

Research Briefing

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By Library specialists

Countering Russian influence in the UK



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Summary

Diplomatic relations between the UK and Russia have been on a downward trajectory since the mid-2000s. Despite this, Russian influence in the UK has grown.

The Russian threat to the UK

In its report on Russia, published in July 2020, the UK Parliament's [Intelligence and Security Committee called Russian influence in the UK “the new normal”](#) (PDF) and said that the government had underestimated the response required to the Russian threat.

The government's [Integrated Review of Security, Defence, Development and Foreign Policy](#) in 2021 said that state threats to the UK are growing and diversifying, and that states are becoming increasingly assertive in how they advance their own objectives. It called Russia one of “the most acute threat[s] to our security”. That assessment was reiterated in the subsequent [refresh of the integrated review](#) in 2023, which had, in part, been prompted by Russia's invasion of Ukraine in February 2022.

The government said on several occasions that any Russian incursion into Ukraine would be a “[strategic mistake and subject to consequences](#)”, including [an “unprecedented” package of coordinated sanctions](#). However, there were also [widespread calls for the government to go beyond sanctions](#) and bring forward the initiatives and legislation on countering foreign influence in the UK that had been promised in the years prior.

Despite progress over the last three years, Russia continues to pose a threat. The Russian government has been accused of orchestrating a widespread campaign of interference and disinformation that seeks to undermine the global order. In September 2024, the heads of MI6 and the CIA jointly warned that [the international order is under threat](#) in a way not seen since the end of the Cold War, accusing Russia of a “reckless campaign of sabotage across Europe”.

Russian wealth in the UK

Prior to the invasion, [the UK was an attractive place for wealthy Russians](#) (PDF) to invest and spend their money for reasons including:

- Strong capital and housing markets in which to invest

- Company law which enabled owners to obscure their ownership of assets
- The availability of luxury goods and services, and opportunities to fund cultural institutions to improve their standing and gain influence in UK society

In 2022, Parliament passed the [Economic Crime \(Transparency and Enforcement\) Act 2022](#), to increase the transparency of foreign entities holding UK property, help the government confiscate UK assets obtained with illegally acquired money and to increase the scope of sanctions penalties.

This was followed by the [Economic Crime and Corporate Transparency Act 2023](#) which the government said would help tackle “dirty money” by requiring more information from companies and giving Companies House more powers to investigate companies submitting inadequate information.

Official statistics report that Russians not resident in the UK hold around [£8.2 billion in UK financial assets](#), compared with almost £30 billion prior to the invasion. As of October 2023, [£22.7 billion of assets had been frozen](#) in connection with the Russian sanctions regime.

[Trade with Russia has also fallen](#) almost 90% in value, and [trading in Russian companies listed on the London Stock Exchange is suspended](#).

Countering hostile state activity

Hostile activity by those acting on behalf of foreign states or entities has been a growing security concern in recent years.

In response to the poisoning of Sergei and Yulia Skripal in Salisbury in March 2018, attributed to the Russian state, the government expelled Russian diplomats that had been identified as undeclared intelligence officers. The [Counter-Terrorism and Border Security Act 2019](#), subsequently introduced powers to stop, question, search and detain people at ports and borders to determine whether they appear to be, or have been, engaged in hostile state activity.

Both the Intelligence and Security Committee and the 2021 Integrated Review proposed legislation be introduced to give law enforcement and the security and intelligence agencies the necessary powers to deal with state threats. IR21 argued that action which falls short of conflict can nevertheless threaten and interfere with the UK’s security, economy, democracy and social cohesion.

The [National Security Act 2023](#) (NSA) subsequently sought to implement the recommendations of a Law Commission review of the Official Secrets Acts, taking account of evolving threats. It introduced new offences in relation to espionage, entering prohibited places, sabotage, and foreign interference. It also introduced a regime of prevention and investigation measures aimed at

those suspected of involvement in state threat activity who are not able to be prosecuted.

The [Foreign Influence Registration Scheme](#), a public register created by the NSA, is yet to be commenced. It would require those working for foreign governments to declare their lobbying activities.

Visa reforms

The availability of investor visas was identified as a [key driver of London's appeal to wealthy Russians](#) (PDF). In February 2022, [the government closed the Tier 1 \(Investor\) visa](#) to new applicants. The visa had offered permission to stay in the UK and a route to permanent residence and citizenship for those with the means to invest at least £2 million in the UK.

There had been [longstanding concerns that the visa was vulnerable to misuse](#) by people wanting to transfer illicitly obtained wealth to the UK. An [internal government review of investor visas granted before April 2015](#) identified potential evidence of this in a “small minority” of cases.

The government has used sanctions powers to impose [travel bans on certain individuals associated with the Russian regime](#). In February 2025 [it expanded the policy on excluding people from the UK to include people who are part of an elite with links to the Russian state](#). It has also introduced restrictions on visas for Russian diplomats, including limiting the length of time they can spend in the UK.

Broader [powers to impose visa penalties](#) on citizens from countries whose governments are considered to pose a risk to international peace and security, armed conflict, or international humanitarian law were introduced in 2022 following Russia's invasion of Ukraine. [The government said at the time it was minded to use them in respect of Russia](#). It hasn't done so, but there have been some reports that [visa applicants from Russia and Belarus experience slow visa processing times](#) because of additional security checks and other reasons.

Election finance

The Intelligence and Security Committee's 2020 report on Russia noted that attempts at broader political influence and disinformation have been widely reported. It said that Russians oligarchs had used their business interests, donations to charities and political parties to influence UK affairs.

[Donations to political parties and elected representatives are regulated](#), mainly through the Political Parties, Elections and Referendums Act 2000, as

amended (PPERA). The system of regulation is designed to prevent foreign money entering the political system and elections.

However, the current checks on foreign donations have been criticised. The Committee on Standards in Public Life (CSPL) recommends PPERA should be updated to require parties and non-party campaigners to have appropriate procedures in place to determine the true source of donations. [The CSPL's most recent report on party finance](#), from July 2021, also included recommendations to limit foreign money entering political finance and campaigns.

The [Labour Party manifesto for the 2024 election](#) committed it to strengthening rules on donations and loans.

Media and disinformation

In March 2022, the media regulator Ofcom revoked the broadcast licence of the TV network Russia Today (RT). Ofcom had opened investigations into the impartiality of RT programmes following Russia's invasion of Ukraine.

Since February 2022, the UK has also taken steps to [sanction Russian state media](#), social media platforms, propagandists, news anchors, and regime spokespeople accused of spreading disinformation about the conflict.

The government has also passed the [Online Safety Act 2023](#). One of the aims of that legislation is to protect users from illegal content and activity. It makes foreign interference (as set out in [section 13 of the National Security Act 2023](#)), a priority offence. This means that 'in-scope services' such as social media platforms and search engines, must take [proactive, preventive action](#) to identify and minimise people's exposure to state-sponsored or state-linked disinformation aimed at interfering with the UK.

Countering Russian military activity

Russian military activity in, or near, UK territorial waters and airspace is not new. However, it remains a concern, particularly with respect to Russia's alleged intelligence gathering activities and threats to the UK's critical undersea infrastructure.

In January 2025, the Defence Secretary John Healey said [“we are strengthening our response to ensure that Russian ships and aircraft cannot operate in secrecy near the UK or near NATO territory”](#).

The UK Chief of the Defence Staff Admiral Sir Tony Radakin has said that the [chance of a significant, direct Russian attack on the UK mainland](#) is, however, “remote”.

1

Background

Apart from a period of relatively cordial relations in the aftermath of the Cold War, diplomatic relations between the UK and Russia have been on a downward trajectory since the mid-2000s.¹ At the same time, and despite a cooling in political relations, Russian influence in the UK has grown.

In its [report on Russia \(PDF\)](#), published in July 2020, Parliament's Intelligence and Security Committee (ISC) concluded that "It has been clear for some time that Russia under Putin has moved from potential partner to established threat, fundamentally unwilling to adhere to international law" and that the government had underestimated the response required to the Russian threat.

The committee suggested the UK was one of Russia's top Western intelligence targets and that "Russian influence in the UK is the new normal", commenting:

Successive Governments have welcomed the oligarchs and their money with open arms, providing them with a means of recycling illicit finance through the London 'laundromat', and connections at the highest levels with access to UK companies and political figures.²

The government [published its response to the ISC](#) on the same day. It argued:

The Government has long recognised there is an enduring and significant threat posed by Russia to the UK and its allies, including conventional military capabilities, disinformation, illicit finance, influence operations, and cyber-attacks. As such, Russia remains a top national security priority for the Government [...]

We have shown in recent years that the UK takes the threat from Russia extremely seriously and will respond to and call out Russian aggression wherever it occurs.³

The government's Integrated Review of Security, Defence, Development and Foreign Policy, published in March 2021, subsequently called Russia one of "the most acute threat[s] to our security" and said that "until relations with

¹ See Library research briefings: [Russia and the West](#), April 2009; [UK relations with Russia](#), October 2012; [UK relations with Russia 2016](#), March 2016; [Russia's foreign and security policy](#), July 2016 and [National security and Russia](#), March 2018

² Intelligence and Security Committee of Parliament, [Russia](#), HC 632, July 2020

³ Cabinet Office, [Government response to the intelligence and Security Committee's 2020 Russia report](#), 21 July 2020

its government improve, we [the UK] will actively deter and defend against the full spectrum of threats emanating from Russia”.⁴

1.1

Russia’s invasion of Ukraine

On 24 February 2022 Russia launched a full-scale invasion of Ukraine, after months of diplomacy aimed at averting a crisis and despite Russia’s insistence that it had no plans to invade the country or occupy territory.⁵

In the build up to the conflict, the government said on several occasions that any “Russian incursion [into Ukraine] would be a strategic mistake and subject to consequences”, including an “unprecedented” package of coordinated sanctions.⁶ The government has subsequently introduced a rolling package of sanctions measures, in coordination with allies, which target the strategic interests of the Russian state, individuals with close ties to the Kremlin and those companies and individuals who have facilitated Russia’s invasion of Ukraine. These are examined in detail in House of Commons Library briefing, [Sanctions against Russia \(February 2022 to January 2025\)](#).

