



Lobbying, Business Appointment Rules and Disclosure

Access to Government Decision Making

**ETHICS &
INTEGRITY
Commission**

July 2026

Lobbying, Business Appointment Rules and Disclosure

Access to Government Decision Making

**A Review by the Ethics and
Integrity Commission**

Chair, Doug Chalmers CB DSO OBE

July 2026

Contents

	Chair's foreword	2
	List of recommendations	4
	Introduction	9
1	Lobbying: the transparency problem	12
2	A register of lobbying activity	24
3	An integrated digital platform for access to government	36
4	The Office of the Registrar of Lobbyists	54
5	Business Appointment Rules	62
6	The declaration and publication of financial interests	80
	Appendices	90

Chair's foreword



The topics covered in this report sit at the heart of building and sustaining public trust and confidence in our system of government. This report presents the Government with an evidence-based opportunity to act.

The Organisation for Economic Co-operation and Development (OECD) is clear that transparency is one of the key drivers of public trust and confidence. The recommendations in this report centre on openness as a common theme. They provide a way for government to demonstrate greater openness in how it interacts with those that seek to influence its policy and commercial decisions through lobbying. They also provide an opportunity for greater transparency around the way that privileged access to government is managed for those leaving public service, and in the disclosure of financial interests.

The report deals primarily with lobbying. This is where the majority of the recommendations emerge and is the area where evidence points to immediate action being needed by the Government if public trust and confidence in its decision making is to be enhanced. Our recommendations on the Business Appointment Rules for those leaving government, and the systems for the disclosure of financial interests, call for modernisation and improved coordination.

Lobbying is an important part of the democratic process and contributes to good policy making. It should not be discouraged. However, policy made in the public's name should be open. It should be easy to see who is seeking to influence government, about what and how. We heard that the Register of Consultant Lobbyists covers just 4-6% of the lobbying that takes place. The current UK lobbying system therefore fails to deliver the required level of transparency and, in doing so, falls short of meeting the Nolan Principles.

The recommendations in this report are clear that, to meet the Nolan Principles, a new approach is required. The Register of Consultant Lobbyists should be replaced by a register of all lobbying activity. We understand that expanding the scope of the register will require primary legislation and we would urge the Government to begin work on a new Bill now, building on the important thinking that Baroness Hayter has done in this area.

But, there are also important areas that can be improved immediately, without legislation, the most important being government transparency data. Current performance is inconsistent and often fails to meet Cabinet Office guidance, let alone the Nolan Principles. This is surprising as analysis of transparency data should be an important tool for government policy making, aiding understanding of how lobbying is taking place across different departments and who is, and, as importantly, is not, involved in these discussions.

An AI-enabled digital platform that brings together all government transparency data into one place and has user ease at its core would provide this insight for policy makers and openness to the public. Using modern and familiar technology would provide one side of a single lobbying platform that could then be expanded to capture data from lobbyists once the relevant legislation is enacted.

EIC's forerunner, the Committee on Standards in Public Life, made recommendations in 2021 on lobbying which were not acted upon. This government called for an urgent review of these areas and this report provides an evidence-based way to build a more trustworthy system that, in time, should rebuild trust in government decision making.

Doug Chalmers CB DSO OBE

Chair

Ethics and Integrity Commission

List of recommendations



Lobbying

Recommendation 1

The Register of Consultant Lobbyists should be replaced by an activity-based Lobbying Register.

Any individual or organisation carrying out lobbying activity should be required to register and submit information returns on their lobbying activity.

Recommendation 2

As well as ministers and permanent secretaries, lobbyists should also have to register on the basis of any communications with special advisers, directors general, directors, non-executive directors or any other government advisers (paid or unpaid) equivalent to director general or director level.

Recommendation 3

Extending the reporting requirements to contacts with special advisers must be prioritised through secondary legislation.

Recommendation 4

The list of roles equivalent to permanent secretary should be reviewed and updated through secondary legislation.

Recommendation 5

There should be no requirement to be VAT-registered for any individual or organisation to be considered to be carrying out lobbying activity.

Recommendation 6

There should be no exemption from the requirement to register on the basis that the making of a communication is incidental to the main focus of a business's activities.

Recommendation 7

A single AI-enabled digital platform should be developed that acts both as the Lobbying Register and as a central repository for government to input and publish departmental transparency releases.

Recommendation 8

Government should not accept any meeting requests to discuss matters that fall within the definition of lobbying, set out in legislation, with any organisation, unless that organisation has registered on the Lobbying Register.

Recommendation 9

The Registrar of Lobbyists and Cabinet Office would be jointly responsible for the maintenance of the new AI-enabled digital platform, but with distinct areas of responsibility that would be visible to the public through a timeliness dashboard.

Recommendation 10

In parallel to progressing the primary legislation that will be needed to create a register of all lobbying activity, Cabinet Office should collate all departmental transparency releases and publish them on an accessible, centrally managed and searchable digital platform. This platform should be used to host the Lobbying Register once legislation is enacted.

Recommendation 11

The single consolidated AI-enabled digital platform for government should be formally championed by the Cabinet Secretary and Chief Operating Officer.

Recommendation 12

The Chief Operating Officer should convene, twice yearly, a meeting of permanent secretaries to discuss the quality and timeliness of departmental transparency returns.

The Registrar of Lobbyists should submit a report on their findings for consideration at each meeting.

Recommendation 13

Government transparency releases should include details of interactive dialogue through non-corporate communication channels, such as WhatsApp and informal meetings, such as those that take place at party conferences.

Departments should apply a principles-based approach when judging whether a communication warrants inclusion in the releases, taking into account whether the communication prompts significant consideration by government.

Recommendation 14

Meetings held between special advisers and external organisations should be included within government transparency releases.

Recommendation 15

Meetings between all directors and external organisations should be included within government transparency releases.

Recommendation 16

For each specific instance of lobbying activity, the following information should be declared by the lobbyist:

- date of engagement
- recipient
- method of engagement
- subject matter (description to include specific legislation, policy or regulation targeted, where relevant)
- client represented (where relevant)
- ultimate intended beneficiary
- details of how the organisation is funded

Recommendation 17

For each external meeting, the following information should be declared in the departmental transparency releases:

- date of engagement
- lead minister/official's name
- name of the individual or organisation
- method of engagement
- purpose of the meeting/ subject matter (description to include specific legislation, policy or regulation affected, where relevant)
- client represented (where relevant)
- ultimate intended beneficiary

Recommendation 18

Government departments should comply with Cabinet Office guidance that the description of the purpose of meetings should be meaningful and clear.

Recommendation 19

Lobbyists and government departments should submit returns on a monthly basis. Government and the Registrar should publish all transparency returns no later than two months from them first being entered.

Recommendation 20

The Office of the Registrar of Lobbyists needs to be suitably resourced to ensure it has the capacity and technical capability to deliver its expanded role.

Recommendation 21

There should be a graduated fee structure for lobbyists to register with the Registrar of Lobbyists.

Recommendation 22

There should be a significant increase in the maximum level of civil penalty that can be imposed by the Registrar for offences under the Lobbying Act, including carrying out lobbying when unregistered.

Business Appointment Rules

Recommendation 23

Cabinet Office should coordinate a forum of the bodies responsible for considering applications under the Business Appointment Rules. This should identify common areas encountered and best practice for managing these, by providing support and advice. The forum should meet twice yearly and produce an annual report sharing key themes and learning.

Recommendation 24

Cabinet Office should provide guidance to bodies making decisions on BARs applications on how to consider matters of national interest.

Recommendation 25

Cabinet Office should modernise the Business Appointment Rules to ensure that they provide a robust framework for protecting public office while not dissuading outside talent from entering public service. The update to the Rules should take into account the outcome of the Civil Service Commission review of the Rules for civil servants.

Recommendation 26

The name of the Business Appointment Rules should be updated to better reflect their purpose.

Recommendation 27

The modernisation of the Business Appointment Rules should require applications to be dealt with according to the risk presented by an outside appointment, building on the broad categorisation approach adopted post ACOBA.

Recommendation 28

Cabinet Office should consider extending the scope of the Business Appointment Rules to include non-executive directors and other similar government advisers.

Recommendation 29

Cabinet Office should work with the eight BARs bodies to agree and publish minimum service levels and key performance indicators (KPIs) for all stages of the application process.

Recommendation 30

Cabinet Office should monitor performance against minimum service levels and KPIs, holding departments that fail to meet them to account. It should review any complaints referred to it by a body in relation to the processing or adjudication of BARs applications and provide advice.

Recommendation 31

Cabinet Office should provide guidance to all those subject to the Business Appointment Rules on their obligations in advance of them needing to interact with the system and provide guidance to line managers completing Business Appointment Rules forms for staff.

Recommendation 32

Cabinet Office should oversee the development of an intuitive online application form, to be used by all applicants seeking advice under the BARs and tailored to meet the requirements of each body. This application form should prompt users to ensure timely completion, act as a performance tracker and flag areas of common issue.

Recommendation 33

A register of individuals and their employing companies that are found to be in serious breach of the BARs should be published centrally for a period commensurate with the seriousness of the breach.

Recommendation 34

Cabinet Office should explore the potential for sanctions for breaches of the BARs, including those against prospective employers, to strengthen enforcement of the system.

Financial Disclosure

Recommendation 35

Cabinet Office should consider how best to reduce duplication in the information that ministers are required to provide to the Independent Adviser and to the relevant parliamentary bodies as MPs or peers about their interests.

Recommendation 36

Cabinet Office should consider how to support officials to submit data on their financial interests through improved data collection processes and the provision of standardised training and guidance.

Recommendation 37

Cabinet Office should consider how to enhance the accessibility of the declaration of financial interests for civil servants, special advisers and non-executive directors.

Introduction



1. In March this year the Prime Minister asked the Ethics and Integrity Commission to conduct a review to look at “how ministers declare and publish their financial interests; at how the government ensures transparency around lobbying; and at how we ensure the rules that govern post employment activity are fit for purpose, in respect of managing potentially improper access to, and influence within, government.”¹
2. Our predecessor, the Committee on Standards in Public Life, looked at the regulation of lobbying in some detail over its 30 years, most recently in its 2021 report, Upholding Standards in Public Life. The majority of CSPL’s recommendations from that report were not implemented. The EIC therefore welcomed the Prime Minister’s request and the opportunity to re-examine the systems and processes for maintaining high standards in this area.
3. As an independent commission, the EIC issued its own terms of reference with the intent of publishing the report before the summer recess – a “short sprint review” that would be completed within four months.² Given the challenging timeframe the review concentrated primarily on lobbying, as this is the EIC’s area of greatest concern. We have made recommendations that, when implemented, will make it easier to see which groups and individuals are lobbying the government and the matters on which they are seeking to exert influence. In relation to the Business Appointment Rules and the disclosure of financial interests, we have made recommendations that should support the government to improve the current systems.
4. The core finding of our review is that the existing system for ensuring the transparency of lobbying is wholly inadequate as a means of understanding who is seeking to influence government, about what, and how it is being done. During the course of gathering evidence, it became increasingly clear to the Commission that simply updating the recommendations in CSPL’s 2021 report would be insufficient. Instead we have reached the firm conclusion that fundamental change is now required.

1 Ethics and Integrity Commission, Letter from the Prime Minister to Doug Chalmers, 11 March 2026, available at: https://eic.independent-commission.uk/wp-content/uploads/2026/03/11_March_2026_-_Letter_from_the_Prime_Minister_to_Doug_Chalmers_CB_DSO_OBE.pdf

2 See Appendix 1

5. Our report makes two overarching recommendations:
 - a. the Register of Consultant Lobbyists should be replaced by a register of all lobbying activity; and
 - b. there should be an integrated AI-enabled digital platform for access to government that contains a lobbying register, compiled by lobbyists, and transparency releases, compiled by government departments.
6. Our review has been led by two guiding principles. The first is that “lobbying is lobbying” and should be registered. This has led us to make recommendations designed to remove the exemptions and loopholes that are a feature of the current system.
7. Our second guiding principle is that our recommendations must be proportionate and practical. A well-designed, AI-enabled register will simplify data entry and make complying with the requirement to register quick and straightforward. There should be a sliding scale for the registration fee, with either no cost or a nominal cost for smaller businesses, charities and not-for-profit organisations.
8. Our proportionate approach is also evident in the scope of the activity that should be recorded. We have proposed that lobbying activity requiring registration has the following meaning:
 - a. oral or written communications made personally to a minister or senior government official (see Chapter Two for definition of the included roles);
 - b. relating to – in summary – the development, adoption or modification of legislation or policy; the making, giving or issuing of contracts or grants; or the exercise of any other function of the government.
9. The register should record lobbying of the UK government only and not parliamentarians or local authorities. While some contributors to our review advocated for including MPs and peers in the lobbying register, we decided not to recommend doing so as our focus was on government decision making.
10. While lobbyists should register all oral or written communications within the above definition, it would be neither feasible nor desirable to expect ministers and officials to record every approach made at a conference or every unsolicited email or WhatsApp. Instead, for informal lobbying that takes place outside of a meeting, it should be based on the response. Ministers and officials should only be required to register communications on the digital platform where an attempt by an external organisation to influence government has resulted in follow-up correspondence or a further interaction, such as a discussion or a referral to a colleague.

11. Private citizens who wish to raise issues with government on their own behalf should, of course, be able to do so without needing to register. Some other narrow exemptions should apply, which we discuss in Chapter Two.
12. Our recommendations on the Business Appointment Rules are designed to support the Government, who owns the rules, modernise them and improve coordination of the bodies charged with administering them.
13. Our recommendations on the disclosure of financial interests are designed to support the Government with making improvements to the current system.
14. To gather evidence for our review, we held over 40 evidence sessions and informal conversations with a range of standards bodies, parliamentarians, academics, government departments, third sector organisations, professional bodies, media organisations and international organisations. We also received 19 submissions to our open consultation. Our review benefited from independent research on government transparency releases led by Unlock Democracy, Spotlight on Corruption and Transparency International.
15. We are grateful to our many contributors who gave of their time so generously to assist us with our review, often at short notice. This report is the product of the expertise shared with us.

1

Lobbying: the transparency problem



What is lobbying and why is it important?

1. Put simply, lobbying is an activity intended to influence decision making. It is a key means by which people can seek to ensure their interests are taken into account when decisions are made by government about matters affecting them. It is also a way for government to draw on the practical experience and technical expertise of a range of organisations to deliver sound public policy.
2. Lobbying is an integral part of a functioning democracy. But it becomes problematic when it is carried out opaquely, creating the impression that certain interests are unfairly influencing decisions about policy, legislation or contracts and that other groups without the same financial backing or networks, are excluded.

The communications in the scope of the 2014 Lobbying Act relate to:

- a. the development, adoption or modification of any proposal of the government to make or amend primary or subordinate legislation;
- b. the development, adoption or modification of any other policy of the government;
- c. the making, giving or issuing by the government of, or the taking of any other steps by the government in relation to:
 - i. any contract or other agreement,
 - ii. any grant or other financial assistance, or
 - iii. any licence or other authorisation; or
- d. the exercise of any other function of the government.

This wording provides the definition of lobbying activity that we have used for this review.

Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, Part 1, s.(3)

“Professional Lobbying” means activities which are carried out in the course of a Business for the purpose of:

- a. influencing, or
- b. advising others how to influence the public functions of a Relevant Public Body.

PRCA Code for Professional Lobbying, 15 September 2025

“Lobbying is an activity intended to inform and influence government policy and legislation. It is one of the key means by which information can enter political discourse, which can assist politicians and policy makers in reaching informed conclusions.”

CIPR, [Your Guide to Professional Lobbying](#), page 4

The Principles of Public Life

3. The Seven Principles of Public Life apply to the conduct of all those in public office. They are: Honesty, Objectivity, Openness, Selflessness, Integrity, Accountability and Leadership. Lobbying activity engages all of these principles but at present, the UK regulatory system is failing to live up to them.
4. Government decision making processes should have integrity, and not be susceptible to inappropriate influence, yet there is currently a lack of openness about the lobbying of government. So little of lobbying activity is captured and made available in a format that is accessible, and the data that is available is insufficient to determine accountability. As such, government cannot demonstrate to the public that lobbying and, by extension, the policy and commercial decisions made by government, are governed by the principles of honesty, objectivity and selflessness.

Why does transparency of lobbying matter?

Public scrutiny

5. Transparency allows public scrutiny of who is gaining access to government and seeking to influence decision making at the highest levels. Without transparency, interested parties have no basis for assessing the fairness and objectivity of decision making processes. They will lack a clear view of whose perspectives and preferences are being heard by ministers and senior officials, which compromises the abilities of electorates to hold government to account.
6. The public should be able to know:
 - a. Who is lobbying?
 - b. Whom are they lobbying?
 - c. When are they lobbying?
 - d. What are they lobbying about and why?
 - e. How are they lobbying?

“Lobbying is a legitimate part of policymaking only when influence is transparent, disclosed, and subject to enforceable rules. The issue is not lobbying per se, but the absence of a system that allows government, Parliament, and the public to trust organised interests’ engagement with policymakers.”

Written evidence, **David Coen**, Professor of Public Policy, University College London; **Alexander Katsaitis**, Associate Professor of Political Science, Stockholm University; and **Dr. Matia Vannoni**, Senior Lecturer in Public Policy, King’s College London

Public trust

7. The OECD has described transparency as being one of the key drivers of public trust.³ Analysis by the OECD found “a positive and significant correlation between transparency of public information in practice (measured as the level of proactive disclosure of key datasets) and higher levels of public trust in countries with a trust deficit.” Cross-national surveys, such as the European Social Survey, a biennial survey conducted since 2002, and the World Values Survey, which covers over 100 countries worldwide, place the UK among the most dissatisfied countries in Western Europe in terms of trust in political institutions. Taking action to improve the transparency of lobbying has the potential to have a real impact on public trust over time.

