

Ethics and Integrity Institutions:

Mapping UK Standards in Public Life

This report provides an overview of the standards in public life that regulate the centralised institutions of the United Kingdom (UK). It focuses on Westminster and Whitehall, local government, and functions that are governed by central agencies. It does not cover the devolved administrations in Wales, Scotland and Northern Ireland. The report provides a snapshot of the institutions that regulate standards in public life at a critical moment: as the new Ethics and Integrity Commission replaces the Committee on Standards in Public Life, following its 30-year tenure advising Government on upholding the highest standards of propriety in public life. The report takes as a key reference point David Hine and Gillian Peele's, *The Regulation of Standards in Public Life*,¹ and refers to a range of academic and publicly available sources to map the system of standards as of December 2025.²

This report was commissioned by the Ethics and Integrity Commission and was written by Dr Rebecca Dobson Phillips, Assistant Professor at the University of Sussex and Pascal Dillabough-Lefebvre, Independent Researcher and Data Analyst.³ The report updates a previous mapping exercise undertaken for the Committee on Standards in Public Life in 2020. The authors would like to thank Professor Mark Philp and Professor David Hine for their kind advice and guidance on the initial preparation of this report, and to thank the standards bodies, including members of the new Ethics and Integrity Commission for their useful and timely feedback on the first draft. Any errors that remain are our own.

¹ Hine, D. and Peele, G. 2016. *The Regulation of Standards in Public Life: Doing the right thing?* Manchester: Manchester University Press.

² While the report was drafted in late 2025, where possible, updates have been included up until the end of March 2026.

³ Given the large volume of official documentation referred to in this report, for ease of reading the usual convention of using quotation marks for quoted work has been adapted. Quotation marks are only used for direct quotes from narrative reports and named authors. Text taken from Codes of Conduct, Guidance or other official documentation is simply summarised or reproduced with appropriate citations.

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Ethics and Integrity Institutions: Mapping Standards in Public Life

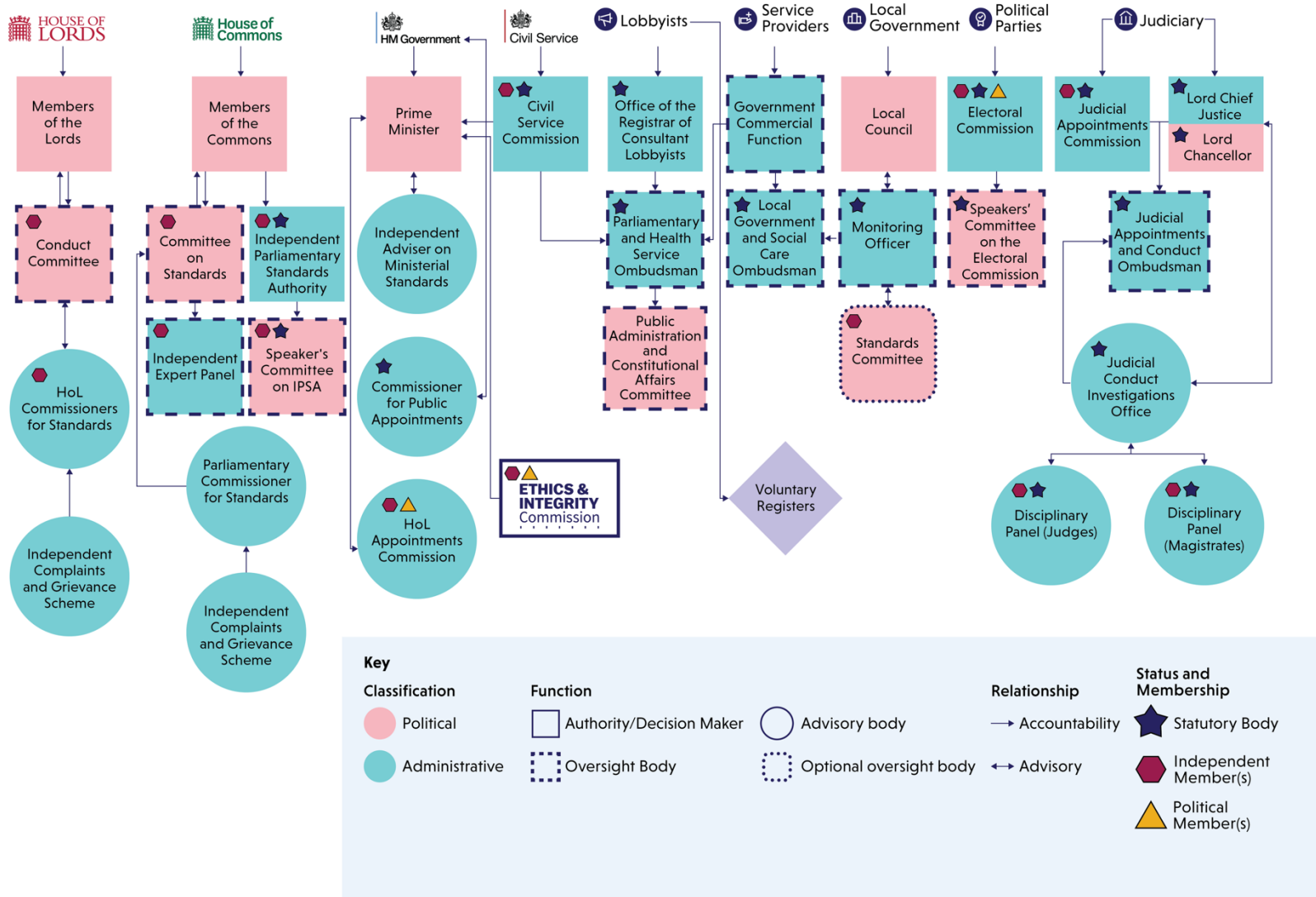


Figure 1. Map of relationships between Ethics and Integrity Institutions

1. Introduction

The origins of the current system of public standards regulation can be traced back to the establishment of the Committee on Standards in Public Life (CSPL) in October 1994. The Committee was set up by then Prime Minister John Major to address increasing concerns about public standards, and was prompted in particular by the Cash for Questions scandal that engulfed Parliament following an investigation by *The Guardian* newspaper.⁴ Some 30 years later in 2025 a new Ethics and Integrity Commission (EIC) was established to replace the CSPL both taking on and expanding its existing remit. In doing so the Government sought to fulfil a 2024 Labour Party Manifesto commitment to establish an independent Commission to “restore confidence in government and ensure ministers are held to the highest standards”.⁵

The establishment of the EIC is a direct response to a decline in public trust in Government over the previous decade. Polling by the UK Anti-corruption Coalition (UKACC) found that in early 2024 66% of voters believed UK politics was becoming more corrupt, while 80% believed that some or all of the main parties are corrupt or untrustworthy.⁶ In the same year, the British Social Attitudes Survey found “record low” levels of trust in Britain’s system of governance, with 45% of respondents stating that they “almost never” trust governments of any party to place the needs of the nation above the interests of their own political party.⁷ The causes of this decline are numerous and varied, but they were at least in part precipitated by a series of egregious violations of parliamentary standards by high profile politicians in the post-Brexit and COVID-19 periods. Successive breaches of the Ministerial Code without meaningful consequences,⁸ put in question the long-standing principle of self-regulation that sits at the heart of parliamentary regulation.⁹

The regulation of standards in public life directly engages questions of proportionality and judgement. Hard and fast rules can be blunt instruments and decisions around standards always involve matters of interpretation and political negotiation. The system of standards therefore relies primarily on a set of principles – expressed in the Seven Principles of Public Life – that guides behaviour.¹⁰ However, implementing these principles depends upon a range of mechanisms and actors working together. Political parties, the media and civil society each have a role to play in monitoring and holding to account behaviour that breaches the collectively agreed principles governing how individuals should behave in their public lives, and increasingly in their private lives too.

Balance is fundamental to a well-functioning system. Formal mechanisms, including increasing transparency and accountability, can assist informal controls on behaviour by providing information to the media, civil society watchdogs and the public. However, increased transparency in public life must be met with the skills, resources and “political will” to respond effectively to what is revealed. Formal measures also need to engage with the environments where they are enacted; in which politicians must have the freedom to negotiate and compromise to achieve their policy goals,¹¹ and where the Judiciary must maintain its independence in the face of potentially dissenting public views or to protect minority groups.¹² The task of striking this fine balance is more difficult as the context in which political decision-making and the implementation of public policy takes place becomes

⁴ The Guardian. 1999. [Chronology - How the scandal unfolded](#), 22 December.

⁵ Labour Party. 2024. [Change: Labour Party Manifesto](#), page 107.

⁶ UKACC. 2024. [Public reflections on dirty money and trust in politics](#), UKACC & Survation.

⁷ Curtice, J., Montagu, I. and Sivathasan, C. 2024. [Damaged politics? The impact of the 2019-24 Parliament on political trust and confidence](#). National Centre for Social Research, page 4.

⁸ TI-UK. 2022. [Analysis finds dozens of potential Ministerial Code breaches were not investigated](#). Press Release, 2 December.

⁹ Dávid-Barrett, E. 2022. “Shirking self-regulation? Parliamentary standards in the UK”, *Public Integrity*: pages 1-12.

¹⁰ Committee on Standards in Public Life (CSPL). [The Seven Principles of Public Life](#).

¹¹ Philp, M. 2001. “Access, accountability and authority: Corruption and the Democratic Process”, *Crime Law and Social Change* 36: pages 357-377, page 372.

¹² Shetreet, S. and Turenne, S. *Judges on Trial: The Independence and Accountability of the English Judiciary*. Cambridge: Cambridge University Press, page 14.

increasingly complex and adversarial. The system of standards has evolved a range of “institutional innovations”¹³ to address the challenges brought about by this changing context. However, other challenges have arisen too: diminishing resources;¹⁴ the new and largely uncharted challenges of tackling the growing prominence and agility of lobbyists;¹⁵ the increased pressures to deliver quality public services; and the potentially significant implications of the digital revolution and artificial intelligence for maintaining standards.¹⁶ All of these areas need to be addressed and balanced proportionately to protect democratic rights and freedoms.

This report provides a starting point for considering the formal institutions that make up the standards regime at the beginning of 2026 and how they have navigated the changing political landscape over the last 30 years. It is structured into nine sections, each of which describes the standards in an area of public life and how they have evolved over time.

The report begins by describing the new *Ethics and Integrity Commission* (EIC), which has taken over the role of the *Committee on Standards in Public Life* (CSPL) and has also been given an expanded remit. The long-term implications of this change are as yet unknown, but the structure and potential of the new Commission are outlined and discussed.

The report then considers the system of standards at the centre of politics – including the *Government, House of Commons* and *House of Lords* – in which there have been profound changes to the institutional structure and approach. In recent times these changes have included acknowledgement of the urgent need to address cultures of bullying and harassment within parliamentary institutions; not only for the benefit and justice of the individuals concerned, but also to protect the functioning of the democratic system.¹⁷ In the post-Brexit period, amidst the discord and crisis that ensued, the parliamentary system was particularly challenged in terms of its legitimacy and the appropriateness of the norms governing its institutions.¹⁸

An analysis of *Local Government* follows, which illustrates a complex changing environment where in recent years the responsibility for ethical standards has been devolved to local authorities with the abolition of any formal independent regulatory authority; and provides a summary of the changes on the way to strengthen local government standards. The report then moves on to consider the *Civil Service and the Judiciary*, and the on-going challenges of maintaining their independence and impartiality, particularly for the Civil Service where institutional culture and management changes have placed it under considerable strain.

Finally, the report considers the regulation of groups and individuals that are not strictly public officials but play a critical role in public life: *Political Parties, Lobbyists and Providers of Public Services*. Each of these groups poses their own unique challenges to regulation, but their incorporation into the system of public standards indicates the increasing reach of the system as it responds to contemporary Britain and the transformations taking place in its approaches to governance. As the scandals surrounding the COVID-19 procurement contracts attest, the relationship between the state and the private sector is particularly fraught with integrity risk and difficult to regulate.¹⁹

With a few notable exceptions, the pattern of change over time is towards the codification and embedding of standards within codes of conduct and guidance, transparency and accountability mechanisms, ethics training and the provision of tailored advice. Nonetheless there remains a considerable degree of discretion in the system, which is most evident in political institutions where there is a strong preference for self-regulation, non-statutory frameworks and institutions, and case-by-case judgements. While discretion is essential for

¹³ Hine and Peele 2016, page 1.

¹⁴ CSPL. 2012. [Report of the Triennial Review of the Committee on Standards in Public Life](#).

¹⁵ Crepaz, M. and Worthy, B. 2024. “Cleaning up UK politics: What would better lobbying regulation look like?”, *Parliamentary Affairs* 77(3): pages 435-449.

¹⁶ Electoral Commission. 2016. [Digital Campaigning: Increasing transparency for voters](#); CSPL. 2020. [Artificial Intelligence and Public Standards](#).

¹⁷ See Statement by Committee on Standards, 24 October 2018, quoted by Kelly, R. 16 July 2019. [Independent Complaints and Grievance Scheme](#), House of Commons Library, page 34.

¹⁸ See Dobson Phillips, R. 2026. “Anti-corruption in Post-Brexit Britain” in Jackson, D., Amundsen, I and Williams, A. *Anti-Corruption in a Discordant World: Contestation, Abuse, and Innovation*. Abingdon: Routledge.

¹⁹ HM Treasury and Rt Hon. Rachel Reeves. 2025. [Failed Covid contracts cost British Taxpayer £1.4 billion](#). Press Release, 2 June.

well-functioning democratic political institutions and public administration, it can also provide the flexibility and cover required for actors to violate their public office duties.²⁰ Finding the right balance between this necessary discretion and effective accountability to ensure that conflicts of interest are resolved in the public interest, is the central platform of any successful ethics and integrity system.