However, there were also widespread calls for the government to go beyond sanctions and bring forward the initiatives and legislation on countering foreign influence in the UK that had been promised in the years prior.⁷

Integrated Review refresh

Russia’s invasion of Ukraine was also instrumental in prompting a refresh of the Integrated Review in 2023. While many of the trends identified in the original review were still considered to be relevant, the refresh acknowledged that the “transition into a multipolar, fragmented and contested world has happened more quickly and definitively than anticipated”.⁸

Systemic competition between states was considered to represent the “most immediate and substantial threat to UK interests”. The refresh identified Russia’s destabilisation of the European security order as the greatest threat to the UK in the Euro-Atlantic area.

⁴ HM Government, [Global Britain in a competitive age: Integrated Review of Security, Defence, Development and Foreign Policy](#), CP403, 16 March 2021, p.18

⁵ President of Russia, [Address by the President of the Russian Federation](#), 24 February 2022. Events leading up to the invasion of Ukraine are examined in Library research briefing: [Ukraine: Russia’s “Red line”](#)

⁶ Foreign, Commonwealth and Development Office, [Press Release](#), 8 December 2021 and HC Deb 31 January 2022, [Russia: sanctions](#), c55

⁷ HC Deb 22 February 2022, [Sanctions](#)

⁸ HM Government, [Integrated Review Refresh 2023: Responding to a more contested and volatile world](#), CP811. May 2023, p.7

The refresh committed to updating the government’s Russia strategy, which is not publicly available, to focus on containing and challenging Russia militarily and to address disinformation and the UK’s vulnerabilities in energy, democratic and electoral institutions, and financial systems.⁹

1.2

Russia’s ongoing campaign of instability

“[The hybrid threat] is everything that stays below the threshold of war...from disinformation to sabotage to cyber or economic coercion... [whatever] offers the adversary the opportunity to achieve its security objectives in a way that is short of armed conflict”.

Sir Alex Younger, former chief of MI6, [Evidence to the defence select committee](#), 21 January 2025

Russia has long been accused by Western countries, including the UK, of attempting to destabilise the international system in pursuit of its strategic interests. Among other things, the Kremlin has been accused of:

- interfering in democratic elections
- engaging in hybrid (or ‘grey zone’) warfare¹⁰
- targeting Russian dissidents overseas (including in the UK)
- pursuing disinformation campaigns as a means of undermining adversaries
- politicising energy and food supplies
- violating international law and the respect for internationally recognised borders.

Russia has also signalled its capacity and willingness to intervene abroad, and/or expand its global footprint, where it is in its national interest to do so. It has also increasingly used nuclear rhetoric as a means of pressuring of the West.¹¹

Since Russia’s invasion of Ukraine in 2022, this campaign of instability, and the threats that it poses, has increased significantly. Russia’s close relationships with China, Iran and North Korea have also given cause for concern.¹²

⁹ HM Government, [Integrated Review Refresh 2023: Responding to a more contested and volatile world](#), CP811. May 2023, p.42. A detailed look at the Integrated Review refresh is available in Library research briefing: [The Integrated Review Refresh 2023: What has changed since 2021?](#)

¹⁰ Typically considered activities below the threshold that would elicit a military response, such as cyber attacks and sabotage of critical national infrastructure. At the time of writing, the Defence Select Committee is conducting an inquiry into [Defence in the Grey Zone](#)

¹¹ See for example, International Crisis Group, [Saying the quiet part out loud: Russia’s new vision for taking on the West](#), 2 May 2023 “[The West must stop protecting Russia from the consequences of its actions](#)”, RUSI Commentary, 4 November 2024 and Library research briefing, [Russia’s use of nuclear threats during the Ukraine conflict](#)

¹² See for example, HL Deb 16 January 2025, [Rules-based international order](#); Central Intelligence Agency, [Opinion Piece: Intelligence partnership helps the US and UK stay ahead in an uncertain world](#), 7 September 2024 and Ministry of Defence, [Chief of the Defence Staff RUSI Lecture](#), 4 December 2024

In an interview with the Financial Times in September 2024, the then head of the CIA, Bill Burns, and the head of MI6, Sir Richard Moore, jointly warned that the international order is under threat in a way not seen since the end of the Cold War. They highlighted the “reckless campaign of sabotage across Europe” that is being waged by Russia and the “cynical use of technology to spread lies and disinformation designed to drive wedges between us”.¹³

In December 2024, the UK Chief of the Defence Staff, Admiral Sir Tony Radakin, also warned that “global power is shifting”, highlighting the threats to UK territorial waters and airspace, threats to its critical digital and energy infrastructure, and interference in “public discourse” driven by both “rogue individuals and nation states”. Russia, he said, was “clearly active and eager to both challenge and undermine the international system”.¹⁴

For its part, Russia has long argued that the West is failing to recognise the reality of an “emerging polycentric world order” and is trying to substitute the new multi-polar world with a rules-based system that benefits the West alone.¹⁵ In comments to the Valdai Discussion Club in October 2023, President Putin said that “the world is too complicated and diverse to be subjected to one system” and that Russia was “compelled to respond to ever-increasing military and political pressure”.¹⁶

1 Further reading

- [The components of Russia’s undeclared war against the West](#), RUSI Commentary, 28 January 2025
- [Safeguarding Europe: How to deter and defeat Russia](#), Chatham House, December 2024
- [Russia’s hybrid war in Europe enters a dangerous new phase](#), International Institute for Strategic Studies, November 2024

¹³ [FT Live: CIA Director Bill Burns and MI6 Chief Sir Richard Moore talk to FT editor Roula Khalaf](#), 7 September 2024. See also Central Intelligence Agency, [Opinion Piece: Intelligence partnership helps the US and UK stay ahead in an uncertain world](#), 7 September 2024. In October 2024, the EU established [a new sanctions framework](#) specifically to address the hybrid threats posed by Russia.

¹⁴ Ministry of Defence, [Chief of the Defence Staff RUSI Lecture](#), 4 December 2024

¹⁵ Ministry of Foreign Affairs of the Russian Federation, [Remarks to the Federal Assembly](#), 1 December 2021

¹⁶ President of Russia, [Valdai International Discussion Club Meeting](#), 5 October 2023 and Valdai Papers, [Putin’s six principles outline the features of the new world order](#), 11 June 2024.

2

Russian wealth in the UK

Russians not resident in the UK held UK financial assets worth £8.2 billion at the end of 2023, falling from £29.0 billion at the end of 2021 (before the Russian invasion of Ukraine).¹⁷ Between February 2022 and October 2023, firms which hold sanctioned assets reported freezing £22.7 billion of such assets in connection with the Russian sanctions regime.¹⁸

These statistics are likely to understate total Russian wealth in the UK, which includes holdings not routinely measured (such as non-financial assets) and those held in corporate structures whose beneficial ownership is obscured (such as investments held via corporate structures based in other countries and territories).¹⁹ They also don't reflect UK assets held by Russians resident in the UK.

2.1

The appeal of the UK to Russian wealth

This section looks at why the UK was an appealing place for Russian oligarchs to invest and spend money prior to the invasion of Ukraine. The situation in 2025 is very different, as evidenced by the sharp fall in the level of Russian investment in the UK since 2021, and following the legislative changes mentioned above.

Prior to the invasion, a number of parliamentary inquiries and government reports looked at the appeal of the UK to Russian wealth.

In July 2020, the Intelligence and Security Committee (ISC) "Russia" report said that Russian oligarchs had for decades viewed the UK as a "particularly favourable destination" to invest their money. As well as the UK's "investor visa" scheme (see Visa reforms), the factors cited by the ISC included:

- a light-touch approach to regulation, with "few questions" asked about sources of wealth
- strong capital and housing markets providing good investment opportunities

¹⁷ Office for National Statistics, [Geographical breakdown of UK international investment position, The Pink Book: 2024 edition](#), 31 October 2024

¹⁸ Office of Financial Sanctions Implementation, [OFSI Annual Review 2022 to 2023: Strengthening our Sanctions](#), 14 December 2023

¹⁹ Oliver Bullough, "[How Britain let Russia hide its dirty money](#)", The Guardian, 25 May 2018

- efforts by the UK Government to develop links with major Russian companies
- the growth in an “industry of enablers” including lawyers, accountants, estate agents and public relations professionals which the report says “manage and lobby for the Russian elite in the UK”²⁰

In evidence to the Foreign Affairs Committee in May 2018, Vladimir Ashurkov of the Anti-Corruption Foundation also noted the English language and the UK’s status as a capital of finance and business as making the UK a “natural magnet” for Russians.²¹

The UK also has appeal as a place where wealthy individuals can spend their wealth due to the availability of high-end services such as private schooling and specialised professionals such as domestic staff and lawyers.²²

A 2020 national risk assessment by HM Revenue and Customs and the Home Office also found that investing in the UK gave oligarchs access to charities or cultural institutions (such as universities or football clubs)²³ that allowed “individuals to launder their reputation, improving their standing and influence in UK society”.²⁴

The risk assessment highlighted that there was also a risk that the UK’s process for incorporating (establishing) companies could be exploited for money laundering purposes:

The UK’s company formation mechanisms provide the necessary corporate vehicles for transferring funds through the international financial system and this is a vulnerability regularly exploited to move Russian-linked illicit finance into the UK.²⁵

2.2

Recent legislative developments

Following the Russian invasion of Ukraine in February 2022, Parliament passed two acts aiming to make it harder for individuals to hide illicit money in the UK and obscure foreign ownership of UK property: the [Economic Crime \(Transparency and Enforcement\) Act 2022](#) and the [Economic Crime and Corporate Transparency Act 2023](#).