“I think, ultimately, when it comes to lobbying, a large part of why it needs to be transparent, and I think everybody acknowledges that, is that it is linked to trust, and trust in politics is really low now, and we’ve seen through successive scandals that the lobbying rules, as they are, are really not fit for purpose ...”

Oral evidence, **Cynthia O’Murchu**, Investigative Reporter, Financial Times, roundtable with journalists and think tanks, 27 April 2026

3 OECD, Anti-Corruption and Integrity Outlook, 2024, page 60, available at: https://www.oecd.org/content/dam/oecd/en/publications/reports/2024/03/anti-corruption-and-integrity-outlook-2024_6e7ad8ce/968587cd-en.pdf

Equality of access

8. Access to government should not depend on who businesses, interest groups and charities know, or whether they can afford the services of a specialist lobbying firm. Good decision making relies on government hearing from a wide range of voices. Timely, meaningful and searchable registers are of value to government by providing a broad overview of who is seeking to influence government across departments and at multiple levels.
9. Transparency of lobbying alone cannot level the playing field, but it can facilitate equitable access by helping government to identify gaps where the views of groups likely to be impacted by a policy or proposed piece of legislation are not being heard. Government also needs to design clear policies for proactively engaging a wide variety of stakeholders.⁴

The system for regulating lobbying in the UK

10. The current system for regulating lobbying of government in the UK consists of codes of conduct that promote high standards of behaviour, the statutory Register of Consultant Lobbyists and transparency registers maintained by government.
11. The Ministerial Code and the Civil Service Code set out the standards and values to which ministers and civil servants are expected to adhere. The Ministerial Code refers explicitly to upholding the Principles of Public Life. The Civil Service Code refers to the Civil Service core values of integrity, honesty, objectivity and impartiality. The Ministerial Code contains a commitment for ministers to “meet many people and organisations and consider a wide range of views as part of the formulation of government policy” and sets out requirements on how external meetings are to be recorded and published quarterly. If a minister meets an external organisation or individual and finds themselves discussing official business, without an official present (for example, at a social occasion or on holiday), any “significant content” should be passed back to the department as soon as possible after the event.⁵
12. Part 1 of the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 (referred to throughout this report as “the Lobbying Act”) established the Register of Consultant Lobbyists and the Registrar of Consultant Lobbyists to oversee it. The core purpose of the lobbying provisions in the Act, as stated in the Act’s Explanatory Notes, is to ensure transparency by making clear “whose interests are being represented by consultant lobbyists who make representations to government.”⁶ The Register was intended to address the problem that it is not always clear whose interests are being represented, as the government’s releases would show any consultant lobbyists with whom meetings had been held or gifts or hospitality received, but not the clients they were representing.

4 Written evidence, Spotlight on Corruption, paragraph 34

5 Cabinet Office, Ministerial Code, 13 October 2025, paragraph 8.13, available at: <https://www.gov.uk/government/publications/ministerial-code>

6 Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014, Explanatory Notes, paragraph 4, available at: <https://www.legislation.gov.uk/ukpga/2014/4/notes/division/2>

13. The Act requires those undertaking consultant lobbying activities to register and declare basic information, covering: their company name, address, senior management and company number (if applicable); details of any industry code they are signed-up to; and the names of their clients during a relevant quarter.⁷
14. The intention, as set out by the government at the time, was that, when analysed together, the departmental disclosures and the statutory register would give an adequate picture of lobbying in the UK.⁸ The impact assessment produced for the Lobbying Act described an alternative policy option of a statutory register of both in-house and third-party consultant lobbyists, but argued that this would not be expected to improve transparency more than a register of third-party consultant lobbyists only, on the basis that “the government already publishes a list of meetings and, for in-house lobbyists, their intentions are already transparent through this channel.”⁹

Members of the public accessing the register should be able to easily see details of lobbying firms and their employees, as well as who has employed those lobbying firms. Because government departments already publish lists of their external meetings there is no need to provide further information about specific contacts with government.¹⁰

Introducing a Statutory Register of Lobbyists, Consultation Paper, January 2012, page 12.

7 Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014, available at: <https://www.legislation.gov.uk/ukpga/2014/4/section/4>

8 Independent research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 8, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

9 GOV.UK, Impact Assessment: A Statutory Register of Lobbyists, 9 July 2013, page 8, available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223834/Lobbying_Impact_Assessment.pdf

10 GOV.UK, Introducing a Statutory Register of Lobbyists, Consultation Paper, January 2012, available at: https://assets.publishing.service.gov.uk/media/5a799016e5274a684690a7a1/Introducing_statutory_register_of_lobbyists.pdf

The weaknesses of the current system

15. It is clear from the evidence given to our review that the government's intention in 2013 that the statutory register and the departmental transparency releases would together give an adequate picture of lobbying in the UK, has not materialised.
16. We have heard overwhelming evidence of the weaknesses of the current system. The shortcomings were evident when our predecessor, the Committee on Standards in Public Life, wrote its 2021 report, *Upholding Standards in Public Life*, and in the findings of Sir Nigel Boardman's report into supply chain finance, and the Public Administration and Constitutional Affairs Committee's (PACAC) 2024 post-legislative scrutiny of the Lobbying Act. Claire Bassett, the Registrar of Consultant Lobbyists, and her predecessor, Harry Rich, have called repeatedly for changes to the system.¹¹ In the five years since CSPL's report, these weaknesses have only become more apparent.

The narrow scope of the statutory register of consultant lobbyists

17. Research by Transparency International has found that only four per cent of those who appear in departmental disclosures are on the statutory register.¹² Consultant lobbyists only make up around 20% of UK lobbyists,¹³ with much of the most significant lobbying for government contracts carried out in-house by leading international companies in, for example, the "big tech" and defence sectors.¹⁴

11 PACAC, Post-legislative scrutiny of the Lobbying Act 2014 and related matters inquiry, written evidence from the Registrar of Consultant Lobbyists, September 2022, available at: <https://committees.parliament.uk/writtenevidence/111492/pdf/>

12 Transparency International Understanding Access and Potential Influence in Westminster, December 2024, available at: <https://www.transparency.org.uk/sites/default/files/2024-12/Understanding%20Access%20and%20Potential%20Influence%20in%20Westminster.pdf>

13 Written evidence, CIPR

14 Written evidence, Robert Hazell, Professor of Government and the Constitution; Sir Peter Riddell, Honorary Professor; and Lisa James, Senior Research Fellow, UCL Constitution Unit

Exemptions and loopholes

18. As well the obligation to register being confined to consultant lobbyists, the scope of the register is limited in other ways.
- a. **“The lobbied”**. Only communications with ministers and permanent secretaries must be registered. Communications with special advisers, who can act as the “gatekeepers” to their ministers and wield significant influence, are not registerable. Neither are communications with senior officials at director general and director level, who often have more direct responsibility for an area of government policy than ministers and permanent secretaries.
 - b. **VAT threshold**. The legislation requires only those that are VAT registered to register. The VAT registration level is currently £90,000. We heard that the threshold for registration is far too high. Basing the threshold on VAT registration also creates the unintended consequence that non-UK public affairs businesses are exempt from the requirement to register. We heard examples in the evidence of cases where this exemption was cited as a reason for not registering.
 - c. **“Incidental lobbying”**. Under Schedule 1 of the Lobbying Act, if a person works for a business which consists mainly of non-lobbying activities and makes a communication that is incidental to those activities, registration is not required. We heard that this exemption allows a wide range of organisations, including law firms, consultancies, trade associations and advisory businesses, to undertake substantial lobbying activity without registering, on the basis that lobbying is not their primary operation.¹⁵ It also creates uncertainty for consultant lobbyists because the meaning is unclear.

Lack of meaningful information in the statutory register

19. As set out in paragraph 13, the Lobbying Act requires only those undertaking consultant lobbying activities to register and declare the names of their clients during the relevant quarter, in addition to some basic information about them and their company. It is not possible to see from the Register what the lobbying was about, the date it took place or who the lobbyist met. Even the information on clients is of limited value, since the requirement is only to list clients during the relevant quarter. This means it may not be clear which client the lobbyist was representing at meetings listed in the government’s transparency releases.¹⁶

¹⁵ Written evidence, CIPR

¹⁶ Independent research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 62, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

Shortcomings in the quality, timeliness and “searchability” of the government’s transparency releases

20. CSPL’s 2021 report, *Upholding Standards in Public Life*, looked at shortcomings in the government’s transparency returns.¹⁷ To ensure this review had the benefit of current analysis, the EIC commissioned a piece of joint independent research from Unlock Democracy, Transparency International and Spotlight on Corruption. While this research found the government had improved its performance against its own targets, transparency releases are still not published until three to six months after meetings have taken place. This lack of timeliness can mean that the public is not aware of who the government is meeting in the crucial stages before bills are passed or decisions are made.¹⁸
21. CSPL recommended in 2021 that Cabinet Office should provide stricter guidelines on minimum standards for the descriptions of meetings and ensure compliance by government departments. Guidance was subsequently issued by government, but the independent research found “there is clearly a significant and ongoing problem with the quality of government’s transparency releases”, with the continued use of general descriptions such as “introductory meeting” or “general discussion” in contravention of Cabinet Office guidance. There are significant gaps in the data where officials have not included meetings that, it is clear from other sources, took place.¹⁹
22. It is difficult to find and search the files as they are published across 24 webpages per quarter (for ministerial releases alone). The fact that the files are published in different file formats and different file names makes automating collection of this data a complex and time-consuming task. Transparency International has created an open access site for ministerial meetings, but this should be the responsibility of government, as CSPL recommended back in 2021.²⁰

17 CSPL, *Upholding Standards in Public Life*, 2021, available at: <https://www.gov.uk/government/publications/upholding-standards-in-public-life-published-report>

18 As above, paragraph 23-31

19 As above, paragraph 41-42

20 Transparency International, Open Access UK, available at: <https://openaccess.transparency.org.uk/>

Reconciling the statutory register with the government's transparency releases

23. Government transparency data captures a splintered record across many different locations that is difficult, and sometimes impossible, to reconcile with the Register of Consultant Lobbyists.²¹
24. In order to monitor whether consultant lobbyists engaged in lobbying government are signing up to the Register, the Office of the Registrar of Consultant Lobbyists (ORCL) examines government transparency releases to identify any businesses that have been meeting with ministers and permanent secretaries that are not registered. Claire Bassett, the Registrar of Consultant Lobbyists, told us her office has experienced considerable difficulties reconciling the data for reasons that include a lack of detail in the transparency releases, discrepancies in the names of organisations, differences in the scope of the datasets resulting in a mismatch and meetings data often released late or not at all.

The EIC's approach to reform

25. The evidence given to our review points to the current system for the transparency of lobbying being wholly inadequate as a means of understanding who is lobbying government, about what, and how it is being done.
26. CSPL's 2021 report concluded that the right solution to addressing the shortcomings of the system was for Cabinet Office and government departments to improve the quality of their transparency data. However, the report made clear that, should adherence to the government's own transparency obligations continue to remain poor, the case for an expanded lobbying register would strengthen. Five years on, a powerful case has emerged for a more transparent and effective system for the disclosure of the lobbying of government. There have been developments internationally in terms of the expectations for standards in lobbying regulation, but while other countries are moving forward, the UK has not kept pace. Fundamental change is now required.
27. The reforms that we recommend in Chapters Two, Three and Four of our report are rooted in the guiding principle that there should be greater transparency about who is lobbying government. There are two overarching recommendations:
 - a. the Register of Consultant Lobbyists should be replaced by a register of all lobbying activity; and
 - b. there should be an integrated AI-enabled digital platform for access to government that contains the lobbying register compiled by lobbyists and the transparency releases compiled by government departments.

21 Independent Research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 2, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

28. We have concluded that, as a general principle, anyone seeking to influence government policy and procurement decisions should be required to record details of the lobbying undertaken. However, it is critical that the system is easy to use and is not a barrier to engagement. It is fundamental that registering details of lobbying activity is as simple as possible through the use of modern technology.
29. It seems very likely that replacing the Register of Consultant Lobbyists with a register of all lobbying activity will require primary legislation. While we recognise that finding legislative time is always challenging, we would suggest that the Government gives urgent and active consideration to bringing forward a bill to Parliament in the current parliamentary term.
30. Developing a suitable digital platform will attract a capital cost initially, but will ultimately save money through ease of data entry for departments. Expanding the scope of the register will mean that the Office of the Registrar will require an increased budget. These costs can be mitigated by the additional fees and, to a lesser extent, fines that will be generated. We explore this further in Chapter Four.
31. Our recommendations are designed to enhance the transparency of the lobbying of government and in doing so build public trust and confidence. Some countries have a single register of lobbying that also covers parliamentarians and positions in local authorities. We also heard evidence that advocated for a register of lobbying to include lobbying of MPs and peers. We have chosen not to make recommendations about the lobbying of Parliament or local government at this time. We are satisfied that our recommendations are a proportionate response to the request from the Prime Minister to undertake a review into how government ensures transparency around lobbying.
32. Some contributors to our review have argued for a statutory code of conduct overseen by a regulator of lobbying, to promote and oversee high standards of behaviour. We have taken the approach of focusing on transparency on the basis that transparency increases accountability. Transparency can also improve standards in two ways. A register of all lobbying activity will reveal any patterns of undue access or repeated privileged contact that can then be investigated and addressed appropriately. Knowing that all lobbying activity will be public is also likely to act as a deterrent to inappropriate behaviour and encourage government to focus its efforts on engaging with a broad range of stakeholders.
33. It is possible that enhanced transparency could generate a drop in public confidence for a short time while issues are revealed and addressed and behaviour changes. There is no way to mitigate this and meet the requirement of openness. The EIC is clear that the benefits the government stands to gain far outweigh any short-term disadvantages. The costs of doing nothing, in terms of government's vulnerability to future scandals and declining public trust, are far greater.
34. The EIC may choose to review in future whether the new system has had the intended effect or whether there should be a full regulatory regime including a statutory code of conduct.

Benefits

35. A single, public-facing digital platform that contains a lobbying register compiled by lobbyists and the transparency releases compiled by government departments would have significant benefits for the public, for government and for lobbyists themselves.
36. Making data available in accessible and user-friendly formats supports external scrutiny by the public, media and civil society organisations, contributing to a broader “ecosystem of accountability”.²² The platform would have the capacity to both reveal areas for further investigation and to provide reassurance that lobbying is not taking place without disclosure, increasing confidence in the policy making process. Our recommendations therefore provide government with a clear opportunity to take action that has the potential to increase public trust in politics at a time when trust is low.
37. A single platform that utilises modern technology well and is AI-enabled could save public money by simplifying data entry for departments. By placing information into the public domain in a readily searchable format, this may result in fewer requests for government held information.
38. There is another clear benefit to government, which is as a policy making and stakeholder engagement tool. A comprehensive digital platform would allow government to see at a glance which organisations have an interest in specific policies. It would also provide a clear picture of who is lobbying government across its various departments, and potentially seeking to play one off against another. That knowledge would allow government to adjust its approach and ultimately be more effective.
39. Lobbyists also stand to benefit. Through registering, lobbyists would be able to demonstrate that they are complying with the requirements placed on them. They could use registration as a marketing tool to show to their clients that they maintain high standards and are open about their lobbying activity. Small businesses could use the register to understand the policy making process and find other businesses to collaborate with. Charities could use the register to demonstrate their impact and push for equitable access.

22 Written evidence, David Coen, Professor of Public Policy, University College London; Alexander Katsaitis, Associate Professor of Political Science, Stockholm University; and Dr. Matia Vannoni, Senior Lecturer in Public Policy, King’s College London

2

A register of lobbying activity



1. Studies have found that only four per cent of those who appear in departmental transparency releases are on the Register of Consultant Lobbyists.^{23,24}

“In some jurisdictions, including the UK, only professional consultancy lobbyists are required to register, while in-house lobbyists and other organised interests are excluded. This distinction does not align with the broader reality of lobbying ecosystems. Interest groups include businesses, NGOs, think tanks, professional associations, and other organisations that seek to influence policy. All these actors engage in lobbying activities, often using similar strategies and pursuing comparable objectives.”

Written evidence, **David Coen**, Professor of Public Policy, University College London and **Alexander Katsaitis**, Associate Professor of Political Science, Stockholm University

2. As discussed in Chapter One, the evidence we have taken shows that it is no longer credible for the UK to have a lobbying register that covers such a small proportion of lobbying activity and does not capture the realities of contemporary lobbying practices. The UK is failing in its obligation to operate a system that upholds the Nolan Principles of Openness and Accountability. The electorate should be able to see who is seeking to influence government decision making and be able to hold the government to account for the judgments made about who it is granting access to.
3. We heard in our evidence how other countries have taken a more comprehensive approach to lobbying transparency. Finland, Germany, Canada, Ukraine, Chile, Ireland, France, Scotland and the EU all have registers that include both consultant and in-house lobbyists and all score more highly than the UK in the OECD Anti-Corruption and Integrity Outlook.²⁵ As of March 2025, the UK register covered just 249 organisations, compared with 7,957 in Canada, 17,067 in the EU and 13,699 in the US. Scotland’s Holyrood register covers over 1,400 organisations.²⁶

23 McKay, A.M., Wozniak, A. Opaque: an empirical evaluation of lobbying transparency in the UK. Int Groups Adv 9, 102–118 (2020), available at: <https://doi.org/10.1057/s41309-019-00074-9>

24 Transparency International Understanding Access and Potential Influence in Westminster, December 2024, available at: <https://www.transparency.org.uk/sites/default/files/2024-12/Understanding%20Access%20and%20Potential%20Influence%20in%20Westminster.pdf>

25 OECD, Transparency of lobbying activities and prevention of undue influence, available at: <https://oecd-public-integrity-indicators.org/indicators/1000097/subindicators/1000408/>

26 Written evidence, CIPR

4. The majority of the contributors to our review were in favour of a register of all lobbying activity. The most vigorous support for such a register came from lobbyists themselves. We heard from the Public Relations and Communications Association (PRCA) and the Chartered Institute of Public Relations (CIPR) that the industry supports reform, with CIPR's 2024 survey finding 83% of professionals support expanding the register to cover all lobbyists.²⁷

Consideration of alternative approaches

5. We have considered whether there are alternative approaches that would address the concerns we heard without extending the register to cover all lobbyists. In his 2021 report into supply chain finance, Sir Nigel Boardman proposed extending the requirement to register to include lobbyists employed by more than one organisation and any former senior civil servant or minister who engages in lobbying. (Sir Nigel Boardman also recommended removing or severely curtailing the exemption for 'incidental lobbying' and removing the exemption for those not registered for VAT, which we address later in this chapter).²⁸
6. The EIC has concluded that approaches which stop short of registering all lobbying activity are insufficient to address the requirements of the Nolan Principles of Openness and Accountability. Neither would such an approach be an adequate response to the evidence we heard, which was that fundamental change is required.
7. We recommend the government acts at pace to legislate for an expansion of the register. However, there are some changes to the register that can be achieved through secondary legislation (see paragraph 30 and 31 below). While these changes alone would not go far enough towards meeting the requirements of the Nolan Principles, they are important and should be made as soon as possible. Government should not wait until it has legislated to act.
8. Claire Bassett, the Registrar of Consultant Lobbyists, felt the pressing need to make rapid changes to significantly improve the current system and that this should not be delayed whilst recommendations for major changes to the regime are considered.