²⁰ Klitgaard, R. 1988. *Controlling Corruption*. Berkeley, CA: University of California Press.

2. Ethics and Integrity Commission

Summary of standards

The Ethics and Integrity Commission (EIC) was established on 13 October 2025. It replaced the Committee on Standards in Public Life (CSPL) and in doing so assumed the CSPL's former responsibility for promoting the highest standards in public life.

The work of the EIC is guided by the Seven Principles of Public Life, also known as the Nolan Principles, which were devised and then promoted by the CSPL for more than 30 years. The principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership²¹ establish a “golden thread” weaving its way through the warp and weft of the UK system, conferring both its character and coherence.

The Principles apply to all those who are elected or appointed to public office at the national and local levels. This includes those working in the Civil Service, local government, the police, courts and probation services, non-departmental public bodies and in health, education, social and care services. They also apply to private and voluntary sector actors who deliver services paid for by the taxpayer.

So appealing is the pattern this golden thread traces, that the Nolan Principles have gained international recognition,²² and three decades on remain central to our collective understanding of the role and responsibilities of individuals in public life. Indeed, research conducted for the CSPL in 2021 found that the Nolan Principles remain both durable and popular and resonate with the views and expectations of diverse communities across Britain.²³

Institutions

Committee on Standards in Public Life

The CSPL's 1994 Terms of Reference were:

To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life.²⁴

The CSPL was established as an advisory, non-departmental public body sponsored by the Cabinet Office, tasked with advising the Prime Minister on upholding ethical standards of conduct. It was led by an independent chair appointed by the Prime Minister. The Prime Minister also appointed four independent members following an open competition, with a non-renewable five-year term, and three political members recommended by the three largest political parties in the House of Commons.²⁵ After 2013, the CSPL's remit was expressly limited to England, with the devolved nations making their own arrangements.²⁶ The CSPL undertook research, ran inquiries and made recommendations, but did not investigate individual complaints or advise on specific cases.

The Committee's first report – the Nolan Report – was published in 1995, and its recommendations set the groundwork for a new system of standards underpinned by the Seven Principles of Public Life (also known as the Nolan Principles). Between 1994 and 2025 the Committee published 27 independent reports and made recommendations for change

²¹ Nolan Report. CSPL. 1995. *Standards in Public Life: First Report of the Committee on Standards in Public Life*, page 14.

²² David-Barrett, E. 2015. “Nolan's Legacy: Regulating parliamentary conduct in democratising Europe”, *Parliamentary Affairs* 68(3): pages 514-532.

²³ CSPL. 2021. *Upholding standards in public life: Final report of the Standard Matter 2 review*, page 33.

²⁴ CSPL. *Terms of Reference*.

²⁵ CSPL. *Membership*.

²⁶ CSPL. 2012. *Report of the Triennial Review of the Committee on Standards in Public Life*, page 2; see also, Cabinet Office. 2013. *Written Ministerial Statement*.

across a whole range of institutions.²⁷ The Committee's recommendations were advisory but nevertheless made a significant impact on both the structure and culture of the system of standards as it evolved. The Committee's recommendations led to reform in both houses of Parliament, the formalisation of standards for the Civil Service and informed the establishment of the Electoral Commission. The CSPL also made headway in tackling lobbying, addressing governance in local government and considering standards for providers of public services.

The Committee's widening remit over the years demonstrates an increasing interest in groups that are not strictly public officials, but play a significant role in public life: in 1997 its Terms of Reference were expanded to consider funding to political parties, and in 2013 they were expanded again to examine ethical issues related to public services provided by private and voluntary sector organisations.²⁸ In 2016, the Committee published a report on public regulators, which again demonstrated the increasing reach of the Committee and its interests.²⁹ Recent reports have not shied away from addressing pressing societal changes that have the potential to threaten the integrity of the standards framework. The CSPL's 2020 report on AI recognised the transformative effect such technologies could have on the delivery of public services and Government decision-making and made a range of recommendations, including transparency requirements and regular evaluations of the risks to public standards.³⁰

The CSPL's approach reflected a wide range of concerns about standards of conduct in public life and the interaction of public officials with society. As demonstrated in the analysis that follows, a central concern of the standards system is to manage these interactions and the conflicts that arise between public officials' private interests – both financial and non-financial – and the need to ensure propriety in the pursuit of the public interest and the delivery of public services.

Ethics and Integrity Commission

In October 2025, the CSPL was replaced by the Ethics and Integrity Commission (EIC). The CSPL's former Chair, Doug Chalmers, became the Chair of the EIC.

Composition & governance

In many respects the Commission is modelled on the Committee that came before it. Like the CSPL, the EIC is an advisory body of the Cabinet Office and reports directly to the Prime Minister. As such, it remains dependent upon the Cabinet Office for its funding and other resources.

The EIC comprises a Chair and six independent members (an increase on the four independent members of the CSPL), and three political members recommended by the largest parties in the House of Commons. All members are appointed by the Prime Minister; the chair and independent members are appointed for a fixed five-year term; and they must comply with the Seven Principles of Public Life and the Code of Conduct.³¹

The EIC has also appointed an executive head as Chief Executive Officer. The CEO will lead the organisation day-to-day and provide leadership and continuity in support of the Chair and members.³²

Remit & responsibilities

The EIC's remit is wider than that of the CSPL that preceded it and this aims to ensure greater visibility and a more strategic role for the Commission.

While it cannot inquire into matters involving the devolved administrations (unless asked) or investigate individual cases, it nonetheless has freedom to inquire into a wide range of institutions and actors participating in public life and has been given a coordination role in

²⁷ CSPL. [Previous CSPL Reports and Reviews](#).

²⁸ CSPL. [Terms of Reference](#).

²⁹ CSPL. 2016. [Striking the Balance: Upholding the Seven Principles of Public Life in Regulation](#).

³⁰ CSPL. 2020. [Artificial Intelligence and Public Standards](#).

³¹ EIC. 2025. [Code of Conduct](#).

³² Sterling, S. 2025. [Building the Ethics and Integrity Commission](#). EIC Blog, 27 November.

relation to the Network of Standards Bodies, which include many of the institutions described in this report.³³

According to its Terms of Reference the EIC will:

- A. Promote and safeguard the Seven Principles of Public Life
- B. Conduct research and thematic inquiries and make recommendations on changes to present arrangements to help ensure the highest standards in public life
- C. Advise public authorities on the development of clear codes of conduct with effective oversight arrangements, in line with the planned forthcoming obligations of the Public Office (Accountability) Bill
- D. Examine current concerns about standards of conduct of all public office holders, and report annually to the Prime Minister on the health of standards in public life
- E. Engage and inform the wider public on the values, rules and oversight mechanisms that govern standards in public life
- F. Convene ethics and standards bodies in central government (and parliamentary standards bodies, with their agreement) to share best practice and identify and address areas of common concern.³⁴

The last four of these responsibilities are new or expanded from those of the CSPL and it is not yet clear how the EIC will fulfil them. The EIC has published an Implementation Plan for its first 18 to 20 months, which includes continuing the promotion of the CSPL's 2025 report on recognising early warning signs in public sector bodies, establishing the evidence base for and planning its approach to providing effective guidance on Codes of Conduct, and publishing its first EIC review.³⁵

In the longer view, the Public Office (Accountability) Bill, which is currently working its way through the legislative process is also likely to inform the EIC's future activities.³⁶ The Bill addresses several issues related to standards in public life, including imposing a duty of candour on public institutions, requiring public authorities to take steps to maintain ethical conduct, including through publishing and adopting a code of ethical conduct, and abolishing and replacing the common law offence of misconduct in public office.

³³ EIC. 2025. [Network of Standards Bodies – Terms of Reference](#).

³⁴ EIC. 2025. [Ethics and Integrity Commission – Terms of Reference](#).

³⁵ EIC. 2025. [Implementation Plan](#); see also EIC. 2025. [Standards require regular attention and upgrades](#). EIC Blog, 28 October.

³⁶ Ministry of Justice. 2025. [Policy Paper: Hillsborough Law Bill](#), 16 September; [Public Office \(Accountability\) Bill](#).

3. Government

- The Prime Minister and Cabinet Office
- Independent Adviser on Ministerial Standards
- House of Lords Appointments Commission
- Commissioner for Public Appointments

Summary of standards

The executive forms the centre of Government, with the Prime Minister at its head. Ministers are formally accountable to the legislature and ultimately to voters. However, informally Ministers answer to the Prime Minister who appoints them. Ministers generally come from the pool of MPs elected to the Prime Minister's party, although in the rare case of a coalition government the Cabinet is made up of members of the coalition parties. Cabinet Ministers can also be appointed from the House of Lords; and in these cases, are usually salaried in the same way as others. Ministers remain subject to the Codes of Conduct in their respective Houses and must comply with the rules laid down by the Independent Parliamentary Standards Authority (see below).³⁷

The Ministerial Code is issued by the Prime Minister and sets out the standards of conduct they expect of Ministers. It has been issued by successive Prime Ministers since 1997, but it remains non-statutory. It is not a strict rulebook, and the Prime Minister has the final say in determining how it is applied so long as the Minister concerned has not broken the law.³⁸ There have been sustained criticisms of the Code's dependence on the judgment of the Prime Minister, especially following a series of Code breaches in the early 2020s.³⁹

The CSPL made extensive recommendations for improvements in its 2021 report *Upholding Standards in Public Life*,⁴⁰ and some progress has been made in line with these. As of November 2024, the Independent Adviser (see below) can initiate investigations into breaches of the Code without the Prime Minister's consent (recommendation 8). However, ultimate authority to draft and adjudicate the Code remains with the Prime Minister (recommendation 5) and there have been no moves to enshrine the Code in primary legislation (recommendation 4) or provide a statutory footing for any of the Prime Minister's advisers (recommendation 2).

The Cabinet Office, a range of committees and the Ethics and Integrity Commission (formerly the CSPL), guide the Prime Minister in decision-making. One area over which the Government has considerable influence is in appointments made to the House of Lords and various public bodies. These appointments pose considerable risks for impropriety, with opportunities for Ministers to use these powers for reward or to curry favour.

Ministerial Code

The Ministerial Code outlines the standards against which ministerial conduct can be judged. The first Ministerial Code was published in 1997 by Prime Minister Tony Blair. However, a similar document had long existed as the Questions of Procedure for Ministers. This was first issued to Ministers as a confidential document by Prime Minister Clement Atlee in 1945 and was first made public in 1992 by Prime Minister John Major.⁴¹ Each Prime Minister has been free to update and rewrite the Ministerial Code in line with the recommendations of their advisers or their own preferences.

The specificity of the Code varies across different versions but generally it provides a set of rules that are meant to ensure that Ministers behave in ways that uphold the highest

³⁷ [Ministerial Code](#), October 2025, paragraph 1.7.

³⁸ Hine and Peele 2016, page 157.

³⁹ Dobson Phillips. 2026. *Anti-corruption in Post-Brexit Britain*.

⁴⁰ CSPL. 2021. *Upholding Standards in Public Life*.

⁴¹ Gay, O. 1996. ["Questions of Procedure for Ministers"](#), Research Paper, House of Commons Library.

standards of propriety.⁴² The current Code refers to the Seven Principles of Public Life⁴³ and reiterates that the Prime Minister is the ultimate judge of expected standards in line with their position as the head of the executive and as the sovereign's principal adviser. As such, they exercise the prerogative powers of the sovereign to organise the executive.⁴⁴ It also makes clear expectations in relation to declaring private interests and resolving any conflicts of interest, or perceived conflicts, that arise from those,⁴⁵ the use of government and official facilities,⁴⁶ the duties of collective responsibility in Cabinet,⁴⁷ rules about civil service and public appointments,⁴⁸ when and how announcements should be made in Parliament,⁴⁹ the cost effectiveness of ministerial travel,⁵⁰ and obligations on leaving office.⁵¹

In terms of managing conflicts of interest, Ministers are held to similar standards as those that apply to MPs, which in the spirit of self-regulation are set by the MPs themselves (see below). The standard of avoiding "reasonable" perceptions of conflicts rather than only real conflicts is aligned with both the Commons' and Lords' Codes of Conduct.⁵² Ministers' interactions with external organisations while in office are monitored relatively closely. The Ministerial Code sets out that official meetings with external organisations should be organised through their departments and there should be a private secretary or other official present in all meetings on Government business. The details of these meetings are published by the departments each quarter (also see section on lobbying below).⁵³ Gifts and hospitality are tightly regulated, with Ministers only able to keep gifts worth less than £140. All others are handed over to the department as Government property, which they have the option to buy back.⁵⁴ The Cabinet Office publishes a monthly Register of Ministers' Gifts and Hospitality.⁵⁵

On leaving office Ministers have several obligations, which are outlined in the Code and Business Appointment Rules.⁵⁶ The general principle is that Ministers should not profit from their public roles and that their new employers should not gain any unfair advantage through their access to Government.⁵⁷

Reviews of the Ministerial Code

While the Code has generally remained consistent in its main goal to avoid potential conflicts between ministers' private interests and their ministerial responsibilities, the document has evolved over its lifetime with a number of notable changes since 1990s.⁵⁸ In 1995, the Code included for the first time a statement on "not knowingly misleading parliament", and the terms of Ministerial accountability were outlined in 1997.⁵⁹ In 2001, following a 1995 recommendation from the CSPL, the Code clarified the Prime Minister as the ultimate judge of the Code; it also incorporated the Seven Principles of Public Life and amended paragraphs on Special Advisers, confidentiality and the treatment of special interests. In 2005, additions also clarified that Ministers must comply with the Codes of Conduct of the houses to which they are also members.⁶⁰

Significant changes were made to the Code in 2010, which increased transparency, and included amendments on complying with IPSA, on Special Advisers and rules on publishing details of hospitality and travel.⁶¹ A 2011 addendum incorporated into the 2015 Code

⁴² Ministerial Code, paragraph 1.1.

