech of all members of our community and the academic freedom of academic staff.

1.3. Approach to Assessment

The University applies a proportionate, risk-based approach to determining whether arrangements fall within scope of FIRS. Not all international activity requires registration. Each arrangement is assessed to determine:

- Whether it meets the statutory criteria under FIRS;
- Whether any form of foreign direction or control is present;
- The level of legal, regulatory, and reputational risk to the University.

This assessment informs whether registration is required and ensures that compliance obligations are met in a consistent and proportionate manner.

1.4. Key Requirements

- Notify FIRS@surrey.ac.uk where an arrangement may fall within scope of this Procedure, or where there is uncertainty.
- Do not proceed with activities where registration may be required until assessment has been completed.
- Complete registration within statutory timeframes where required.
- Report any material changes within 14 calendar days.
- Complete the internal FIRS Declaration Form following registration or material updates.

These requirements apply where arrangements are connected to the University's activities, resources, or reputation, or where there is uncertainty as to whether such a connection exists.

2. Scope and Exceptions to the Procedure

2.1. This Procedure applies to all University staff – including emeritus and visiting staff, students, and subsidiaries who may engage in activities captured under FIRS legislation.

¹ [UK Government Collections: Foreign Influence Registration Scheme](#)

² [Guidance: Foreign Influence Registration Scheme: how to register online](#)

This includes activities undertaken in a professional capacity and, where relevant, in a personal capacity where there is a connection to the University, its resources, or its reputation.

Where such a connection is unclear, individuals are expected to seek advice in line with this Procedure.

2.2. Exceptions apply only where specific statutory provisions override this Procedure.

2.3. Subsidiary companies are expected to adopt this Procedure unless exemption is formally requested, recorded, and approved.

3. Definitions and Terminology

Arrangement	Any type of agreement, whether formal or informal. This could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement. Does not include conversations or correspondence that do not materialise into an agreement.
Direction	An order or instruction to act with which a person is obliged or compelled, whether formally or informally, to comply. May include coercion, conditional funding, quid-pro-quo arrangements, or implied pressure. Whilst funding from a foreign power does not 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 without attached conditions does not constitute direction.
Exemption	A circumstance in which registration requirements do not apply.
FIRS	Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023. The transparency regime, effective from 1 July 2025, requires registration of certain foreign-directed activities in the UK.
Foreign power	A government outside the UK, an agency or authority of such a government, or an entity controlled by such a government.
Information notice	A notice requiring the recipient to provide further information related to arrangements or activities registerable under FIRS.
Material changes	Refers to but not exclusively scope, timing, or details of the arrangement, which must be updated on the FIRS register within 14 calendar days.
Person	An individual or other person who is not an individual, such as a company.
Political influence activities	Communication, public communication or provision of money, goods or services intended to influence political matters.
Registrant	A person needed to register under FIRS.
Relevant activity	A type of activity in scope of registration under the enhanced tier of FIRS.
Specified foreign power	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
Specified foreign power-controlled entity (FPCE)	An entity which is controlled by a foreign power, and which has been specified through regulations under the enhanced tier of FIRS.

For the purposes of this Procedure, “arrangement” is the primary term used to describe agreements in scope of FIRS. References to “activities” relate to actions undertaken pursuant to such arrangements.

4. Procedural Principles

4.1. Roles & Responsibilities

Executive Board (EB)

- Approves the Procedure and any significant amendments.
- Receives annual reports on compliance status, risk assessments, and any escalations relating to FIRS.

Chief Operating Officer (COO)

- Acts as Authorised Owner of the Procedure.
- Ensures alignment with legislative requirements under FIRS and incorporation of regulatory updates.
- Oversees institutional compliance and escalates significant risks to the Executive Board where required.