27 Written evidence, CIPR written evidence

28 GOV.UK, Review into the development and use of supply chain finance (and associated schemes) in government, Part 2: recommendations and suggestions, 5 August 2021, recommendation 16, available at: https://assets.publishing.service.gov.uk/media/61430bc6d3bf7f05b5a9035c/A_report_by_Nigel_Boardman_into_the_Development_and_Use_of_Supply_Chain_Finance__and_associated_schemes__related_to_Greensill_Capital_in_Government_-_Recommendations_and_Suggestions.pdf

Scope

9. The Boardman report considered the arguments for changing the regime to include in-house lobbyists but expressed concerns “that the burden of registration may be disproportionate to the benefits achieved and may have the result of silencing those who would wish occasionally to contribute to a public debate, but are concerned that it might require them to register.” This argument was also raised in debates when the Lobbying Act was going through Parliament.
10. Some contributors to our review expressed the view that a register of all lobbying activity may place an administrative burden on charities, think tanks and smaller organisations that may engage occasionally with government, creating a “chilling effect”. The National Council of Voluntary Organisations (NCVO) shared their concern that the introduction of an additional reporting process could deter smaller organisations from engaging, especially if they are risk-averse and concerned about falling foul of the rules. If the reporting requirements were to be expanded to include charities, the NCVO urged the EIC to ensure requirements are easy to understand, free, and proportionate.
11. Canada, Ireland and Scotland – countries that have included in-house lobbyists within the scope of their registers – have all undertaken reviews of their legislation and not found the administrative requirements prohibitively burdensome.²⁹ Louise Whatham, Head of Public Affairs and Policy at PRCA, told us that their members, whether in-house or consultant lobbyists, already report activity on their register through a relatively straightforward process. Many organisations record meetings for governance and accountability purposes, so it was her view that reporting requirements for transparency would not create a significant administrative burden.
12. A well-designed register that maximises the use of modern and familiar technology to simplify data entry will be critical to mitigating concerns about the burden of a register on smaller organisations. A system that has ease-of-use and user-need as its central design principles will help mitigate concerns raised about the “chilling effect”. Evidence from consultant lobbyists, academics and industry bodies was clear that government should undertake a “discovery” phase to understand and map out user needs. This would ensure that the solution has the flexibility to meet the requirements of modern lobbying activity.

29 Transparency International Understanding Access and Potential Influence in Westminster, December 2024, page 5, available at: <https://www.transparency.org.uk/sites/default/files/2024-12/Understanding%20Access%20and%20Potential%20Influence%20in%20Westminster.pdf>

“ Accessible education efforts in conjunction with a well-designed register platform will lower any potential ‘costs’ of registration for smaller groups, and concerns for any onus placed on these groups should not discourage the EIC from moving forward with this plan.”

Written evidence, **Dr. Alexander Fitzpatrick**, Lecturer in Public Policy, Queen’s University Belfast

“ We welcome the platform proposal as it supports good lobbying, but this would need to be developed carefully to meet the user need. For instance, consultancy members will often engage with Government to arrange meetings on behalf of a client that they don’t attend or attend meetings on behalf of more than one client. There should be an easy way of recording this within the platform to avoid any misunderstanding of how this engagement is delivered.”

Oral evidence, **Jessica Daniels-Roberts**, Co-Chair, PRCA Public Affairs Board, 16 June 2026

13. We will take a proportionate approach to the fee structure through a sliding scale for registration, with either no cost or a nominal cost for smaller businesses, charities and not-for-profit organisations. This approach should also be adopted in the proportionate exercise of the Registrar’s power to issue fines for non-compliance (see Chapter Four).
14. The EIC has concluded that there should not be a carve-out for charities and think tanks since they can still exert significant influence. Spotlight on Corruption set out in their evidence to our review that if the register was limited to commercial interests, it would give the impression to the public that lobbying is conducted only by these interests. Including charities and think tanks would enable the public to see if decision makers are granting equitable access to a range of parties when formulating policy and would be in line with registers in Canada, the EU, France, Germany, Scotland and Ireland.³⁰ Phil Brickell MP, Chair of the APPG on Anti-Corruption and Responsible Tax, told us that think tanks should be included in the statutory lobbyist register and disclosure of their funding should be mandated.

30 Written evidence, Spotlight on Corruption, paragraph 12

15. We considered whether it would be proportionate to set a threshold below which lobbying activity is not required to be registered. Canada has such a system, where organisations are required to only register if they spend more than eight hours in a four-week consecutive period engaged in lobbying activity.³¹ However, a volume threshold would not be consistent with the principle that all lobbying should be transparent. It would also potentially be difficult for the Registrar to enforce. As we discuss below in relation to the current VAT exemption and incidental lobbying, exemptions create the scope for loopholes and confusion.

“Organisations’ ability to resource the recording of information will broadly track their level of engagement with government, meaning the most influential organisations are the most able to meet the requirements of a new register. Smaller organisations with less resource will generally have the least information to record.

Creating formal exemptions for smaller organisations would significantly risk creating incentives allowing lobbying to be channeled through intermediaries, undermining the transparency of the system.”

Written evidence, **InfluenceMap** (a global non-profit think tank on climate and sustainability)

The meaning of “lobbying”

16. The definition of lobbying laid down in legislation will be critical to the effective operation of the system. The definition must be clear and unambiguous, to support organisations to comply with the requirements, and to ensure that the Registrar’s task of monitoring compliance is as straightforward as possible.
17. While we have proposed significant changes to the scope of the lobbying register, we recommend that the new system draws on existing definitions in section 2(3) of the 2014 Lobbying Act. First, the communications in scope should be oral or written communications made personally to the recipient – only direct communications should trigger the requirement to register.³²

31 The Canadian Lobbying Commissioner has recommended amending the Lobbying Act to remove this threshold (recommendation 1: **Modernizing the Lobbying Act**)

32 We deal with the oral or written method of communications in Chapter Three, including non-corporate communications channels..

18. Secondly, the register should record lobbying of the UK government only and not be expanded to cover parliamentarians or local authorities. As discussed in Chapter One, while some contributors to our review advocated for including MPs and peers in the lobbying register, we decided not to recommend doing so as our focus was on government decision making. We also considered that merging parliamentary and government systems might overly complicate the case for change.
19. Finally, we recommend that the topic of communications in scope remains as drafted in the Act, namely:
 - a. the development, adoption or modification of any proposal of the government to make or amend primary or subordinate legislation;
 - b. the development, adoption or modification of any other policy of the government;
 - c. the making, giving or issuing by the government of, or the taking of any other steps by the government in relation to,
 - any contract or other agreement,
 - any grant or other financial assistance, or
 - any licence or other authorisation; or
 - d. the exercise of any other function of the government.
20. We consider that the current definition of the topic of communications in scope is appropriately broad. Narrowing the scope could create potential loopholes, which would conflict with the policy objective underpinning our recommendations, which is that there should be greater transparency about whose interests are influencing government and that existing loopholes should be closed.
21. Where there are sensitivities, for example, for national security, personal safety or commercial reasons, suitable protections should be put in place.

Exempted categories

22. Private citizens who wish to raise issues with government on their own behalf should be able to do so without friction and would not be considered to be carrying out regulated lobbying. Requests for factual information or communications requested by a public body, such as public consultation responses, should not be in scope. Neither should petitions to demand action on an issue. And of course, constituency communications are out of scope by dint of MPs not being included within the scope of the register. Constituency communications with a MP, who also happens to be a minister, should not be included if they relate purely to a constituency matter.
23. There should be no requirement for public bodies to register since providing impartial, expert advice to government in the public interest is an integral part of their role and their governance.

Phased implementation

24. Replacing the Register of Consultant Lobbyists with an activity-based lobbying register would significantly increase the number of organisations and individuals in scope and, therefore, the volume of entries in the register. To ensure that the increase in volume is managed effectively and sustainably, we recommend a phased implementation based on risk. The sequencing of categories would be for government to determine but we would suggest starting with former Ministers, special advisers and senior civil servants, (alongside the existing category of consultant lobbyists), followed by in-house lobbyists working for companies; with charities and not-for-profit organisations in the final tranche.
25. The benefit of this approach is that government will be able to pilot the system as it is rolled out and ensure that any glitches in the technology and user experience are rectified before all organisations are required to register.

Recommendation 1

The Register of Consultant Lobbyists should be replaced by an activity-based Lobbying Register.

Any individual or organisation carrying out lobbying activity should be required to register and submit information returns on their lobbying activity.

The Registrar of Lobbyists

26. We recommend that the Registrar of Consultant Lobbyists becomes the Registrar of Lobbyists and oversees the Lobbying Register. This would require a significant expansion of the resources for the Office of the Registrar. We discuss resourcing, fees for registering as a lobbyist and the enforcement powers of the Registrar in Chapter Four.

“The lobbied”

27. Building on our guiding principle that there should be greater transparency about who is lobbying government, the scope of the register must also be extended to cover communications with a greater number of governmental roles.
28. The current regime requires communications only with ministers and permanent secretaries (or their equivalents as specified in the Act) to be registered. CSPL’s 2021 report recommended that the categories should be extended to include special advisers and senior civil servants below permanent secretary level (including director generals and directors).

29. The evidence we took for our review supports this approach. Special advisers exercise a significant degree of influence over policy development and ministerial decision making. Officials at director general and director level are closely involved in policy development at working level and are a target for lobbyists interested in their policy area. Unlock Democracy has made the case for including business advisers and special envoys (and any other category of senior advisors with significant influence over government policy).³³ We agree and would specifically add non-executive directors working in government to this.

Recommendation 2

As well as ministers and permanent secretaries, lobbyists should also have to register on the basis of any communications with special advisers, directors general, directors, non-executive directors or any other government advisers (paid or unpaid) equivalent to director general or director level.

30. Extending the reporting requirement to contacts with special advisers was envisaged when the Lobbying Act was introduced and can be achieved via secondary legislation under Part 1 Section 2(5) of the Act. This change does not need to wait for primary legislation and should be made immediately.

Recommendation 3

Extending the reporting requirements to contacts with special advisers must be prioritised through secondary legislation.

31. The opportunity should also be taken to review and update the list of people who are considered in the Act to be equivalent to permanent secretaries because some of those roles no longer exist.³⁴ This can be done through secondary legislation under paragraph 11(2) of Schedule 1.

Recommendation 4

The list of roles equivalent to permanent secretary should be reviewed and updated through secondary legislation.

³³ Written evidence, Unlock Democracy

³⁴ PACAC, Post-legislative scrutiny of the Lobbying Act 2014 and related matters inquiry, written evidence from the Registrar of Consultant Lobbyists, September 2022, section 9, available at: <https://committees.parliament.uk/writtenevidence/111492/pdf/>

Removing the VAT exemption

32. The Lobbying Act requires only those that are VAT registered to comply with the system. The current VAT registration level is £90,000. The original intention appears to have been to exclude small organisations due to the perceived administrative burden associated with registration. However, we heard three principal reasons why this exemption is problematic. The first is that the threshold exempts a significant amount of lobbying from disclosure. Harry Rich, the Registrar of Consultant Lobbyists for seven years until September 2025, told the Public Administration and Constitutional Affairs Committee in October 2025, “you can do an awful lot of lobbying for £90,000” and that the VAT threshold “excludes some quite significant lobbyists”.³⁵ The CIPR told PACAC that there were instances of consultant lobbyists being asked to bill their clients in different financial years to remain below the VAT threshold.³⁶

“... a lobbyist’s turnover has no bearing on their influence, yet under the current rules it determines whether they need to register at all. This means a well-connected individual or small consultancy operating below the VAT threshold can lobby Ministers on behalf of paying clients without any obligation to declare it, even where the lobbying itself is substantial.”

Written evidence, **Chartered Institute of Public Relations (CIPR)**

33. Secondly, the VAT registration requirement excludes foreign businesses or subsidiaries. Philip Rycroft’s review into countering foreign financial influence and interference in UK politics described the VAT exemption as creating a loophole which should be closed. The Rycroft Review recommended that “the Lobbying Act should be amended to remove the VAT exemption for all foreign-based entities which would otherwise fall under the provisions of the Act.”³⁷

35 PACAC, The work of the Register of Consultant Lobbyists, oral evidence from Harry Rich, October 2025, available at: <https://committees.parliament.uk/oralevidence/16521/pdf/>

36 PACAC, Post-legislative scrutiny of the Lobbying Act 2014 and related matters inquiry, oral evidence from Jon Gerlis, CIPR, 15 November 2022, available at: <https://committees.parliament.uk/oralevidence/11542/html/>

37 Ministry of Housing, Communities & Local Government, The Rycroft Review: Report of the independent review into countering foreign financial influence and interference in UK politics, 25 March 2026, available at: <https://www.gov.uk/government/publications/the-rycroft-review-report-of-the-independent-review-into-countering-foreign-financial-influence-and-interference-in-uk-politics/the-rycroft-review-report-of-the-independent-review-into-countering-foreign-financial-influence-and-interference-in-uk-politics>

34. Finally, the VAT exemption creates practical issues. We heard from Claire Bassett, the Registrar of Consultant Lobbyists, that the exemption can cause administrative confusion, “we have organisations contacting us who are in the process of VAT registration but can’t be on our Register or engage in consultant lobbying until that process is complete. We have others who are too small to be VAT registered who actually want to be on the Register because of their clients’ expectations. We have also had a few instances where organisations have de-registered from VAT but have remained on our register unnecessarily.”
35. We have considered whether an alternative de minimis provision should be set so that individuals or organisations engaged in a small amount of lobbying are not required to register. We rejected this approach on the basis that all lobbying should be recorded as a matter of principle and because a threshold would have resource implications for the Office of the Registrar who would need to check whether the de minimis criteria were met.

Recommendation 5

There should be no requirement to be VAT-registered for any individual or organisation to be considered to be carrying out lobbying activity.

Removing the “incidental lobbying exemption”

36. Clause 1(1) of Schedule 1 of the Lobbying Act says, “a person does not, by reason of making a communication, carry on the business of consultant lobbying if:
- a. the person carries on a business which consists mainly of non-lobbying activities, and
 - b. the making of the communication is incidental to the carrying on of those activities.
37. PACAC looked at this issue in their 2024 report on post-legislative scrutiny of the Lobbying Act. In evidence to PACAC, the Minister explained that the “incidental lobbying exemption” was designed to exempt those who communicate with Ministers only as a small part of the conduct of their main business, such as a lawyer who writes to a Minister in the course of representing their client in litigation. Former Registrar, Harry Rich, was critical of the exemption, which he considered to be “the most contentious, vague and problematic drafting in the legislation.”³⁸ The current Registrar, Claire Bassett, told our review that this exception has repeatedly been invoked to demonstrate that communications that would otherwise have constituted registrable consultant lobbying fell outside the requirements of the Act.

38 PACAC, Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters, 2 May 2024, paragraph 59-60, available at: <https://committees.parliament.uk/publications/44541/documents/221331/default/>

38. ORCL updated their formal guidance in 2023 to provide a more detailed explanation of how the exemption is applied in legitimate cases. It can only be applied where the lobbying is a “minor accompaniment” to the main focus of a business’s activities. It is “a narrow exception and will not apply to most businesses or individuals that engage in consultant lobbying”. The guidance makes clear that the lobbying is not “incidental” if it forms a substantive part of the main business, assessed by volume of work, the value of it, or the significance of it to either the firm or individual doing the lobbying or to those on whose behalf the lobbying was undertaken.³⁹
39. While this has gone some way to establishing the limits to the exemption, the guidance is complex and does not resolve the underlying issue that the exemption in the legislation is vague and there is a lack of detail around the policy intention. PACAC recommended that “If the government maintains that there is a need for the incidental exemption, it must amend the Act to clarify its purpose and remove any ambiguity about what that is and when it can apply.”⁴⁰
40. The EIC has reached the clear view that the incidental lobbying exemption should be removed entirely. The exemption has been used to avoid reporting lobbying that would otherwise require registration. Lobbying is lobbying and whether it is carried out by public affairs firms or a wider range of organisations for whom lobbying is not their primary business, the principle of transparency requires the lobbying to be registered.

Recommendation 6

There should be no exemption from the requirement to register on the basis that the making of a communication is incidental to the main focus of a business’s activities.