⁴³ Ministerial Code, paragraph 1.4.

⁴⁴ Ministerial Code, paragraph 2.1, 7.1; see also Cabinet Office. 2010. [The Cabinet Manual](#).

⁴⁵ Ministerial Code, paragraph 3.1.

⁴⁶ Ministerial Code, paragraph 4.1, 8.1.

⁴⁷ Ministerial Code, paragraph 5.1.

⁴⁸ Ministerial Code, paragraph 6.1.

⁴⁹ Ministerial Code, paragraph 9.1.

⁵⁰ Ministerial Code, paragraph 10.1.

⁵¹ Ministerial Code, paragraph 11.1.

⁵² Ministerial Code, paragraph 3.1.

⁵³ Ministerial Code, Paragraph 8.13.

⁵⁴ Ministerial Code, paragraph 3.25.

⁵⁵ Ministerial Code, paragraph 3.26; see also Cabinet Office. [Register of Gifts and Hospitality](#).

⁵⁶ Cabinet Office. 2025. [Business Appointment Rules for Ministers](#), 13 October.

⁵⁷ Ministerial Code, paragraph 11.1.

⁵⁸ Armstong, H and Rhodes, C. 29 March 2023. [The Ministerial Code and the Independent Adviser on Ministerial Interests](#). House of Commons Library, for a full history of changes to the Code.

⁵⁹ Armstong and Rhodes, 29 March 2023, paragraph 5.1.

⁶⁰ Armstong and Rhodes, 29 March 2023, paragraph 5.2; see also Nolan Report 1995, recommendation 12.

⁶¹ Armstong and Rhodes, 29 March 2023, paragraph 5.3.

increased Government transparency regarding links with the media.⁶² In 2016, further amendments included the removal of provisions on Extended Ministerial Offices.⁶³ Changes to the Code reflect on-going or current political discussions of adequate Ministerial responsibility and impunity. The 2018 Code, for example was influenced by three cases of forced Cabinet resignations in late 2017. These changes focused primarily on the issues raised by these resignations: sexual harassment, improper behaviour and undisclosed meetings.⁶⁴

One of the main tensions surrounding the Code has been in regard to its ownership:⁶⁵ in 2001 the Public Administration Select Committee recommended that Parliament have a voice in the formulation of the Code, which was rejected by the Government to the Committee's regret.⁶⁶ The Committee raised the issue again in 2012, and in response to its report of the same year on the independence of investigations,⁶⁷ the Government stated that parliamentary ownership of the Code "would lead to an unacceptable blurring of the lines between the Executive and Parliament".⁶⁸

This issue of ownership became a live issue in 2022, when former Prime Minister Boris Johnson was accused of re-writing the Code to his own benefit in the wake of several unresolved alleged breaches of the Code.⁶⁹ He made three significant changes: clarified that Ministers would not be expected to resign for all breaches of the Code, but could instead apologise or temporarily lose their pay; the Nolan Principles, which had previously lived in the foreword were relegated to an appendix; and the tone of the Code reasserted the Prime Minister's ultimate authority over the Code. The then Chair of the CSPL, Lord Evans, referred to the new Code as insufficient to alleviate "suspicion about the way in which the Ministerial Code is administered".⁷⁰ Indeed, more broadly the tone with which the Code was delivered was interpreted as conveying a clear message that further entrenched the Prime Minister's power.⁷¹

The current Ministerial Code retains the change from 2022 that makes explicit that, while Ministers will always be expected to resign if they are found to have knowingly misled Parliament, for other breaches of the Code, a range of sanctions is available, including resignation.⁷² The Independent Adviser (see below) has made the case for this approach, and indeed, despite being controversial at the time it was first clarified in the Code, a diversity of sanctions had been previously recommended by the CSPL.⁷³ There is also an additional sanction available in the form of a forfeiture of severance payments for serious breaches of the Code, breaches of the Business Appointment Rules and where Ministers have served less than six months.⁷⁴ The Nolan Principles are reinstated into Chapter 1,⁷⁵ and while the Prime Minister remains the ultimate arbiter of the Code, greater powers have been afforded to the Independent Adviser in terms of being able to initiate an investigation into breaches of the Code on their own authority and without the Prime Minister's prior consent.⁷⁶

The primary upholders of standards in Government are the **Prime Minister**, with the support of the **Cabinet Office** and the **Independent Adviser on Ministerial Standards**. In addition, the **House of Lords Appointments Commission** recommends appointments and vets party

⁶² Armstong and Rhodes, 29 March 2023, paragraph 5.4.

⁶³ Armstong and Rhodes, 29 March 2023, paragraph 5.7.

⁶⁴ Armstong and Rhodes, 29 March 2023, paragraph 5.8.

⁶⁵ Hine and Peele 2016, page 160.

⁶⁶ Armstong and Rhodes, 29 March 2023, paragraph 1.4; see also Public Administration Select Committee, 7 February 2001. Ministerial Code: Improving the Rule Book, Third Report of Session 2000-01.

⁶⁷ Public Administration Select Committee, 17 March 2012. The Prime Minister's adviser on Ministers' Interests: independent or not?, Twenty-second Report of Session 2010-12.

⁶⁸ The Prime Minister's Adviser on Ministers' Interests: independent or not?; Government Response to the Committee's Twenty Second Report of Session 2010-12 - Public Administration Committee.

⁶⁹ Mason, R. and Allegritti, A. 2022. "Boris Johnson accused of changing ministerial code to 'save his skin'", Guardian, 27 May.

⁷⁰ Evans, J. 2022. "The government should go beyond a 'low level of ambition' on the Ministerial Code", CSPL Blog, 1 June.

⁷¹ Durrant, T. 2022. "The new ministerial code again fails to improve standards", Institute for Government, 30 May.

⁷² Ministerial Code, paragraph 1.6c.

⁷³ Independent Adviser on Ministerial Standards. 2025. Annual Report 2024-2025, paragraph 3.4; and CSPL. 2021. Standards Matter 2, Recommendation 6.

⁷⁴ Ministerial Code, paragraph 1.14.

⁷⁵ Ministerial Code, paragraph 1.4.

⁷⁶ Ministerial Code, paragraph 2.6b.

nominations for propriety for the House of Lords, and the **Commissioner for Public Appointments** regulates the way Ministers appoint positions on the boards of national and regional public bodies.

Institutions

The Prime Minister (and the Cabinet Office)

The Prime Minister heads the Government and, with the support of the Cabinet Office, is responsible for the implementation and enforcement of the Ministerial Code. The Ministerial Code is published at the beginning of a new administration or at other times as needed and has been subject to a number of reviews and amendments over the years.⁷⁷ The Prime Minister also oversees and approves the appointment of Ministers' Special Advisers,⁷⁸ who are temporary civil servants, but their appointments are political and therefore not subject to the same merit-based recruitment requirements as permanent civil servants,⁷⁹ and is responsible for recommending appointments to the House of Lords.

Breaches of the Ministerial Code

Where breaches of the Ministerial Code are alleged they are referred to the Cabinet Secretary or Independent Adviser (see below) for investigation.⁸⁰ However, the Prime Minister on taking the advice of the Independent Adviser determines whether a breach has occurred and if so the appropriate level of sanction.⁸¹

There are several levels of sanction for breaches of the Code, which range from requiring a public apology, remedial action or removal of ministerial salary for a period of time.⁸² The Prime Minister always has the authority to request a resignation from a Minister, but there is only one circumstance in which the Code is explicit about the expectation to resign: this is when Ministers are found to have knowingly misled Parliament.⁸³

While previously there had been no financial sanctions for Ministers, the most recent Code rules that severance payments are forfeit for Ministers that commit a serious breach of either the Business Appointment Rules or the Ministerial Code.⁸⁴

Independent Adviser on Ministerial Standards

The Independent Adviser is appointed by the Prime Minister to advise on matters relating to the Ministerial Code. The first Independent Adviser on Ministers' Interests (now Independent Adviser on Ministerial Standards) was appointed in 2006, three years after the CSPL had recommended the creation of the role.⁸⁵ However, over the lifetime of the role, both the CSPL and the Public Administration Select Committee (PASC) have raised concerns about the Adviser's independence and vulnerability to executive influence.⁸⁶ The challenges were illustrated in recent years by the resignation of two Advisers: Sir Alex Allan resigned in 2020 when his advice about a breach of the Code was not upheld by the Prime Minister,⁸⁷ and Lord Geidt resigned following a request from the Prime Minister to offer a view on a potential "deliberate and purposeful breach of the Ministerial Code".⁸⁸ The PASC has long criticised the appointment process for the Adviser as undermining its independence – effectively arguing that the "post is in the Prime Minister's gift", that there had been a closed recruitment, and that the appointment of Advisers formerly with senior civil service roles put the independence

⁷⁷ Cabinet Office. 2025. [The Ministerial Code](#), 13 October.

⁷⁸ Ministerial Code, paragraph 3.2.

⁷⁹ Cabinet Office. 2024. [Code of Conduct for Special Advisers](#), September, paragraph 8.

⁸⁰ Ministerial Code, paragraph 2.1.

⁸¹ Ministerial Code, paragraph 2.7.

⁸² Ministerial Code, paragraph 2.7.

⁸³ Ministerial Code, paragraph 1.6c.

⁸⁴ Ministerial Code, paragraph 1.14.

⁸⁵ CSPL. 2003. [Defining the Boundaries within the Executive: Ministers, Special Advisers and the permanent Civil Service](#), recommendation 3.

⁸⁶ Armstrong and Rhodes, 29 March 2023, paragraph 3.1.

⁸⁷ Cabinet Office. 2020. [Statement from Sir Alex Allan](#), 20 November.

⁸⁸ BBC News. 2022. ["In full: Lord Geidt's resignation letter and Boris Johnson's reply"](#), 16 June.

of the Adviser in doubt.⁸⁹ The appointment process for the role of the Adviser in 2025 remains unchanged.

Reporting on interests

Ministers are required to disclose their private interests to their Permanent Secretary and to the Independent Adviser; these include the interests of their spouse or partner and close family.⁹⁰ They are also required to disclose their interests to Ministerial colleagues when they discuss relevant business.⁹¹ On a quarterly basis, the Independent Adviser publishes a statement on interests, known as the List of Ministers' Interests. The list does not include all information declared by ministers but rather those interests that the Independent Adviser deems relevant to each minister's portfolio and responsibilities.⁹²

Investigating breaches of the Code

The Adviser has primary responsibility for investigating breaches of the Code. The inability of the Adviser to initiate investigations had been criticised by the PASC as a departure from the powers available to other regulators.⁹³ In a 2012 PASC report on the independence of the Adviser,⁹⁴ the Committee considered the role and the lessons that could be learnt from recent breaches of the Code where the Adviser had not been consulted. It concluded that, "the title of 'independent adviser' is a misnomer",⁹⁵ and recommended that, "the independent adviser should be empowered to instigate his own investigations".⁹⁶ The Government response to the PASC's report in 2013 rejected this recommendation.⁹⁷ However, in 2024, the Code was changed to enable the Adviser to start an investigation on their own initiative.⁹⁸

On completing an investigation, the Adviser may give the Prime Minister advice on whether – in their view – there has been a breach of Code, and what sanctions should be considered. They can also require that the advice given to the Prime Minister on the outcome of their investigations is published in a timely manner.⁹⁹

Application of Business Appointment Rules

With the closure of the Advisory Committee on Business Appointments (ACOBA) in October 2025 (see below),¹⁰⁰ the Independent Adviser is now responsible for reviewing applications and providing advice to Ministers on the Business Appointment Rules. The Civil Service Commission (see below) has taken on responsibility for the administration of the Rules for Senior Civil Servants.

The Business Appointment Rules are drafted and owned by the Cabinet Office. The Rules aim to ensure that former Ministers and officials are not influenced in anticipation of future rewards and cannot profit from their knowledge and contacts or provide improper advantages to subsequent employers.¹⁰¹ Any former Ministers intending to take up an appointment or employment within two years of leaving office must apply to the Independent Adviser who considers the case.¹⁰² For Cabinet Ministers leaving office, there is also a minimum waiting period of three months before taking up employment.¹⁰³ Ministers are prohibited from lobbying Government or advising on any bids for Government contracts for two years from leaving office and there is a general prohibition on drawing on privileged information gained while in

⁸⁹ Public Administration Select Committee, 17 March 2012, paragraph 58 and the [Government Response to the Committee's Twenty Second Report of Session 2010-12 - Public Administration Committee](#).

⁹⁰ Ministerial Code, paragraph 3.3.

⁹¹ Ministerial Code, paragraph 3.7.

⁹² Ministerial Code, paragraph 3.6; see also Independent Adviser on Ministerial Standards. [List of Ministers' Interests](#).

⁹³ Armstrong and Rhodes, 29 March 2023, paragraph 3.1.

⁹⁴ Public Administration Select Committee, 17 March 2012.

⁹⁵ Public Administration Select Committee, 17 March 2012, paragraph 63.

⁹⁶ Public Administration Select Committee 17 March 2012, paragraph 44.

⁹⁷ [Government Response to the Committee's Twenty Second Report of Session 2010-12 - Public Administration Committee](#).

⁹⁸ Ministerial Code, paragraph 2.6b; Independent Adviser on Ministerial Standards. 2025. [Terms of Reference](#), 13 October, paragraph 2.2.

