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Foreign Influence Registration Scheme Policy Briefing

What is at Stake

The **Foreign Influence Registration Scheme (FIRS)** — introduced under the National Security Act 2023 — aims to increase transparency around the activities of individuals or organisations in the UK who are directed by foreign powers to carry out political influence activities.

A critical decision lies in identifying which states or territories should be subject to the **Enhanced Tier** designation. The **People's Republic of China (PRC)** and the **Hong Kong Special Administrative Region (HKSAR)** must be explicitly listed under the Enhanced Tier to protect the UK from covert political interference and transnational repression. Otherwise, it risks leaving one of the UK's biggest national security threats unaddressed.

FIRS is expected to come into force on **1 July 2025**. A public register will be established, allowing the public to monitor activities undertaken at the direction of a foreign power. The Home Office is responsible for monitoring and enforcing the scheme. If concerns about undeclared activities arise, the Home Office can issue an Information Notice to request for more details.

What is FIRS

FIRS is a transparency mechanism designed to **counter state threats** by requiring registration of activities carried out **on behalf of foreign governments or entities**. The two-tier system of registration distinguishes between the **Political Influence Tier** and the **Enhanced Tier**.

1. Political Influence Tier:

Individuals or organisations must register under the Political Influence Tier if they are directed by any foreign power to carry out political influence activities in the UK.

This includes lobbying activities that target Members of Parliament, public officials, or political parties; publishing or promoting materials with a political stance or messaging; organising or funding political events or campaigns; and making arrangements for others to carry out any of these activities.

2. Enhanced Tier:

Registration under this tier is required if an individual or organisation is directed by a specified foreign power, or an entity under its control, to carry out relevant activities in the UK—or if they arrange for others to do so.

Organisations controlled by a specified foreign power must also register if they are undertaking relevant activities on their own initiative. At the moment, Russia and Iran are listed as specified foreign powers under the Enhanced Tier. More may be added in the future.

3. Key Differences Between the Two Tiers:

1. **Who it targets:** the Political Influence Tier applies to activities directed by *any* foreign power; the Enhanced Tier applies only to *specified* foreign powers.
2. **Type of activity:** the Political Influence Tier focuses on political influence; the Enhanced Tier includes any activity considered to pose a risk to the UK's safety or interests.
3. **Legal consequences:** Breaches of the Enhanced Tier requirements may result in more serious penalties.

Why the PRC and HKSAR Should Be Designated Under the Enhanced Tier

1. Systematic Covert Influence Campaigns in the UK

The PRC has a documented history of influence operations targeting UK academic institutions, political actors, human rights defenders, diaspora communities, media and think tanks. These are often masked through united front organisations, cultural exchanges, and overseas police stations. The Intelligence and Security Committee (ISC) of Parliament noted in 2023 China's attempt to gain political influence and economic advantage over the UK, to “mute criticism and build support for China as a partner” and to “gain economically”.¹

- The London-based Hong Kong Economic and Trade Office (HKETO) allegedly hosted activities aligned with Beijing's political goals. On 13 May 2024, three men were charged with aiding Hong Kong intelligence service.² Among the three men, one works as the London HKETO's office manager. According to the court documents, activists are surveilled by the HKSAR government as early as 2021.³
- Covert donations to UK political parties and parliamentarians have been traced to individuals associated with the CCP, as highlighted in the MI5 warning about lawyer Christine Lee in 2022. Lee was declared in 2022 as an “agent of influence” who carried out “political interference activities on behalf of the Chinese Communist Party”. Lee had access across the political spectrum at the highest levels, having met successive prime ministers and donated half a million pounds to MPs.⁴
- The Chinese Embassy in the UK has been documented to coordinate and fund the Chinese Students and Scholars Associations (CSSAs), which operate on university campuses across the country. While presenting themselves as cultural or student groups, many CSSAs have been implicated in monitoring, reporting on, and intimidating Chinese and Hong Kong students who express dissenting political views. These associations contribute to a climate of fear, silencing critical voices and extending the Chinese government's surveillance apparatus into UK academic

¹ Intelligence and Security Committee of Parliament, *China Report*, 13 July 2023, <https://isc.independent.gov.uk/wp-content/uploads/2023/07/ISC-China.pdf> [accessed 18 April 2025].

² Dan Sabbagh, ‘Three Men Charged with Aiding Hong Kong Intelligence Service, Says Met’, *The Guardian*, 13 May 2024, <https://www.theguardian.com/uk-news/article/2024/may/13/three-men-charged-with-aiding-hong-kong-intelligence-service-says-met> [accessed 18 April 2025].

³ James Lee, ‘Explainer: Why UK Authorities Arrested 3 Men Linked to Hong Kong's Trade Office’, *Hong Kong Free Press*, 18 May 2024, <https://hongkongfp.com/2024/05/18/explainer-why-uk-authorities-arrested-3-men-linked-to-hong-kongs-trade-office/> [accessed 18 April 2025].

⁴ Ruth Comerford, ‘Three charged with aiding Hong Kong intelligence service’, *BBC News*, 13 May 2024, <https://www.bbc.com/news/uk-67977207> [accessed 18 April 2025].

space.⁵

- The United Kingdom has a substantial Chinese state media presence within its borders. This includes outlets that are overtly pro-government, such as *Sing Tao*, as well as those that are subtly state-affiliated, like *China Daily*. Both of these influential media organizations have established their headquarters in London,⁶ demonstrating the strategic importance the Chinese government places on shaping the media landscape and public opinion within the UK.