²⁰ Intelligence and Security Committee, [Russia](#), July 2020, paras 49 to 62 (pdf)

²¹ Foreign Affairs Committee, [Moscow’s Gold: Russian Corruption in the UK, May 2018](#), para 6 (pdf)

²² “[The Siege of Londongrad](#)”, Town & Country magazine, 15 June 2022

²³ Foreign Affairs Committee, [Moscow’s Gold: Russian Corruption in the UK, May 2018](#), para 8, pdf

²⁴ HM Treasury and Home Office, [National risk assessment of money laundering and terrorist financing](#), December 2020, paras 4.23 – 4.26 and 17.7 to 17.8 (pdf)

²⁵ As above para 4.23

Economic Crime (Transparency and Enforcement) Act 2022

The Economic Crime (Transparency and Enforcement) Bill was introduced in the House of Commons on 1 March 2022.²⁶ It was fast-tracked because of the Russian invasion of Ukraine, so received Royal Assent on 15 March 2022.

The act contains three main measures:

- Introduces a public register of beneficial owners of overseas entities which own UK property. This aims to make it easier for the UK government to identify foreign-owned property for the purposes of, for example, sanctions or legal action.²⁷
- Changes to unexplained wealth orders (UWOs). The courts can use UWOs to require people to explain how they acquired property, which could help UK law enforcement build a case to confiscate property obtained illegally. The act expands when UWOs can be used, allows law enforcement to apply for concurrent asset freezing orders to prevent targeted assets being sold and, crucially, reduces the liability of enforcement authorities to pay defendants' legal costs. The potential liability for these costs had previously been cited as a barrier for law enforcement in using UWOs.²⁸
- Changes to the sanctions regimes to broaden the circumstances in which individuals can be fined for breaching sanctions law, among other things.

For more information see the Library's [briefing on the Economic Crime \(Transparency and Enforcement\) Act 2022](#).²⁹

Economic Crime and Corporate Transparency Act 2023

The Economic Crime and Corporate Transparency Bill 2022-23 was introduced in the House of Commons on 22 March 2022 and received Royal Assent on 26 October 2023.³⁰

Its provisions include:³¹

²⁶ UK Parliament, [Economic Crime \(Transparency and Enforcement\) Act 2022 bill page](#) (accessed 15 January 2025)

²⁷ For more, see Commons Library Insight "[The Register of Overseas Entities: Five things you need to know](#)", 13 June 2022

²⁸ Commons Library research briefing CBP-9098 [Unexplained Wealth Orders](#)

²⁹ Commons Library research briefing CBP-9486 [Economic Crime \(Transparency and Enforcement\) Act 2022](#)

³⁰ UK Parliament, [Economic Crime and Corporate Transparency Act 2023 bill page](#) (accessed 15 January 2025)

³¹ Commons Library research briefing CBP-9625 [Economic Crime and Corporate Transparency Bill 2022-23: Progress of the Bill](#)

- Requiring companies to provide more information to Companies House, including verifying information about directors and beneficial owners and requiring small businesses to file profit and loss accounts.
- Requiring more information from limited partnerships (a type of business entity).
- Giving Companies House more powers to investigate information on the register.

The government has said these are intended to combat “dirty money” in general and prevent people taking advantage of the UK’s open economy to perpetrate fraud and money laundering.³²

For more information see the [Commons Library research briefing on the then Economic Crime and Corporate Transparency Bill](#).

2.3

Financial links between the UK and Russia

Official measures of financial links between Russia and the UK, such as trade and investment, have fallen significantly since the invasion of Ukraine.

However, these measures may not capture the full extent of financial ties between the two countries. Some aspects of Russian financial links to the UK, both legitimate and illegitimate, include:

Sanctioned assets

As of October 2023, the Office of Financial Sanctions Implementation (OFSI) said £22.7 billion of frozen assets had been reported to OFSI in relation to the Russia regime.³³

Investment

The value of Russian investment in the UK was £8.2 billion at the end of 2023, considerably lower than the £29 billion reported at the end of 2021.³⁴

This reflects financial assets owned by foreign residents and so doesn’t include holdings by Russians resident in the UK. It also doesn’t include non-

³² HM Government, “[Economic Crime and Corporate Transparency Act: overarching factsheet](#)”, updated 1 March 2024

³³ Office of Financial Sanctions Implementation, [OFSI Annual Review 2022 to 2023: Strengthening our Sanctions](#), 14 December 2023

³⁴ Office for National Statistics, [Geographical breakdown of UK international investment position, The Pink Book: 2024 edition](#), 31 October 2024

financial assets and may not fully capture investments held via other countries or undeclared.³⁵

The value of UK-owned investment in Russia amounted to £8.9 billion at the end of 2023, down from £36.9 billion at the end of 2021.³⁶

Trade

Total trade between the UK and Russia was £2.2 billion in 2023. Of this, £1.7 billion was exports to Russia (split broadly equally between goods and services) and £540 million was imports from Russia (mostly services). By comparison, in 2021, total trade was £16.2 billion (£5 billion exports and £11.2 billion imports).³⁷

There are reports of Russia and UK trading more than official statistics suggest, via third countries. For example, Sky News reported that the UK's exports of cars to Azerbaijan increased sharply after the invasion of Ukraine.³⁸ The export of luxury vehicles to Russia is banned under [The Russia \(Sanctions\) \(EU Exit\) Regulations 2019](#), though exporters can apply for licences exempting them from this ban.³⁹

The government has said some types of third-country trade may be in breach of sanctions.⁴⁰ In October 2024 it launched the Office of Trade Sanctions Implementation (OTSI) to strengthen the implementation and enforcement of trade sanctions.⁴¹

Property

In February 2022, the anti-corruption organisation Transparency International (TI) estimated that £1.5 billion of UK property had been bought by who had been Russians accused of corruption or who had links to the Russian government, including £430 million of property in the City of Westminster.⁴²

³⁵ International Monetary Fund, [Balance of Payments and International Investment Position Statistics](#) (accessed 21 January 2025)

³⁶ Office for National Statistics, [Geographical breakdown of UK international investment position, The Pink Book: 2024 edition](#), 31 October 2024

³⁷ Office for National Statistics, [UK total trade: all countries, seasonally adjusted](#), 25 October 2024

³⁸ Sky News, [“Car industry insists 2,000% increase in sales to Azerbaijan has nothing to do with Russia”](#), 18 March 2024

³⁹ HM Government, [“Russia sanctions: guidance”](#), updated 5 December 2024

⁴⁰ Department for Business and Trade, [“Countering Russian sanctions evasion - guidance for exporters”](#), 7 January 2025

⁴¹ Office of Trade Sanctions Implementation, [“Introducing OTSI”](#), 11 October 2024. This is examined in detail in Library research briefing, [Sanctions against Russia \(February 2022 to January 2025\)](#)

⁴² Transparency International, [“Stats reveal extent of suspect wealth in UK property and Britain’s role as global money laundering hub”](#), 18 February 2022

In 2022, estate agents Savills said it estimated 1.4% of central London properties were owned by Russians.⁴³

Billionaire wealth

While many wealthy Russians have left the UK since the invasion, billionaires who were born in Russia (or the former Soviet Union) make up at least six of the top 100 in the Sunday Times Rich List.⁴⁴

This includes individuals like Nikolay Storonsky, CEO of the mobile banking company Revolut, who renounced his Russian citizenship following the invasion, and Dr Viatcheslav Kantor, who has been sanctioned by the UK Government.⁴⁵

UK capital markets

Before the February 2022 invasion of Ukraine, 24 Russian companies were listed on the London Stock Exchange (LSE) with a combined value, at the time, of \$515 billion.⁴⁶ These companies spanned sectors from energy to mining, retail and banking, including three of Russia's biggest state-backed companies: gas company Gazprom, oil company Rosneft, and Russia's largest bank, Sberbank.⁴⁷

As of 2024, only four Russian-incorporated companies remained on the LSE, and shares of these companies cannot currently be traded on the LSE because of UK sanctions.⁴⁸

The Financial Times reported that Russian use of UK capital markets had been reducing for some time. Since 2014 (the year of the Russian annexation of Crimea) only three Russian companies were listed in the UK, and far less money was raised on UK capital markets by Russian companies than had been the case in the late 2000s.⁴⁹

⁴³ [“Loss of Russian buyers won’t hurt London property market, says Savills CEO”](#), The Standard, 10 March 2022

⁴⁴ Alex Gerko, Sir Len Blavatnik, Dmitry and Igor Bukhman, Viatcheslav Moshe Kantor, Inna Gudavadze and Nikolay Storonsky

⁴⁵ [“2 Russian Businessmen Renounce Citizenship, Condemn Ukraine Invasion”](#), Business Insider, 1 November 2022 and Charity Commission, [“Sanctioned trustee removed and charity closed down following investigation”](#), 14 December 2023

⁴⁶ [“Russia’s waning reliance on London markets reduces UK sanctions bite”](#), The Financial Times, 23 February 2022

⁴⁷ [“Unpicking Russia’s web of UK interests”](#), The Times, 23 February 2022 and Statista, [Ranking of Russian banks](#) as of 1 January 2024, by total assets

⁴⁸ London Stock Exchange, [Issuer lists 2024 and 2021](#) (accessed 15 January 2025)

⁴⁹ [“Russia’s waning reliance on London markets reduces UK sanctions bite”](#), The Financial Times, 23 February 2022

3

Countering hostile state activity

Hostile activity by those acting on behalf of foreign states or entities has been a growing security concern in recent years.