⁹⁹ Terms of Reference for the Independent Adviser, October 2025, paragraph 2.6.

¹⁰⁰ Advisory Committee on Business Appointments. 2025. [ACOBA's closure: the new process and contact details for applications under the Business Appointment Rules as of Monday 13 October 2025](#), 23 July.

¹⁰¹ Ministerial Code, paragraph 11.1.

¹⁰² Ministerial Code, paragraph 11.2.

¹⁰³ Ministerial Code, paragraph 11.4.

office.¹⁰⁴ The Adviser provides written advice to applicants, and the advice is published if the role is announced or taken up by the applicant, or at the applicant's request.¹⁰⁵

The application of the Rules has been far from uncontroversial with different actors taking different views on the powers, given that any regime that restricts appointments after holding office has the potential to reduce the recruitment of politicians and civil servants and unfairly constrain their future opportunities and earnings.¹⁰⁶ The CSPL's first report – the Nolan Report – recommended that Ministers and Special Advisers should be subject to similar rules to those applied to Senior Civil Servants on seeking employment on resigning from public office.¹⁰⁷ Since 1995, Ministers (but not Special Advisers, until 2010) had to seek advice when taking up roles within two years of leaving office. This was strengthened in 2007, with the inclusion in the Ministerial Code of an expectation that Ministers were to abide by the advice,¹⁰⁸ and strengthened again in the 2018 Ministerial Code to clarify that former ministers must seek advice before taking up a new role.¹⁰⁹ Following controversy over the enforceability of the Rules,¹¹⁰ the Government agreed in 2023 that they should be made more enforceable and that for Ministers a “ministerial deed” would be designed to commit them legally to the Rules.¹¹¹ Subsequent to this commitment the Government changed and the new Prime Minister has not introduced this reform.¹¹² However, since 2025, Ministers that seriously breach the Business Appointment Rules are liable to forfeit their severance payment.¹¹³

Closure of the Advisory Committee on Business Appointments

The Advisory Committee on Business Appointments (ACOBA) was a non-statutory body that provided advice to Ministers, Senior Civil Servants and Special Advisers under the Business Appointment Rules. Its membership varied over the 50 years it was in place, but in its last few years, it comprised nine members, all appointed by the Prime Minister. Three were nominated by the three largest political parties, one of whom was the Chair, and six independent lay members were appointed for a non-renewable term of five years.¹¹⁴

With the closure of ACOBA its responsibilities with regard to former ministers have been transferred to the Independent Adviser and for Senior Civil Servants and the most senior Special Advisers to the Civil Service Commission (see below). The transfer of this responsibility to the Adviser did not change the Rules themselves or the process by which advice is provided, except that it is now the responsibility of one individual rather than a diverse deliberative Committee with representation from beyond Parliament.

ACOBA's 2017-18 Annual Report referred to a recent report of the Public Administration and Constitutional Affairs Committee (PACAC), which highlighted the “escalating” problem of “increased numbers of public servants moving between the public and private sectors”, and made recommendations for reform of the system, indicating that failures to improve the system “will lead to an even greater decline in public trust in our democracy and our Government”.¹¹⁵ The recommendations were extensive, including revisiting the question of creating a statutory scheme for overseeing business appointments, with effective powers to impose sanctions for non-compliance.¹¹⁶ In ACOBA's 2024 report, the Chair of the Committee Lord Pickles described the system as “bust and needs fixing”.¹¹⁷ Necessary improvements

¹⁰⁴ Ministerial Code, paragraph 11.3.

¹⁰⁵ Ministerial Code, Annex A Terms of Reference: Independent Adviser, paragraph 5.2.

¹⁰⁶ For details see Hine and Peele, pages 188-189.

¹⁰⁷ Nolan Report 1995, page 5.

¹⁰⁸ Hine and Peele 2016, page 187.

¹⁰⁹ Ministerial Code, paragraph 11.2.

¹¹⁰ See CSPL. 2021. *Upholding standards in public life*; Boardman, N. 2021. *Review into the Development and Use of Supply Chain Finance (and associated schemes) in Government*; Public Administration and Constitutional Affairs Committee. 2022. *Propriety of Governance in Light of Greensill*. Fourth Report of Session 2022-2023.

¹¹¹ Cabinet Office. 2023. *Strengthening Ethics and Integrity in Central Government*, page 9.

¹¹² Durrant, T. Saveur, S., and McCalary, P. 2025. *Jobs after government: rules for ex-ministers and civil servants*. Institute for Government.

¹¹³ Ministerial Code, paragraph 1.14.

¹¹⁴ ACOBA, *21st Report April 2020 - March 2024*, paragraphs 70-71.

¹¹⁵ PACAC. 24 April 2017. *Managing Ministers' and officials' conflicts of interest: time for clearer values, principles and action*, page 3.

¹¹⁶ PACAC, 24 April 2017, pages 48-49.

¹¹⁷ ACOBA, *21st Report April 2020 - March 2024*, paragraph 2.

included addressing the lack of demonstrable consequences for non-compliance with the Rules, lack of focus on where the risks are greatest, lack of clarity on expectations, and a toleration of risk in positions below the level at which ACOBA advises, which means that many individuals involved in commercial decision-making are not effectively regulated.¹¹⁸ He recommended introducing a formal mechanism to commit Ministers to the Rules, sanctions for non-compliance and a risk-based approach to identifying who should be subject to additional conditions.¹¹⁹

To accompany the closure of ACOBA, wider reforms were announced introducing penalties for former Ministers who breach the Rules, regular audits by the Civil Service Commission of departmental decisions on the application of the Rules, and a commitment to developing a more “efficient and responsive system” ensuring that applicants understand their obligations.¹²⁰

House of Lords Appointments Commission

The Monarch appoints peers to the House of Lords on the recommendation of the Prime Minister. This gives the Prime Minister considerable power over the evolving make-up of the House of Lords; a power that has persistently raised concerns about the inability of any authority to hold the Prime Minister accountable for decisions that might appear to be politically or personally motivated.

Since 2000, the House of Lords Appointments Commission has assisted the Prime Minister in deciding on appointments. The Commission is an independent, advisory, non-departmental public body with seven members, including its chair.¹²¹ The composition of the Commission is intended to avoid political bias with three members representing political parties and the Chair and other three members being independent and non-political.¹²² The Commission has its own Code of Practice and Register of Commission Members’ Interests to maintain standards within its own organisation.¹²³

There have been repeated calls to place the Commission on a statutory footing, which would protect it from abolition without an Act of Parliament.¹²⁴

Remit of the Committee

The Committee has two main responsibilities: to recommend individuals for the appointment as non-party-political life peers; and to vet the nominations of peers, including those nominated by political parties, to ensure the highest standards of propriety.¹²⁵ The latter of these responsibilities is particularly important for the maintenance of standards, as the award of peerages by political parties for donations as a form of political gift has caused considerable controversy and scandal.¹²⁶ This was a live issue during the 2006-7 Cash for Honours scandal, in which both the Labour and Conservative parties were implicated in selling honours to party donors.¹²⁷ There have also been calls to expand the remit of the Commission to consider the suitability of candidates as well as their propriety.¹²⁸

Many remain highly critical and sceptical of political nominations to this day, particularly given the non-binding nature of the Committee’s advice and a recent example of the Prime Minister Boris Johnson ignoring it.¹²⁹

¹¹⁸ ACOBA 21st Report, paragraph 8.

¹¹⁹ ACOBA 21st Report, paragraph 10.

¹²⁰ McFadden, P. 2025. [Statement](#), 21 July.

¹²¹ House of Lords Appointments Commission. [Chair and Members of the Appointments Commission](#).

¹²² House of Lords Appointments Commission. [Chair and Members of the Appointments Commission](#).

¹²³ House of Lords Appointments Commission. [Code of Practice](#).

¹²⁴ Scott, E. 10 January 2025. [“House of Lords Appointments Commission: Role and powers”](#), House of Lords Library.

¹²⁵ House of Lords Appointments Commission. [Chair and Members of the Appointments Commission](#).

¹²⁶ Hine and Peele 2016, page 127.

¹²⁷ See for example, The Guardian. 2007. [“Cash for Honours Timeline”](#), 11 October.

¹²⁸ Constitution Unit. 2024. [“Seven steps to restore trust in government ethics”](#), The Constitution Unit Blog, 24 June.

¹²⁹ Scott, 10 January 2025. [“House of Lords Appointments Commission”](#).

Nominations and vetting

Anyone over the age of 21, resident in the United Kingdom and also a British, Irish or Commonwealth citizen can be nominated for a non-party-political life peerage. Following an assessment, the Committee makes recommendations following an “independent and fair assessment” based on the “individual merit” of the nominees.¹³⁰ There are criteria against which nominees are considered, including the ability to make an “effective and significant contribution” to the House of Lords, a record of “significant achievement” and a strong commitment to high standards in public life. In addition, they are expected to demonstrate “integrity and independence”, including the ability to put aside party-political considerations where necessary.¹³¹

In addition to making recommendations on individual nominations the Committee also conducts a vetting process, which covers individuals nominated by political parties. The Committee can advise the Prime Minister about any concerns relating to the propriety of a nominee. The individual should have good standing in the community and with the regulatory authorities and any past conduct should not reasonably be regarded as bringing the House into disrepute.¹³² If the Prime Minister decides to recommend an appointment which the Commission has been unable to support, the Commission writes to the Public Administration and Constitutional Affairs Select Committee to ensure transparency.¹³³

Commissioner for Public Appointments

The Commissioner for Public Appointments was established in 1995, following the recommendations of the Nolan Report,¹³⁴ and is independent of both the Government and Civil Service.¹³⁵ The Commissioner regulates the way Ministers appoint positions on the boards of national and regional public bodies.¹³⁶ All those who make public appointments are required to follow the Governance Code on Public Appointments and are subject to regulation by the Commissioner.¹³⁷

The Commissioner’s statutory functions are set out in the Public Appointments Order in Council 2025, and include: carrying out audits of the practices followed by the appointing authorities; conducting investigations with the object of improving the quality of public appointments; conducting inquiries in response to a complaint or otherwise; and may also require authorities to publish summary information relating to appointments.¹³⁸ A crucial duty of the Commissioner is to be an ‘active advocate for diversity’ and promote good practice to encourage candidates from under-represented groups to apply for posts; data on diversity is published in the Commissioner’s annual report and by the Cabinet Office.¹³⁹

Governance Code on Public Appointments

The Governance Code on Public Appointments is published by the Cabinet Office and includes the nine principles for public appointments: ministerial responsibility, selflessness, integrity, merit, openness, diversity, assurance, fairness and public service.¹⁴⁰ The responsibilities of Ministers, the Commissioner, Advisory Assessment Panels, Senior Independent Panel Members and Departments are also laid out in the Code.

Advisory Assessment Panels are responsible for deciding which candidates meet the published criteria for the role and then supplying the Minister with the names of all the

¹³⁰ House of Lords Appointments Commission. [Criteria guiding the assessment of nominations for non-party political life peers](#).

¹³¹ House of Lords Appointments Commission. [Criteria guiding the assessment of nominations for non-party political life peers](#)

¹³² House of Lords Appointments Commission. [Vetting](#).

¹³³ House of Lords Appointments Commission. [Vetting](#).

¹³⁴ Nolan Report, recommendation 38.

¹³⁵ Armstrong, H. and Rhodes, C. 1 February 2022. [The Commissioner for Public Appointments](#). House of Commons Library, page 5.

¹³⁶ [Commissioner for Public Appointments](#).

¹³⁷ Armstrong and Rhodes, 1 February 2022, page 4.

¹³⁸ [Public Appointments Order in Council 2025](#), 12 November 2025, paragraph 4.

¹³⁹ See Commissioner for Public Appointments, [Annual Report 2024-5](#). The Cabinet Office’s data report for 2024-25 can be found [here](#); and historical reports, from 2018/19-2021/22, are [here](#).

¹⁴⁰ Cabinet Office. 2025. [Governance Code on Public Appointments](#), October, paragraph 2.1.

potential candidates.¹⁴¹ The Panels remain advisory, however. Ministers may choose to appoint an individual who is not considered “appointable” by a Panel, but in such cases would be required to consult the Commissioner.¹⁴² The responsibility for public appointments ultimately lies with the Minister concerned, who in turn is accountable to Parliament.

In cases where Ministers and the Commissioner agree that an appointment is “significant” panels should include Senior Independent Panel Members. These individuals should be familiar with senior recruitment, independent of the department and not politically active.¹⁴³ They have specific responsibilities for highlighting any material breaches in the appointment process.¹⁴⁴ Departments are responsible for ensuring the process is run in a way that complies with the Code,¹⁴⁵ and are also responsible for the transparency requirements, including advertising public appointments and the contact details of their public appointments team.¹⁴⁶

Remit of the Commissioner

In 2016, a review of the Commissioner’s role was published.¹⁴⁷ The report received extensive commentary from the outgoing Commissioner, as well as the CSPL and the PACAC, which interpreted the recommendations as weakening the role of the Commissioner.¹⁴⁸ There were two main recommendations that caused controversy: the increased emphasis on Ministerial responsibility for appointments and the recommendation that the Government rather than the Commissioner should publish the Governance Code.¹⁴⁹

Under the current Code, the Minister has the final decision on appointments and the Commissioner must only be consulted if a Minister chooses to make an appointment that a Panel has deemed not to be “appointable”;¹⁵⁰ decides to make an appointment without a competition;¹⁵¹ or appoints a Senior Independent Panel Member.¹⁵² The Commissioner must also be notified of extension of tenure beyond ten years/two terms.¹⁵³

In 2016, the CSPL raised concerns about the removal of “too many of the checks and balances on Ministerial powers in relation to the public appointments process”, to the inquiry into the report led by the PACAC.¹⁵⁴ In March 2017, the CSPL indicated that the “new regime will require continued monitoring and review”.¹⁵⁵ In 2020, the outgoing Commissioner for Public Appointments wrote to the CSPL voicing concerns about the political nature of the system.¹⁵⁶ The CSPL’s 2021 report recommended amendments to the Code to the effect that Ministers should not be able to appoint candidates deemed to be not appointable by assessment panels, and if they do they should be brought before a relevant select committee to explain their actions.¹⁵⁷ While the current Code does not prohibit Ministers from appointing such candidates it does require them to write to the relevant select committee and appear before it if requested.¹⁵⁸ Further concerns have been raised about the power of Ministers to dismiss appointees before their terms are up where conflicts arise.¹⁵⁹

¹⁴¹ Governance Code, paragraph 5.2.