Executive Assistant to Provost

- Acts as the central point of coordination for FIRS across the University.
- Provides advice and guidance to staff and students via FIRS@surrey.ac.uk and published materials on the University's internal webpages.
- Assesses notified arrangements against FIRS requirements, including undertaking a proportionate risk assessment.
- Determines, based on available information and UK Government guidance, whether registration is likely to be required.
- Escalates complex, high-risk, or ambiguous cases in line with the escalation provisions set out in this Procedure, where a clear determination cannot be made based on available guidance.
- Coordinates institutional registrations where the University is the registrant, including seeking approval from the Provost (or delegated authority) prior to submission.
- Maintains a central record of all FIRS-related activity, including registrations, decisions, exemptions, and supporting rationale.
- Undertakes periodic compliance monitoring and audit activity to assess adherence to this Procedure, including reviewing records, sampling cases, and identifying areas of risk or non-compliance.
- Produces annual compliance and risk reports for the Executive Board.
- Coordinates awareness, communication, and training materials relating to FIRS.
- Liaises with relevant internal stakeholders (e.g., Legal, Governance, Research) where additional advice or escalation is required.

Heads of Schools / Departments

- Promote awareness of FIRS requirements within their areas.
- Ensure appropriate local processes are in place to identify potential FIRS-relevant activities.
- Support staff in escalating queries and complying with this Procedure.
- Escalate concerns, risks, or potential non-compliance to FIRS@surrey.ac.uk.

All Staff and Students

- Remain aware of and comply with FIRS requirements.
- Notify FIRS@surrey.ac.uk as soon as a relevant arrangement is identified, including where there is uncertainty.
- Provide accurate and timely information to support assessment.
- Submit individual registrations directly to the UK Government where required.
- Report material changes within 14 calendar days in line with statutory requirements.
- Complete the internal FIRS Declaration Form following registration or where material changes occur.

Subsidiary Companies

- Adopt and implement this Procedure unless a formal exemption is approved and recorded.

4.2. FIRS Compliance Lifecycle

1. Identification

Individuals must notify FIRS@surrey.ac.uk when an arrangement with a foreign power is identified, or where there is uncertainty. The [UK Government eligibility tool](#) may be used as an initial guide.

2. Assessment

The Executive Assistant to the Provost will review the arrangement using UK Government FIRS guidance and supporting documentation.

As part of this stage, a proportionate risk assessment will be undertaken, considering:

- Whether the arrangement meets the statutory criteria for registration under FIRS.
- The presence and nature of any foreign direction or control.
- Legal and regulatory compliance risk.
- Reputational and institutional risk to the University.

Additional information may be requested from the individual to support this assessment. Where necessary, advice will be sought from relevant internal stakeholders.

3. Registration

a. Where individual registration is required:

- The individual must submit their registration directly via the [UK Government FIRS online system](#) within the statutory timeframe.

b. Where the University is the registrant:

- The Executive Assistant to the Provost will coordinate the submission.
- Approval will be obtained from the Provost (or delegated authority) prior to submission.
- The Executive Assistant to the Provost will complete and submit the registration on behalf of the University.

c. Where both apply:

- Both the individual and the University must complete their respective registration obligations.

4. Notification

Following submission to the UK Government system:

- Individuals must complete the [internal FIRS Declaration Form](#).
- The Executive Assistant to the Provost will complete the [form](#) where submission is made on behalf of the University.
- The [form](#) must also be completed for any material changes to an existing registration.

5. Record-Keeping

The Executive Assistant to the Provost will maintain a central record of:

- Registrations and supporting documentation.
- Assessment outcomes and rationale.
- Risk assessments.
- Exemptions and decisions not to register.

6. Monitoring & Local Oversight

- Monitoring activities are undertaken to provide assurance of compliance and do not replace individual or institutional legal responsibilities under FIRS.
- Heads of Schools / Departments to maintain local oversight and direct escalations to FIRS@surrey.ac.uk.

7. Reporting

The Executive Assistant to the Provost will provide an annual report to the Executive Board and, where appropriate, other relevant University committees. This will include:

- Compliance activity.
- Risk assessment outcomes and trends.
- Findings from monitoring and audit activity.
- Any escalations or incidents of non-compliance.

8. Procedure Review

This Procedure will be reviewed biennially by the Executive Assistant to the Provost and updated as required.