3.1

Statements and reports on state threats

Salisbury poisoning

After the poisoning of Sergei and Yulia Skripal in Salisbury in March 2018, which was attributed to the Russian state, the government took a number of steps in response, including expelling Russian diplomats that had been identified as undeclared intelligence officers.

The then Prime Minister, Theresa May, said this would “degrade Russian intelligence capability in the UK for years to come”.⁵⁰ She further committed to introducing legislation to “harden our defences against all forms of hostile state activity”, including a power to detain those suspected of it at the border, and consideration of the need for new counter-espionage powers “to clamp down on the full spectrum of hostile activities of foreign agents” in the country.⁵¹

The Conservative government subsequently passed the [Counter-Terrorism and Border Security Act 2019](#), which introduced powers to stop, question, search and detain people at ports and borders to determine whether they appear to be, or have been, engaged in hostile state activity. These are equivalent to powers which already existed in relation to terrorism related activity under the [Terrorism Act 2000](#).

ISC report and Integrated Review

In its [July 2020 report on Russia \(PDF\)](#), the Intelligence and Security Committee recommended that new legislation be brought forward to replace the Official Secrets Acts regime “that can be used by MI5 to defend the UK against agents of a hostile foreign power such as Russia”.⁵²

The 2021 Integrated Review said that state threats to the UK are growing and diversifying, and that states are becoming increasingly assertive in how they advance their own objectives. Action that falls short of conflict (often referred

⁵⁰ [HC Deb 4 March 2018, c 856](#)

⁵¹ [HC Deb 4 March 2018, c 856](#)

⁵² Intelligence and Security Committee of Parliament, ‘[Russia](#)’, HC 632, 2020

to as hybrid or grey zone warfare) can nevertheless threaten and interfere with the UK's security, economy, democracy and social cohesion. It identified different forms of threat, including:

- Espionage
- Political interference
- Sabotage
- Assassination and poisonings
- Electoral interference
- Disinformation
- Propaganda
- Cyber operations
- Intellectual property theft

The Integrated Review further noted that non-state actors also use these methods, and that states increasingly work with non-state actors to achieve their goals, including using them as proxies. As a result, the line between state threats and other types of security threat such as terrorism becomes blurred.

UK intelligence agencies

Richard Moore, head of the UK Secret Intelligence Service (MI6), also warned of the “acute threat” from Russia to the UK in a November 2021 speech.⁵³ Talking of the “spectrum of threats Moscow poses”, he mentioned state-sanctioned attacks, interference in democratic processes and cyber-attacks as examples of activities Russia has directed against the UK.

Ken McCallum, the Director General of MI5, gave a threat update on 8 October 2024. He said that the UK faced the most complex threat environment ever seen, as a result of the interplay between the threat from terrorism and ongoing efforts of autocratic states to harm the UK's security. He said that the number of state threat investigations had grown by 48% in the past year. Russia, China and Iran continue to pose the biggest threat.⁵⁴

Ken McCallum also said that cyber operations had become more important to Russia and that it had also increased the use of proxies, including private intelligence operatives and criminals, which reduces the professionalism of their operations. He said that the GRU (Russia's [military intelligence agency](#))

⁵³ Secret Intelligence Service, [Speech by SIS Chief Richard Moore: Human Intelligence in the Digital Age](#), 30 November 2021

⁵⁴ MI5 Security Service, [Speech by Director General Ken McCallum](#), 8 October 2024

“is on a sustained mission to generate mayhem on British and European streets”, including arson and sabotage.⁵⁵

3.2 State threats legislation: The National Security Act 2023

The 2021 Integrated Review indicated the government’s intention to introduce legislation to counter state threats, when parliamentary time allowed.

Subsequently, the Queen’s Speech in May 2021 announced legislation to counter hostile activity by foreign states. The purpose would be to “provide the security services with the tools they need to tackle the evolving threat from hostile activity by states and actors”.⁵⁶

Following the Queen’s Speech, the Home Office published a consultation paper on [Legislation to Counter State Threats \(Hostile State Activity\)](#). The paper defined ‘State Threats’ as:

overt or covert action orchestrated by foreign governments which falls short of general armed conflict between states but nevertheless seeks to undermine or threaten the safety and interests of the UK, including: the integrity of its democracy, its public safety, its military advantage and its reputation or economic prosperity.⁵⁷

It went on to describe the threat as one which is “growing, diversifying and evolving” and suggested that states that engage in it are becoming bolder and more aggressive.⁵⁸

The government’s intention was that the legislation should perform a similar role to the [Terrorism Act 2000](#), which repealed previous counter-terrorism legislation to provide the legislative basis for the UK’s current response to terrorism. Similarly, the new legislation would provide “a new modern baseline of tools and powers” which may be updated, amended or complemented with new powers or tools as the threat evolves.

The 2022 Queen’s Speech announced a National Security Bill which was published shortly after, followed by [the government’s response to the consultation](#).

The [National Security Act 2023](#) received royal assent in July 2023. It contained measures including:

- new offences, of espionage, sabotage and entering prohibited places

⁵⁵ As above

⁵⁶ Queen’s Speech 2021, [Counter State Threats Bill](#)

⁵⁷ Home Office, [Legislation to Counter State Threats \(Hostile State Activity\)](#), p.5

⁵⁸ Home Office, [Legislation to Counter State Threats \(Hostile State Activity\)](#), p.5

- a new offence of foreign interference
- criminalising preparatory conduct relating to state threat activity
- powers to take state threat activity into account as an aggravating factor in sentencing
- powers to arrest and detain without a warrant
- powers to impose civil prevention and investigation measures on individuals suspected of involvement in such activity where prosecution is not possible
- the creation of a Foreign Influence Registration Scheme (FIRS), a public register that requires those working for foreign governments to declare their lobbying activities. Failure to do so is a criminal offence. The scheme has a standard tier and an enhanced tier, entry to which is determined by the level of threat deemed to be posed.

The act is now largely in force, with the exception of the FIRS provisions in part 4. In late 2024, the Security Minister Dan Jarvis said that work was underway to identify which foreign powers would be placed on the enhanced tier, based on security and intelligence analysis. He said the government would set out its approach in due course.⁵⁹

3.3

Other measures

Defending democracy taskforce

In 2022, the government launched the Defending Democracy Taskforce. When first announced the government said its focus was to “protect the democratic integrity of the UK from threats of foreign interference” including:

- in our elections and electoral processes;
- disinformation;
- physical and cyber threats to our democratic institutions and those who represent them;
- foreign interference in public office, political parties and universities; and
- transnational repression in the UK.⁶⁰

⁵⁹ [PQ20280](#), Foreign Influence Registration Scheme, 19 December 2024

⁶⁰ Home Office, [Ministerial Taskforce meets to tackle state threats to UK democracy](#), 28 November 2022.

Much of the taskforce's work is not in the public domain. However, it is known to have established a Joint Election Security Preparedness Unit which takes responsibility for coordinating electoral security and preparedness.⁶¹

Dan Jarvis has said that the taskforce works across government and with Parliament, the intelligence community, the devolved administrations, local authorities, the private sector and civil society to take on the full range of threats to democratic institutions.⁶²

2 A new Foreign Affairs Committee Inquiry

In January 2025, the Foreign Affairs Committee launched a new inquiry into the threat that disinformation campaigns pose to the UK and UK interests:

[Disinformation diplomacy: How malign actors are seeking to undermine democracy](#)

⁶¹ National Cyber Security Centre, [NCSC Annual Review 2023](#)

⁶² [PQ23614, Subversion: Russia](#), 21 January 2025

4

Visa reforms

4.1

Closure of Tier 1 (Investor) visa scheme

On 17 February 2022 the [government announced the immediate closure](#) of the [Tier 1 \(Investor\) visa](#) route to new applicants.⁶³ The route was kept open for people who had already been granted permission as an investor so they can extend their stay and qualify for permission to stay permanently.⁶⁴

The visa was a type of [residence/citizenship by investment scheme](#). It offered successful applicants three years' permission to stay in return for at least £2 million investment in the UK.⁶⁵ Successful applicants could extend their visa and become eligible to apply for indefinite leave to remain (permission to stay in the UK permanently) after five years. Reforms introduced in 2011 shortened the route to indefinite leave to three years for people who invested at least £5 million and two years for those who invested at least £10 million.⁶⁶

The government said one reason for closing the route was longstanding concerns that it could be used by people wanting to transfer illicitly obtained wealth to the UK.⁶⁷

There had been a long history of concerns about the UK's investor visa, which had been rebranded as the Tier 1 (Investor) visa in June 2008.⁶⁸ The visa's rules and eligibility criteria were amended several times over the years (notably in 2015 and 2019), but critics continued to identify loopholes and vulnerabilities until its closure.⁶⁹ The government almost closed the visa in December 2018 but changed its mind a few days later, opting instead to introduce some additional requirements.⁷⁰

⁶³ Statement of changes in Immigration Rules, [CP 632 of 2021-22](#)

⁶⁴ People can continue to apply for temporary permission as an investor until 17 February 2026 and have until 17 February 2028 to apply for indefinite leave to remain: Home Office, [Tier 1 \(Investor\), v.19.0](#), 17 February 2022

⁶⁵ Until November 2014 the minimum investment required was £1 million

⁶⁶ Home Office press release, [Government rolls out the red carpet for entrepreneurs and investors](#), 16 March 2011

⁶⁷ [Explanatory memorandum to CP 632](#), para 7.2

⁶⁸ Chatham House, [The UK's kleptocracy problem](#), December 2021; Spotlight on Corruption, [Red Carpet for Dirty Money](#), July 2021; Transparency International, [Gold Rush: Investor Visas and Corrupt Capital Flows in the UK](#), October 2015; Migration Advisory Committee, [Tier 1 \(Investor\) route: investment thresholds and economic benefits](#), February 2014

⁶⁹ Spotlight on Corruption, [Red Carpet for Dirty Money](#), July 2021

⁷⁰ ["Investor visa scheme halted in money laundering crackdown"](#), BBC News, 6 December 2018; ["Gold-plated" investor visa scheme 'not suspended'"](#), BBC News, 11 December 2018; WS 1388 [\[Statement of changes to the immigration rules\]](#), 7 March 2018

The Intelligence and Security Committee’s Russia report had identified the availability of investor visas since 1994 as a key driver of London’s appeal to Russian oligarchs.⁷¹ The committee said a “more robust” approach to approving investor visa applications was needed to protect national security.⁷²

How many investor visas were issued?