39 Office of the Registrar of Consultant Lobbyists, Guidance from the Registrar of Consultant Lobbyists, section 5.1, Lobbying that is incidental to non-lobbying activities, available at: <https://registrarofconsultantlobbyists.org.uk/guidance/guidance-from-the-registrar-of-consultant-lobbyists/#Exceptions-from-registration>

40 PACAC, Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters, 2 May 2024, paragraph 64, available at: <https://committees.parliament.uk/publications/44541/documents/221331/default/>

3

**An integrated
digital platform
for access to
government**



A consolidated transparency register

1. A core recommendation of our review is that government should create a comprehensive, consolidated register that brings into a single repository a lobbying register compiled by lobbyists, and the transparency releases compiled by government departments.
2. A range of contributors made a case for a comprehensive register covering the full lobbying ecosystem, including the APPG on Anti-Corruption and Responsible Tax, CIPR and academics specialising in lobbying regulations. We heard that a dual-reporting approach can improve the accuracy and completeness of lobbying data and, by capturing interactions from both sides, “provide a more comprehensive and reliable account of influence, reducing the potential for omissions or discrepancies in reporting.”⁴¹
3. A single, consolidated AI-enabled digital platform would create a valuable resource for government policy making. It would offer a clearer cross-departmental view of government’s relationships with key stakeholders. It would also provide a comprehensive record of who is seeking to influence different parts of government and on what issues.

“Research has highlighted that for policy-makers, lobbying register data (in jurisdictions with relatively high levels of transparency) is used to learn about groups that approach them and understand the lobbying landscape more fully. As such, robust lobbying registers have practical benefits for those that lobby as well as those that receive lobbyists.”

Written evidence, **Dr. Alexander Fitzpatrick**, Lecturer in Public Policy, Queen’s University Belfast

Form and function

4. Under our proposal, when lobbyists undertake a simple registration process they would be assigned a unique identification number for their organisation which they would provide to the government department they are intending to lobby prior to lobbying government for the first time. They would then file on a monthly basis information returns about the specific communications events that have taken place in the preceding month. A new, modern and AI-enabled platform would use algorithms to link and cross-check entries inputted by lobbyists and government departments that relate to the same communication events.

41 Written evidence, David Coen, Professor of Public Policy, University College London; Alexander Katsaitis, Associate Professor of Political Science, Stockholm University; and Dr. Matia Vannoni, Senior Lecturer in Public Policy, King’s College London

5. A single digital platform with a combination of drop-down menus and free text boxes would make it easy for government to enter data efficiently and in a form that is consistent across departments. It is crucial that the register is also simple for lobbyists to use. Baroness Anderson, Parliamentary Secretary to Cabinet Office with responsibility for standards policy, told us that she sees ease of compliance as being key to the EIC's recommendations.
6. Including gifts and hospitality on the government side of the system would allow this data to be correlated with meetings data. This would support government to address an issue raised in research carried out for the EIC by Unlock Democracy, Spotlight on Corruption and Transparency International, where gifts and hospitality were declared in the government transparency data without the expected corresponding meeting record.⁴²
7. The platform should include performance dashboards which makes visible data about the compliance of lobbyists with the requirement to register and file information returns on time and departmental performance against reporting targets.

Improved matching and searching

8. Together with parity in the categories of information captured by both sides of the register (see paragraph 18), new technology would deliver improved data matching. The independent research on government transparency releases provides examples of contacts in the statutory Register that are not reflected in the government transparency releases. The report lists possible explanations for why this may be the case, such as the differences between the definitions of the communications that must be recorded, but notes that there is no way of finding out without submitting FOI requests.⁴³

“I have long argued that reconciling the current consultant-lobbying register with departmental transparency returns is difficult and often artificially so. The datasets do not align well on dates, coverage, or detail. That difficulty is itself evidence of design failure. A person should not need to piece together partial transparency from disconnected systems in order to understand who sought to influence whom.”

Written evidence, **Barry Solaiman**, Associate Dean for Academic Affairs and Assistant Professor of Law, HBKU Law, Qatar

42 Independent Research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 43, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

43 As above, paragraph 60

9. Claire Bassett, the Registrar of Consultant Lobbyists, told us that her office has experienced considerable difficulties examining the government's transparency releases in order to identify any businesses that have been meeting with ministers and permanent secretaries but are not registered.

“We experience a number of difficulties reconciling the Register with the government's transparency releases:

- The transparency data sets are very large, making it very time consuming for one member of my office to go through them. The size of the datasets also makes this manual activity subject to human error;
- data given in the transparency releases very often lacks detail, the description of the meeting gives very little context or can be missing;
- we are reliant on the names of organisations meeting ministers aligning with the names on our Register. If they use different names, e.g. of a subsidiary, we may not be able to make the link;
- the transparency returns only cover official meetings, my remit also covers written communications so there is a mismatch in data sets and this explains why we wouldn't necessarily expect our Registrants to appear that often in the transparency data; the transparency data does not cover any meetings or contacts held during party conference. There is no such exemption for my Register. We have had occasions of potential lobbying reported to us during party conferences but those would not show up on transparency returns;
- the meetings data is often released late or not at all.

The impact of this is that it can make our investigations more time consuming and complex than they need to be and risks undermining public confidence where we are unable to prove a breach of the legislation.”

Oral evidence, **Claire Bassett**, Registrar of Consultant Lobbyists, 17 April 2026

10. A further benefit is that the new digital platform would hold data that is accessible, searchable and easily downloadable. Independent research revealed just how difficult it is currently to locate and search the government transparency data which are published on 24 different webpages in different file formats and with different names. A new system would enable users to search, filter and sort information by key criteria.

“For anyone wanting to collect data on ministerial, senior official and special advisor meetings covering just one quarter, they would have to search and locate up to 72 files across 63 pages. If they need data covering multiple years, then these amounts are multiplied accordingly; for example, collecting all data for just 2023 to 2025 (the period in our terms of reference) would involve searching and compiling 216 files. For a human to do this manually, we assess it would take them between three to five minutes per file excluding breaks i.e. between 11 and 18 hours of solid work. This is not reasonably practicable.”

Unlock Democracy, Transparency International, Spotlight on Corruption, Independent Research on government transparency releases, May 2026, paragraph 46

Recommendation 7

A single AI-enabled digital platform should be developed that acts both as the Lobbying Register and as a central repository for government to input and publish departmental transparency releases.

11. Government should adopt a general policy of not accepting meeting requests to discuss matters that fall within the definition of lobbying set out in legislation, with any organisation who has not registered and generated a unique identification number. This would achieve two purposes. It would motivate lobbyists to register. And it would signify that government believes in the value of the register and is committed to building a culture of transparency and accountability.

Recommendation 8

Government should not accept any meeting requests to discuss matters that fall within the definition of lobbying, set out in legislation, with any organisation, unless that organisation has registered on the Lobbying Register.

12. Under our proposal ORCL would become the Office of the Registrar of Lobbyists. They would have the role of examining any anomalies flagged by the system and would liaise with government departments and lobbyists to establish whether these are due to data entry errors (in which case these errors would reduce over time) or omissions or errors in the recording of communications events. They would casework these anomalies and produce regular reports to the Cabinet Secretary on their findings.
13. The generation of unique IDs for organisations on the statutory register, combined with a government policy of only meeting organisations who have registered, means that we expect the system to be largely self-checking. The circumstances where entries require caseworking are likely to be where AI-enabled sentiment matching flags a mismatch between how the lobbyist and government department have described the purpose of the meeting. Anomalies may also be flagged for checking where a lobbyist has entered the details of a meeting that is sensitive, for example because it relates to national security or defence and there is either no corresponding entry or a less detailed record on the government side because government has determined that disclosure would engage an exemption under the Freedom of Information Act.

Recommendation 9

The Registrar of Lobbyists and Cabinet Office would be jointly responsible for the maintenance of the new AI-enabled digital platform, but with distinct areas of responsibility that would be visible to the public through a timeliness dashboard.

Improving the accessibility of government transparency releases in the short-term

14. In 2021, CSPL recommended that government should collate all departmental transparency releases and publish them in an accessible, centrally managed and searchable database. In July 2023, the then government committed to developing a single database to collate and publish departments' transparency returns, which cover meetings, gifts, hospitality and travel.⁴⁴ However, in evidence to our review, Baroness Anderson told us that there was never any funding allocated to that workstream and no work was commissioned to build a single platform.
15. While we are now advocating for a single register that includes data entered by lobbyists on one side and government on the other, we are clear that work to consolidate the government's transparency returns must not wait for the requirement to register to be extended to all lobbyists. Government should commence work now on the government side of the platform, but it should be built in such a way that it can connect to the Lobbying Register once legislation has been passed and the Lobbying Register has been built, taking advantage of developments in modern technology, including AI, to ensure ease of use.

“Improving the government transparency data to ensure that it is consistent, easy to use, and more meaningful would be an important step, but it is equally important that any technology platform is future proof.”

Oral evidence, **Baroness Hodge of Barking DBE PC**, Anti-Corruption Champion, 18 June 2026

Recommendation 10

In parallel to progressing the primary legislation that will be needed to create a register of all lobbying activity, Cabinet Office should collate all departmental transparency releases and publish them on an accessible, centrally managed and searchable digital platform. This platform should be used to host the Lobbying Register once legislation is enacted.

44 GOV.UK, Strengthening Ethics and Integrity in Central government, section 3, available at: https://assets.publishing.service.gov.uk/media/64b7bff0ea2cb001315e5e1/CP_900_-_Strengthening_Ethics_and_Integrity_in_Central_Government_Accessible.pdf

Government leadership

16. The single consolidated digital platform for access to government (including the phase one focus on the government's transparency releases) should be formally championed by the Cabinet Secretary and the Chief Operating Officer. The Chief Operating Officer should support and hold departments to account for the quality and timeliness of departmental transparency returns by convening, twice yearly, a meeting of permanent secretaries. The Chief Operating Officer would have access to a dashboard of performance data generated by the platform. The Registrar of Lobbyists should produce a report for these meetings which could include an analysis of a sample of the descriptions of meetings alongside insights from the caseworking of anomalies between the description of the same communication events recorded by the lobbyist and the department.
17. As well as overseeing the quality and timeliness of departmental transparency releases, the Chief Operating Officer will be able to identify patterns of undue access or repeated privileged contact.

Recommendation 11

The single consolidated AI-enabled digital platform for government should be formally championed by the Cabinet Secretary and Chief Operating Officer.

Recommendation 12

The Chief Operating Officer should convene, twice yearly, a meeting of permanent secretaries to discuss the quality and timeliness of departmental transparency returns.

The Registrar of Lobbyists should submit a report on their findings for consideration at each meeting.

Consistency of requirements between the Register and government transparency releases

18. An important objective for our recommendations is that, as far as possible, the requirements for the Lobbying Register should be consistent with the government's transparency data requirements. This is important as a matter of principle, since if there is a strong case for information to be disclosed, this information should be disclosed consistently across both halves of the system. Secondly, consistent requirements and definitions will maximise the effectiveness of the single digital platform for access to government as a tool for understanding the lobbying of government.
19. However, there will be records that do not align within the integrated platform for good reason. There are two key reasons why this may be the case. First, not all records of meetings in the departmental transparency releases are records of lobbying, as some will be meetings held to give or receive factual information. For meetings that do not meet the definition of lobbying in the legislation, a department could tick a box so that this entry will not be flagged as an anomaly for manual checking by the Registrar. Secondly, when it comes to the use of non-corporate communication channels, such as WhatsApp, and impromptu informal meetings, it would be neither practical nor desirable for government to be required to register every single communication on the integrated digital platform. We explore this further below.

Non-corporate communication channels and informal lobbying

20. The Lobbying Act defines the method of communications within scope as oral or written communications made personally to a Minister or permanent secretary relating to government business as defined in the Act.⁴⁵ Guidance issued by the Registrar of Consultant Lobbyists makes clear that communications includes “in person, in writing or digitally (including online meetings, telephone calls, emails and text messages on any platform).”⁴⁶ If a social media message or post is directed to an official or personal social media account and fits the criteria for consultant lobbying, this will require registration.⁴⁷

45 Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014, Part 1, s.2(3), available at: <https://www.legislation.gov.uk/ukpga/2014/4>

46 Office of the Registrar of Consultant Lobbyists, Guidance from the Registrar of Consultant Lobbyists, section 2.3.1, available at: <https://registrarofconsultantlobbyists.org.uk/guidance/guidance-from-the-registrar-of-consultant-lobbyists/#Exceptions-from-registration>

47 As above, section 2.3.4

21. The government's guidance on transparency releases requires government departments to publish details of ministers and senior civil servants' meetings with external organisations but not other methods of communication, such as non-corporate communication channels (NCCCs).
22. CSPL's 2021 report recommended, "The government should revise the categories of published information to close the loophole by which informal lobbying is not disclosed in departmental releases." Disclosure should be made where the representations to government are "serious, premeditated, and credible, or are given substantive consideration by ministers, special advisers or senior civil servants." The then government declined to do so, stating, "The Government does not believe that transparency obligations should include letters, WhatsApps, impromptu phone calls or emails, which do not alone evidence a substantive lobbying engagement. Where an 'informal' lobbying approach is granted time or resource by Government, it should result in a diarised engagement and therefore be recorded."⁴⁸
23. In his report into supply chain finance, Sir Nigel Boardman pointed out that "an extended interchange of messages on an instant messaging platform can serve as effective a lobbying device as a physical meeting." He recommended that government extend the definition of 'meeting' to include "all forms of non-public interactive dialogue which, were it face to face, would constitute a meeting requiring inclusion in the transparency return." He recommended that government publish a set of principles to support ministers and senior civil servants to decide whether an encounter should be disclosed and attached an appendix with a potential set of questions and accompanying guidance:
 - a. Was the discussion substantive?
 - b. Was the subject matter sensitive?
 - c. What was the duration of the encounter?
 - d. If the encounter was a meeting or call, what were the circumstances?
 - e. What is the relationship between the person lobbying and the person being lobbied?
 - f. What is the status of the person lobbying?
 - g. What medium was used for the access?
24. PACAC's report on post-legislative scrutiny of the Lobbying Act recommended that, "Where exchanges by means of NCCCs are in place of a face-to-face meeting or prompt significant consideration in government, they warrant inclusion in the government transparency releases."⁴⁹

48 GOV.UK, Strengthening Ethics and Integrity in Central government, page 19-20, available at: https://assets.publishing.service.gov.uk/media/64b7bff0ea2cb001315e5e1/CP_900_-_Strengthening_Ethics_and_Integrity_in_Central_Government_Accessible.pdf

49 PACAC, Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters, 2 May 2024, paragraph 37, available at: <https://committees.parliament.uk/publications/44541/documents/221331/default/>

25. We heard in the evidence we took that significant lobbying can take place through non-corporate communication channels, such as WhatsApp, SMS text messaging and private messaging on social media platforms, and that NCCCs should be included in government transparency returns. Written evidence from UCL Constitution Unit supported the principles-based approach advocated by Sir Nigel Boardman.⁵⁰

“I think people typically know when they’ve been lobbied.”

Oral evidence, **Baroness Anderson**, Parliamentary Secretary to Cabinet Office, 28 April 2026

26. The EIC has formed the view that ministers and officials should only be required to register communications on the digital platform where an attempt by an external organisation to influence government has led to the minister or official responding by way of a written communication, (including Whatsapp, email or any other method) or a commitment to meet that individual or another individual. For example, if a firm approaches a minister at a conference in relation to a government function and suggests that they might be able to help, this communication should be recorded by the lobbyist, as it would be lobbying activity, but the government would only be required to register the communication on the government side of the digital platform if the minister entered into a dialogue at the conference or agreed to a follow-up meeting or agreed to put them in touch with government officials.

Recommendation 13

Government transparency releases should include details of interactive dialogue through non-corporate communication channels, such as WhatsApp and informal meetings, such as those that take place at party conferences.

Departments should apply a principles-based approach when judging whether a communication warrants inclusion in the releases, taking into account whether the communication prompts significant consideration by government.

⁵⁰ Our recommendations are concerned with disclosure but there is a separate question about how non-corporate communications channels are used in government. The government launched an independent review of the use of non-corporate communications channels in government on 2 July 2026: <https://www.gov.uk/government/news/independent-review-of-the-use-of-non-corporate-communications-channels-in-government>

Senior officials and special advisers

27. The Lobbying Act requires communications with only ministers and permanent secretaries (or their equivalents as specified in the Act) to be registered. As set out in Chapter Two, we recommend that lobbyists should also have to register on the basis of any communications with special advisers, directors general, directors, or any other government advisers equivalent to director general or director level (paid or unpaid). This would include non-executive directors working in government.
28. Government transparency releases cover meetings between:
 - a. external organisations/individuals⁵¹ and ministers;
 - b. external organisations/individuals and department permanent secretaries, directors general, finance directors, commercial directors and directors who are senior responsible owners in the Government's Major Projects Portfolio at SCS2 grade and above; and
 - c. senior media figures and special advisers.
29. For the same reasons as described in Chapter Two and to support our goal for consistency between the two halves of the integrated digital platform for access to government, we recommend an expansion of the current scope of the government transparency releases to include all directors and all meetings that special advisers have with external organisations.

Recommendation 14

Meetings held between special advisers and external organisations should be included within government transparency releases.

Recommendation 15

Meetings between all directors and external organisations should be included within government transparency releases.

51 Government transparency data guidance clarifies that government bodies (UK, devolved or foreign) should not be included.

What information should be recorded?