¹⁴² Governance Code, paragraph 3.5.

¹⁴³ Governance Code, paragraph 6.1.

¹⁴⁴ Governance Code, paragraph 6.3.

¹⁴⁵ Governance Code, paragraph 7.1.

¹⁴⁶ Governance Code, paragraph 8.2.

¹⁴⁷ Grimstone, G. March 2016. Better Public Appointments: A review of the public appointments process. Cabinet Office.

¹⁴⁸ Armstrong and Rhodes, 1 February 2022, page 4.

¹⁴⁹ Armstrong and Rhodes, 1 February 2022, page 16.

¹⁵⁰ Governance Code, paragraph 3.5.

¹⁵¹ Governance Code, paragraph 3.6.

¹⁵² Governance Code, paragraph 6.2.

¹⁵³ Governance Code, paragraph 3.11.

¹⁵⁴ CSPL. 7 April 2016. Submission of Evidence to the Public Administration and Constitutional Affairs Select Committee inquiry into Better Public Appointments: A review of the public appointments process.

¹⁵⁵ Committee on Standards in Public Life. 2017. Public Appointments: CSPL view on PACAC follow up report, Press Release, 10 March.

¹⁵⁶ Commissioner for Public Appointments. 2020. Letter to Lord Evans Chair of the CSPL, 7 October.

¹⁵⁷ CSPL. 2021. Upholding Standards in Public Life, page 10 and recommendation 10.

¹⁵⁸ Governance Code, paragraph 3.5.

¹⁵⁹ Rutter, J. and Chivukula, S. 2020. The public appointments process. Institute for Government, 7 October.

Investigating complaints

Initially, complaints should be taken up with the Department concerned, but if the complainant is dissatisfied with the Department's response they may bring it to the Commissioner.¹⁶⁰ The Commissioner will normally consider a complaint if it relates to a specific public appointment; the complainant identifies the part of the Governance Code that was breached and provides evidence, and the complaint has already been made to the relevant Department.¹⁶¹ The Commissioner publishes the details of the complaints investigated and the outcome of investigations, and can also make recommendations for future appointment processes.¹⁶²

The Commissioner also has the power to hold investigations into any aspect of the public appointments process,¹⁶³ the results of which are published on the Commissioner's website. While the Commissioner can make recommendations following these complaints and investigations, there is no power to ask for a competition to be re-run or for a particular individual to be appointed.

Conduct of Public Appointees

Once recruited, all public appointees are required to comply with the Seven Principles of Public Life and the Code of Conduct for Board Members of Public Bodies.¹⁶⁴ The Code is owned by the Cabinet Office and outlines the expected behaviour of board members, including the use of public funds, allowances, gifts and hospitality, use of official resources and information, political activity and employment and appointments.¹⁶⁵ In particular, conflicts of interest should be declared and registered with the relevant Department and the individual should not take part in discussions or the determination of matters in which they have a financial interest.¹⁶⁶ Breaches of the Code are considered a breach of the terms of employment,¹⁶⁷ and should be reported internally to the Chair of the body concerned or the Permanent Secretary of the sponsor Department.¹⁶⁸

¹⁶⁰ Governance Code, paragraph 4.4.

¹⁶¹ Commissioner for Public Appointments. [Complaints](#).

¹⁶² Commissioner for Public Appointments. [Outcomes of investigations](#).

¹⁶³ Public Appointments Order in Council 2025, paragraph 4(3).

¹⁶⁴ Governance Code, paragraph 9.1.

¹⁶⁵ Cabinet Office. 2019. [Code of Conduct for Board Members of Public Bodies](#), June.

¹⁶⁶ Code of Conduct for Board Members of Public Bodies, paragraph 4.3.

¹⁶⁷ Code of Conduct for Board Members of Public Bodies, foreword.

¹⁶⁸ Code of Conduct for Board Members of Public Bodies, paragraph 8.2.

4. House of Commons

- Parliamentary Commissioner for Standards
- Committee on Standards
- Independent Complaints and Grievance Scheme
- Independent Expert Panel
- Independent Parliamentary Standards Authority
- Speakers Committee on the Independent Standards Authority

Summary of standards

As the elected chamber of the United Kingdom's Parliament, members of the House of Commons (MPs) come under the greatest public scrutiny. The regime governing MPs' standards of behaviour has changed profoundly since the 1990s, from one that relied mainly on self-regulation to one that is increasingly overseen by rules, regulations and several independent bodies and officers.¹⁶⁹

The Committee on Standards in Public Life (CSPL) published its first report – known colloquially as the Nolan Report – in 1995, with 11 recommendations to address standards in the House of Commons. These included a reinstatement of the ban on paid advocacy, the introduction of a Code of Conduct, a more detailed disclosure of interests, expanded guidance on conflicts of interest, and the appointment of a Parliamentary Commissioner for Standards.¹⁷⁰ The recommendations were initially resisted by many MPs who were concerned to avoid outside regulation and viewed the report as an attack on the sovereignty of Parliament,¹⁷¹ but in time all the recommendations made in 1995 were implemented.¹⁷²

Code of Conduct

Since 1996, MPs have been subject to a Code of Conduct (the Code), which outlines their duties and the general principles of conduct expected of them based on the Seven Principles of Public Life.¹⁷³ The Code outlines 11 Rules of Conduct and places emphasis on resolving any “conflicts of interest” that arise in favour of the public interest:

Members must base their conduct on a consideration of the public interest, avoid conflict between personal interest and the public interest and resolve any conflict between the two, at once, and in favour of the public interest.¹⁷⁴

Managing conflicts of interest is the cornerstone of the system of public standards. A central feature of the work of politics is to negotiate between and reconcile competing interests in society. The subversion of that process by the pursuit of private or covert group interests seriously hampers its ability to perform this basic function.¹⁷⁵ This requires a careful balancing in the case of politicians, because the standard of impartiality in public office, does not apply to them with the same force as it does to other public roles.¹⁷⁶

In the British system, MPs are exempt from some lobbying rules, as it is implicit in the political nature of the role of politicians that they will necessarily be called upon to make partial

¹⁶⁹ See Hine and Peele 2016, page 69.

¹⁷⁰ For a full list of House of Commons recommendations see: The Nolan Report 1995, pages 7-9.

¹⁷¹ Oliver, D. 1997. “Regulating the conduct of MPs. The British experience of combating corruption”, *Political Studies* XLV: pages 539–558, page 549.

¹⁷² Oliver 1997, page 549.

¹⁷³ House of Commons. 2023. [Code of Conduct and Guide to the Rules relating to the Conduct of Members](#), 10 February.

¹⁷⁴ Rule of Conduct 2 in Code of Conduct and Guide to the Rules relating to the Conduct of Members.

¹⁷⁵ For a fuller discussion: Philp, M. 1997. “Defining political corruption”, *Political Studies* 45 (3): pages 436–462, page 453.

¹⁷⁶ Rothstein, B. and Teorell, J. 2008. “What is quality of government? A theory of impartial government institutions”, *Governance* 21(2): pages 165-190.

decisions,¹⁷⁷ and at times make representation on behalf of their constituents.¹⁷⁸ Outright paid advocacy or the receipt of a bribe to influence an MP's conduct is banned, as is the provision of paid advice by MPs on the inner workings of Parliament.¹⁷⁹ However, the regulation of conflicts of interest is primarily governed by the registration of interests and by declarations whenever they are relevant, including in the chamber, committees and during inquiries (see below).¹⁸⁰

A key challenge of the Code has been to distinguish between the public and private lives of MPs.¹⁸¹ In late 2011-2012, the Committee on Standards and Privileges responded to the Parliamentary Commissioner for Standards' recommendation to increase the scope of the Code to include:

... cases in which a Member's conduct in private or wider public life is so extreme that it damages the reputation of the House should fall within the Code.¹⁸²

As a result, a revised Code in 2012 included changes that raised concerns about MPs' rights to privacy.¹⁸³ While the previous Code had been unequivocal in excluding MPs' "purely private and personal lives",¹⁸⁴ in 2012 the wording was changed to:

The Code applies to a Member's conduct which relates in any way to their membership of the House. The Code does not seek to regulate the conduct of Members in their purely private and personal lives or in the conduct of their wider public lives unless such conduct significantly damages the reputation and integrity of the House of Commons as a whole or of its Members generally.¹⁸⁵

While an amendment made during the debate on the Code,¹⁸⁶ constrained the Commissioner from investigating matters relating exclusively to the private and personal lives of MPs,¹⁸⁷ this did not limit the ability of the Commissioner to investigate matters in which personal and public lives intersected. These changes were reversed in 2015, with the wording returning to its pre-2012 form.¹⁸⁸ The 2023 Code added an additional statement affirming that "no member is above the law".¹⁸⁹

The concerns about the conflicts of interest arising at the intersection of public and private lives has continued, however. In July 2018, the CSPL issued a report, which suggested a new package of reforms, including recommendations to impose "reasonable limits" on MPs outside activities and restricting gifts and hospitality from lobbyists.¹⁹⁰ Some of the report's recommendations have since been adopted, including bans on MPs acting as parliamentary consultants,¹⁹¹ but others were rejected.¹⁹² These included imposing "reasonable limits" on the outside activity of MPs, including second jobs, which the Committee on Standards deemed "not practicable or enforceable".¹⁹³ The heart of the ongoing disagreement lies in the feasibility of defining "reasonable limits" on MPs' earnings or hours.

In 2025, the Committee on Standards reignited the debate with its own inquiry into MPs' outside interests and employment. This aims to clarify the significance of the rules-based and principle-based approaches to MPs' second jobs.¹⁹⁴ The inquiry is yet to conclude (December

¹⁷⁷ Philp, M. 2017. "The corruption of politics." *Social Philosophy and Policy*, 34, 8. Permanent WRAP URL: <http://wrap.warwick.ac.uk/90797>

¹⁷⁸ Committee on Standards. 2021. Sanctions and confidentiality in the House's standards system: revised proposals. Twelfth Report of Session, page 26; Application of the Lobbying Rules in Code of Conduct and Guide to the Rules, paragraph 16(d).

¹⁷⁹ Rule of Conduct 3 & 9. Code of Conduct and Guide to the Rules relating to the Conduct of Members.

¹⁸⁰ Rules of Conduct 5, 6 & 8. Code of Conduct and Guide to the Rules relating to the Conduct of Members; see also "Registration of Members' Financial Interests" in Guide to the Rules.

¹⁸¹ Hine and Peele 2016, page 84.

¹⁸² Committee on Standards and Privileges. 2011. Review of the Code of Conduct. 8 November, page 6.

¹⁸³ See Hine and Peele 2016, page 84.

¹⁸⁴ House of Commons. Code of Conduct 2009.

¹⁸⁵ House of Commons. Code of Conduct 2012, paragraph 2.

¹⁸⁶ Gay, O and Kelly, R. 16 March 2015, The Code of Conduct for Members – recent changes, page 12.

¹⁸⁷ Code of Conduct 2012, paragraph 17.

¹⁸⁸ House of Commons. Code of Conduct 2015.

¹⁸⁹ Code of Conduct 2023, page 2.

¹⁹⁰ CSPL. 2018. MPs' outside interests.

¹⁹¹ Recommendation 10 is implemented by Rule of Conduct 9.

¹⁹² Written evidence submitted by Committee on Standards in Public Life, WOC0087, 2024.

¹⁹³ Committee on Standards. 2021. Review of the Code of Conduct: proposals for consultation. Fourth Report of Session 2021–22.

¹⁹⁴ UK Parliament. Outside employment and interests.

2025), but considerable thought has been given to how professions traditionally seen as beneficial to the work of MPs, such as the legal profession, could produce conflict of interests when legislating. There also remains concern over the growing pressure for MPs to manage their time and how that impacts on their other roles, with “conflict of attention” seen as an increasingly modern problem. How MPs maintain public confidence is pertinent to these discussions, just as much as the need for a diverse and well-informed Parliament.¹⁹⁵

Since August 2018, the Code of Conduct has included reference to the Behaviour Code and a rule on the treatment of staff and others “with dignity, courtesy and respect”.¹⁹⁶ This addition was agreed by Parliament on 19 July 2018, in response to concerning reports of bullying, harassment and sexual misconduct, and is part of an on-going process to deal with the problem through the Independent Complaints and Grievance Scheme (see below).¹⁹⁷

Guide to the Rules

A Guide to the Rules accompanies the Code and provides detailed guidance on the registration and declaration of members’ interests, lobbying and outside interests. The test for the registration and declaration of interests by MPs sets a high bar:

The overall aim of both registration and declaration is to provide information about any financial interest which *might reasonably be thought by others* to influence a Member’s actions, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament.¹⁹⁸ (Italics added.)