The government issued 13,560 Tier 1 (Investor) visas between 2008 and March 2022.⁷³

Russians were the second most common nationality granted this type of visa. In that period 2,615 Tier 1 (Investor) visas were issued to Russians (roughly one fifth of all such visas issued). Tier 1 (Investor) visas made up 45% of the 5,804 Tier 1 or other ‘high value’ route visas issued to Russians during this time.⁷⁴

However, Russians accounted for a much smaller proportion of investor visa applicants after 2015.

Although the scheme closed to new applicants in February 2022, 387 people have been granted visas under the scheme since then, including 34 Russians. Some are likely to be dependants of existing visa holders, or previous investor visa recipients. Until February 2026, the visas can continue to be issued to existing investor visa holders and people who apply within 12 months of having permission in that category.⁷⁵

The most common nationality of people granted a Tier 1 (Investor) visa was Chinese, accounting for around one third of visas issued (4,538 in total, as of September 2024).⁷⁶

Home Office review of Tier 1 (Investor) route

In March 2018, following the Salisbury poisonings, the Home Secretary announced a review of all Tier 1 (Investor) route visas granted between 30 June 2008 (when the visa launched) and 6 April 2015.⁷⁷ Anti-corruption campaigners describe this as the “blind faith” period, because visas were issued with few anti-money-laundering checks having been conducted on investors’ sources of wealth.⁷⁸ That changed on 6 April 2015, when new

⁷¹ Intelligence and Security Committee of Parliament, [Russia](#), HC 632 of 2019-21, para 49

⁷² Intelligence and Security Committee of Parliament, [Russia](#), HC 632 of 2019-21, para 56

⁷³ Home Office (see [Immigration statistics quarterly, September 2024](#), table Vis_D02). This might be an over-count of the number of individuals who have been granted visas since individuals could have been granted them in more than one period.

⁷⁴ Home Office, [Immigration statistics quarterly, September 2024](#), table Vis_D02

⁷⁵ Immigration rules (HC 395 of 1993-4 as amended), [paras 245E-245EE](#)

⁷⁶ This does not include those listing their nationality as ‘Hong Kong’. Home Office, [Immigration statistics quarterly, September 2024](#), table Vis_D02

⁷⁷ Home Affairs Committee, [Oral evidence: Work of the Home Secretary \(PDF\)](#), HC 434, 28 March 2018, q354-5

⁷⁸ Transparency International, [Gold Rush: Investor Visas and Corrupt Capital Flows in the UK](#), October 2015, p.16

immigration rules came into effect requiring people to open UK bank accounts before applying for the visa (and so subjecting them to banks' due diligence checks before the visa was issued).

6,312 main applicants and adult dependents were within the scope of the review. Spotlight on Corruption, a UK-based non-governmental organisation, noted that 85% of visas granted to Russian applicants between 2008 and 2020 were granted during the 'blind faith' period.⁷⁹ It also highlighted that many people granted visas during that time would have since completed the residence requirement for naturalisation as a British citizen.

Review findings

The review's report had been expected to be published in spring 2022.⁸⁰ However, only a summary of the review's findings was published, as a written statement in Parliament, in January 2023.⁸¹

The statement confirmed the review had identified a "small minority" of people connected to the visa route who "were potentially at high risk of having obtained wealth through corruption or other illicit financial activity, and/or being involved in serious organised crime". It said the information had been shared with UK law enforcement agencies and that a range of follow-up actions was being considered, including under immigration powers.

The government has declined to provide more specific information about the review's findings or actions arising from it, citing operational sensitivities.⁸² The Home Office has said it doesn't collate or publish data on how many Tier 1 (Investor) visa applications had been refused because of concerns about corruption or illicit finance.⁸³ It also says it can't identify the number of Tier 1 (Investor) visa holders who have been granted British citizenship.⁸⁴

4.2

Powers to exclude people from the UK

There are longstanding powers in UK immigration law to exclude foreign nationals from the UK if their presence is not conducive to the public good.⁸⁵

The government expanded the exclusion criteria in February 2025 so that, while Russia is considered an acute national security threat, the Home Office can consider for exclusion people who have known financial, political or governmental ties to the Russian state. The government says the exclusion

⁷⁹ Spotlight on Corruption, [Red Carpet for Dirty Money](#), July 2021, p.10

⁸⁰ For example, WS 614 [\[Tier 1 \(Investor\) route\]](#), 21 February 2022; [HL Deb 8 March 2022 c1331](#)

⁸¹ WS 492 [\[The Tier 1 \(Investor\) route: Review of operation between 30 June 2008 and 6 April 2015\]](#), 12 January 2023

⁸² For example, PQ 122028 [\[Visas: Foreign investment in UK\]](#), answered on 20 January 2023; PQ 15298 [\[Visas: Foreign investment in UK\]](#), answered on 22 February 2024

⁸³ PQ 148672 [\[Visas\]](#), answered on 8 February 2021

⁸⁴ PQ 111688 [\[British nationality\]](#), answered on 2 February 2022

⁸⁵ House of Commons Library, [Visa bans](#), CBP 7035, 4 April 2024

criteria won't target ordinary Russians but are rather targeted at the most senior and influential individuals. It says:

This category will consider any individual who:

- provides significant support to the Russian state,
- and/or owes their significant status or wealth to the Russian state,
- and/or has access to the highest levels of the Russian state.⁸⁶

Other powers

The government has also used powers under the Sanctions and Anti-Money Laundering Act to impose travel bans on certain individuals associated with the Russian regime. It has also introduced restrictions on visas for Russian diplomats, including limiting the length of time they can spend in the UK.⁸⁷

4.3

Powers to impose visa penalties

Following Russia's invasion of Ukraine the government introduced [statutory powers to impose visa penalties](#) on countries whose governments are deemed to be risking international peace and security, armed conflict, or a breach of international humanitarian law.⁸⁸

Nationals of a country specified under the powers would be subject to visa penalty provisions if they wanted to come to the UK.⁸⁹ Penalties would be specified in the immigration rules. They could include delaying or suspending powers to grant visas, treating visa applications from those countries as invalid, and charging an additional visa fee.

The government said at the time that it was minded to use the powers in respect of Russia, but hasn't done so since the legislation passed.⁹⁰

⁸⁶ WS 458 [on [Home Office changes to exclusions guidance](#)], 24 February 2025

⁸⁷ For example, Foreign, Commonwealth and Development Office press release, [Foreign Secretary sanctions 386 Russian lawmakers who supported Putin's invasion of Ukraine](#), 11 March 2022; [HC Deb 8 May 2024 c584](#). Travel bans on individuals associated with the Kremlin are examined in Library research briefing, [Sanctions against Russia \(February 2022 to January 2025\)](#)

⁸⁸ [Nationality and Borders Act 2022, s 71](#)

⁸⁹ [Nationality and Borders Act 2022, s 70](#)

⁹⁰ [HL Deb 8 March 2022 c1334](#)

Legislation and debate

The powers were introduced as amendments to the Nationality and Borders Bill at Lords report stage. They were agreed to by the Commons and Lords without divisions.⁹¹

Speaking during debate on the bill, Baroness Williams, a Home Office minister, said the ability to suspend the granting of visas for Russian nationals would “send a strong signal to the Putin regime that they ... cannot expect business as usual”. She also argued that disadvantaging Russian nationals in such a way would “contribute to the pressure on the Putin regime”.⁹²

Some members in both Houses raised concerns about how the powers might affect people who are critics of their national governments.⁹³ Ministers said that they would “carefully consider” that issue, and that “in any case, we will ensure that the most vulnerable individuals ... are exempted from the application of visa penalties”.⁹⁴

The powers came into force in late April 2022 but haven’t been applied to Russia or any other country.⁹⁵ However there have been reports that applicants from Russia and Belarus are experiencing slow visa processing times, which have been attributed to additional security checks and other reasons.⁹⁶

⁹¹ [HL Deb 8 March 2022 c1338-1340; c1414; HC Deb 22 March 2022 c305 \(Lords amendments 28-39, 42\)](#)

⁹² [HL Deb 8 March 2022 c1334](#)

⁹³ [HL Deb 8 March 2022 c1335-6; HC Deb 22 March 2022 c277; c285](#)

⁹⁴ [HC Deb 22 March 2022 c285](#)

⁹⁵ [Nationality and Borders Act 2022, s87\(3\)](#)

⁹⁶ Turpin Miller, [Update on visa delays for Russian nationals](#), (undated; accessed 10 February 2025)

5 Election finance

The Intelligence and Security Committee (ISC) report on the [Russian threat to the UK](#) noted the highly dispersed paper-based voting and counting system of UK elections makes any significant tampering and cyber-attacks difficult. It also highlighted that GCHQ has undertaken a great deal of work to help ensure that the online voter registration system is safe.⁹⁷

The report noted that other attempts at broader political influence and disinformation have been widely reported and that Russian oligarchs had used their business interests, donations to charities and political parties to influence public affairs in the UK.⁹⁸

The Labour Party manifesto for the 2024 general election made a commitment to “protect democracy by strengthening the rules around donations to political parties”.⁹⁹

5.1 Donations and loans

Donations to political parties and elected representatives are regulated. The main piece of legislation is the Political Parties, Elections and Referendums Act 2000, as amended, known as PPERA. The system of regulation is designed to prevent foreign money entering the political system and elections.