Escalation

Where required, matters may be escalated for further review or decision-making:

Operational escalation

- Queries, uncertainties, or potential FIRS-relevant arrangements must be escalated to FIRS@surrey.ac.uk for initial review and assessment.

Formal escalation (internal)

- Where required, the Executive Assistant to the Provost will escalate operational matters, including registration decisions or approvals, to the Provost (or delegated authority).
- Policy, legal, or compliance matters will be escalated to the Chief Operating Officer as Authorised Owner.

All escalations will be coordinated through the Executive Assistant to the Provost.

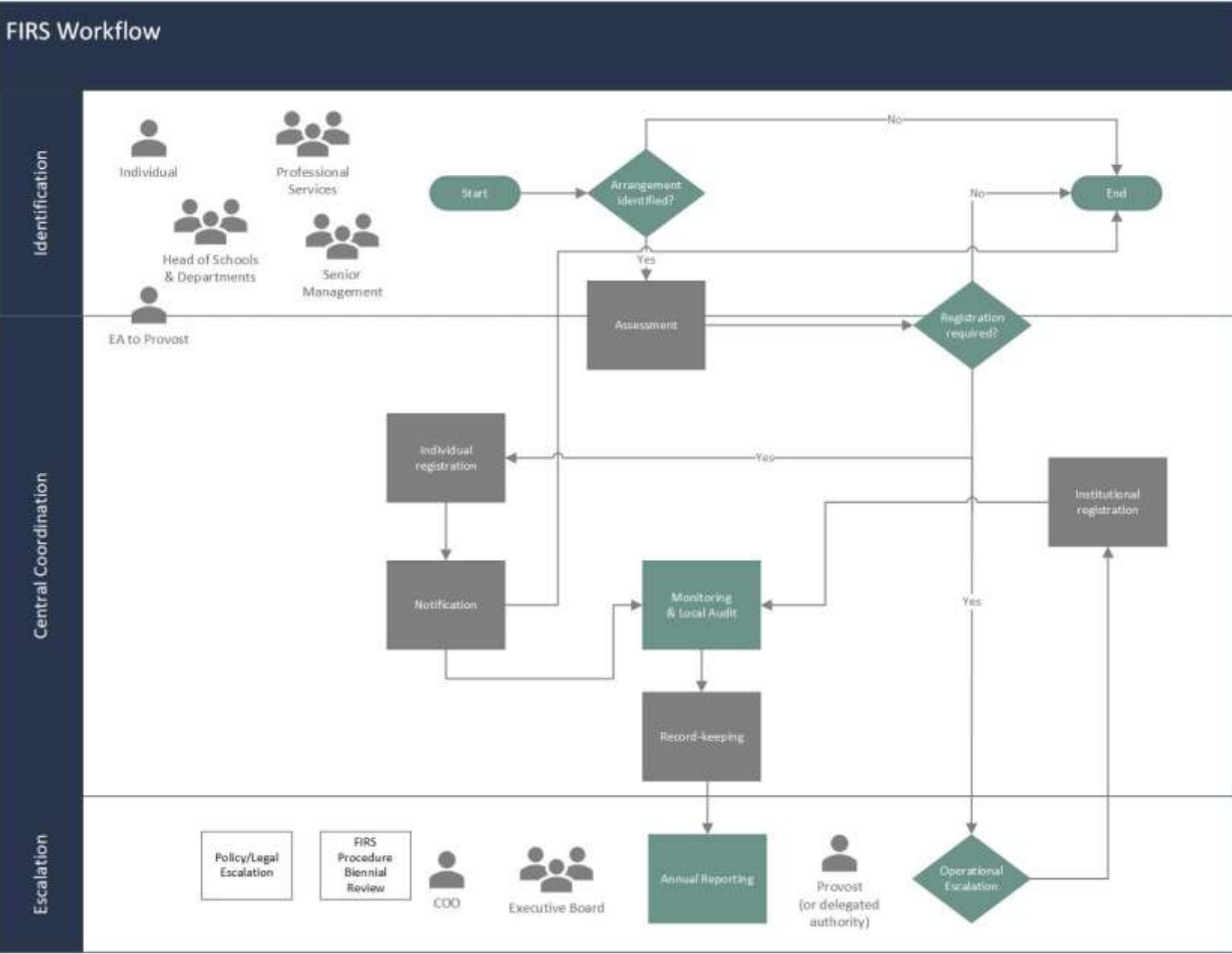
4.3. Workflow

The workflow below illustrates how FIRS-related arrangements are identified, assessed, and managed across the University.