30. The Lobbying Act requires those undertaking lobbying activities to register and declare basic information covering:
 - a. their name, address, senior management and company number (if applicable);
 - b. details of any industry code they are signed-up to;
 - c. the names of their clients during a relevant quarter; and
 - d. anything else prescribed in regulations.
31. The evidence we have heard is that this information is insufficient for a comprehensive understanding of the lobbying of government. Transparency requires that sufficient information is made available about who is lobbying government and the subject matter. When CSPL looked at this matter in its 2021 Upholding Standards in Public Life report, CSPL recommended that lobbyists should also have to declare the date, recipient and subject matter of their lobbying.
32. We consider that the following additional information should be included:
 - a. The ultimate intended beneficiary of the lobbying activity. Currently, consultant lobbyists have to reveal their client(s) but the client may not be the person paying the lobbyists' fees or the intended lobbying beneficiary. The Boardman report recommended that the rules be strengthened to include this information.⁵² This can be achieved by secondary legislation.
 - b. How the lobbying was undertaken, for example, by email, letter, phone call etc.
 - c. Details about how the organisation carrying out lobbying activity is funded (e.g. publicly traded, profit, membership, public grants, private donations).
33. The description of the subject matter of the lobbying should include the specific piece of legislation, policy or regulation being lobbied on.

52 GOV.UK, Review into the development and use of supply chain finance (and associated schemes) in government, Part 2: recommendations and suggestions, 5 August 2021, recommendation 17, available at: https://assets.publishing.service.gov.uk/media/61430bc6d3bf7f05b5a9035c/A_report_by_Nigel_Boardman_into_the_Development_and_Use_of_Supply_Chain_Finance__and_associated_schemes__related_to_Greensill_Capital_in_Government_-_Recommendations_and_Suggestions.pdf

Recommendation 16

For each specific instance of lobbying activity, the following information should be declared by the lobbyist:

- date of engagement
- recipient
- method of engagement
- subject matter (description to include specific legislation, policy or regulation targeted, where relevant)
- client represented (where relevant)
- ultimate intended beneficiary
- details of how the organisation is funded

34. Government guidance states that ministerial and senior civil servant transparency releases should include: the lead minister/official's name; the date the meeting took place; the name of the individual or organisation; and the purpose of the meeting, including any policy or legislation affected.⁵³
35. We consider that the following additional information should be included:
- a. In the case of meetings held with consultant lobbyists, the client being represented.
 - b. The ultimate intended beneficiary.
 - c. How the lobbying was undertaken, for example, by email, letter, phone call etc.
36. The information in (a) and (b) would be provided by the external organisation to the minister/senior official and would be included as a way of ensuring government is aware of the ultimate intended beneficiary at the time of the meeting and to support cross-checking the information provided.
37. Departments should continue to give due consideration to whether disclosure of information relating to meetings would engage exemptions under the Freedom of Information Act 2000. Government guidance notes that this would most commonly apply to sections 23-24, 26, 35-36 and 42 of the Act.⁵⁴ Where disclosure would engage an exemption under the FOI, this should be flagged on the record.

53 Cabinet Office, Guidance: Senior Officials' business expenses, hospitality received and meetings with external organisations and individuals, 2 February 2024, available at: https://assets.publishing.service.gov.uk/media/696fa4ac2b64f0e8c32e33b2/2024_04_02-Senior-Officials-Transparency-Guidance.pdf

54 As above, page 14

Recommendation 17

For each external meeting, the following information should be declared in the departmental transparency releases:

- date of engagement
- lead minister/official's name
- name of the individual or organisation
- method of engagement
- purpose of the meeting/subject matter (description to include specific legislation, policy or regulation affected, where relevant)
- client represented (where relevant)
- ultimate intended beneficiary

38. CSPL's 2021 report recommended that Cabinet Office should provide stricter guidelines on minimum standards for the descriptions of meetings and ensure compliance by government departments.
39. Despite the publication of new government guidance in 2024, independent research from Unlock Democracy, Transparency International and Spotlight on Corruption on the government transparency releases found that there has been no substantial improvement in the meaningfulness of descriptions of meetings throughout the past three years. The research found some departments were struggling to follow the government's own guidance. Within the sample period covered by the report, there were 114 entries reporting "introductory meeting" despite Cabinet Office asking departments not to do so.⁵⁵ The research also revealed significant gaps in the data where officials had not included meetings that it is clear from social media posts and gift and hospitality releases took place.⁵⁶

55 Independent research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 35, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

56 As above, paragraph 41-42

Departments should make every effort to provide a meaningful and clear description of the ‘purpose of the meeting’, succinctly capturing

- a. the key topic(s) discussed and:
- b. state any specific area(s) of government policy/legislation etc., affected.
- c. Broad descriptions such as ‘general discussion’, ‘introductory meeting’, ‘informal catch-up’, ‘bilateral meeting’ etc. should not normally be used.
- d. An example of a good description would be – ‘Discussion during visit to the National Space Centre, on the National Space Strategy and UK investment in the space sector’.

Extract from Guidance: **Senior Officials’ business expenses, hospitality received and meetings with external organisations and individuals**, version 2024-04-02, pages 13-14

40. We are clear that significant improvements are needed to the government’s transparency returns and we would encourage permanent secretaries to make this a priority for their departments. CSPL’s 2023 report, *Leading in Practice*, discussed how leaders influence behaviour through where they direct their attention and by the actions that demonstrate whether what they do is aligned with what they claim is important to them. Leadership in this context means helping their teams to understand why the public should know who is meeting government ministers and officials and how everyone in the organisation has a part to play in building a culture of transparency. It requires a relentless focus on the publication of timely and meaningful transparency data, so that this work continues alongside, and is not thrown off course by, the day to day challenges of government.

Recommendation 18

Government departments should comply with Cabinet Office guidance that the description of the purpose of meetings should be meaningful and clear.

Frequency of disclosure

41. Registered consultant lobbyists must submit Information Returns on a quarterly basis. We heard that information is most valuable if it is available as close as possible to the date that the communication took place.
42. There are different approaches taken internationally to the frequency of reporting. Some countries require quarterly, biannual or even annual reporting. Under Canadian federal lobbying rules, lobbyists must file a monthly Communication Report if they had a reportable communication during the specific month.
43. Timeliness is a prerequisite for meaningful transparency. The government publishes data on meetings with external organisations quarterly, up to three months after the end of a reporting period, which means that transparency releases are not published until three to six months after the meetings have taken place. Research commissioned by the EIC showed that the government has improved its performance against its own targets but pointed to the lack of timeliness in the publication schedule. The transparency releases are of most value if they are made in time to be actionable or relevant. A lack of timeliness can have significant consequences, obscuring who the government is meeting in the critical months before decisions are made. The report included two examples where the monthly reporting of meetings would have flagged earlier the lack of engagement with organisations interested in issues directly relevant to proposed legislation at the point at which the bills were being drafted.⁵⁷
44. CSPL's 2021 report recommended the government should publish all transparency returns monthly and the EIC stands by this recommendation. Cabinet Office now publishes monthly releases for ministerial gifts and hospitality, but gifts and hospitality releases for officials are still published quarterly by departments, as are records of external meetings for both ministers and senior officials. This needs to change. Lobbyists and government departments should submit returns by a fixed date each month. Checking the returns, supported by AI algorithms, should take no longer than one month from submission, enabling the government and registrar to publish all transparency returns no later than two months from them first being entered.

Recommendation 19

Lobbyists and government departments should submit returns on a monthly basis. Government and the Registrar should publish all transparency returns no later than two months from them first being entered.

57 Independent research on government transparency releases, Unlock Democracy, Transparency International, Spotlight on Corruption, May 2026, paragraph 23-31, available at: <https://eic.independent-commission.uk/wp-content/uploads/2026/05/EIC-research-report-lobbying-May-2026.pdf>

4

The Office of the Registrar of Lobbyists



The role of the Registrar

1. As explained in Chapter One, rather than recommending moving to a full regulatory regime our recommendations focus on enhancing meaningful transparency. Bringing the lobbying of government more fully into the open will reveal any patterns of undue access or repeated privileged contact that can then be investigated and addressed appropriately. We anticipate that greater transparency will deter inappropriate behaviour and assist government with meeting the commitment in the Ministerial Code to “meet many people and organisations and consider a wide range of views as part of the formulation of government policy.”⁵⁸
2. Our recommendation that all lobbyists should be required to register whenever they lobby government will not require a fundamental shift in the nature of the role of the Registrar. The core purpose of the Registrar would continue to be to oversee a register of lobbyists rather than to become a regulator whose role is also to investigate and monitor compliance with a lobbyists’ code of conduct.
3. As we set out in Chapter Three, we propose that the Registrar takes on additional duties in relation to the digital platform for access to government. The Office of the Registrar of Lobbyists would have the role of caseworking any anomalies flagged by the platform between the data entered by lobbyists and government departments about the same engagement. They would also produce biannual reports for the Chief Operating Officer on the themes arising from their work, to be used by government to improve the quality of their releases.

Resourcing the Office of the Registrar of Lobbyists

4. The necessary consequence of updating the current system to deliver meaningful transparency of who is lobbying the government, and the matters on which they are seeking to exert influence, is that the Office of the Registrar of Lobbyists will need to be appropriately resourced. Expanding the Register of Consultant Lobbyists to become the Register of Lobbying and requiring monthly returns will significantly increase the number of lobbyists on the register and the number of returns that the Office of the Registrar would need to monitor. Additional resources will also need to be allocated to raising awareness and educating lobbyists about the new requirements.
5. ORCL currently consists of the Registrar, a Head of Office and two administrators. To realise the improvements that our recommendations will bring, the Office of the Register will require a substantial but necessary uplift in headcount and budget to support the increase in the number of registrants and the additional duties required of the office in relation to the proposed new caseworking function.

58 Cabinet Office, Ministerial Code, 13 October 2025, paragraph 8.13, available at: <https://www.gov.uk/government/publications/ministerial-code>

Recommendation 20

The Office of the Registrar of Lobbyists needs to be suitably resourced to ensure it has the capacity and technical capability to deliver its expanded role.

6. The Lobbying Act established the Registrar to be self-financing, with section 22(3) stipulating that regulations must ensure that the total paid to the Registrar in charges is sufficient to offset the total of the costs incurred by the Registrar in exercising their functions. In practice the Office is funded via Grant in Aid from Cabinet Office with the Office recouping its costs (excluding its staffing and Cabinet Office shared services costs) via the fees charged to registrants for using the Register.⁵⁹

A graduated fee structure

7. Registration costs £1000 a calendar year. This is made up of the registration fee of £950 and £12.50 per Quarterly Information Return period. There is also a fee of £12.50 for processing the initial registration. Fee levels are determined by the Cabinet Office through secondary legislation and have not increased since 2015.⁶⁰
8. We recommend the current flat fee is replaced by a graduated fee structure. This should start at zero or a nominal fee, for example for smaller charities and not-for-profit community based organisations, with global corporations paying the highest fees. A sliding scale should operate that takes into account the size of the organisation and the volume of lobbying activity. UCL Constitution Unit suggested to us that Cabinet Office, working with the CIPR and PRCA, should be able to forecast the likely level of demand if in-house lobbyists are included and set the fees accordingly. The proposed expansion of the requirement to register should lead to a significant increase in the fees received.

⁵⁹ Registrar of Consultant Lobbyists, Memorandum of Understanding between the Cabinet Office and the Registrar of Consultant Lobbyists, 21 January 2025, available at: <https://registrarofconsultantlobbyists.org.uk/memorandum-of-understanding-2/#Finance-and-accountability-arrangements>

⁶⁰ Written evidence, Robert Hazell, Professor of Government and the Constitution; Sir Peter Riddell, Honorary Professor; and Lisa James, Senior Research Fellow, UCL Constitution Unit

9. It is of note that registration for lobbying registers in comparator OECD jurisdictions – including Australia, Canada, the EU, France, Germany, Scotland, USA and Ireland – is free.⁶¹ Some contributors to our review argued that the cost to register with the UK Registrar should be removed entirely. As a matter of principle, we consider it would be preferable for there to be no fee at all. This would demonstrate that government considers transparency to be a public good and is willing to shoulder the cost. However, we acknowledge that pressures on the public purse mean a centrally funded system may not be feasible. A graduated fee scheme ensures that those who stand to gain the most financially from lobbying government subsidise the cost of registering for charities and not-for-profit organisations.

Recommendation 21

There should be a graduated fee structure for lobbyists to register with the Registrar of Lobbyists.

Funding the integrated AI-enabled digital platform for access to government

10. An initial capital investment would be needed to build the integrated AI-enabled digital platform but, once operational, it would result in time savings for departments because a central database that utilises modern technology would be far easier to administer than the current collection of individual webpages. In addition, as discussed in Chapter One, the new system would deliver significant benefits for government as a policy making and stakeholder engagement tool, by providing a complete picture of the organisations seeking to exert influence and the various levels at which organisations are engaging with government. It is our contention that, ultimately, an integrated platform will create a system that is more worthy of public trust. The value of such a system is difficult to quantify but should carry significant weight in the cost-benefit calculation.

61 Written evidence, Spotlight on Corruption, paragraph 28

Spotlight on Corruption has calculated the staff costs of inputting into departmental transparency releases, combined with the cost of Cabinet Office quality assuring and uploading the releases to gov.uk as £26,194 per month. This is based on the assumption that each transparency return is filled in by a junior official, checked by a mid-level official, and cleared by a senior civil servant.

Written evidence, **Spotlight on Corruption**⁶²

11. Spotlight on Corruption has suggested the current IT update to the Scottish lobbying register is instructive. The tender document for this suggests that the cost of full system implementation and set up of the register would be £300,000, with annual maintenance costs of £50-75,000. The Scottish government is expecting to pay £2 million over 9.5 years.

Enforcement

12. If a person or organisation commits an offence under the Lobbying Act, the Registrar can impose a civil penalty of up to £7,500. The Registrar may refer the matter to the Director of Public Prosecutions for potential criminal prosecution, although Claire Bassett told us that she is not aware of criminal proceedings ever having been issued for a breach of Part 1 of the Lobbying Act.
13. Twelve notices of intention to issue a civil penalty for non-compliance were issued in 2024-25, the bulk of which resulted in a penalty being issued.⁶³ Claire Bassett told us that, since ORCL was established, there have been 31 penalty notices issued for pre-registration lobbying. The maximum fine has been used just once since ORCL was established.
14. The principal issue raised in the evidence we heard is that so little of the lobbying of government falls within the scope of the Register. The EIC's recommendations would expand the scope of the Register to include in-house lobbyists and remove the current VAT and incidental lobbying exemptions. It is important to consider whether the maximum level of fine available to the Registrar is sufficient to support compliance once the Register is opened up to a much broader cohort.

⁶² The figure was updated by Spotlight on Corruption following submission of their written evidence to include an estimate of Cabinet Office quality assuring and uploading the releases to gov.uk, as well as the cost originally calculated of departments collating the releases.

⁶³ Office of the Registrar of Consultant Lobbyists, Annual Report and Accounts 2024-2025, Objective 4: Ensure Compliance, available at: <https://registrarofconsultantlobbyists.org.uk/annual-report-and-accounts-2024-to-2025/>

15. The OECD recommends that member countries “provide for fair, objective, proportionate, timely and dissuasive sanctions for non-compliance with policies and regulations concerning lobbying and influence, through disciplinary, administrative, civil and/or criminal processes.”⁶⁴
16. Several contributors to our review argued that a maximum fine of £7,500 is insufficient to deter non-compliance and there is a risk of the fine being seen by some organisations as a cost of doing business. We heard that, given lobbying can be a highly profitable activity, there should be serious penalties for those who deliberately seek to avoid disclosure.

“I do think that the £7,500 cap on fines needs to be increased substantially... I think that Germany has the ability to impose fines of up to €50,000 for non-compliance, as I understand it. Otherwise, this is treated as nothing more than a risk that individuals are willing to bear and it does not drive the right behaviours, but it drives a culture of impunity, where individuals and firms that don’t register don’t get fined, or do get fined a paltry sum, feel as if they can continue in that vein.”

Oral evidence, **Phil Brickell**, Chair, APPG on Anti-Corruption and Responsible Tax, 20 April 2026

17. ORCL’s available penalties of £7,500 are comparable with Scotland (£5,000) but far smaller than the EU (£50,000), Germany (£50,000), Canada (£113,000) and the US (£154,000).⁶⁵
18. We consider that there should be a substantial uplift in the maximum size of the civil penalty. The level of the fine should be decided by government following consultation. However, based on the above comparators, we would suggest that a tenfold increase to £75,000 per offence would be a reasonable starting place for discussions. The maximum sum of the fine should be set out in secondary legislation so that there is scope for adjustment should the limit need revising. Safeguards should be put in place to protect against the risk of large fines placing a disproportionate burden on smaller organisations with fewer resources.
19. The Registrar has a duty to monitor compliance with the obligations imposed by or under Part 1 of the Lobbying Act, but may currently only investigate any person who is either registered or not registered but the Registrar has reasonable grounds for believing to be a consultant lobbyist.

64 OECD, Recommendation of the Council on Transparency and Integrity in Lobbying and Influence, recommendation X, available at: <https://legalinstruments.oecd.org/public/doc/256/256.en.pdf>

65 Written evidence, InfluenceMap

20. Government should consider whether the Registrar should be granted new powers to initiate investigations, to support the Registrar with monitoring and enforcing compliance with an expanded register.

Recommendation 22

There should be a significant increase in the maximum level of civil penalty that can be imposed by the Registrar for offences under the Lobbying Act, including carrying out lobbying when unregistered.

21. Claire Bassett, the Registrar of Consultant Lobbyists, raised awareness as being a key factor to consider in relation to compliance. ORCL is reviewing their awareness raising activities as part of this year's business plan. However, with a team of only three, their size will have a bearing on what is possible and they will be looking for ways to maximise their impact. Raising awareness of the new responsibilities on all lobbyists to register their lobbying of government will be an important aspect of the Office of the Registrar of Lobbyists and will need adequate resourcing.