Donations or loans over £500 to parties or campaigners must come from a permissible source. A permissible source is someone registered to vote in the UK (including overseas voters) or a UK-based organisation. Registered voters must be British, Irish or eligible Commonwealth and EU citizens who are resident in the UK. Parties and campaigners are responsible for checking permissibility. The Electoral Commission’s [Donations and loans pages](#) gives more detail.

Donations or loans over a certain level (£7,500 to a central party or £1,500 to local parties) must be reported to the Electoral Commission. These are then published on the commission’s [database of donations and loans](#).

In the past, high-value donations to the Conservative Party from donors with Russian links have been criticised by MPs from other parties.¹⁰⁰ The

⁹⁷ Intelligence and Security Committee of Parliament, [Russia, HC632 \(PDF\)](#), 2019-21, p10

⁹⁸ As above, p9 and p15

⁹⁹ Labour Party, [Serving the country](#), June 2024

¹⁰⁰ “[Labour challenges Tories over checks on Russia-linked donations](#)”, The Guardian, 17 November 2021

Conservative Party has defended the donations. It says the donations have come from British citizens “received in good faith after appropriate due diligence”.¹⁰¹

Improving permissibility checks

The current permissibility checks have been criticised. In July 2021, Lord Hodgson highlighted the concerns to the Public Administration and Constitutional Affairs Committee. He has undertaken several reviews for the government on aspects of the voluntary sector and charities. In his evidence he pointed out that charities are required to carry out anti-money-laundering checks on donations, but political parties and campaigners are not.¹⁰²

The Committee on Standards in Public Life (CSPL) recommends PPERA should be updated to require parties and non-party campaigners to have appropriate procedures in place to determine the true source of donations. The committee says “this may involve incorporating some aspects of anti-money laundering requirements into electoral law” but also recommends that all donations over £500 should be donated only through the banking system.¹⁰³

The House of Lords Select Committee on Democracy and Digital Technologies and the All Party Parliamentary Group (APPG) on Electoral Campaigning Transparency both heard evidence that expressed concerns about donations made online that might be at risk from evading the permissibility rules.¹⁰⁴

Recommendations to amend PPERA

The CSPL’s most recent [report on party finance](#), from July 2021, also included recommendations to limit foreign money entering political finance and campaigns. These included explicitly banning foreign organisations or individuals from buying campaign advertising in the UK and ensuring donations from companies should not exceed the company’s net profits (after tax) generated in the UK within the preceding two years. The Electoral Commission has previously made similar recommendations.¹⁰⁵

The CSPL said the current rules are insufficient to guard against foreign interference in UK elections. Recommendations included:

- Company donations should not exceed net profits generated in the UK

¹⁰¹ [“Wrong to tar all Russian-linked Tory donors with the same brush, Government says”](#), The Independent, 23 February 2022

¹⁰² Public Administration and Constitutional Affairs Committee, [Oral evidence: The work of the Electoral Commission](#), Q177

¹⁰³ Committee on Standards in Public Life, [Regulating Elections Finance, July 2021](#), p58

¹⁰⁴ House of Lords Select Committee on Democracy and Digital Technologies, [Digital Technology and the Resurrection of Trust](#), HL 77 2019-20, June 2020, p97 and APPG on Electoral Campaigning Transparency, [Defending our Democracy in the Digital Age](#), p12

¹⁰⁵ Electoral Commission, [Digital campaigning Increasing transparency for voters](#) (PDF), p19, June 2018

- Rules should be updated to require parties and non-party campaigners to have appropriate procedures in place to determine the true source of donations
- Foreign organisations and individuals should be banned from buying campaign advertising in the UK.¹⁰⁶

It was also concerned that the rules around [unincorporated associations](#) (a type organisation, which does not have to be registered with Company's House) needed tightening. It said the rules are "neither easy to follow, nor do they provide sufficient confidence in the original sources of donations".¹⁰⁷

The [response of the Conservative government](#) to the CSPL report in 2021 said "rules that apply to political donations are already strong and based on the right principles". It went on to say it keeps the rules on donations under review and the CSPL's recommendations "will be considered carefully in detail to assess their viability in practice".¹⁰⁸

The Labour Party manifesto for the 2024 election committed it to strengthening rules on donations and loans. In answer to a parliamentary question in August 2024 the government said:

The Government also recognises the threat posed by malign actors who seek to interfere in UK elections by hiding the true source of funding behind political donations. We will therefore act to strengthen protections against foreign interference in our political finance framework.¹⁰⁹

5.2 Elections Act 2022

The [Elections Act 2022](#) included measures to fulfil the Conservative government's commitment to strengthen the integrity of UK elections.¹¹⁰ This was one of the elements of the government's Defending Democracy programme.¹¹¹

Measures in the act

Measures included tightening rules on how much foreign third-party campaigners can spend on UK elections. The act removed the scope for any legal spending by foreign third-party campaigners above £700.

¹⁰⁶ Committee on Standards in Public Life, [Regulating Election Finance: report](#), 7 July 2021, p51

¹⁰⁷ As above, p53

¹⁰⁸ Cabinet Office, [Government response to 'Regulating Election Finance'](#), 15 September 2021

¹⁰⁹ [WPQ 1523 \[Elections\]](#), 1 August 2024

¹¹⁰ Commons Library briefing CBP 9304, [Elections Bill 2021-22](#)

¹¹¹ Cabinet Office, [Defending Democracy - Policy Exchange Speech](#), 15 June 2021

The act also requires new political parties being set up to declare if they have assets or liabilities over £500 when registering with the Electoral Commission. This is designed to ensure foreign funding is not used to set up new parties.

It also introduced a UK-wide [digital imprint regime for political campaigning](#). Imprints inform voters who has produced and paid for campaign material; they are intended to give more transparency to digital campaign spending. The measures in the 2022 act extended the requirements that already existed on printed material (and on digital material for devolved elections in Scotland).

The Electoral Commission had called for digital imprints for some time and welcomed the government's proposals. The Electoral Commission's view is that digital imprints will improve public trust and confidence in digital campaigns and would help UK voters understand who is paying to target them online.

Labour Party amendments

The Labour Party introduced amendments to the bill in its stages in the House of Lords.

These would have required individual and company donors to be based in the United Kingdom, and to make the individuals running a company liable for any donation evasion offences their company committed. An evasion offence is where there is an attempt to conceal the true source of a donation.

It also introduced amendments to prevent registered overseas voters (British citizens living overseas who can register to vote in UK Parliament elections) donating to political parties.

The Labour Party argued it would “close the loophole allowing the use of shell companies to hide the true source of donations to political parties by foreign actors”.¹¹²

These amendments were not carried.

¹¹² Labour List, [Back Labour amendments to counter “Russian influence”, Starmer urges PM](#), 23 February 2022

6

Media

6.1

RT (formerly Russia Today)

On 2 March 2022, the EU suspended the broadcasting activities of RT (formerly Russia Today).¹¹³ As satellite companies in Luxembourg and France provided the RT feed to Sky, Freesat and Freeview, the EU suspension meant that RT was not available on any broadcast channels in the UK.¹¹⁴

Ofcom revokes RT's licence

3 Role of Ofcom

Ofcom is the UK's communications regulator. Broadcasters are required by the terms of their licence to comply with Ofcom's [Broadcasting Code](#) (December 2020; updated June 2023). [Section 5 of the Code](#) is "designed to ensure that news, in whatever form, is reported with due accuracy and presented with due impartiality".

Ofcom has a range of powers to deal with non-compliance. Depending on the nature of the breach of its Code, Ofcom can:

- publish a breach finding
- require the licensee to broadcast a summary of Ofcom's decision
- impose a financial penalty
- revoke the licence

On 28 February 2022, Ofcom announced that it had opened 15 investigations into the due impartiality of news programmes on the RT news channel.¹¹⁵ A further 12 investigations were announced on 2 March 2022.¹¹⁶

On 18 March 2022, Ofcom announced that it had revoked RT's licence to broadcast in the UK with immediate effect. Ofcom said this was because it considered that RT's licensee, ANO TV Novosti, was not fit and proper to hold

¹¹³ European Council, [EU imposes sanctions on state-owned outlets RT/Russia Today and Sputnik's broadcasting in the EU](#), 2 March 2022 (accessed 27 January 2025)

¹¹⁴ ["RT: Russian-backed TV news channel disappears from UK screens"](#), BBC news, 3 March 2022

¹¹⁵ [Ofcom launches 15 investigations into RT](#), Ofcom news, 28 February 2022

¹¹⁶ [Ofcom launches further investigations into RT](#), Ofcom news, updated 16 March 2023

a licence because of its relationship with the Russian state and because of Russian laws limiting freedom of speech:

...We consider the volume and potentially serious nature of the issues raised within such a short period to be of great concern – especially given RT’s compliance history, which has seen the channel fined £200,000 for previous due impartiality breaches. In this context, we launched a separate investigation to determine whether ANO TV Novosti is fit and proper to retain its licence to broadcast. This investigation has taken account of a number of factors, including RT’s relationship with the Russian Federation. It has recognised that RT is funded by the Russian state, which has recently invaded a neighbouring sovereign country. We also note new laws in Russia which effectively criminalise any independent journalism that departs from the Russian state’s own news narrative, in particular in relation to the invasion of Ukraine. We consider that given these constraints it appears impossible for RT to comply with the due impartiality rules of our Broadcasting Code in the circumstances [...]