It is designed to operate through multiple entry points, recognising that potential FIRS-relevant activity may be identified at different stages and by different roles across the institution. This includes individuals, line managers, and professional services functions involved in research (e.g. FRIOs), partnerships, and external engagement.

The workflow supports a distributed model of responsibility, where local oversight and awareness form the first line of identification, with central coordination, assessment, and oversight provided by the Executive Assistant to the Provost.

Regardless of the entry point, all cases follow the core compliance lifecycle set out in Section 4.2, ensuring a consistent, proportionate, and risk-based approach to assessment and registration.



4.4. FIRS Registration Requirements

Foreign Influence Registration Scheme

FIRS³ is a two-tiered mandatory scheme designed to protect the safety and interests of the UK by increasing awareness of arrangements between its entities and foreign powers, where activities meet the legislative criteria. It does not prohibit or restrict lawful international collaboration but does require registration of specific arrangements where activities meet the legislative criteria.

Tier Differentiation

- Political Influence Tier⁴: registration required where a UK entity or individual acts at the direction of any foreign power (excluding the Republic of Ireland) to influence politics, policy making, or public life. Timely registration of qualifying arrangements is required within 28 days.
- Enhanced Tier⁵: registration required for a broader set of activities conducted at the direction of specified foreign powers or foreign power-controlled entities, or by those entities themselves. Timely registration of qualifying arrangements is required within 10 days, preventing the commencement of relevant activities until registration is complete. The current specified foreign powers are Iran and Russia, and additional entities may be designated.

Material Changes and Information Notices

- Material changes (e.g., scope, timing, or key details) must be updated on the FIRS register within 14 calendar days.
- The University must comply with information notices issued by the Secretary of State, providing the requested information by the specified deadline, in accordance with the National Security Act 2023 and FIRS regulations.

Tier Overlap

Where overlap occurs, meaning that an arrangement falls under both tiers, only Enhanced Tier registration is required to ensure compliance.

Applicability

FIRS applies to all University of Surrey staff, students, and anyone acting on behalf of the University. This includes, but is not limited to, contractors, consultants, agency workers, student societies, visitors, University subsidiaries, and controlled entities.

Where staff or students engage in interactions with a foreign power that do not meet the statutory definition of an 'arrangement' under FIRS, these interactions should still be conducted in a transparent and proportionate manner and may be recorded internally in accordance with University policy.

Any arrangement with a foreign power that meets the statutory conditions under FIRS must be assessed for FIRS registration in accordance with the National Security Act 2023.

Geographical Scope

FIRS applies only to activities conducted within the UK; therefore, activities conducted entirely overseas without any UK-based element (e.g., research undertaken at a partner institution abroad) do not require registration.

Four-Condition Registration Principle⁶

In order to register an arrangement, it needs to meet the four conditions below:

³ [Guidance: Foreign Influence Registration Scheme: guidance for academia and research](#)

⁴ [Guidance: Foreign Influence Registration Scheme: political influence tier](#)

⁵ [Guidance: Foreign Influence Registration Scheme: enhanced tier](#)

⁶ An individual or organisation is required to register with the scheme when all the below four conditions are met. Although for political tier, this is in accordance with section 69 while for enhanced tier, it is in accordance with section 65, this four-condition registration principle applies to both tiers.