5

Business Appointment Rules



About the Business Appointment Rules

1. The Business Appointment Rules (the Rules or BARs) are a set of principles that apply to ministers and crown servants at all levels, including all civil servants, diplomats and special advisers, when accepting new appointments on leaving government. The Rules are owned by Cabinet Office. Their purpose is to safeguard against the improper exploitation of privileged access or information, protecting public office by avoiding reasonable concerns that:
 - a. an appointment might be a reward for past favours; or
 - b. an employer might gain an improper advantage by appointing a former official or minister who holds information about its competitors, or about impending government policy; or
 - c. a former official or minister might improperly exploit privileged access to contacts in government.⁶⁶
2. The Rules were introduced in 1975, alongside the creation of the Advisory Committee on Business Appointments (ACOBA), a non-statutory public body. Initially ACOBA only provided advice on outside appointments sought by the most senior civil servants. In 1995, following recommendations from the Committee on Standards in Public Life, ACOBA's remit was expanded to provide independent advice to former ministers on their employment within two years of leaving office.
3. For civil servants, the Rules apply for either one or two years after leaving public office, depending on the seniority of the applicant and/or the nature of their work. While ACOBA considered applications for director general and permanent secretary level appointments, government departments considered applications under the Rules at more junior levels.
4. ACOBA was closed on 13 October 2025. Its function to provide independent advice on the application of the Rules in respect of the most senior civil servants and special advisers was transferred to the Civil Service Commission and its function to provide independent advice to former ministers was transferred to the Independent Adviser on Ministerial Standards.⁶⁷ The Rules are now distributed across eight separate bodies, as set out in the table below.

66 Cabinet Office, Collection, Business Appointment Rules, available at: <https://www.gov.uk/government/collections/business-appointment-rules>

67 UK Parliament, WMS, Government of service, Statement UIN HCWS870, 21 July 2025, available at: <https://questions-statements.parliament.uk/written-statements/detail/2025-07-21/hcws870>

Responsible body	Category of applicant
The Office of the Independent Adviser on Ministerial Standards (IA)	Ministers
The Civil Service Commission (CSC)	Senior civil servants (director general and above) and special advisers (pay band 4)
The Ministry of Defence (MOD)	Military personnel
The Scottish Government	Scottish government ministers and civil servants
The Welsh Government	Welsh government ministers and civil servants
GCHQ	Civil servants in their employment
Security Service (MI5)	Crown servants in their employment
Secret Intelligence Service (MI6)	Crown servants in their employment

Weaknesses of the current system

Lack of central coordination

- Before being disbanded, ACOBA was criticised for numerous limitations: its lack of investigatory powers; its advice not having a basis in law and, for having no means of independently enforcing its advice. ACOBA's track record for providing timely advice was also a source of discontent for applicants. We discuss below how the post-ACOBA reforms have led to some improvements, particularly with regard to processing times but our review has found that dispersing the responsibility for considering BARs applications across eight separate bodies has had the consequence of removing the coordination and standardisation function which the system now lacks.
- Some bodies, including the Office of the Independent Adviser and the Civil Service Commission, have started work to interpret the Rules as they apply to those individuals within their remit. This is to be welcomed. However, without leadership and coordination between the bodies, the system is at risk of regulatory divergence, reduced transparency and disparity in the treatment of individuals accessing different parts of the system.

“The substance of their advice [Civil Service Commission and the Independent Adviser] may be the same, but it will be important to avoid the impression that there is any difference in the way ministers’ and officials’ applications are handled.”

Written evidence, **Robert Hazell**, Professor of Government and the Constitution; **Sir Peter Riddell**, Honorary Professor; and **Lisa James**, Senior Research Fellow, UCL Constitution Unit

The modern employment landscape

7. Today’s employment landscape is increasingly complex. The reliance on technology and new technological advances has meant that the public sector needs to draw on private sector expertise to deliver public services. This has led to more frequent interchange between the public and private sectors. People are no longer expected to have a single career. Experts predict that people will have many careers and, because we all work for longer, there is a greater focus on an individual’s core skills and lifelong learning over organisational loyalty.⁶⁸
8. In her evidence to the EIC, Baroness Stuart, the First Civil Service Commissioner, emphasised the need for the BARs in a modern environment to strike a balance between protecting privileged information and maintaining a permeable public sector workforce, attractive to outside talent.
9. In her 2025 written evidence to the Public Administration and Constitutional Affairs Committee (PACAC), Isobel Doerty, the interim chair of ACOBA from April to October 2025 acknowledged a need for the BARs to “better reflect the modern employment landscape”, citing the following considerations:
 - a. the need to bring short term specialist skills into the Civil Service;
 - b. the benefit of sharing experience gained in public service with industry and other private sector employers; and
 - c. an increasing number of those leaving government and the Civil Service to work on short term contracts and in portfolio careers.⁶⁹

68 World Economic Forum, ‘Having many careers will be the norm, experts say’, 2 May 2023, available at: <https://www.weforum.org/stories/2023/05/workers-multiple-careers-jobs-skills/>

69 Statement of evidence from the then Interim Chair of ACOBA for PACAC inquiry, “Propriety, ethics and the wider standards landscape in the UK”, 16 September, available at: https://assets.publishing.service.gov.uk/media/68ebd849e5f463a62cb9868b/2025-09_Submission_to_PACAC_-_ACOBA_closure___the_wider_ethical_standards_landscape__1_.pdf

10. This movement should be welcomed. The government can benefit from specialist expertise, commercial knowledge and technical skills gained outside government and the private sector benefits by employing people who understand government and its processes. However, the more frequent movement of individuals needs to be reflected in the rules in a proportionate way that is based on risk.

Lack of meaningful sanctions for breaching the Rules

11. Above all, the Rules have been criticised for being unenforceable. The former Chair of ACOBA, Lord Pickles, described the system as “toothless”.⁷⁰ In evidence to our review, Sir Peter Riddell, Robert Hazell and Lisa James of UCL’s Constitution Unit, emphasised that the system can only be effective if individuals comply with the Rules and argued for effective, legal sanctions – ideally robust financial penalties – for non-compliance. Whilst rules do not always need to be accompanied by sanctions it is commonly understood, and expected, that there will be a penalty for those who breach them. Penalties must, however, be proportionate and differentiate between flagrant or persistent breaches and administrative errors, which, whilst they would constitute a breach, should not necessarily attract an automatic sanction.

“The rules provide a reasonable procedural framework but are undermined by the absence of meaningful sanctions, weak oversight, and a culture of self-regulation that can be easily exploited.”

Written evidence, **The Chartered Institute of Public Relations (CIPR)**

12. In its 2021 report, Upholding Standards in Public Life, CSPL recommended making adherence to the Rules a legally enforceable requirement. In response to that recommendation, the government agreed to strengthen the Rules by increasing detail in contractual clauses for civil servants and by developing a ministerial deed to legally commit ministers to the Rules.⁷¹ Whilst a 2025 update to the Ministerial Code set an expectation that former ministers repay their severance payments where serious breaches of the Rules occur it remains the case that there is no legal requirement for them to do so.⁷²

70 The Guardian, ‘Bring in new lobbying rules for ex-ministers by autumn, says watchdog’, Rowena Mason, 27 July 2023, available at: <https://www.theguardian.com/politics/2023/jul/27/ex-ministers-who-break-uk-lobbying-rules-should-be-fined-says-watchdog>

71 GOV.UK, Strengthening Ethics and Integrity in Central government, section 1.3, available at: https://assets.publishing.service.gov.uk/media/64b7bff0ea2cb001315e5e1/CP_900_-_Strengthening_Ethics_and_Integrity_in_Central_Government_Accessible.pdf

72 Cabinet Office, Ministerial Code, 13 October 2025, paragraph 1.14, available at: <https://www.gov.uk/government/publications/ministerial-code>

The EICs approach to reform

13. The EIC's view is that, in reviewing the Business Appointment Rules, the Government must consider the core purpose and principles of the system. The BARs are an important part of the standards landscape and should be reformed to offer clear and equitable rules which, when applied consistently and reported on transparently, will play an important role in public trust in government.
14. Without fundamental change, the continued reliance on an outdated and weakly enforced system risks further undermining public trust and perpetuating systemic problems concerning standards in public life.

“Once you've identified the principle, the rules that embody that principle and specifically reflect those principles, those rules must be enforceable, and in order to be enforceable, they need to be clear and certain.”

Oral evidence, **Daniel Greenberg**, Parliamentary Commissioner for Standards, 17 April 2026

“The principles, I think, are that the system needs to be efficient and effective; so, by efficient, it needs to be much speedier and less bureaucratic than it was when it was run by ACOBA. It needs to be effective in that the Rules need to be complied with, and in cases of non-compliance, there need to be effective sanctions.”

Oral evidence, **Robert Hazell**, Professor of Government and the Constitution, UCL Constitution Unit, 21 April 2026

15. Whilst the majority of people who engage with the BARs process comply with the rules, it only takes one egregious case to negatively impact public perception. At the same time the EIC believes that it is vital that good candidates are attracted to public service and that the Rules and any reforms to them should be proportionate to the risk.

Recommendations for improvement

Central leadership and coordination

16. A system that involves eight separate bodies making decisions about applications under parallel business appointment rules carries an inherent risk of inconsistency of interpretation and, therefore, unfairness in how the Rules are applied to different public office holders.

“There’s also a risk around fragmentation in terms of how, for instance, the Civil Service Commission manages that revolving door risk compared to how it’s managed for former ministers. I think there does need to be a means by which there is consistency applied through the system, regardless as to what the nature of the previous role you held, compared to how it manifests itself around the new role that you wish to take on.”

Oral evidence, **Phil Brickell MP**, Chair, APPG on Anti-Corruption and Responsible Tax, 20 April 2026

17. As the owner of the Business Appointment Rules, Cabinet Office is best-placed to perform the leadership and coordination role that has been missing since the closure of ACOBA. Cabinet Office should convene a regular meeting of the eight bodies to promote shared standards and best practice. The meeting will provide a forum for supporting the eight bodies to discuss the way in which the Rules are interpreted and applied and to identify and address emerging trends and changes to the landscape. Cabinet Office should consider how it coordinates meetings to ensure that national security considerations, relating to the roles held by former employees of the security agencies, are taken into account.

Recommendation 23

Cabinet Office should coordinate a forum of the bodies responsible for considering applications under the Business Appointment Rules. This should identify common areas encountered and best practice for managing these, by providing support and advice. The forum should meet twice yearly and produce an annual report sharing key themes and learning.

Review of the Business Appointment Rules

Reflecting modern employment practices

18. As Isobel Doverty set out in her evidence to PACAC, the Business Appointment Rules were first drafted over fifty years ago when applications for advice were largely from those taking up private sector posts on retirement.⁷³ The evidence to our review is that the Business Appointment Rules framework does not reflect the realities of modern public service careers, where there is more fluid movement between the public and private sectors. Some parts of the public sector are increasingly seeing what might be termed “zig-zag careers”, where individuals move between government, industry and consultancy roles. As we discussed earlier, this can bring benefits to the public sector, providing that risks to the integrity of government are mitigated appropriately.
19. The Civil Service Commission launched a review of the Business Appointments Rules for civil servants in April 2026, with the objective of looking “at how the Rules can better support a modern Civil Service, where movement in and out is possible and positive.”⁷⁴ The Civil Service Commission’s review is due to conclude in the autumn.
20. The EIC considers that the modernisation of the Business Appointment Rules framework is long overdue. Cabinet Office should update the Rules as a matter of priority, taking into account the findings of the review of the Civil Service Commission and following consultation with the Independent Adviser on Ministerial Standards and the other bodies with responsibility for administering the Rules.
21. Cabinet Office should take the opportunity to rename the Rules to better reflect their purpose as post public office appointment rules and to support understanding of their requirements.

73 Statement of evidence from the then Interim Chair of ACOBA for PACAC inquiry, “Propriety, ethics and the wider standards landscape in the UK”, 16 September, available at: https://assets.publishing.service.gov.uk/media/68ebd849e5f463a62cb9868b/2025-09_Submission_to_PACAC_-_ACOBAs_closure_the_wider_ethical_standards_landscape__1_.pdf

74 Civil Service Commission, Advising on exits – improving the Business Appointments process, 16 April 2026, available at: <https://civilservicecommission.independent.gov.uk/2026/04/advising-on-exits-improving-the-business-appointments-process/>

Risk-based administration of the Rules

22. The Civil Service Commission and the Office of the Independent Adviser categorise applications into two groups, according to the type of prospective role on which advice is being sought:

Level 1 – a briefer application form and a streamlined process are used for appointments where the risks to Government integrity are recognised to be low and appropriately managed by the standard conditions, for example for unpaid positions and non-executive charity roles.

Level 2 – for all other roles, including proposals to establish consultancies, applicants must submit detailed information about the role and any previous involvement they had with the appointing entity whilst in public office.

The relevant government departments verify the information submitted and provide a view on appropriate mitigations. The advice provided by the Independent Adviser or the Civil Service is then based on a risk analysis of all of the information received.⁷⁵

23. The EIC supports a risk-based approach to considering applications, which allows attention to be directed to higher risk cases while simplifying the process for the types of roles that are less likely to give rise to a concern that it could be considered a reward for decisions made in public office or where privileged information or contacts could afford the appointing organisation an unfair advantage. We consider that Cabinet Office should formalise this approach within the updated Business Appointment Rules and that it should be adopted by all BARs bodies.
24. The administration of the Business Appointment Rules has historically operated according to grade or rank, with ACOBA considering applications from Crown Servants at permanent secretary and director general level and special advisers at Pay Band 4. The Civil Service Commission now considers applications for civil servants and special advisers at the same level.
25. The premise underpinning this grade or rank-based system is that greater seniority correlates with a higher potential for risk. The evidence we heard suggests, however, that this core assumption is not always the case. Risks relating to access to information, influence and conflicts of interests can arise across a broader range of grades than currently considered by the Civil Service Commission and submitted to the Prime Minister for approval.

75 Explanation of categories drawn from the Independent Adviser's Annual Report 2025-26, paragraph 4.3, available at: https://assets.publishing.service.gov.uk/media/6a1828b9050971fbeb3bbb0/2026-05-28_Independent_Adviser_Annual_Report_2025-26.pdf

“[...] we only deal with the top civil servants. Below us – if that is the right word – it is the responsibility of the board of the different Government Departments or Ministries. In truth, that is the area that I was most concerned about when I went in, and I thought the last Government were extraordinarily lucky not to have a scandal operating.”

Lord Pickles, former Chair of ACOBA, PACAC in 2025

26. In evidence to PACAC in 2025, Lord Pickles remarked that lower-grade public servants are attractive to corporates on the basis that they have been “the people actually physically doing the job”, as opposed to top civil servants or Ministers.⁷⁶
27. Some government roles are likely to give rise to a higher level of risk than others, for example, commercial roles where former public servants have had official dealings with their prospective employer or had access to commercially sensitive information of competitors of their prospective employer. The MOD told us that they have adopted a modified application form asking for extensive information on commercial experience and contracts regardless of the applicant’s rank.
28. We recommend that, as part of the modernisation of the Business Appointment Rules, Cabinet Office should include risk-based criteria for departments to escalate high-risk cases below director general level to the Civil Service Commission for consideration and ultimately, to the Prime Minister for decision. The evidence suggests that government should move towards a more proportionate and risk-based model based on the nature of the individual’s role, their access to commercially sensitive information, their involvement in procurement or regulation and the extent of their external interests and networks.
29. The Civil Service Commission has launched an audit of how departments apply Business Appointment Rules to grades below SCS3, the results of which should be used to inform the approach for the administration of the rules.
30. Cabinet Office should develop guidance that would act as a framework for bodies, and departments feeding into those bodies, to assess risk in a consistent way. The implementation of a risk matrix framework may help bodies to assess risk equitably. Baroness Stuart, the First Civil Service Commissioner, cautioned that it remains important to maintain a proportional outlook and to exercise discretion when interpreting the risk of individual cases.

76 PACAC, The Work of the Advisory Committee on Business Appointments, HC 957, oral evidence from Rt Hon Lord Pickles, 10 June 2025, available at: <https://committees.parliament.uk/oralevidence/16069/html/>

31. Until 2010, ACOBA guidance stated that “there may be occasions when a Minister decides that the national interest is the overriding consideration, regardless of the circumstances of the case”.⁷⁷ The evidence taken during this review suggests that some bodies do still consider “national interest” as a mitigating factor in their adjudication. The EIC is of the view that “national interest” should not be determined by an individual department alone. Guidance on how to consider matters of national interest would assist bodies making decisions on BARs applications. This would also support consistent application and help to ensure that an independent view is sought, for example by a national security adviser on national security matters.

Recommendation 24

Cabinet Office should provide guidance to bodies making decisions on BARs applications on how to consider matters of national interest.

Expanding the Rules to cover non-executive directors

32. Non-executive directors (NEDs) and other similar government advisers play a significant and valuable role across government departments, providing external expertise, commercial experience and independent challenge. However, they are not currently subject to the Business Appointment Rules. While such expertise can provide substantial benefits to government, the lack of oversight arrangements once NEDs have left their posts is an obvious gap in the scope of the Rules which should be considered in the update to the Rules.
33. In summary, the modernisation of the Business Appointment Rules should ensure that they:
- a. are applied in a way that is efficient, effective and equitable;
 - b. reflect modern employment patterns including “zig-zag” career paths; and
 - c. fully incorporate a risk-based approach.

Consideration should also be given to extending the Rules to cover non-executive directors and potentially other appointments not currently in scope.

77 GOV.UK, ACOBA, Eleventh Report 2009 – 2010, available at: <https://assets.publishing.service.gov.uk/media/5a800c8040f0b62302691339/acobaeleventhreport2009-2010.pdf>

Recommendation 25

Cabinet Office should modernise the Business Appointment Rules to ensure that they provide a robust framework for protecting public office while not dissuading outside talent from entering public service. The update to the Rules should take into account the outcome of the Civil Service Commission review of the Rules for civil servants.

Recommendation 26

The name of the Business Appointment Rules should be updated to better reflect their purpose.