Taking all of this into account, as well as our immediate and repeated compliance concerns, we have concluded that we cannot be satisfied that RT can be a responsible broadcaster in the current circumstances...¹¹⁷

6.2

Disinformation

Disinformation refers to intentionally spreading factually incorrect information through social media, online news sites, and traditional media.¹¹⁸ Russian-led disinformation campaigns relating to Ukraine have been operating for about a decade,¹¹⁹ with social media and disinformation news sites being used to spread disinformation relating to the Russia-Ukraine war.¹²⁰

Since February 2022, the UK has taken steps to sanction Russian state media, social media platforms, propagandists, news anchors, and regime spokespeople accused of spreading disinformation about the conflict.¹²¹

Countering disinformation: The Online Safety Act 2023

One of the aims of the [Online Safety Act 2023](#) is to protect users from illegal content and activity.¹²² [Section 179](#) makes it an offence for a person to send a

¹¹⁷ [Ofcom revokes RT’s broadcast licence](#), Ofcom news, 18 March 2022

¹¹⁸ Parliamentary Office of Science and Technology (POST), [Disinformation: sources, spread and impact](#) (PDF), POSTnote 179, April 2024, pp6-9 (accessed 27 January 2025)

¹¹⁹ As above, p4

¹²⁰ As above, p8

¹²¹ These measures are examined in greater detail in Library research briefing: [Sanctions against Russia \(February 2022 to January 2025\)](#)

¹²² The Department for Science, Innovation and Technology has published an [“explainer” giving an overview of what the act will do](#), 8 May 2024 (accessed 27 January 2025)

message that conveys information they know to be false, which is intended to “cause non-trivial psychological or physical harm to a likely audience.”

[Schedule 7 of the act](#) lists the foreign interference offence, set out in [section 13 of the National Security Act 2023](#), as a priority offence. This means that in-scope services¹²³ must take proactive, preventive action to identify and minimise people’s exposure to state-sponsored or state-linked disinformation aimed at interfering with the UK.¹²⁴

The Online Safety Act also requires [Ofcom](#), the online safety regulator, to:

- generate awareness of disinformation and reduce users’ exposure to it through its media literacy strategy ([section 165](#)). Ofcom’s [three-year media literacy strategy](#) was published on 7 October 2024.¹²⁵
- establish and maintain an advisory committee to provide advice on how regulated services should counter disinformation and misinformation¹²⁶ ([section 152](#)).

In January 2025, when asked about steps to tackle online disinformation, the government referred to the Online Safety Act:

...The OSA [Online Safety Act] sets out a clear regulatory framework to tackle both mis- and disinformation where it constitutes illegal content or harmful content to children.

In addition, through our work on media literacy, we are taking steps to empower users with the skills they need to engage critically with online content. Since 2022, we have provided almost £3million in funding to projects helping citizens make safer, more informed decisions online.

Officials also regularly meet with major social media platforms to discuss disinformation activity, emerging risks and platforms’ responses.¹²⁷

Ofcom’s draft illegal content codes of practice were laid before Parliament on 16 December 2024.¹²⁸ Peter Kyle, the Secretary of State for Science, Innovation and Technology explained:

The illegal content duties apply to all regulated user-to-user and search services under the Act, no matter their size or reach. These include new duties to have systems and processes in place to tackle illegal content and activity. Ofcom, as the independent regulator for this regime, is required to set out measures in codes of practice that providers can take to fulfil these statutory duties. Ofcom has now submitted to me the drafts of its first codes of practice

¹²³ In-scope services include social media platforms, and apps and websites allowing people to post their own content, as well as search engines.

¹²⁴ [Internet safety laws strengthened to fight Russian and hostile state disinformation](#), DCMS press release, 5 July 2022 (accessed 27 January 2025)

¹²⁵ Ofcom, [A Positive Vision for Media Literacy](#) (PDF), October 2024 (accessed 27 January 2025)

¹²⁶ Misinformation refers to unknowingly spreading factually incorrect information.

¹²⁷ PQ 21490, [Internet: Disinformation](#), 9 January 2025

¹²⁸ DSIT, [Online Safety Act Implementation](#), HCWS 312, 16 December 2024; DSIT, [Online Safety Act – illegal content codes of practice 2024 and explanatory memorandum](#), 17 December 2024

for the illegal content duties to lay these in Parliament for scrutiny. If neither House objects to the draft codes, Ofcom must issue the codes and the illegal content duties will come into force 21 calendar days later. Once the Codes have come into force, the statutory safety duties will begin to apply to service providers, and Ofcom will be able to enforce against non-compliance.

Ofcom has also published its guidance on how providers should carry out risk assessments for illegal content and activity. Providers now have three months to complete their illegal content risk assessment.

The completion of the risk assessments should coincide with the codes of practice coming into force if they pass the statutory laying period. Ofcom's codes will set out steps service providers can take to address identified risks. The draft codes will drive significant improvements in online safety in several areas. They will ensure service providers put in place effective systems and processes to take down illegal content...¹²⁹

Further information on the act is available from the [online safety section of Ofcom's website](#).

¹²⁹ DSIT, [Online Safety Act Implementation](#), HCWS 312, 16 December 2024

7

Roman Abramovich and Chelsea Football Club

In early March 2022, Chelsea FC's then owner, Roman Abramovich, announced his intention to sell the club.¹³⁰

On 10 March 2022, the government announced that Mr Abramovich had been added to the UK sanctions list and his assets had been frozen.¹³¹ On the same day, the government said the Office of Financial Sanctions Implementation (OFSI) had issued a licence to Chelsea so that various football-related activities could continue.¹³²

The sale of Chelsea FC was completed on 31 May 2022, freeing the club of the operating restrictions that had been imposed under the sanctions.¹³³ The government announced that the proceeds of the sale would be used for humanitarian purposes in Ukraine.¹³⁴ This has not yet happened.¹³⁵

In May 2024, Sir Chris Bryant asked the previous government about this. Andrew Mitchell, then a minister at the Foreign, Commonwealth and Development Office referred to legal and technical difficulties in setting up the charitable fund:

The hon. Gentleman is right in what he says about the so-called Chelsea fund, and he reflects the immense frustration that many of us have felt over the last year in trying to get the fund up and running. The Foreign Secretary is absolutely determined that we will do so. It will be the second largest charity in Britain after the Wellcome Trust. Every sinew is being bent to get it to operate. It is mired in legal and technical difficulties, but the hon. Gentleman has my personal assurance that we are doing everything to try to ensure the money is used to good effect.¹³⁶

¹³⁰ “[Chelsea: Roman Abramovich says he plans to sell club](#)”, BBC Sport, 2 March 2022 (accessed 27 January 2025)

¹³¹ Prime Minister's Office, [Abramovich and Deripaska among 7 oligarchs targeted in estimated £15 billion sanction hit](#), 10 March 2022

¹³² Department for Culture, Media and Sport, [Chelsea FC granted licence to continue operating](#), 10 March 2022; OFSI, [General licence – Football Matches, INT/2022/1327076](#) (PDF)

¹³³ “[Chelsea takeover: Todd Boehly completes £4.25bn takeover as Roman Abramovich era ends](#)”, Sky Sports news, 31 May 2022 (accessed 27 January 2025)

¹³⁴ Department for Culture, Media and Sport, [Unilateral declaration regarding the sale of Chelsea Football Club](#), 30 May 2022; HCWS71, [Sale of Chelsea FC](#), 26 May 2022

¹³⁵ HL3712, [Ukraine: Humanitarian aid](#), 30 January 2025. At the time of writing, the following parliamentary question was also awaiting an answer: [UIN30572](#), Ukraine: Humanitarian aid

¹³⁶ [HC Deb 20 May 2024 c676](#)

At the end of January 2025, the FCDO confirmed that government officials “continue to hold discussions with Mr Abramovich's representatives, experts and international partners in pursuit of a resolution”.¹³⁷

¹³⁷ HL3712, [Ukraine: Humanitarian aid](#), 30 January 2025.

8

Countering Russian military activity

Upon taking office in July 2024, the Labour government announced that it would conduct a new Strategic Defence Review to determine the roles and capabilities required by UK defence to meet the challenges and threats of the 21st century “that are growing and diversifying”.¹³⁸

Addressing the threats posed by Russia will be a key part of that review. There have been calls for the review to give priority to UK homeland defence, specifically air and missile defence, national resilience and the protection of UK critical infrastructure.¹³⁹

8.1

Russian activity affecting UK territorial waters and airspace

“There’s been a phenomenal increase in Russian submarine and underwater activity over the last 20 years”.

UK Chief of the Defence Staff, Admiral Sir Tony Radakin, [Interview with The Times](#), January 2022

While a direct Russian attack on the UK mainland is considered by the UK Chief of the Defence Staff to be “remote”, Russian activity in, or close to, UK territorial waters and airspace remains a concern.¹⁴⁰ This is particularly relevant to Russia’s alleged intelligence gathering activities and the monitoring of UK capabilities and NATO exercises.

Such activity is not new. Throughout the Cold War, Soviet and NATO navies frequently monitored each other’s activities and gathered intelligence on each other’s capabilities.¹⁴¹ Russian strategic bomber patrols were a common occurrence both to demonstrate military capability and to periodically test the air defence reaction times of NATO allies.

Russian naval activity near to the UK is also a result of geography. To reach the Atlantic Ocean and Russian bases in the Mediterranean, Russia’s northern fleet, based in the Arctic circle, must transit either the Greenland-Iceland-UK (GIUK) gap, shown in the map below, or the North Sea and the English Channel.