- **Condition 1 – Arrangement with a Foreign Power:** A person makes an arrangement, whether formal or informal, with a foreign power or entity; therefore, there is a registerable arrangement.
- **Condition 2 – Direction:** That arrangement involves a "direction" from the foreign power or entity.
- **Condition 3 – Activity in the UK:** The direction is to carry out "political influence activities" or "relevant activities" in the UK (whether by the registrant, or with or through someone else).
- **Condition 4 – No Exemptions:** No legal exemptions apply to the arrangement or the activities.

Registration Responsibilities

- Responsibility for registration under FIRS may rest with either the individual, the University, or both, depending on the nature of the arrangement.
- Where the University as an institution is a party to an arrangement with a foreign power (or specified entity) that includes direction regarding how funds are used or how the University must act (e.g., communications, policy influence, required actions), the University itself must register.
- An individual academic's registration does not automatically meet the University's obligations, especially where University resources are used, funding is awarded to or managed through the University, or the University is named or otherwise implicated in the arrangement.
- When assessing their responsibilities under FIRS, individuals should consider whether the University is a contracting party (e.g., contract, grant, MoU), whether any conditions or directions are attached from a foreign power, and whether the University benefits from or is responsible for fulfilling obligations under the arrangement.
- For transparency and to manage reputational risk, individuals must notify FIRS@surrey.ac.uk of any such arrangements, even where they believe they are acting in a personal capacity, to allow oversight and to confirm whether institutional obligations apply.

Examples

Activities that may fall under FIRS (non-exhaustive), include:

- International research collaborations.
- Consultancy work with foreign state-linked organisations.
- Knowledge Exchange, external engagement, or policy advisory roles.
- Funding or sponsorship from foreign governments or entities.
- Student funding and campaigning, especially if directed by a foreign power.

Compliance Steps

Compliance with FIRS is managed through the University's defined lifecycle set out in Section 4.2 of this Procedure, which outlines the required steps from identification through to reporting and review.

If an arrangement started on or after 1 July 2025 and has not yet been registered, individuals should contact FIRS@surrey.ac.uk.

Please note that where uncertainty exists, the presumption should be to comply and seek advice rather than assume exclusion.

Non-Compliance

Failure to comply is a criminal offence with penalties up to two years' imprisonment for breaches of the political influence tier, or five years for the enhanced tier, and reputational risk for both individuals and the University.

Arrangements Commencing After the Legislation Came into Effect

If an arrangement commenced after the legislation came into effect and has not yet been registered under FIRS but falls within the scheme's scope, the registration must be completed as soon as possible and in accordance with statutory requirements.

Accountability

Responsibility for compliance with FIRS rests with the individual and/or the University, depending on the nature of the arrangement.

Where arrangements involve the University as a contracting party, make use of University resources, or are otherwise connected to the University's activities, the University will provide oversight, coordination, and support to ensure compliance.

Where arrangements are undertaken in a personal capacity and are not connected to the University, individuals remain solely responsible for meeting their statutory obligations. In such cases, the University may not have visibility of the arrangement or any associated registration.

Individuals are expected to notify the University where there is any uncertainty regarding whether an arrangement may fall within scope of this Procedure.

Exemptions

Certain arrangements are exempt from registration under FIRS. The following exemptions are outlined in the National Security Act 2023 and associated regulations:

- Activities involving the UK Government or public bodies.
- Legal services provided by qualified lawyers.
- Recognised news publishers (Political Influence Tier only).
- Scholars funded by specified foreign powers for UK study.
- Communications clearly attributed to a foreign power, where transparency requirements are met.

Exclusions

- Activities entirely outside the UK.
- Ordinary academic engagement not undertaken under foreign direction.
- Collaborations funded by foreign sources without conditions constituting direction.

Escalation and Guidance

Where uncertainty exists, the presumption should be to comply and seek advice rather than assume exclusion. Individuals should contact FIRS@surrey.ac.uk for more information and guidance.

4.5. Cross-Referencing with Other Procedures

FIRS obligations may intersect with a range of existing University policies, procedures, and supporting documentation relating to research, partnerships, governance, compliance, and legal or regulatory requirements.

This Procedure should be applied in conjunction with relevant University frameworks where applicable. Supporting procedures and guidance will be developed, maintained, and updated as required to ensure alignment with legislative requirements and institutional processes.

