

EIC REVIEW INTO LOBBYING, DISCLOSURE AND ACCESS TO GOVERNMENT

Terms of Reference

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:

1. 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.
2. 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.
3. Examine the role of the Registrar of Consultant lobbyists, including the Registrar's enforcement powers and resources.
4. 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.
5. Consider how to increase the transparency of lobbying that takes place through non-corporate communications channels.
6. 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.
7. Identify the principles that should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort.
8. 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.
9. 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.
10. Identify potential next steps for the government in assessing whether additional transparency methods should be adopted for Ministers and senior government officials.

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