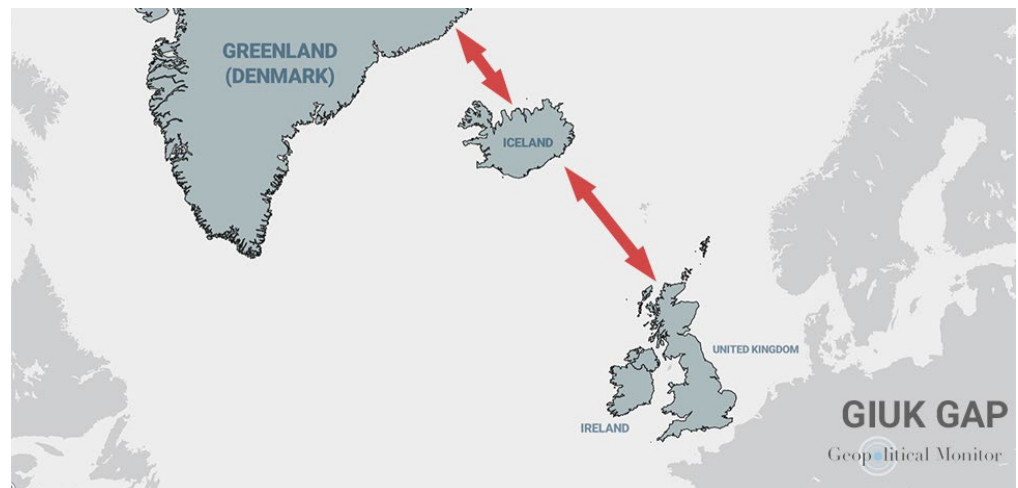
¹³⁸ Ministry of Defence, [Strategic Defence Review 2024-2025: Terms of Reference](#), July 2024

¹³⁹ HC Deb 27 November 2024, [UK air and missile defences](#); HC Deb 16 January 2025, [UK air defence](#) and HL Deb 16 January 2025, [Undersea internet cables](#)

¹⁴⁰ Ministry of Defence, [Chief of the Defence Staff RUSI Lecture](#), 4 December 2024

¹⁴¹ The Greenland-Iceland-UK gap was of particular strategic significance to NATO forces monitoring the movements of Soviet naval vessels.

The Greenland-Iceland-UK gap



Source: [Geopolitical Monitor](#), January 2025

Such Russian military activity declined after the fall of the Soviet Union in 1990, but it was revived under Presidents Putin and Medvedev in the mid-2000s,¹⁴² and has been increasing ever since.¹⁴³ While much of this activity “remains lawful and benign”, and is monitored by the UK and NATO allies, in the last few years Russia has been accused of using naval vessels passing through UK and Irish waters to map the UK’s critical undersea infrastructure (such as undersea cables).¹⁴⁴

¹⁴² Dmitry Medvedev succeeded Vladimir Putin as President in May 2008 and served until 2012. Putin was appointed Prime Minister during this time and then re-elected as President in 2012.

¹⁴³ The resumption of strategic bomber patrols and naval deployments is examined in greater detail in Library research briefing, [Russia’s military posture](#), April 2009. The number of times Quick Reaction Alert aircraft have been launched in response to Russian aircraft approaching UK airspace since 2005, has been provided by the MOD in response to a series of Freedom of Information requests and parliamentary questions: Ministry of Defence, [FOI 2014/0328](#) (PDF), 28 March 2014; Ministry of Defence, [FOI 2019/00501](#) (PDF), 5 February 2019; PQ198539, [Air Force: Military bases](#), 18 September 2023; PQ16583, [Military aircraft: deployment](#), 4 December 2024 and PQ16582, [Military aircraft: deployment](#), 4 December 2024

¹⁴⁴ [“How the Royal Navy monitors the Russian Navy sailing close to the UK”](#), Navy Lookout, 19 February 2021. See also Royal Navy, [Press release](#), 23 August 2022; Library Insight: [Seabed warfare: Protecting the UK’s undersea infrastructure](#), 24 May 2023; [“Why are Russian spy ships free to prowl Irish waters”](#), The Times, 14 May 2023; [“Stalking the seabed: How Russia targets critical undersea infrastructure”](#), RUSI Commentary, May 2023; [“Bear underwater: Russia’s undersea capabilities”](#), Britain’s World, 26 June 2023; [“Royal Navy monitors Russian seabed spy ship Yantar loitering in Irish Sea”](#), Navy Lookout, 15 November 2024; HL Deb 3 December 2024, [Undersea cables](#), and [“Russian ships seen in UK waters 40 times since 2022 invasion of Ukraine”](#), The Times, 23 January 2025

4 International legal position: The right of innocent passage

All ships have the right of innocent passage through a state's territorial waters under Article 17 of the [UN Convention on the Law of the Sea](#) (PDF) (UNCLOS).

This applies subject to certain restrictions and exceptions, particularly where the passage may be “prejudicial to the peace, good order or security of the coastal State”. Under Article 19 UNCLOS, this may include activities such as threatening or using force, collecting information to the prejudice of the defence or security of the coastal state, any fishing activities, any research or survey activities, or any other activity that does not have a direct bearing on passage through the territorial sea.

As provided by Articles 21 and 22 of UNCLOS, innocent passage is also subject to the law and regulations of the state. This means that ships must also abide by any regulatory requirements that might apply to maritime zones it passes through, such as the English Channel. For example, there are several [requirements for mandatory reporting and shipping lanes in the Dover Strait](#).

UK response to recent Russian maritime activity in UK waters

“We are strengthening our response to ensure that Russian ships and aircraft cannot operate in secrecy near UK or NATO territory.”

Ministry of Defence,
[Press release](#), 22
January 2025

The Royal Navy and Royal Air Force maintain several military assets tasked with monitoring and defending UK territorial waters and airspace, including a fleet ready escort vessel, maritime patrol aircraft and quick reaction alert (QRA) aircraft. A new surveillance ship, RFA Proteus, which is devoted to the UK's area of interest, also entered service in October 2023.¹⁴⁵

On 22 January 2025, the Defence Secretary John Healey made a statement to the House of Commons outlining the UK's response to the most recent Russian attempts to gather intelligence by the spy ship Yantar as it passed through UK waters in November 2024 and again in mid-January 2025. The Defence Secretary confirmed that the Royal Navy's rules of engagement had been changed to allow UK warships to get closer to the Yantar to track its activities. He said that in November 2024 a Royal Navy submarine had been authorised to surface close to the vessel, as a deterrent measure, adding:

I also want President Putin to hear this message: we see you, we know what you are doing, and we will not shy away from robust action to protect this country. With our NATO allies, we are strengthening our response to ensure

¹⁴⁵ Royal Navy, [Press release](#), 10 October 2023. See also Library Insight: [Seabed warfare: Protecting the UK's undersea infrastructure](#), 24 May 2023

that Russian ships and aircraft cannot operate in secrecy near the UK or near NATO territory.¹⁴⁶

Mr Healey also confirmed that Russian military aircraft were conducting “periodic incursions... into airspace for which we are responsible”, including in September 2024 when QRA aircraft were scrambled to intercept two Russian long-range strategic bombers operating near UK airspace.¹⁴⁷

The Russian embassy in London called the Defence Secretary’s accusations “completely groundless” and said that the UK was deliberately escalating tensions in the Baltic (see below) and the North Sea.¹⁴⁸

5 A new inquiry by the Joint Committee on National Security Strategy

On 23 January 2025, the Joint Committee on National Security Strategy (JCNSS) launched an [inquiry into undersea cables](#). It will examine the UK’s ability to defend its underseas infrastructure and the UK’s resilience in the event of a major, protracted disruption to the flow of data.

The committee is accepting written evidence until 6 March 2025.

Activation of the UK-led Joint Expeditionary Force (JEF) in the Baltic

In December 2024, damage to a major undersea cable (Estlink 2) linking Finland and Estonia was also reported. According to the EU, the incident is the latest in “a series of suspected attacks on critical infrastructure”.¹⁴⁹

In response, in early January 2025 the Ministry of Defence announced that the UK-led [Joint Expeditionary Force \(JEF\)](#) had activated Operation Nordic Warden, which will track potential threats to undersea infrastructure and monitor the movements of Russia’s shadow fleet (see box 6).¹⁵⁰ A vessel from Russia’s shadow fleet is alleged to have been responsible for the latest attack, although an investigation is still underway.

Deployment to NATO Operation Baltic Sentry

On 22 January 2025, the Defence Secretary also confirmed that the RAF would provide P-8 Poseidon maritime patrol aircraft and Rivet Joint surveillance

¹⁴⁶ HC Deb 22 January 2025, [Russian maritime activity and UK response](#), c1016

¹⁴⁷ As above, c1017

¹⁴⁸ Embassy of the Russian Federation to the United Kingdom of Great Britain and Northern Ireland, [Embassy comment on UK allegations against Russia](#), 23 January 2025

¹⁴⁹ European External Action Service, [Joint Statement](#), 26 December 2024

¹⁵⁰ Ministry of Defence, [Press release](#), 6 January 2025

aircraft to [NATO's new operation \(Baltic Sentry\)](#), which has been established to protect critical infrastructure in the Baltic Sea.¹⁵¹

6 Wider measures to address Russia's 'shadow fleet'

Russia's "shadow fleet" is composed of ageing vessels with obscure ownership, which are uninsured and often environmentally unsound. It is primarily used by Russia to transport sanctioned crude oil and related oil products around the globe, outside of the [G7 imposed oil price cap](#). Such vessels are, however, reported to be increasingly being used for [intelligence gathering and sabotage purposes](#).

The UK, and other allies and partners have committed to [address the risks posed by the shadow fleet](#) and have [imposed sanctions on suspected vessels](#). The Department of Transport is also working alongside the [Joint Maritime Security Centre](#) and the Maritime and Coastguard Agency to challenge suspected shadow fleet vessels to provide details of their insurance status as they pass through UK waters.¹⁵² In December 2024, the UK, Denmark, Sweden, Poland, Estonia and Finland also agreed a new partnership to challenge suspected vessels along the Baltic route.¹⁵³

¹⁵¹ HC Deb 22 January 2025, [Russian maritime activity and UK response](#), c1017

¹⁵² Foreign, Commonwealth and Development Office, [Press release](#), 17 October 2024

¹⁵³ Prime Minister's Office, [Joint Statement by the Nordic-Baltic 8++ countries](#), 16 December 2024

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