That is, it is not sufficient for MPs to be confident that any interests they have are not in conflict, they must make judgements based on the reasonable perceptions of others. The Committee on Standards addressed the interpretation of this test in a case in 2015, where an MP was accused of failing to declare an interest while participating in a relevant debate. Although no conflict of interest was found, the Commissioner considered the case to fit the above criteria in the sense that an ordinary person might have reasonably viewed the MP’s interests in this way.¹⁹⁹ Its deliberations found the MP concerned not in breach of the rules, but that “more clarity” should be provided in future.²⁰⁰

In 2022, following an extensive enquiry by the Committee on Standards, the Guide was updated to tighten the rules on lobbying.²⁰¹ In particular, the “serious wrong or substantial injustice” exemption for whistleblowers was clarified. This exemption had provided some cover for lobbying activity, if the activity disclosed wrongdoing by another party. It was used as a defence in the 2021 case of paid advocacy involving former MP Owen Paterson.²⁰² MPs must now declare their whistleblowing intention at the outset of any communication and can only use the exemption once.²⁰³

The primary upholders of standards in the House of Commons are the **Parliamentary Commissioner for Standards**, overseen by the **Committee on Standards**, which is in turn overseen by the **Independent External Panel**. The **Independent Complaints and Grievance Scheme** investigates complaints of bullying, harassment and sexual misconduct and passes its findings to the Commissioner. The **Independent Parliamentary Standards Authority (IPSA)** regulates MPs’ salaries and expenses and is overseen by the **Speaker’s Committee**. The **Speaker** is directly responsible for conduct in the Chamber.

¹⁹⁵ Committee on Standards, 14 January 2025. [Outside employment and interests - Oral evidence](#), Q19 and Q13.

¹⁹⁶ Rule 1 Code of Conduct. See also UK Parliament. [The Behaviour Code](#).

¹⁹⁷ See Kelly, 16 July 2019, 4. See also UK Parliament. [The Independent Complaints and Grievance Scheme](#).

¹⁹⁸ Guide to the Rules, paragraph 5.

¹⁹⁹ Committee on Standards. 2015. [Mr Peter Lilley](#), Fifth Report of Session 2014-15, paragraph 2.

²⁰⁰ Committee on Standards. 2015. [Mr Peter Lilley](#), paragraph 10.

²⁰¹ House of Commons Committee on Standards. 2022. [New Code of Conduct and Guide to the Rules: Recommendations for Reform](#). 15 December.

²⁰² Committee on Standards. 2021. [Mr Owen Paterson](#), Third Report of Session 2021-22, paragraph 22.

²⁰³ Code of Conduct, “The Rules Relating to Lobbying”, paragraph 7.

Institutions

Parliamentary Commissioner for Standards

The Commissioner's Office was established in 1995 following the recommendations of the Nolan Report. The Commissioner is an independent officer in the House of Commons and is responsible for: maintaining the Register of Members' Financial Interests and any other registers of interest established by the House, providing confidential advice to Members and others subject to registration; advising the Committee on Standards, its sub-committees and individual MPs on the interpretation of the Code of Conduct; monitoring the operation of the Code and registers and making recommendations to the Committee on Standards or appropriate sub-Committee; investigating matters relating to the conduct of MPs and reporting to the Committee on Standards or relevant sub-committee with findings; and overseeing and making findings in cases against MPs under the Independent Complaints and Grievance Scheme.²⁰⁴ The Commissioner is not responsible for and does not have the power to update the Code of Conduct.

The Commissioner is an officer of the House of Commons, but not one of its Members; and is appointed in an open competition for a fixed-term period of five years. The Commissioner can only be removed by a resolution of the House after a report by the Committee on Standards stating that the Commissioner is unfit to hold office or unable to carry out their functions.²⁰⁵ In January 2019, changes were made to the Commissioner's remit and independence, including the removal of the requirement on the Commissioner to consult the Committee on Standards before investigating historical allegations (over seven years old) or those relating to a former MP and also the need to consult the Committee prior to referring a matter to the police. The then-Commissioner stated that this had "reinforced" their independence.²⁰⁶

Upholding and reviewing the Code

The Commissioner makes recommendations to the Committee on Standards (or previously the Committee on Standards and Privileges) about necessary revisions to the Code and Guide to the Rules. The Committee considers these and then presents its recommendations to Parliament. The Government decides on the terms of the motions proposing changes to the Code, which are submitted to the House for approval. In 2002, the CSPL recommended that the Commissioner should conduct a review of the Code of Conduct once in every Parliament.²⁰⁷ While this recommendation has not been followed precisely – there was no review in 2005-10 Parliament – there have been regular reviews, often following public consultations.²⁰⁸ Since 2003, the Commissioner has produced annual summaries which detail statistics and trends.²⁰⁹

The Commissioner's Office ensures that MPs are offered adequate counsel when they enter Parliament and that they are aware of the Code and the Guide to the Rules. When the new Code came into effect in March 2023, the Commissioner also noted their educative role, which included circulating a template clause on lobbying so that all Members were aware of the stricter approach on initiating or participating in paid parliamentary advice.²¹⁰ Given the high number of new MPs (335) entering the house after the 2024 General Election, the Office of the Commissioner prepared itself for "the biggest logistical challenge it had faced in living memory".²¹¹ An induction pack containing a video overview of the parliamentary standards system and an introduction to the Nolan Principles and the new Code was sent directly to parliamentary emails and published on the Commissioner's website, and Q&A sessions were also held during the fortnight following the election.²¹²

²⁰⁴ [Standing Order 150](#) (2).

²⁰⁵ [Standing Order 150](#) (8).

²⁰⁶ Parliamentary Commissioner for Standards (PCS), [Annual Report 2018-19](#), 25 July 2019, page 7.

²⁰⁷ CSPL. 2002. [Standards of Conduct in the House of Commons](#), page 1.

²⁰⁸ Hine and Peele 2016, page 84. The Commissioner has twice conducted public consultations on the Code (in 2011 and 2016) and the Guide (in 2012 and 2016), which have been used to inform reviews and recommendations for change; see UK Parliament. [Press Notices](#); alterations of the Code and Guide to the Rules can be found [here](#).

²⁰⁹ The Parliamentary Commissioner for Standards, Annual Reports can be found [here](#).

²¹⁰ The Parliamentary Commissioner for Standards. 2023. [Annual Report 2022-23](#), 12 July, paragraph 3.

²¹¹ Parliamentary Commissioner for Standards. 2024. [Annual Report 2023-2024](#), 6 November, paragraph 47.

²¹² Parliamentary Commissioner for Standards, Annual Report 2023-2024, paragraphs 51-2.

Registers of Interests

The first register of member's interests was created in February 1974, but the level of detail required was increased considerably by the recommendations of the Nolan Report and updated regularly in revisions of the Code and Guide to the Rules.²¹³ The significance of these registers in demonstrating transparency in Parliament and providing public confidence in the management of MPs' interests should not be underestimated. As well as registering their interests, MPs also must make ad hoc declarations, which cover a wider range of interests than those they are required to register.

The Commissioner's Office is responsible for administering four registers: Register of Members' Financial Interests, Register of Journalists' Interests, Register of Interests of Members' Staff and Register of All-Party Parliamentary Groups (APPGs). The registers reflect the ways in which conflicts of interest might enter Parliament. APPGs in particular have come under scrutiny for providing an access point for lobbyists to exert influence on policy processes.²¹⁴ Since 2020, the Committee on Standards has investigated the role of APPGs more closely, citing their large number (744) and lack of transparency as potential catalysts for the "next great parliamentary scandal".²¹⁵ In 2023 it published a comprehensive list of recommendations,²¹⁶ which were largely accepted by Government, with their response even calling for further bans on foreign funding coming from organisations, not just governments.²¹⁷

The Guide to the Rules provides detail on the Registration of Members Financial Interests.²¹⁸ The overall purpose of the Register is to catalogue any financial or other material benefit which might "influence his or her actions, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament".²¹⁹ MPs are required to register financial and other registrable benefits received in the previous 12 months before their election, within one month of entering Parliament; and thereafter to register any benefits within 28 days.²²⁰ Registerable benefits include employment and earnings; donations and other support for activities as MPs; gifts, benefits and hospitality from UK sources; visits outside the UK; gifts and benefits from outside the UK; land and property; shareholdings; miscellaneous; family members employed; and family members engaged in lobbying.²²¹ Thresholds for registration of interests vary, but for example MPs must register payments received (of whatever size) for any employment outside the House once they have received a total of over £300 in payments from the same source in a calendar year.²²²

The 2018 CSPL report on outside interests recognised that the registration of non-pecuniary interests remained problematic to the extent that "the interest might reasonably be thought by others to influence actions taken in their capacity as a Member of Parliament" and recommended they should be registered in the same way as pecuniary interests.²²³ The Code has since adopted more stringent wording of the miscellaneous category, noting that "significant, formal unpaid roles" must be registered. Whilst this provides less room for interpretation,²²⁴ it does not adopt the CSPL recommendations in full. The Government's response on this was that "overly expansive policy including all non-pecuniary interests could undermine the right of a Member to enjoy a private life and be a member of, or volunteer for, organisations where they do not hold decision-making power".²²⁵

²¹³ Hine and Peele 2016, page 85.

²¹⁴ Hine and Peele 2016, page 203.

²¹⁵ Committee on Standards. 2022. All-Party Parliamentary Groups: improving governance and regulation. Seventh Report of Session 2022-23, paragraph 51.

²¹⁶ Committee on Standards. 2023. All-Party Parliamentary Groups: final proposals. Eighth Report of Session 2022-23, paragraph 13.

²¹⁷ All-Party Parliamentary Groups: final proposals.

²¹⁸ Guide to the Rules, Registration of Members' Financial Interests.

²¹⁹ Guide to the Rules, Registration of Members' Financial Interests, paragraph 3.

²²⁰ See also Rule 5 Code of Conduct.

²²¹ Guide to the Rules, Registration of Members' Financial Interests, paragraph 5-62.

²²² Guide to the Rules, Registration of Members' Financial Interests, paragraph 5.

²²³ CSPL 2018. MPs outside interests. Recommendation 3.

²²⁴ See rulings on Category 8, Code of Conduct.

²²⁵ Committee on Standards. 2022. New Code of Conduct and Guide to the Rules: promoting appropriate values, attitudes and behaviour in Parliament. First Report of Session 2022-23, paragraph 62.

Breaches of the Code

The Commissioner is responsible for responding to allegations of breaches of the Code and considering complaints about MPs. Since the adoption of the 2023 Code, the role of the Commissioner and the procedures for inquiry have been captured in its own document, the Procedural Protocol, which is approved by the House.²²⁶ The Code states that the Commissioner may investigate matters relating to an MP's adherence to the rules, but not alleged breaches of the Seven Principles of Public Life themselves.²²⁷

The Commissioner can start an investigation into an alleged breach of the rules that has been brought to their attention in the following ways:

- Allegations brought to their attention by a complainant
- Matters brought to their attention by the Member concerned (self-referral)
- Investigations on their own initiative
- Matters which arise during an investigation
- Matters referred to them by IPSA and certain other bodies.²²⁸

An inquiry is opened if there is sufficient evidence, if it falls within Commissioner's remit and if the Commissioner is of the opinion it is justified and proportionate to do so. The Commissioner cannot, for example, investigate criminal misconduct, as this is a matter for the police. Other matters the Commissioner cannot investigate are:

- Conduct in the Chamber, which is a matter for the Speaker
- Breaches of the scheme for parliamentary expenses, which are matters for the Independent Parliamentary Standards Authority
- The funding of political parties and the permissibility of donations, which are matters for the Electoral Commission
- Allegations of breaches of the Ministerial Code, which are matters for the Cabinet Office and the Prime Minister
- Allegations relating to a Member's purely private and personal life.²²⁹

The Commissioner may conclude an inquiry in three ways: decide not to uphold the complaint and consider there has not been a breach of the Code; find a breach and engage in a rectification procedure, if agreed to by the MP; or find a breach unsuitable for rectification or raising issues of wider concern. In the final case, the Commissioner reports to the Committee on Standards, which then reaches a conclusion on the breach of the rules and can recommend sanctions to the House (see below).²³⁰ In the case where no breach of the rules or a rectification procedure is conducted, the Commissioner will publish a letter with their reasoning on their website and will notify the Committee on Standards.²³¹ Where there are serious allegations or allegations are of wider significance or relevance, the Commissioner may submit a memorandum to the Committee for a decision; the Committee then makes a report to the House.²³²

The number of formal complaints against named MPs fluctuate each year and are reported in the Commissioner's Annual Report: in the 2024-25 report there were 2,955 written allegations and inquiries. Only 15 inquiries commenced, with a large majority of complaints falling under the remit of another body, relating to freedom of speech, constituency case work or ministerial conduct.²³³

Committee on Standards

The Committee on Standards was established in December 2012, following its separation from the former Committee on Standards and Privileges. Its role involves adjudicating on

²²⁶ House of Commons. 2023. Procedural Protocol in respect of the Code of Conduct.

²²⁷ Code of Conduct, page 2.

²²⁸ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 21.

²²⁹ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 19.

²³⁰ Procedural Protocol in respect of the Code of Conduct 2023, paragraphs 38-56.

²³¹ Procedural Protocol in respect of the Code of Conduct 2023, paragraphs 45, 52.

²³² Procedural Protocol in respect of the Code of Conduct 2023, paragraph 46.

