

Honesty

Objectivity

Openness

Selflessness

Integrity

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Leadership

Calum Miller MP

[Sent by email]

11 November 2025

Dear Mr Miller,

Thank you for your letter of 27 October and for your congratulations on my appointment as Chair of the new Ethics and Integrity Commission (EIC). I share your view that high ethical standards in public life are essential for a thriving democracy.

You wrote about your specific concerns regarding the potential for UK ministers or officials to advocate for the personal, financial interests of foreign leaders, and the gap you see in the current standards landscape on this point - that there is no framework to stop UK ministers and officials acting in their public capacities to influence overseas ministers or officials by appealing to their personal interests. You asked the Commission to consider an examination of the systems in place to protect against these forms of patronage and what legislative steps may be needed to address such gaps. You also asked the Commission to open an inquiry into the actions of ministers and officials in the Department for Culture, Media and Sport and its agencies to ascertain whether or not they used public resources to lobby on behalf of Donald Trump's personal corporate interests.

The Commission's remit is to promote the highest standards in public life, report to the Prime Minister on matters concerning ethical standards, and advise public bodies on the development of clear codes of conduct with effective oversight arrangements. This remit allows the EIC to take a broad, system-wide view of the standards landscape. The Commission is not a regulator and has no remit to investigate individual cases or potential standards breaches. Ministerial and civil servants' conduct are regulated by the Ministerial Code and the Civil Service Code which set out the standards of behaviour expected of ministers and civil servants respectively. You may therefore wish to write to the Department for Culture, Media and Sport in the first instance regarding conduct of civil servants, and to the ministers concerned regarding their conduct as the Ministerial Code says that 'ministers are personally responsible for deciding how to act and conduct themselves in light of the Code and for justifying their actions and conduct to

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Parliament and the public'. You may wish to draw the matter to the attention of the Independent Adviser on Ministerial Standards who advises the Prime Minister on matters relating to the Ministerial Code.

As the Ethics and Integrity Commission, one of our key responsibilities is to build on the legacy of the Committee on Standards in Public Life and to identify and recommend systemic improvements to the arrangements for upholding standards in public life. The Committee on Standards in Public Life, whilst recognising the importance of appropriate lobbying for enabling citizens and groups to inform and influence policymakers ensuring that diverse voices and those with specialised knowledge are heard, also considered the implications of the cumulative effect of money, influence and power for standards in public life. CSPL made recommendations in 2013 on 'Strengthening Transparency around Lobbying', and again in our 2021 'Upholding Standards in Public Life' report, but neither review considered the manifestation of foreign influence that you raise in your letter. I am grateful to you for writing to us about this particular aspect of lobbying, a subject that the new Commission will continue to monitor as part of its work on the health of the standards landscape.

In line with the Commission's transparency arrangements, we will publish this letter on our website.

Yours sincerely,



Doug Chalmers CB DSO OBE
Chair, Ethics and Integrity Commission