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Regulatory Update

The UK Launches Its Own ‘FARA’: What Companies Need to Know About the New Foreign Influence Registration Scheme

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On July 1, 2025, the United Kingdom’s new Foreign Influence Registration Scheme (FIRS) will formally take effect, creating sweeping registration obligations under U.K. law for persons engaging in certain activities on behalf of foreign powers.

FIRS, established under the National Security Act 2023, is widely viewed as the U.K.’s analog to the U.S. Foreign Agents Registration Act (FARA), though it is broader in scope in some respects.

The new law seeks to enhance transparency around foreign influence in U.K. politics and other sensitive sectors, responding to longstanding national security concerns. Following extensive government guidance issued in April, companies, public affairs professionals, nonprofits and others with potential exposure should move quickly to assess their obligations and implement compliance measures.

Key Features

Two-Tier Registration Structure

FIRS establishes two registration tiers — the Political Influence Tier and the Enhanced Tier — with distinct triggers and obligations.

- **Political Influence Tier**
Individuals or organizations must register if they have an arrangement with a foreign power to carry out “political influence activities” in the U.K. These include communications with U.K. public officials, public communications intended to influence elections or policy decisions, and the provision of money or services to influence political outcomes. Registration must occur within 28 days of entering the arrangement.
- **Enhanced Tier**
Separate, stricter requirements apply for arrangements involving certain “specified persons,” specifically entities linked to Iran and Russia. Activities undertaken at the direction of these specified foreign powers must be registered within 10 days and prior to conducting any activities. Unlike the political influence tier, registration obligations here extend to a broad range of activities, not just political influencing.

The U.K. government retains discretion to expand the list of specified persons and countries and has signaled that future additions, including Chinese state-linked entities, remain under consideration.

Definitions and Scope

The definition of “foreign power” is expansive, encompassing not only foreign governments but also their agencies, public authorities and governing political parties.

Importantly, activities need not be overtly political to trigger registration if they occur under the Enhanced Tier — commercial, academic, media or charitable engagements directed by specified foreign powers may also be covered.

Exemptions

There are limited exemptions, including for some legal activities carried out by qualified U.K. lawyers, for arrangements with the Republic of Ireland and for certain news publishers.

However, the exemptions are narrow, and organizations should not assume safe harbor based solely on their sector or mission.

Penalties

Penalties for noncompliance are significant:

- Violations of the political influence tier may result in up to **two years’ imprisonment** or fines.
- Violations of the enhanced tier may lead to **five years’ imprisonment** or fines.

A dedicated FIRS management unit within the Home Office will administer compliance, conduct investigations and refer potential violations for prosecution.

Implications for Organizations

The practical impact of FIRS is far-reaching.

Any organization or individual interacting with foreign governments or government-linked entities in a way that could be perceived as influencing U.K. public life must carefully assess whether registration is required.

Unlike prior U.K. lobbying rules, which applied only to direct engagements with a limited subset of senior officials, FIRS covers a much broader range of activities and actors.

Entities that traditionally viewed themselves outside the lobbying sphere, including public relations firms, think tanks, academic institutions, charities and even private companies engaged in international business, may now find themselves subject to FIRS registration requirements.

Moreover, the timing obligations are strict. Entities with existing arrangements continuing beyond July 1, 2025, must register them by October 1, 2025. New arrangements made after July 1 must be registered within the applicable 28- or 10-day window, depending on the tier.

Failure to comply not only risks criminal liability but may also trigger reputational damage, contractual complications and heightened regulatory scrutiny.

Preparing for FIRS Compliance

Organizations should immediately review their relationships with foreign governments and associated entities to determine whether registration obligations may apply.

Recommended steps include:

- Conducting a detailed risk assessment of all foreign engagements.
- Updating internal compliance policies and procedures to incorporate FIRS requirements.

- Educating relevant employees, executives and directors about the scope of activities that may trigger registration.
- Preparing to track and disclose activities in a timely and complete manner.

Given the broad scope and tight compliance windows, proactive preparation is critical.

Final Observations

FIRS represents a major shift in the U.K.'s approach to foreign influence transparency.

It mirrors but also expands upon models established in the United States and Australia.

As the U.K. continues to recalibrate its national security frameworks post-Brexit and in an increasingly multipolar world, FIRS is likely just the beginning of a broader compliance environment focused on foreign relationships and influence activities.

Entities operating across borders, particularly those interacting with U.K. public officials, political processes or strategic sectors, should recognize FIRS compliance will be a new and ongoing feature of the U.K. regulatory landscape.



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