²³³ The Parliamentary Commissioner for Standards. 2025. Annual Report 2024–25, page 24.

standards cases, overseeing the work of the Commissioner and considering policy relating to standards.²³⁴

The Committee on Standards comprises seven MPs and seven lay members, following a recommendation made in 2015 to expand and rebalance the membership – there were previously 10 MPs and three lay members.²³⁵ The Chair of the Committee is a senior opposition MP; the members are appointed rather than elected by the House and there is no Government majority in its make-up.²³⁶

Lay members are not MPs, but members of the public and are intended to “bring an independent and external perspective to the Committee's deliberations”.²³⁷ Voting rights were extended to lay members in January 2019, and they have the right to have their opinions added to a report of the Committee. The Committee cannot meet without the presence of a lay member, so they also have the option to withdraw and prevent the continuation of Committee deliberations and decision-making – the Committee's quorum is three elected members and three lay members.²³⁸

Resolution of inquiries

The Committee does not investigate complaints directly. Instead, the Commissioner investigates alleged breaches of the Code and refers more serious cases for review to the Committee.²³⁹ Once the Committee has received a memorandum from the Commissioner detailing a case, they can ask the MP concerned to appear before it, providing written or oral evidence.²⁴⁰ The Committee publishes its decision through a report made to the House of Commons.²⁴¹

Where the Commissioner has determined that there has been a breach of the rules and the Committee agrees, it can recommend sanctions.²⁴² On its own authority, the Committee can impose an apology which can be made in writing or on the floor of the House, a requirement to attend training or repay money, the withdrawal of services or facilities from an MP and for non-members, the withdrawal of parliamentary passes for a fixed or indefinite period.²⁴³ For more serious matters, the Committee can also recommend sanctions to the House of Commons. These include withdrawal of services and facilities, dismissal from a select committee, suspension from the House during which they receive no salary and cannot attend Parliament, withholding of salary and allowances and in the most serious cases, expulsion from the House.²⁴⁴ MPs have the right to appeal the decisions of the Committee through the Independent Expert Panel (see below).

It is customary for the House to accept the recommendations of the Committee,²⁴⁵ and decisions had been taken normally without a formal vote. However, following the controversy surrounding the Owen Paterson lobbying case in 2021, sanctions now require a vote in the House, which is taken without the opportunity for debate or amendment of the Committee's report.²⁴⁶

The Committee can also make reports to the House of Commons on other matters referred to it by the Commissioner that do not directly deal with the conduct of individual members but

²³⁴ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 57. See also, UK Parliament. [Role – Committee on Standards](#).

²³⁵ Committee on Standards. 10 February 2015. [The Standards System in the House of Commons](#). Sixth Report of Session, paragraph 90.

²³⁶ UK Parliament. [Committee on Standards – Membership](#).

²³⁷ UK Parliament. [Lay members – Committee on Standards](#).

²³⁸ UK Parliament. [Lay members – Committee on Standards](#).

²³⁹ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 53.

²⁴⁰ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 65.

²⁴¹ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 71.

²⁴² Procedural Protocol in respect of the Code of Conduct 2023, paragraph 78.

²⁴³ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 79.

²⁴⁴ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 81.

²⁴⁵ Procedural Protocol in respect of the Code of Conduct 2023, paragraph 82.

²⁴⁶ Baker, F. 2024. [Who regulates standards for MPs?](#) Institute for Government, 9 February; see also Procedural Protocol in respect of the Code of Conduct 2023, paragraph 85.

address more general and broader issues.²⁴⁷ The Committee publishes its reports on inquiries and other matters on its website, along with the Government's response.²⁴⁸

Independent Complaints and Grievance Scheme

Reports of bullying and harassment of staff and MPs came to light in November 2017 and set in motion initiatives to tackle the problem and institute an Independent Complaints and Grievance Scheme (ICGS). Dame Laura Cox's report into the bullying and harassment of House of Commons staff, published in October 2018, emphasised the need for "broad cultural change" to address the problems.²⁴⁹ A further report by Gemma White QC, published in July 2019, examined the "unacceptable risk of bullying and harassment" faced by the staff of MPs, concluding that the problem was "sufficiently widespread to require an urgent collective response".²⁵⁰

The ICGS has been in operation since July 2018 and receives complaints of bullying, harassment or sexual misconduct involving current and former members of the parliamentary community.²⁵¹ Its work is guided by the Behaviour Code, the Bullying and Harassment Policy and Procedure and the Sexual Misconduct Policy and Procedure. The Behaviour Code outlines how individuals should:

- Respect and value everyone
- Recognise their power, influence or authority and don't abuse them
- Think about how their behaviour affects others and strive to understand their perspective
- Act professionally towards others
- Ensure Parliament meets the highest ethical standards of integrity, courtesy and mutual respect
- Speak up about any unacceptable behaviour.²⁵²

It provides both support and advice to complainants and witnesses, as well as conducting investigations into allegations. The ICGS runs a helpline, which can be accessed via phone, text and email. Initial contacts are made by an independent investigator, who assesses the complaint and makes an Initial Assessment to establish whether a Full Assessment will take place.²⁵³ If a Full Assessment is warranted, an investigation will take place, where the complainant and the person complained about, along with any witnesses, are informed and interviewed. A draft report is produced, sent to all parties and when finalised is sent to the relevant decision-making body. In the case of MPs, the decision-making body is the Parliamentary Commissioner for Standards. If a complaint is made about someone working for an MP, then the decision-maker is their line manager, who is usually the MP.²⁵⁴

Since its establishment, the ICGS has been subject to three independent reviews in 2019, 2021 and 2024. The most recent of these concluded that overall the ICGS is "making a difference", but also made several recommendations for improvement, including improving the agility and responsiveness of the ICGS's governance function with the establishment of a permanent ICGS Assurance Board.²⁵⁵ As of July 2025, a new ICGS Assurance Board is in operation and comprises senior administrators, lay experts, and HR representatives, empowered to approve procedures under a newly defined policy framework.²⁵⁶

Independent Expert Panel

The Independent Expert Panel (IEP) was established in June 2020 to hear appeals against decisions made by the Committee on Standards on breaches of the Code and to determine

²⁴⁷ [Standing Order 149](#): Guide to the Rules, Chapter 4, paragraph 21.

²⁴⁸ UK Parliament. [Committee on Standards – Publications](#).

²⁴⁹ Cox, L., 15 October 2018. [The Bullying and Harassment of House of Commons Staff: Independent Inquiry Report](#), page 5.

²⁵⁰ White, G. 11 July 2019. [Bullying and Harassment of MPs' Parliamentary Staff: Independent Inquiry Report](#), page 3.

²⁵¹ UK Parliament. [Independent Complaints and Grievance Scheme](#).

²⁵² UK Parliament. [Behaviour Code](#).

²⁵³ ICGS. 1 October 2025. [Using the Independent Complaints and Grievance Scheme](#): Guide for Complainants.

²⁵⁴ ICGS. 1 October 2025.

²⁵⁵ Kernaghan, P. 2024. [Independent Review of the ICGS](#). ICGS, 13 May.

²⁵⁶ Hansard, Commons Chamber Volume 769, [Column 89](#), 16 June 2025.

appeals and sanctions in cases where complaints have been brought against MPs under the ICGS.²⁵⁷

The IEP comprises eight members drawn from outside of Parliament from nominations by the House of Commons Commission. While transparency is encouraged in their profiles, they are not subject to any interest registration or declaration requirements. Any actual or potential conflicts of interest should be brought to the attention of the Secretary.²⁵⁸

The IEP is guided by the principles of “natural justice, fairness for all parties, transparency and proportionality”.²⁵⁹ The choice to appeal a decision remains with the MP concerned, and appeals should be made within 10 working days of the publication of the Committee report. The IEP cannot re-investigate any allegations during the appeal or take any fresh decisions based on the investigation. Instead, its role is to review the decisions taken by the Committee.²⁶⁰

The IEP normally reports on its findings, and these are published on its website. It does so in any case that requires the House of Commons to agree on the sanction imposed, or where an apology to the House is required. Reports are usually published in other cases where the complaint has been upheld, or where it has not been upheld but the allegations are already known publicly. To date it has reported on five appeals relating to the Code of Conduct,²⁶¹ and 18 appeals relating to the ICGS.²⁶²

Independent Parliamentary Standards Authority

The 2009 scandal on parliamentary expenses led to the creation of an “independent extra-parliamentary body”²⁶³ – the Independent Parliamentary Standards Authority (IPSA) – to regulate MPs’ salaries, pensions, and staffing and business costs.²⁶⁴

The establishment of IPSA was a major departure from the previously held principle of self-regulation in the House of Commons,²⁶⁵ which led to some controversy and “sustained and intensive scrutiny” in its first few years.²⁶⁶ On the whole, however, its establishment has addressed many of the abuses that led to the 2009 scandal.²⁶⁷ In its most recent annual report (2023-24), IPSA found high levels of MP compliance with the rules (99.9%).²⁶⁸

IPSA was properly established in May 2010 to:

- Regulate MPs’ staffing and business costs
- Determine MPs’ pay and pension arrangements
- Provide financial support to MPs in carrying out their Parliamentary functions.²⁶⁹

IPSA is independent, but also accountable to the House of Commons, and subject to a high level of scrutiny in its consultation processes. It is required to consult with nine different institutions in the preparation of its scheme.²⁷⁰ It must lay its scheme (and any revisions) before the House; produce an annual report and annual estimates for a parliamentary vote; and its annual accounts are signed off by the National Audit Office.²⁷¹

It is generally accountable to the Speaker’s Committee for the Independent Parliamentary Standards Authority (see below); but other relevant committees include the Public Accounts

²⁵⁷ UK Parliament. [Independent Expert Panel](#).

²⁵⁸ UK Parliament. [Independent Expert Panel Members](#).

²⁵⁹ Independent Expert Panel. July 2024. [Guidance for Appellants in Code of Conduct Cases](#), paragraph 7.

²⁶⁰ Guidance for Appellants in Code of Conduct Cases, paragraph 14.

²⁶¹ UK Parliament. [Reports into Code of Conduct Cases](#).

²⁶² UK Parliament. [Reports into ICGS Cases](#).

²⁶³ Hine and Peele 2016, page 104.

²⁶⁴ IPSA. 19 July 2021. [How have things changed since IPSA’s creation?](#)

²⁶⁵ Hine and Peele 2016, page 108.

²⁶⁶ Hine and Peele 2016, page 115.

²⁶⁷ Hine and Peele 2016, page 118.

²⁶⁸ Independent Parliamentary Standards Authority. 2024. [Annual Report and Accounts 2023-24](#), page 5.

²⁶⁹ IPSA. [Who we are](#).

²⁷⁰ [Parliamentary Standards Act 2009](#).

²⁷¹ Hine and Peele 2016, page 113.

Committee for oversight of its value for money, the Members' Estimates Committee, and the Standards and Administration Committees.²⁷²

IPSA produces an annual report, which includes the report of its Compliance Officer (see below). A Scheme of MPs' Staffing and Business Costs is also published each year (now in its 18th edition, 2024-25).²⁷³

Compliance Officer

The Compliance Officer for IPSA is an independent statutory office holder, established by the Parliamentary Standards Act 2009, as amended by the Constitutional Reform and Governance Act 2010. The Officer is appointed by IPSA for a fixed term of five years, and IPSA provides the Compliance Officer with resources and staffing, including an Investigations Officer.²⁷⁴

The Compliance Officer's remit is to:

- Investigate, if they have reason to believe that a member of the House of Commons may have been paid an amount under the MP's allowances/business-costs scheme that should not have been allowed
- Review a determination made by IPSA to refuse reimbursement for an expense in whole or in part, at the request of an MP.²⁷⁵

The Procedures for the Investigations by the Compliance Officer for IPSA, which was last updated in 2025, guide the investigations.²⁷⁶ The Compliance Officer can receive complaints in writing, including reasons and evidence, and can request further information from any source before deciding whether to initiate an investigation.²⁷⁷ If an investigation is initiated, the Officer can make formal requests for information and must also enable both the MP concerned and IPSA to make representations, prior to and following the report of the provisional findings.²⁷⁸ The final Statement of Findings is then sent to the complainant, the MP concerned and IPSA with conclusions, recommendations and any Repayment Direction.²⁷⁹ For transparency, the findings of investigations are published on the Compliance Officer's website.²⁸⁰

Speaker's Committee for the Independent Parliamentary Standards Authority

The Speaker's Committee for the Independent Parliamentary Standards Authority is a statutory body to oversee and hold IPSA accountable. The Committee is comprised of 11 members:²⁸¹ the Speaker, Leader of the House and the Chair of the Standards Committee are members, with five further MPs and three lay members appointed by the Committee.²⁸²

The Committee meets every few months. It considers the candidates for the posts of Chair and members of IPSA proposed by the Speaker, but decisions on appointments are approved by the House of Commons. It also has a role in reviewing IPSA's annual estimate of resources. The Speaker proposes the candidates to the Committee following a fair and open competition.²⁸³ The Committee's reports are published on its website.²⁸⁴

²⁷² Hine and Peele 2016, page 114. UK Parliament. [Speakers Committee for the Independent Parliamentary Standards Authority](#).

²⁷³ IPSA. [The Funding Scheme for MPs](#).

²⁷⁴ Parliamentary Standards Act 2009, Schedule 2.

²⁷⁵ Parliamentary Standards Act 2009. IPSA. [About the Compliance Officer for IPSA](#).

²⁷⁶ [Procedures for the Investigations by the Compliance Officer for IPSA](#), Fifth Edition, October 2025.

²⁷⁷ Procedures for the Investigations by the Compliance Officer for IPSA, paragraph 6.

²⁷⁸ Procedures for the Investigations by the Compliance Officer for IPSA, paragraphs 14 & 15.

²⁷⁹ Procedures for the Investigations by the Compliance Officer for IPSA, paragraph. 25.

²⁸⁰ IPSA. [Investigations and Reviews](#). Complaints relating to expenses prior to the establishment of IPSA in 2010 are referred to the Parliamentary Commissioner for Standards (see above).

²⁸¹ UK Parliament. [Speakers Committee on IPSA – Membership](#).