The Executive Assistant to the Provost will coordinate with relevant University functions to ensure consistency of approach, avoid duplication, and support effective implementation across the institution.

Where there is any uncertainty regarding the interaction between this Procedure and other University requirements, individuals should seek advice via FIRS@surrey.ac.uk.

5. Governance Requirements

5.1. Communication Plan

Communication activities will be coordinated in line with University communication channels and governance processes.

The Executive Assistant to the Provost is responsible for coordinating and implementing the communication of this Procedure. This will include:

- Publishing the Procedure on the University's external and internal websites.
- Issuing periodic communications to staff, students, and relevant external partners, as appropriate.
- Ensuring that clear and accessible guidance materials are available to support understanding of FIRS requirements.

Communication activities will be reviewed periodically to ensure they remain effective and aligned with legislative requirements and institutional needs.

5.2. Training Plan

The Executive Assistant to the Provost will ensure that appropriate training and guidance materials are developed, maintained, and made available via the University's internal webpages.

This will include:

- Providing accessible guidance on FIRS requirements and responsibilities.
- Identifying where targeted training or awareness-raising activities may be required.
- Acting as a central point of contact via FIRS@surrey.ac.uk to provide advice and support to staff and students.

Training and guidance materials will be reviewed and updated as required to reflect changes in legislation, regulatory guidance, or University processes.

5.3. Review

This Procedure will be reviewed biennially, or earlier where required, to ensure ongoing compliance and effectiveness. A review may be triggered by:

- Changes in legislation, regulatory guidance, or sector best practice.
- Significant changes to University structures, processes, or roles.
- Identified risks, gaps, or issues arising from implementation or compliance monitoring.

Minor amendments (e.g., updates to role titles or administrative details) will be approved by the Authorised Owner through Chairs' Action of the Executive Owner.

Major amendments (e.g., changes affecting the meaning, scope, or compliance requirements of the Procedure) will be submitted through the full approval route in line with University governance processes.

5.4. Legislative Context and Sector Guidance

This Procedure is informed by, and should be read in conjunction with, relevant legislation and sector guidance relating to the Foreign Influence Registration Scheme (FIRS). Key sources include:

- The National Security Act 2023⁷
- UK Government guidance on the Foreign Influence Registration Scheme (FIRS)⁸, including specific guidance for the higher education and research sector.

This Procedure will be updated, as required, to reflect changes to legislation, statutory guidance, or emerging sector best practice.

⁷ [National Security Act 2023](#)

⁸ [UK Government Guidance for Academia and Research](#)

5.5. Sustainability

This Procedure has no direct environmental impact and will not result in additional energy consumption or waste.

6. Stakeholder Engagement and Equality Impact Assessment

- An Equality Impact Assessment was completed on **30/03/2026** and is held by the Authorised Co-ordinator.
- Procedure communicated to all subsidiaries on 28 May 2026.
- Stakeholder Consultation was completed, as follows:

Stakeholder	Nature of Engagement	Request EB Approval (Y/N)	Date	Name of Contact
Governance	Reviewed draft procedure	N	20 November 2025	Kelley Padley, Governance Officer
H&S	Reviewed draft procedure	N	10 March 2026	Matt Purcell, Director of H&S
Sustainability	Reviewed draft procedure	N	10 March 2026	Martin Wiles, Head of Sustainability
Academic Freedom of Speech	Reviewed draft procedure	N	10 March 2026	Josh Andresen, AFFE Sub-committee rep
Our Colleagues	Reviewed draft procedure and endorsed in the Operations Committee	Y	9 March 2026	Will Davies, Chief Operating Officer
Our Partners & Reputation	Reviewed draft procedure	N	10 March 2026	Patrick Degg, Vice-President, Global
Our Research & Innovation	Reviewed draft procedure and endorsed in the URIC	Y	10 March 2026	Prof Lisa Collins, PVC R&I
Our Students	Reviewed draft procedure	N	10 March 2026	Emma Rowsell, Chief Student Officer