

**Ethics and Integrity Commission**  
**Lobbying, Disclosure and Access to Government Review**

**Call for Evidence**

**The Commission invites responses to the following questions. Submissions need not respond to every question.**

1. Consultant lobbyists are required to register lobbying of Ministers and permanent secretaries. Should this requirement be expanded to include communications made to others, such as special advisers, director generals and directors. If yes, which groups should be included and why?
2. Should the current requirement for only those consultant lobbyists who are VAT registered to comply with the regulations, be removed? Should a de-minimis provision be set and if so, what should the threshold be?
3. What information should consultant lobbyists be required to record in the Register about their lobbying activity (for example, date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place)?
4. Is the 'incidental lobbying' exemption to the requirement to register as a consultant lobbyist clear and reasonable? Are any amendments required, and if so, what changes are needed and why?
5. Is there merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government, regardless of who is doing it? If so, what are the pros and cons? Are there ways of ensuring that any requirement to register is not disproportionately burdensome for smaller businesses, charities and think tanks?
6. Are the Registrar of Consultant Lobbyists' enforcement powers sufficient to deter non-compliance? If not, what is needed?
7. What would be the resource implications of a) expanding the register and as it stands and b) replacing the current register with a new register that captures all lobbying of government? How could these resource implications be mitigated?
8. The government publishes transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials. How can the quality, timeliness and accessibility of the data be enhanced?

9. For meetings with Ministers, special advisers and senior officials, does the transparency data include the right information about the following:
  - a. The recipient(s) of the lobbying.
  - b. The type of information and level of detail that is reported.
  - c. The forms of communications that should be included.
  - d. When and how the transparency data is published.
10. What oversight mechanism should be put in place for ensuring adherence with the requirements for government transparency returns and what should the consequences be for non-compliance?
11. How can any lobbying that takes place through non-corporate communications channels (eg. WhatsApp and other instant messaging platforms) or non-official settings (such as party conferences, non-official meetings) be made transparent?
12. Have you tried reconciling the Register of Consultant Lobbyists with the Government's transparency returns on external meetings? If so, how easy or difficult was this to do?
13. What are the strengths and weaknesses of the current system for considering applications under the Government's Business Appointment Rules?
14. What principles should guide the Government when reviewing the Business Appointment Rules?
15. What principles should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort?
16. What are the strengths and weaknesses of the current arrangements for the declaration and publication of financial interests for Ministers and senior government officials?
17. What improvements can be made to the current system for the declaration and publication of financial interests for Ministers and senior government officials?
18. Are there different arrangements in place in other countries for the declaration and publication of financial interests for Ministers and senior government officials that should be considered for implementation in the UK?
19. What arrangements in place for the declaration and publication of financial interests of directors of large corporations could be adopted for use within government?

## How to make a submission

Anyone with an interest may make a submission. Submissions should be emailed to [contact@eic.independent.gov.uk](mailto:contact@eic.independent.gov.uk)

Submissions should:

- State clearly who the submission is from, i.e. whether from your or sent on behalf of an organisation.
- Include a brief introduction about you/ your organisation and your reason for submitting evidence.
- Submissions need not respond to every question.
- Be in word or another editable format. Please do not send uneditable formats like PDF.
- Have numbered paragraphs.
- Comprise a single document. If there are any annexes or appendices, these should be included in the same document.
- Be concise – we recommend no more than 2,000 words in length.
- Contain a contact email address.

The Commission may choose not to accept a submission as evidence, or not to publish a submission even if it is accepted as evidence. This may occur where a submission is very long or contains material which is inappropriate. Submissions may be published online with any contact information removed.

The Commission will publish anonymised submissions (where the name of the respondent and any references to named individuals are removed) where a respondent makes a reasonable request to do so.

Submissions sent to the Commission after the deadline of **20 April 2026** may not be considered.

If you have any questions, please email [contact@eic.independent.gov.uk](mailto:contact@eic.independent.gov.uk).