Recommendation 27

The modernisation of the Business Appointment Rules should require applications to be dealt with according to the risk presented by an outside appointment, building on the broad categorisation approach adopted post ACOBA.

Recommendation 28

Cabinet Office should consider extending the scope of the Business Appointment Rules to include non-executive directors and other similar government advisers.

Service and Compliance

34. The timeliness of advice being given to applicants is critical to ensuring they are willing and able to comply with the system, sometimes on a repeated basis. The Office of the Independent Adviser and the Civil Service Commission both told us that compliance can be best encouraged and secured by ensuring prompt and efficient service to those interacting with the system.
35. Under ACOBA, delays and lack of communication were widely viewed as undermining confidence in the process, with many applicants having to wait an unreasonably long time before receiving advice on prospective roles. The Independent Adviser made reference to this in his evidence session, reflecting on feedback from former ministers and civil servants that the process was “opaque”.
36. We heard that the streamlined approach taken by the Civil Service Commission and the Independent Adviser to lower risk applications has had a significant impact on the pace with which applications are processed. Baroness Stuart commented on the positive feedback the Commission has received from applicants about the steps taken to improve customer service for applicants so they have a better understanding of where their application is in the system.

Performance data from the Office of the Independent Adviser

61 applications received between 13 October 2025 to 31 March 2026. Advice issued within 20 working days for 98% of the cases.⁷⁸

37. This is important because delays can carry practical and financial consequences for individuals, which can be all the more frustrating when communication around timelines is unclear. Evidence gathered during the review suggests that greater clarity and consistency within the Business Appointment Rules process would support compliance. Those subject to Rules should be told what is expected of them before, during and after the process – and their obligation to comply with the requirements of the Rules should be brought to their attention when they are first employed.
38. We also heard that confidence in the process is closely linked to perceived fairness and responsiveness of the system. Clearer expectations, better tracking and more timely communication are likely to drive up voluntary compliance.

⁷⁸ GOV.UK, Independent Adviser on Ministerial Standards Annual Report 2025-2026, 28 May, available at: https://assets.publishing.service.gov.uk/media/6a1828b9050971fbbbf3bbb0/2026-05-28_Independent_Adviser_Annual_Report_2025-26.pdf

“We need to make sure, if we’re asking people to properly comply with these rules, that there are clear KPIs and they have the expectations of how long they’re going to have to wait for a decision to be made ...”

Oral evidence, **Baroness Anderson**, Parliamentary Secretary to Cabinet Office, 28 April 2026

Recommendation 29

Cabinet Office should work with the eight BARs bodies to agree and publish minimum service levels and key performance indicators (KPIs) for all stages of the application process.

Recommendation 30

Cabinet Office should monitor performance against minimum service levels and KPIs, holding departments that fail to meet them to account. It should review any complaints referred to it by a body in relation to the processing or adjudication of BARs applications and provide advice.

39. Evidence also suggests that delays are often caused by repeated requests for additional information later in the process. ACOBA’s 21st report noted that more complex applications required extensive consultation with departments to clarify an applicant’s involvement in previous policy or procurement, resulting in longer time taken to consider such applications.⁷⁹ This can be of particular significance in departments feeding into the Civil Service Commission, who may have limited experience of the BARs.
40. The EIC considers that greater standardisation across the process could help reduce avoidable delays and improve overall user experience. Some delays are caused by line managers failing to complete assessments in a timely manner. This could be improved by the use of technology. The implementation of a single, intuitive, comprehensive online application form, used across all eight bodies administering the Business Appointment Rules, would provide support to users whilst providing greater consistency in the consideration of applications. It would also provide greater clarity on what is expected of those subject to the Rules.

79 GOV.UK, Advisory Committee on Business Appointments, 21st Report, April 2020 to March 2024, available at: https://assets.publishing.service.gov.uk/media/669923de0808eaf43b50d22c/Advisory_Committee_on_Business_Appointments-21st_Report_-_April_2020_to_March_2024_PDF.pdf

41. Online application forms are familiar to users. A single form could be tailored to the different needs of the eight bodies, through options which when selected at the outset from drop-down menus, bring up the relevant questions for that body. The form could make use of text boxes that pop up, known as ‘tooltips’, which provide guidance through quick hints, explanations and clarifications to users when completing sections. This would make it easier for users to input the relevant information correctly from the outset and in doing so minimise errors which have led to delay.

Recommendation 31

Cabinet Office should provide guidance to all those subject to the Business Appointment Rules on their obligations in advance of them needing to interact with the system and provide guidance to line managers completing Business Appointment Rules forms for staff.

Recommendation 32

Cabinet Office should oversee the development of an intuitive online application form, to be used by all applicants seeking advice under the BARs and tailored to meet the requirements of each body. This application form should prompt users to ensure timely completion, act as a performance tracker and flag areas of common issue.

Enforcement and sanctions

42. The bodies consulted in this review agreed that most applicants accept that they have a responsibility to comply with the Business Appointment Rules. Indeed, the Independent Adviser observed a strong willingness among applicants to do so. However, clear rule breaking, while rare, results in negative media coverage, which highlights the lack of sanctions for breaches of the Rules.
43. We heard evidence that legal enforcement of the Rules is necessary to address concerns regarding non-compliance. During evidence we heard that the government had explored enforcement options but legal experts had determined that any such provisions would not be enforceable, unless the government committed to instituting criminal sanctions.

“The current approach of restricting post-ministerial appointments without compensation (i.e. akin to unpaid gardening leave) relies on former ministers’ willingness to cooperate. I think introducing a more proscriptive regime could jeopardise that and would be difficult, in any event, to enforce.”

Oral evidence, **Sir Laurie Magnus**, Independent Adviser on Ministerial Standards, 31 March 2026

44. The Netherlands has stringent new post-employment rules, combined with taxpayer-funded transition payments. Reporting suggests the new rules are making it difficult for former Ministers to find new employment, leaving 65 of them on taxpayer-funded waiting allowances. This, it is reported, has increased costs to taxpayers by millions of euros.⁸⁰ Academics consulted during this review thought there would be little appetite for similar allowances in the UK.
45. Whilst there are risks associated with former public service workers moving to the private sector, those we consulted in the Welsh Government made the point that the benefits of the so-called ‘revolving door’ are not often discussed publicly; for example, talented individuals bringing knowledge and experience to the private sector and thereby contributing to economic growth in the UK.
46. A legally enforceable system could have the unintended consequence of deterring talented individuals from joining the public sector, and a more punitive system could seriously undermine the future resilience of the Civil Service and its capacity to develop and implement policy, particularly given the increasing complexity of policy demands and the Service’s gradual reduction in size.⁸¹ The challenge facing the government is to balance the need for appropriate and effective sanctions with a proportionate system that avoids deterring talent away from the public sector.

80 NL Times, “Strict new lobby rules leave 65 ex-Dutch ministers on taxpayer allowances”, 21 April 2026, available at: <https://nltimes.nl/2026/04/21/strict-new-lobby-rules-leave-65-ex-dutch-ministers-taxpayer-allowances#:~:text=Strict%20new%20anti%2Drevolving%20door,waiting%20allowances%2C%20De%20Telegraaf%20reports>

81 Institute for Government, “Whitehall Monitor 2026: Part 2 –The state of the civil service”, 13 January, available at: <https://www.instituteforgovernment.org.uk/publication/whitehall-monitor-2026/part-2-state-civil-service>

47. There is a clear need for striking the right balance. Notwithstanding this, EIC heard evidence that the system's current enforcement methods are not adequate. The current system relies, perhaps too heavily, on the deterrent effect of reputational damage but, for this to be effective, an individual must be influenced in their actions by this. The system should be underpinned by transparent reporting of persistent or egregious breaches to provide greater openness and transparency, act as a stronger deterrent and provide greater accountability.
48. Alexander Katsaitis, Associate Professor of Political Science, Stockholm University, told us how transparency can be good in allowing external actors, such as journalists, to expose those who are guilty of egregious non-compliance. Spotlight on Corruption highlighted in their written evidence to the review that the dispersion of notices across different bodies means that the "naming and shaming" or reputational element of sanctions is at risk of being lost. Whilst not all breaches should be dealt with in the same way, there is a need for cases of egregious non-compliance to be addressed through real consequences, especially where the risk of reputational damage may not offer enough of a meaningful deterrent.
49. The government should consider what other non-legislative means are available to further strengthen the system. Options could include placing restrictions on access to government premises for those individuals under lobbying restrictions, or a register listing companies who employ individuals guilty of non-compliance. Baroness Hodge suggested a similar measure, outlining a "red list" of former ministers and officials (at SCS and above) who are found in breach of the Rules. This in itself could become a factor in considering individuals for future government roles or other things, such as honours nominations. Consideration could also be given to banning organisations from the Lobbying Register that we recommend in Chapter Two, for a period commensurate with the seriousness of the breach.
50. Other consultees emphasised holding prospective employers accountable alongside employees. Transparency International UK and the Institute for Government proposed refusing government business to firms employing individuals who breach the Rules – potentially by mandating adherence within procurement frameworks, mirroring practice in the United States. This accountability measure was also supported by other contributors. The Civil Service Commission is now attempting to secure commitments from prospective employers to uphold conditions before advising applicants; a strategy the Independent Adviser is also adopting.
51. We recommend that flagrant or persistent breaches should be added to a centrally held list. Cabinet Office should develop guidance to support a consistent approach across the BARs bodies and which ensures that administrative or minor breaches do not meet the threshold for inclusion.

Recommendation 33

A register of individuals and their employing companies that are found to be in serious breach of the BARs should be published centrally for a period commensurate with the seriousness of the breach.

Recommendation 34

Cabinet Office should explore the potential for sanctions for breaches of the BARs, including those against prospective employers, to strengthen enforcement of the system.

52. Finally, Baroness Hodge reflected that “a strengthened lobbying register and Business Appointment Rules system could reinforce each other.” This serves as an important reminder of the broader context of this review; that the three frameworks under investigation (lobbying, the Business Appointment Rules and financial disclosure) must function in a cohesive and integrated manner to effectively address the systemic challenges posed by privileged access to government.

6

The declaration and publication of financial interests



1. The purpose of requiring public office holders to disclose relevant financial interests is to ensure that actual or potential conflicts of interest can be identified and managed. Perceptions of conflicts of interest can arise when there is a tension between public duties and private financial interests. Significant, undeclared or non-transparent financial interests may create a perception that decisions are being influenced by personal gain rather than the public interest. Effective rules, supported by clear and robust disclosure requirements, are therefore essential to maintain public confidence and uphold the highest ethical standards set out in the Nolan Principles.

Ministers must scrupulously avoid any danger of an actual or perceived conflict of interest between their ministerial position and their private interests.

Ministerial Code, paragraph 3.8

The system for regulating the disclosure of financial interests in the UK

2. The declaration and publication of financial interests is not governed by a single framework. Instead, different categories of public office-holder are subject to separate requirements set out in separate codes of conduct and overseen by different independent authorities.

Ministers

3. The requirements that ministers are expected to comply with for the declaration of interests are set out in Part B of the Ministerial Code.
4. Upon appointment, ministers must provide their permanent secretary with a comprehensive declaration of their private interests, in confidence, via a standard declaration form. The information required is considerably more extensive than that disclosed by MPs and peers through the parliamentary registers and should cover the interests of the minister's spouse or partner; relevant family members; constituency interests and other personal connections that could give rise to an actual or perceived conflict of interest. The permanent secretary will review the minister's declaration of interests in light of their responsibilities and, in discussion with the minister, advise on actions needed to manage any interests. The minister's declaration should then be shared with the Independent Adviser on Ministerial Standards (the Independent Adviser).
5. The full declaration submitted by ministers is not published. Instead, the Independent Adviser reviews the information provided, advises on the management of any perceived or actual conflicts of interest and determines which interests are relevant to a minister's portfolio. All interests that the Independent Adviser determines to be relevant are published quarterly on the public List of Ministers' Interests.

6. Provision of a financial declaration is not a one-off requirement. Ministers have an ongoing duty to keep these declarations up to date throughout their time in office, notifying their department and the Independent Adviser of any significant changes to their interests or circumstances.
7. Sir Laurie Magnus, the Independent Adviser on Ministerial Standards, told us that he keeps the disclosure criteria under review to ensure that they remain relevant and effective, including in relation to emerging forms of asset ownership such as cryptocurrency holdings.
8. Ministerial disclosures are completed in addition to the financial declaration made in a minister's capacity as a member of either the House of Commons or House of Lords.

Civil servants

9. The Civil Service Code establishes the core foundational principles that underpin financial disclosure, including the duty not to be influenced by the prospect of personal gain or to accept gifts or hospitality that might compromise impartiality.⁸²
10. The practical requirements for the declaration and recording of interests are set out in a guidance document on the declaration and management of outside interests in the Civil Service.⁸³
11. All civil servants, regardless of grade or contract type (permanent or fixed-term), must declare any relevant outside interest that could overlap with or be perceived to bear upon their official duties. Civil servants must declare relevant outside interests before appointment, when moving roles and whenever their circumstances change. Responsibility to make declarations sits with the individual.
12. Once a declaration is submitted, it is reviewed by a decision maker (usually the line manager), who categorises the risk into an "actual conflict", "potential conflict", or "perceived conflict". Departments are responsible for assessing and managing any conflicts of interest that arise.
13. Additional transparency requirements apply to senior civil servants (SCS), particularly those operating at SCS2 grade and above or earning above specific thresholds. Senior civil servants must proactively provide an annual disclosure return, including nil returns, and departments are required to maintain strict central oversight and tracking of all SCS declarations.

82 GOV.UK, Civil Service Code, 16 March, available at: <https://www.gov.uk/government/publications/civil-service-code/the-civil-service-code>

83 GOV.UK, Cabinet Office, "Declaration and management of outside interests in the Civil Service", 6 November 2024, available at: <https://www.gov.uk/government/publications/declaration-and-management-of-outside-interests-in-the-civil-service/declaration-and-management-of-outside-interests-in-the-civil-service#declaring-interests>

14. Relevant interests for permanent secretaries and SCS members sitting on departmental boards, alongside secondary paid employment for all SCS, are published annually on GOV.UK.

Special advisers

15. As temporary civil servants, special advisers are subject to the Civil Service Code, except, in recognition of their specific role, the requirements for objectivity and impartiality. They are required to act with integrity and to avoid conflicts between their private interests and their official duties.
16. Special advisers are also subject to their own Code of Conduct, which sets out additional obligations reflecting their unique role.⁸⁴ On appointment and annually thereafter, they must complete a confidential declaration of interests form, disclosing relevant financial, business and other interests that could give rise to an actual or perceived conflict with their official responsibilities. They must also make an updated declaration if they move to another special adviser role.
17. These declarations are reviewed by the employing department and Cabinet Office, with any mitigations agreed by departmental permanent secretaries. The Special Adviser HR Team within Cabinet Office's Proprietary and Ethics Team manages the process.
18. In addition to these personal financial disclosure requirements, the government publishes an annual transparency return on GOV.UK containing a list of all special advisers and their pay bands.

Non-executive directors

19. Non-executive directors, formally appointed as non-executive board members, are subject to the Code of Conduct for Board Members of Public Bodies.⁸⁵ This code sets expectations around integrity, confidentiality and the appropriate use of information.
20. Non-executive directors must declare interests within ten working days of appointment and must notify the board secretariat of relevant changes on an ad-hoc basis as they occur.
21. A list of all relevant interests is published annually or biannually (depending on the government department) on a dedicated "Board Interests" page within the department's GOV.UK governance section.

84 GOV.UK, Cabinet Office, Special advisers: code of conduct, 6 November 2024, available at: <https://www.gov.uk/government/publications/special-advisers-code-of-conduct>

85 GOV.UK, Cabinet Office, "Code of Conduct for Board Members of Public Bodies," June 2019, available at: <https://assets.publishing.service.gov.uk/media/5d037ebc40f0b609a555f141/Code-of-Conduct-for-Board-Members-of-Public-Bodies-2019-WEB.PDF>

The weaknesses of the current system

22. Although the principles underpinning the disclosure frameworks are broadly adequate, the evidence we heard clearly demonstrated that significant operational weaknesses persist across the financial disclosure landscape.

Archaic data collection

23. Ministerial financial declarations and disclosure rely on manual processes which are less efficient and place a greater administrative burden on users and the Independent Advisor's office than should be necessary today. The House of Commons has a modern digital platform for the collection and management of disclosures. A similar system is in the process of being developed for the House of Lords.
24. We also heard that financial disclosures by senior civil servants, special advisers and non-executive directors are completed using a variety of locally developed templates, including Word documents, Excel spreadsheets, Google Docs and Google Sheets, which are then submitted by email. There is no standardised template or submission process across government departments, resulting in a fragmented and largely manual system that is inefficient and increasingly out of step with modern standards for data collection and management.

Overlapping disclosure regimes

25. Ministers are also MPs or peers and are therefore required to comply with additional financial disclosure regimes. While these regimes have slightly different requirements and are overseen by different bodies, there is significant overlap in the information that individuals are required to provide.
26. In some instances, the same underlying interest must be declared more than once through separate processes and to different organisations. At the same time, different thresholds, categories, definitions and reporting requirements mean that an interest that must be declared in one regime may not need to be declared in another, or may need to be declared in a different way.

“I think there could be greater synergy between what a minister has to declare and what Members of Parliament have to declare, and I think as well, in an ideal world, the Commons and the Lords would be a parity of expectation.”

Oral evidence, **Simon Hoare MP**, Chair, Public Administration and Constitutional Affairs Committee, 20 April 2026

27. During oral evidence sessions, witnesses were clear that the existence of multiple disclosure processes increases the administrative burden on ministers and creates a risk of confusion about what should be declared, to whom and when. While individuals remain responsible for complying with their obligations, the complexity of the current system increases the likelihood of inadvertent errors or omissions.