2. Export of Transnational Repression

The Chinese and Hong Kong authorities have extended their authoritarian reach abroad, targeting exiled critics through legal and extralegal means. Under the extraterritorial powers of the National Security Law, Hong Kong authorities have issued bounties of HK\$1 million on 19 pro-democracy activists overseas, with ten currently residing in the UK. The latest round of warrants was issued on 24 December 2024.⁷

Beyond legal threats, UK-based Hong Kongers report anonymous intimidation letters,⁸ online harassment, and surveillance—often with their families back home targeted in parallel. Since July 2024, at least 91 relatives and associates of the wanted individuals have been arrested, detained, or interrogated in Hong Kong.⁹

The Foreign Influence Registration Scheme promotes transparency, but more importantly, it serves as a safeguard against foreign harassment and transnational repression. Including both China and Hong Kong in the enhanced tier is essential to protect people's rights and safety on UK soil.

3. Legal and Institutional Ambiguity of the HKSAR

While the HKSAR maintains the appearance of being a distinct jurisdiction under the “One Country, Two Systems” framework, this distinction has become functionally obsolete. The imposition of the National Security Law in 2020 marked a turning point. With the additional implementation of the National Security Ordinance (also known as Article 23) in 2024, it effectively ended the territory's autonomy and integrated its political, legal, and security apparatus into the PRC's authoritarian governance model.

The HKETO in London continues to enjoy diplomatic privileges based on outdated assumptions of autonomy. In reality, HKETO now serves Beijing's political agenda, promoting state narratives and engaging with UK stakeholders on behalf of an authoritarian regime.

This creates a serious oversight gap in the UK's foreign influence framework. Without the Enhanced Tier designation, actors associated with the HKSAR can operate with fewer constraints than those directly tied to the PRC—despite serving the same strategic objectives.

⁵ China: Repression of Hong Kong Pro-Democracy Activists in Exile, Amnesty International, 2022, <https://www.amnesty.org/en/documents/asa17/8006/2024/en/> [accessed: 18 April 2025].

⁶ Angeli Datt and Sam Dunning, *Beijing's Global Media Influence 2022: United Kingdom*, Freedom House, 2022, <https://freedomhouse.org/country/united-kingdom/beijings-global-media-influence/2022> [accessed 18 April 2025].

⁷ James Pomfret, ‘Hong Kong Offers Bounties for Six More Democrats in Security Squeeze’, *Reuters*, 24 December 2024, <https://www.reuters.com/world/china/hong-kong-offers-bounties-six-more-democrats-security-squeeze-2024-12-24/> [accessed 18 April 2025].

⁸ Alix Culbertson, ‘Ministers Urged to Act After Hong Kong Activists' UK Neighbours 'Bribed' to Hand Them into Chinese Embassy’, *Sky News*, 6 March 2025, <https://news.sky.com/story/ministers-urged-to-act-over-hong-kong-activists-targeted-in-uk-13322099> [accessed 18 April 2025].

⁹ Brian Kern, ‘Hong Kong Repression Monitor series - Timeline of Arrest Warrants and Bounties Issued for Overseas Hong Kongers’, 28 January 2025 [updated on 10 April 2025], https://briankernkongtsunggan.substack.com/p/timeline-of-arrest-warrants-and-bounties?r=mngv&utm_campaign=post&utm_medium=web&triedRedirect=true [accessed 18 April 2025].

For the Foreign Influence Registration Scheme to be credible, Hong Kong must be listed alongside China in the Enhanced Tier. Anything less leaves the door open to covert influence under the cover of a false distinction.

4. Alignment with Allied Democracies

Allied democracies are already taking decisive action to counter China's influence operations. Australia's Foreign Influence Transparency Scheme explicitly targets activities linked to the Chinese Communist Party and has even led to prosecutions.^{10 11} In the US, the 2023 Countering PRC Malign Influence Fund authorised \$325 million annually to push back against China's global interference.¹² The UK must follow suit to ensure transatlantic consistency and strengthen collective deterrence against authoritarian threats.

Recommendations

The UK is at a critical juncture in defending its democratic institutions from foreign state interference. The PRC and HKSAR represent unique and pressing threats to the UK's human rights, national security, civic freedoms, and sovereignty. During a Parliament debate on 16 December 2024, Security Minister Dan Jarvis MP explicitly named China as one of the UK's top national security threats, alongside Russia and Iran. It would be inconsistent and strategically incoherent to designate Russia and Iran under the Enhanced Tier of FIRS while omitting China and Hong Kong. Including both is a necessary and proportionate step to protect the integrity of the UK's political, academic, and civil space.

1. **Designate the PRC and HKSAR under the Enhanced Tier of FIRS before it comes into force on 1 July 2025**, ensuring mandatory registration of all activities undertaken on their behalf.
2. **Review and revise privileges of PRC and HKSAR-affiliated entities** in the UK, including the HKETO, Confucius Institutes, CSSAs and politically connected donors.
3. **Publish transparency report** on registered foreign influence activities under FIRS to enhance public accountability.
4. **Ensuring transparency, deterrence, and protection** for UK-based communities and democratic institutions.

¹⁰ Kirsty Needham, 'Australia's Foreign Interference Laws Designed for China – Former PM Turnbull', *Reuters*, 21 February 2023, <https://www.reuters.com/world/asia-pacific/australias-foreign-interference-laws-designed-china-former-pm-turnbull-2023-02-21/> [accessed 18 April 2025].

¹¹ 'Australia's Foreign Interference Laws Target China', *AP News*, 21 February 2023, <https://apnews.com/article/australia-foreign-interference-china-a5b0031c9b9de0da592638101918147b> [accessed 18 April 2025].

¹² *Countering the PRC Malign Influence Fund Authorization Act of 2023*, 118th US Congress, H.R. 1157, <https://www.congress.gov/bills/118/congress/house-bills/1157> [accessed 18 April 2025].