

## EIC REVIEW INTO LOBBYING, DISCLOSURE AND ACCESS TO GOVERNMENT

### Terms of Reference for independent research on government transparency releases

On 11 March 2026, 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.”

#### Purpose

1. To produce an up-to-date piece of objective, factual research on the government’s transparency releases.

#### Method

2. Unlock Democracy will lead a group of transparency organisations, including Transparency International and Spotlight on Corruption, to produce research with a robust evidence base that the EIC will publish and draw on in the report of its review.

#### Scope

3. The government’s transparency releases for Ministers, senior officials and special advisers.
4. The primary focus should be the data on meetings, with a secondary focus on gifts and hospitality.
5. An assessment of the quality of the government’s transparency releases, with reference to:
  - a. Accuracy (including clarity of purpose for the meetings register)
  - b. Timeliness (are the releases published to the government’s own deadlines?)
  - c. Any gaps in the data (missing data or gaps due to the classification of meetings)
  - d. The extent to which the transparency releases are meeting their objective.

6. An assessment of the accessibility of the government's transparency releases, with reference to:
- a. How easy are releases to find?
  - b. How searchable are they?
  - c. How easy is it to reconcile the releases with the Register of Consultant Lobbyists?

### **Requirements**

7. The research should:
- a. Cover a sample of datasets taken from the past 2-3 years of published data.
  - b. Be evidence-based and objective in its output.
  - c. Include a description of the methodology or methodologies employed to collect the data and to test the robustness of the information obtained.
  - d. Include an assessment of whether there has been an improvement in the data following the Government's February 2024 guidance on transparency returns, including minimum standards for description of purpose of meetings, and extension to include DGs and other key posts.
  - e. Take into account the improvements claimed by the government in the letter from the Minister for the Cabinet Office to Simon Hoare, Chair, PACAC of 8 December 2025.

### **Timescale**

8. Given the tight timescale for the review, the research should be provided to the EIC by Friday 8 May 2026.