“Some of the problems for ministers arise ... because it’s disclosure overload ... in some cases there’s purely a confusion about what’s needed to be disclosed ... so I think a simplicity of disclosure, even though it has different purposes for the Independent Adviser and for the Parliamentary Commissioner, is desirable.”

Oral evidence, **Sir Peter Riddell**, Honorary Professor, Constitution Unit, University College London, 21 April 2026

Inaccessible data formats

28. Disclosures across all regimes are provided in disparate formats – including Excel, PDF and HTML. Because individuals record information in slightly different ways, the data lacks the structure needed for effective comparison and comprehension. We heard from multiple sources that declarations do not enable systematic analysis.

“The disclosures, as they are, are practically unusable. The declarations are in PDF or HTML format. It’s not set out in a way that is easily analysable ...”

Oral evidence, **Cynthia O’Murchu**, Investigative Reporter, Financial Times, roundtable with journalists and think-tanks, 27 April 2026

“On the different Excel spreadsheets, different tabs, different downloads for different quarters It should be automated. It should be machine readable. It should be in a database. It shouldn’t require messing around, going on different departmental tabs. There should be one version of the truth.”

Oral evidence, **Phil Brickell**, Chair of the All Party Parliamentary Group (APPG) on Anti-Corruption and Responsible Tax, 20 April 2026

29. Under the current system, researchers, journalists and members of the public seeking to understand a minister's declared financial interests must consult multiple disclosure regimes and separate public registers. For example, while the List of Ministers' Interests is easy to locate on the Independent Adviser's pages of the GOV.UK site, it is not integrated with the Register of Members' Financial Interests or the Register of Lords' Interests.⁸⁶ As a result, individuals interested in analysing financial disclosure data have to navigate and reconcile information from different sources in order to build a complete picture of a minister's declared financial interests.
30. Financial disclosure data provided by senior civil servants, special advisers and non-executive directors is fragmented across separate departmental pages and is difficult to locate on GOV.UK.

Publication cycles

31. MPs are required to register and publish relevant interests within 28 days, whereas the List of Ministers' Interests is published on a quarterly basis. This can result in information about a minister's financial interests becoming publicly available significantly later than equivalent information disclosed in their capacity as an MP, potentially creating confusion and reducing the overall coherence of the disclosure landscape.

“Reporting on ministerial interests is slower and less detailed presently than that of members ... and I think complexity and anomalies and unexplained differences do damage trust.”

Oral evidence **Daniel Greenberg**, Parliamentary Commissioner for Standards, 17 April 2026

32. Financial disclosures provided by senior civil servants and special advisers are only published annually, while non-executive director data is published bi-annually. We heard that this cycle fails to account for in-year staff turnover or movements, meaning published data quickly becomes obsolete.⁸⁷

86 GOV.UK, Independent Adviser on Ministerial Standards, List of ministers' interests, available at: <https://www.gov.uk/government/publications/list-of-ministers-interests>

87 As at 5 June 2026, the most recent publicly available Cabinet Office declaration of paid employment is dated July 2025.

“... every bit of declaration is done in retrospect, sometimes six months in retrospect, so whether it’s the list of SpAds that gets published with their salaries, or whether it’s senior civil service interests, what you tend to get is never live capture, but always a backwards-looking thing from a point in time.”

Oral evidence, **Sam Coates**, Deputy Political Editor, Sky News, roundtable with journalists and think-tanks, 27 April 2026 Standards, 17 April 2026

Training and central guidance

33. Within the Civil Service, line managers are expected to assess employees’ declarations. In 2024, the National Audit Office’s ‘Managing Conflicts of Interest’ report identified significant variation in the training and support provided to officials responsible for reviewing and managing declarations of interests across the civil service. The NAO concluded that these shortcomings can limit the ability of decision-makers to identify, assess and manage conflicts effectively.

“There is no central training offer available to all civil servants on managing conflicts of interest Line managers told us that they would benefit from more timely, targeted guidance and training that would support them to get this right.”

‘Managing Conflicts of Interest’; National Audit Office, 2024⁸⁸

34. Looking to international comparators, there are examples of good practice, where those completing disclosures are fully supported. For instance, the US provides detailed guidance published online to help filers navigate and complete reports.⁸⁹

88 National Audit Office, Managing conflicts of interest: value for money, 22 November 2024, available at: <https://www.nao.org.uk/reports/managing-conflicts-of-interest/#downloads>
89 United States of America Government, U.S. Office of Government Ethics, available at: <https://www.oge.gov/web/278eGuide.nsf/Overview>

Recommendations for improvement

35. Our review of the current system for declaration and publication of financial interests for ministers and senior government officials found that, for financial disclosure to be meaningful and effective, simply making information available is insufficient. Meaningful disclosure requires that disclosed information is presented clearly, concisely and accessibly, rather than dispersed across complex or fragmented datasets.
36. The evidence we heard suggests that the principal challenge facing the current financial disclosure framework is not the quantity or quality of the information disclosed but rather its fragmented alignment, poor signposting and lack of ease of navigation for those seeking to understand and interpret the information.
37. When information is presented clearly and is genuinely accessible, transparency serves its core purpose: enabling informed public discourse, facilitating accountability and strengthening trust between government and the public it serves. Our review found that disclosures of financial interests should be made easier to locate, navigate and understand.
38. While disclosure regimes for MPs, peers and ministers necessarily differ, reflecting their distinct constitutional functions, individuals who are required to complete multiple declarations across different regimes should encounter broadly consistent user journeys and duplication should, as far as possible, be minimised. One suggestion that we heard in the evidence we took was for the Independent Adviser to operate a digital disclosure platform that sits alongside the House of Commons and (future) House of Lords system as a coherent ‘family’ based on common design principles while respecting their distinct constitutional functions.
39. The platform could be capable of drawing relevant information directly from the House of Commons and House of Lords Registers such that users only have to enter data values once. Ministers could then be invited to review, supplement and confirm financial disclosure information already provided through the House of Commons or House of Lords Registers and only be required to provide additional information to the Independent Adviser that is unique to the ministerial disclosure regime. This would reduce duplication, improve data quality and consistency and lessen the administrative burden on ministers while strengthening the efficiency of the disclosure process. Digitisation of the disclosure system would also allow for more frequent publication of the List of Ministers’ Interests, in alignment with parliamentary disclosures.

Recommendation 35

Cabinet Office should consider how best to reduce duplication in the information that ministers are required to provide to the Independent Adviser and to the relevant parliamentary bodies as MPs or peers about their interests.

40. The Civil Service should move away from fragmented, locally managed financial disclosure templates and make greater use of modern digital technology to improve efficiency, enhance data quality and support transparency.
41. While a single, unified digital platform would be the gold standard, there is inexpensive, readily accessible software such as Google Forms that can be used to automate data collection without the expense of a new IT system. This should utilise a standardised core questionnaire that all individuals must complete, while granting individual departments the flexibility to add supplementary questions tailored to their specific operational risks. For the individual filing the return, automating data collection will make submitting information significantly quicker and simpler.
42. Introducing simpler data collection methods would allow Cabinet Office to move to a more frequent cycle of disclosure for senior civil servants, special advisers and non-executive directors, to ensure financial interests are up-to-date.
43. To support civil servants to assess the financial declarations of their staff, the Civil Service should introduce standardised training and centrally developed guidance which would enable officials to review, assess and manage declarations of interest consistently and in line with financial disclosure principles.

Recommendation 36

Cabinet Office should consider how to support officials to submit data on their financial interests through improved data collection processes and the provision of standardised training and guidance.

44. As discussed above, the evidence we heard was clear that the financial data disclosed by departments is released in different file formats and is difficult to locate and search. Cabinet Office should consider what changes need to be made to make it easier for the public to locate, navigate and understand senior officials' declared interests.

Recommendation 37

Cabinet Office should consider how to enhance the accessibility of the declaration of financial interests for civil servants, special advisers and non-executive directors.

Appendix 1

Review Terms of Reference

EIC review into lobbying, disclosure and access to government

On 11 March 2026, the Prime Minister asked the Ethics and Integrity Commission (the Commission) to conduct a review to look at, “how ministers declare and publish their financial interests; at how the government ensures transparency around lobbying; and at how we ensure the rules that govern post employment activity are fit for purpose, in respect of managing potentially improper access to, and influence within, government.”

The Commission welcomes the Prime Minister’s request for the Commission to conduct an independent review of these important areas. The Commission’s predecessor, the Committee on Standards in Public Life, made a number of recommendations on lobbying and the Business Appointment Rules, most recently in the 2021 report, *Upholding Standards in Public Life*, many of which remain unimplemented. The review will revisit these recommendations, while seeking new evidence that reflects the current context.

We intend to publish our final report of our review before the summer recess. Given the urgency of the review, we will focus our attention on the areas where we can have the greatest impact. To this end, we expect a significant proportion of our report to cover lobbying. We intend to issue recommendations that, when implemented, will make it easier to see which groups and individuals are lobbying the government and the matters on which they are seeking to exert influence.

In relation to the Business Appointment Rules, the output of our review is likely to be principles-based. The Rules are owned by government and were last updated substantively over a decade ago (long before the closure of ACOBA and the redistribution of its functions). We will consider the principles that should guide government when reviewing the Rules and we will consider the principles that should guide the bodies charged with implementing the Rules when considering applications within their cohort.

In relation to the declaration and publication of financial interests for Ministers and senior government officials, we will examine the current system and research the arrangements in place in comparable governments. The output will be a better understanding of other systems and the benefits of them. This may point to future work that the Government could consider in this area.

Our review will:

- a. Consider whether the scope of the Register of Consultant Lobbyists should be extended to reveal more information about the lobbying of government carried out by consultant lobbyists.
- b. Consider whether the Register of Consultant lobbyists should be replaced by a register that captures all lobbying of government, regardless of who is doing it.
- c. Examine the role of the Registrar of Consultant lobbyists, including the Registrar's enforcement powers and resources.
- d. Consider recommendations for enhancing the quality, timeliness and accessibility of government transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials.
- e. Consider how to increase the transparency of lobbying that takes place through non-corporate communications channels.
- f. Identify the principles that should guide the Government when reviewing the Business Appointment Rules, in order to ensure that they are effective in respect of managing potentially improper access to, and influence within, government.
- g. Identify the principles that should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort.
- h. Consider whether improvements can be made to the current arrangements for the declaration and publication of financial interests for Ministers and senior government officials to enhance transparency of potential conflicts of interest.
- i. Research the arrangements in place in comparable governments for the declaration and publication of financial interests, including the use of regular published financial disclosure forms or other additional transparency methods.
- j. Identify potential next steps for the government in assessing whether additional transparency methods should be adopted for Ministers and senior government officials.

Appendix 2

About the Ethics & Integrity Commission

The Ethics and Integrity Commission promotes the highest standards in public life, reports to the Prime Minister on matters concerning ethical standards, and advises public authorities on the development of clear codes of conduct with effective oversight arrangements.

The Commission safeguards the Seven Principles of Public Life, which outline the ethical standards all those working in the public sector are expected to adhere to. The Principles apply to all public office holders and private and voluntary organisations delivering services paid for by public funds.

The Commission conducts research and thematic inquiries, collecting evidence to assess specific institutions, policies and regulatory mechanisms, making recommendations to government and others where appropriate. The Commission also convenes ethics and standards bodies across central government (and Parliamentary standards bodies, with their agreement).

The Commission also works to engage and inform the wider public on the values, rules and oversight mechanisms that govern standards in public life. The Commission is not a regulator and has no remit to investigate individual cases.

The Commission was announced by the then Chancellor of the Duchy of Lancaster in Parliament on 21 July 2025. Our terms of reference were issued by the Prime Minister via a letter to the Chair, Doug Chalmers CB DSO OBE, on 13 October 2025.

The Ethics and Integrity Commission was established by strengthening and reforming the Committee on Standards in Public Life (CSPL).

Ethics and Integrity Commission Members

The Review was led by Doug Chalmers CB DSO OBE, Chair, assisted by lead members The Rt Hon Ian Blackford and The Rt Hon Michael Tomlinson KC, and Professor Mark Philp, EIC's Senior Academic Advisor.

Other Commission Members are:

The Rt Hon Lady Arden of Heswall DBE

Ruth Dombey OBE

Ewen Fergusson

Professor Gillian Peele

Officials

The Review was led by Chief Executive, Stuart Sterling OBE, with Sarah Yarwood and Nicola Richardson.

The Review Team was:

Uzma Ali

Femi Ivan

Peter Kelleher

Harri Norris

Joseph Rice

Nanar Setrakian BEM

The team were ably supported by the wider EIC officials team who provided essential assistance throughout, whilst also advancing EIC's other work in the areas of Codes of Ethical Conduct, Public Sector Ombudsman Reform, and Public Engagement.

External Advisor:

Maggie O'Boyle, Press Officer

Appendix 3

Seven Principles of Public Life

The Seven Principles of Public Life (also known as the Nolan Principles) apply to anyone who works as a public office holder. This includes all those who are elected or appointed to public office, nationally and locally, and all people appointed to work in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies (NDPBs), and in the health, education, social and care services. The Principles also apply to all those in the private and voluntary sector delivering services paid for by the taxpayer.

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

Appendix 4

List of contributors

Written evidence

The EIC received 19 submissions to our call for evidence, which are published on the EIC website.

The EIC is particularly grateful to Tom Brake and colleagues from Unlock Democracy, Kamila Kingstone and Sue Hawley with colleagues from Spotlight on Corruption, and Steve Goodrich and colleagues from Transparency International for their independent research into government transparency releases which is published on the EIC website.⁹⁰

Oral evidence (March to June 2026)

Meetings

Parliamentarians

The Baroness Anderson of Stoke-on-Trent, Parliamentary Secretary to Cabinet Office

Phil Brickell MP, Chair of the All-Party Parliamentary Group on Anti-Corruption and Responsible Tax

Alberto Costa MP, Chair of the Committee on Standards

The Rt Hon. Dominic Grieve KC

The Baroness Hayter of Kentish Town

Simon Hoare MP, Chair of the Public Administration and Constitutional Affairs Committee

The Rt Hon. The Baroness Hodge of Barking DBE PC

The Rt Hon. The Lord Kakkar KG KBE, Chair of the Conduct Committee, House of Lords

The Rt Hon. The Lord Pickles

⁹⁰ <https://eic.independent-commission.uk/independent-research-into-government-transparency-releases/>

Joe Powell MP

Lisa Smart MP, Liberal Democrat Cabinet Office Spokesperson

Members of EIC Network of Standards Bodies

Claire Bassett, Registrar of Consultant Lobbyists

Daniel Greenberg CB, Parliamentary Commissioner for Standards

Sir Laurie Magnus CBE, Independent Adviser on Ministerial Standards

Harry Rich, Former Registrar of Consultant Lobbyists (former Network member)

The Rt. Hon. Baroness Stuart of Edgbaston, First Civil Service Commissioner

Government Departments

Cabinet Office

Ministry of Defence

Home Office

Devolved Organisations

Billy McLaren, Lobbying Registrar, The Scottish Parliament

The Scottish Government

The Welsh Government

Professional Bodies

Alistair McCapra and Jon Gerlis, Chartered Institute of Public Relations

Sarah Waddington and Louise Whatham, Public Relations and Communications Association

Academia

Professor Robert Hazell, Professor of Government and the Constitution,
University College London, Dept of Political Science

The Rt Hon. Sir Peter Riddell CBE, Honorary Professor in Political Science,
University College London

Third-Sector Organisations

Tim Durrant and Rebecca McKee, Institute for Government

Susan Hawley, Spotlight on Corruption

Tom Brake, Unlock Democracy

International Organisations

Nancy Bélanger and Kelley Love, Commissioner of Lobbying, Canada

Anthony Murray and Sorcha Murray, Standards in Public Office Commission, Ireland

Organisation for Economic Co-operation and Development

Roundtables

We held round table discussions with:

Lobbying Industry Members of CIPR & PRCA

CIPR, including: Noha Al Afifi, Paul Beckford, David Boot, Donna Castle and Emily Wallace

PRCA, including: Leon Cook, Jessica Daniels-Roberts, Emily Fermor, Joe Ferreira, Simon Fitzpatrick, Tom Frackowiak, Mark MacGregor, Charles Lewington, John Rowland, Stuart Thomson and Sabine Tyldesley

Academics

Professor David Coen, Pro-Vice-Provost (Global Engagement) and Professor of Public Policy, University College London

Dr. Michele Crepaz, School of History, Anthropology, Philosophy and Politics, Queen's University, Belfast

Dr. Becky Dobson Phillips, Assistant Professor in Politics, The Centre for the Study of Corruption, University of Sussex

Wyn Grant, Emeritus Professor, University of Warwick

Professor Alexander Katsaitis, Associate Professor, Department of Political Science, Stockholm University

Dr. Barry Solaiman, Associate Dean for Academic Affairs and Assistant Professor of Law, HBKU Law, Qatar

Dr. Matia Vannoni, Senior Lecturer in Public Policy, Department of Political Economy, King's College London

Dr. Matthew Wood, Senior Lecturer, School of Sociological Studies, Politics and International Relations, University of Sheffield

Dr. Ben Worthy, Lecturer, Politics and Public Policy, School of Social Sciences, Birkbeck, University of London

Civil Society, Think Tanks and Journalists

Tom Brake, Unlock Democracy

Sam Coates, Sky News

Tim Durrant, Institute for Government

George Greenwood, The Times

Duncan Hames, Transparency International

Susan Hawley, Spotlight on Corruption

Robert Hazell, Constitution Unit

Cynthia O'Murchu, Financial Times

Ethan Shone, Open Democracy

The EIC also consulted with the following organisations:

The Charity Commission

National Council for Voluntary Organisations

Honesty

Objectivity

Openness

Selflessness

Integrity

Accountability

Leadership