²⁸² UK Parliament. [Speakers Committee on IPSA – Summary](#).

²⁸³ UK Parliament. [Speakers Committee on IPSA – Summary](#). UK Parliament. [Role – Speakers Committee for IPSA](#).

²⁸⁴ UK Parliament. [Speakers Committee on IPSA – Publications](#).

5. House of Lords

- Commissioner for Standards in the House of Lords
- Conduct Committee

Summary of standards

The House of Lords is the unelected chamber of Parliament and as such is subject to a very different set of challenges and opportunities for maintaining standards than the House of Commons. The House of Lords Act 1999 reduced the number of hereditary peers eligible to sit in the Lords from 750 to 92, so that life peers now form the majority number, accompanied by 26 Bishops of the Church of England.²⁸⁵

There are two characteristics of Members that affect the ability of the House of Lords to regulate them. First, they usually sit for life and are not held accountable through elections.²⁸⁶ Indeed, one of the greatest challenges in the system, has been how to sanction Members for unethical behaviour. A great degree of emphasis has been placed on the institution's strong code of "personal honour", which while undefined,²⁸⁷ places emphasis on voluntarism, unpaid public service, courtesy and mutual respect.²⁸⁸ In 2014 the House of Lords Reform Act made provisions for the expulsion of peers if convicted of a serious offence – more than one year in prison.²⁸⁹ In 2015 the House of Lords (Expulsion and Suspension) Act granted the House power to expel members for misconduct and to suspend their membership beyond the lifetime of an individual Parliament.²⁹⁰ Second, Members of the Lords, unlike their counterparts in the Commons are not remunerated for their participation in the political process, but are entitled to allowances, which are set by the House of Lords Commission.

Code of Conduct

Since 2002, in response to the recommendations of the 2000 CSPL report,²⁹¹ Members have been subject to a Code of Conduct (the Code). Members sign an undertaking to abide by the Code upon introduction and at the start of each Parliament.

As a general principle, the Code states that Members should "conduct themselves in a manner that maintains and strengthens public trust and confidence in the integrity of the House of Lords",²⁹² but as with other principles this is not enforceable. The 10 Rules of Conduct provide the basis for enforcement and incorporate the centuries-old code of "personal honour". The Code clarifies that "personal honour" involves observing the expected standards of the House and its members and obeying the spirit as well as the letter of the Code.²⁹³ Even if no other rule is engaged or breached, a violation of the "personal honour" rule can lead to an investigation.²⁹⁴

In line with the House of Commons' Code, it also provides clarity on resolving conflicts of interest in "favour of the public interest";²⁹⁵ includes the Seven Principles of Public Life under

²⁸⁵ In early 2026 the Hereditary Peers Bill was working its way through the legislative process. The Bill will rule that hereditary peers no longer have the right to sit in the House of Lords; Cabinet Office, Rt Hon Nick Thomas-Symonds MP and The Rt Hon Baroness Smith of Basildon. 2026. [Hereditary Peers Bill passes in House of Lords, paving the way for further reform](#), Press Release, 10 March.

²⁸⁶ You can find a list of active peers in the House of Lords [here](#).

²⁸⁷ House of Lords. [Code of Conduct for Members of the House of Lords and Guide to the Code of Conduct](#), April 2025. This includes a section on the Personal Honour expected of Members.

²⁸⁸ Hine and Peele 2016, page 128.

²⁸⁹ [House of Lords Reform Act 2014](#).

²⁹⁰ [House of Lords \(Expulsion and Suspension\) Act 2015](#).

²⁹¹ CSPL. 2000. [Standards of Conduct in the House of Lords](#).

²⁹² Code of Conduct, paragraph 7.

²⁹³ Code of Conduct, paragraph 10.

²⁹⁴ House of Lords Conduct Committee. 2025. [Review of the Code of Conduct and the Guide to the Code of Conduct](#). Fourth Report of Session 2024-26. paragraph 59.

²⁹⁵ Code of Conduct, paragraph 18.

its general principles;²⁹⁶ and in a recent amendment incorporates the Behaviour Code.²⁹⁷ It also clarifies that although members are free to engage in business of the House that relates to their personal interests, they must not (a) confer an exclusive benefit on an outside person or organisation in which they have a financial interest, or (b) accept or agree to accept payment or other incentive or reward in return for providing parliamentary advice or services.²⁹⁸

The Committee has made regular amendments to the Code of Conduct. In 2009, the Leader's Group Review, which was chaired by Lord Eames, made extensive recommendations.²⁹⁹ The review was informed by a submission from the CSPL,³⁰⁰ which emphasised that the public interest as well as personal honour should guide the conduct of Members. The CSPL also recommended the appointment of a Commissioner for Standards and the introduction of sanctions for both minor and major breaches of the Code, as well as clarifying and simplifying the Register of Lords' Interests. Accordingly, the Eames Report "represented a major change in the Lords' approach to regulation".³⁰¹ In 2014, the Committee made further amendments to the Code,³⁰² including incorporating the Seven Principles of Public Life. Following several sting operations in which Members expressed a "clear willingness" to break the Code, the Committee also clarified that a clear willingness to breach the Code, even if that breach was not actually followed through, "demonstrates a failure to act on his or her personal honour" and therefore constitutes a breach of the Code.³⁰³

In 2024, the House of Lords Conduct Committee launched the first comprehensive review of the Code since 2009. Its report addressed several long-standing issues, including whether behaviour causing reputational damage to the House should be considered a breach of the Code; when social media usage should be considered parliamentary activity; the appropriateness of including lay members on the Conduct Committee; the principle of "natural justice" in the system; and the application of Standing Order 68, which does not allow for debate on the Conduct Committee's motion or sanctions.³⁰⁴ The inclusion of reputational damage as a breach of the Code was rejected on the basis that it would be disproportionate and that the notion of "personal honour" already addressed some of these concerns.³⁰⁵ A clause on Members' social media usage was recommended for the Guide to the Code, which clarified that some social media usage by Members should be considered parliamentary activity.³⁰⁶ The appropriateness of lay members' inclusion on the Conduct Committee was reasserted, and the Procedure and Privileges Committee was invited to review the rotation rule relating to peer members of the Committee, which it did in December 2025.³⁰⁷ Finally, questions of natural justice and the application of Standing Order 68 were addressed with the Committee rejecting calls for reform.

A key change in the new Code is that Members are no longer required to register or declare non-financial interests. The original rules had not included a requirement to register non-financial interests, but this had changed following recommendations from the CSPL in 2000.³⁰⁸ The rationale for removing this requirement included ambiguity over what constitutes a non-financial interest, the burdensome nature of recording them and the inadvertent errors that lead to a high number of complaints.³⁰⁹

The comprehensive review resulted in:

- A revised Code of Conduct for Members of the House of Lords

²⁹⁶ Code of Conduct, paragraph 8.

²⁹⁷ Code of Conduct, paragraph 9.

²⁹⁸ Code of Conduct, paragraph 7.

²⁹⁹ Gay, O., 7 April 2010. [Regulation of Standards of Conduct in the House of Lords](#), Standards Note SN/PC/04950, House of Commons Library, page 10; see also, [Leaders Group on the Code of Conduct – Report](#), 28 October 2009.

³⁰⁰ Leaders Group on the Code of Conduct, Appendix 3, submitted May 2009.

³⁰¹ Hine and Peele 2016, page 139.

³⁰² Committee for Privileges and Conduct, 27 January 2014. [Amendments to the Code of Conduct and the Guide to the Code](#).

³⁰³ Committee for Privileges and Conduct, 27 January 2014, page 5; Code of Conduct, paragraph 10.

³⁰⁴ Review of the Code of Conduct 2025, pages 5-10.

³⁰⁵ Review of the Code of Conduct 2025, paragraph 13.

³⁰⁶ Review of the Code of Conduct 2025, paragraph 24. Guide to the Code of Conduct, paragraph 8.

³⁰⁷ Review of the Code of Conduct 2025, paragraph 30. Procedure and Privileges Committee. 2025. [Conduct Committee: Rotation Rule](#), Fifth Report of Session 2023-26.

³⁰⁸ CSPL. 2000. Standards of Conduct in the House of Lords, paragraph 5.51

³⁰⁹ Review of the Code of Conduct 2025, paragraphs 66, 68.

- A revised Guide to the Code of Conduct
- Two new documents of enforcement procedures, one for general complaints and one relating to bullying, harassment and sexual misconduct
- A revised Code of Conduct for House of Lords' Members' Staff.

Guide to the Code of Conduct

The Guide to the Code of Conduct (the Guide) provides guidance on the application of the Code, including on personal honour, bullying harassment and sexual misconduct, and the registration and declaration of interests.³¹⁰ It no longer contains guidance on the enforcement of the Code, which is published in the Enforcement Procedures.³¹¹

The Guide cites an explanation from the Committee for Privileges in which personal honour is described as "... a matter for individual members, subject to the sense and culture of the House as a whole".³¹² In keeping with the ethos of the Lords more generally, "personal honour" therefore remains based on the norms of the institution rather than being explicitly codified and defined.

The Code provides guidance on the declaration and registration of interests.³¹³ As of 2025, Members do not have to register or declare non-financial interests unless they consider them to be relevant.³¹⁴ The test for the relevance of financial interests is similar to that imposed in the Commons and relies on the test of reasonableness, but it more clearly specifies its meaning:

The test of a relevant financial interest is whether it might be thought by a reasonable member of the public to influence the member. A "reasonable member of the public" means an impartial and well-informed person, who judges all relevant facts objectively.³¹⁵

The Guide makes explicit reference to procedures following criminal convictions, it clarifies that any Member sentenced to prison indefinitely or for more than one year ceases to be a Member of the House.³¹⁶

The primary upholders of standards in the House of Lords are the **House of Lords Commissioners for Standards**, overseen by the **Conduct Committee**.

Institutions

House of Lords Commissioners for Standards

The role of Commissioner for Standards was created in 2010, following the recommendations of the 2009 Leaders Group Report, to investigate breaches of the Code of Conduct. Originally there was a single Commissioner, but in 2021 this changed and there are currently two House of Lords Commissioners, who are appointed for a five-year term.³¹⁷

The commissioners are responsible for investigating complaints made about Members in relation to the Code of Conduct in an impartial and independent manner.³¹⁸ This includes complaints related to the financial support received by Members in carrying out their parliamentary duties, the use of facilities, and their treatment of others, including matters related to bullying and harassment.

There are relatively few complaints made to the Commissioner, particularly when compared to complaints made relating to MPs' conduct. The Commissioner's 2024-25 Annual Report recorded 72 complaints, 18 of which resulted in an investigation.³¹⁹

³¹⁰ Guide to the Code of Conduct.

³¹¹ House of Lords. April 2025. [Code of Conduct Enforcement Procedure 2025: General](#); House of Lords. April 2025. [Code of Conduct Enforcement Procedures 2025: Bullying, Harassment and Sexual Misconduct](#).

³¹² Guide to the Code of Conduct, paragraph 19.

³¹³ Code of Conduct, paragraphs 13-16.

³¹⁴ Code of Conduct, paragraph 15.

³¹⁵ Guide to the Code of Conduct, paragraph 33.

³¹⁶ Code of Conduct, paragraphs 20-23; Guide to the Code, paragraphs 113-117.

³¹⁷ Hansard. Lords Chamber, Volume 835, [Column 1256](#), 12 February 2025.

³¹⁸ UK Parliament. [House of Lords Commissioners for Standards](#).

³¹⁹ House of Lords Commissioner for Standards. 2025. [Annual Report 2024-25](#).

Breaches of the Code

The process for investigating and deciding on breaches is contained in the Code of Conduct Enforcement Procedure.³²⁰ Usually the basis of an investigation is a complaint made by a third-party, but the Commissioner can conduct an investigation, with the agreement of the Conduct Committee, at the request of the Member concerned, or where the Commissioner becomes aware of evidence that establishes a prima facie case that the Code has been breached.³²¹

A complaint must be made in writing.³²² Allegations should not be aired publicly until the complaint has been finally determined.³²³ The Commissioner conducts a preliminary assessment of any complaint to establish whether it is within the Commissioner's remit and whether there is evidence sufficient to establish a prima facie case that the Code has been breached.³²⁴ Matters that do not fall within the Commissioner's remit include:

- Alleged breaches of the Code's general principles that do not engage a specific rule of conduct
- Policy matters or a Member's views or opinions
- The funding of political parties, which are matters for the Electoral Commission
- Alleged breaches of the Ministerial Code, which are matters for the Cabinet Office and Prime Minister
- Members' non-parliamentary or private activities.

The Commissioner may decide to dismiss the complaint or progress to a minor cases procedure or investigation. The minor cases procedure was introduced in 2025 to reduce the toll of full investigations on Members for alleged minor infractions of the Code.³²⁵ This simplified process does not involve a full-blown investigation and report and is not made public until a decision is made and the outcome is published on the commissioners' website.³²⁶

Following an investigation, the Commissioner can find no breach of the Code, or a breach of the Code, in which case they can recommend remedial action or a sanction.³²⁷ In the case of remedial action, if the Member agrees to the action, a report is made on the Commissioner's website.³²⁸ If the member disagrees, then the Commissioner's report is referred to the Conduct Committee.³²⁹ In the case of sanction, the Commissioner's report and recommendations are always referred to the Conduct Committee.³³⁰ On receipt of the report, consideration of the findings and following any appeals, the Committee submits a report to the House.³³¹

Bullying, harassment and sexual misconduct

In July 2018, Naomi Ellenbogen QC published the findings of her inquiry into bullying and harassment in the House of Lords.³³² She found the culture in the House not conducive to ensuring dignity and respect for all those working there, and that there were examples of bullying and harassment between staff and of staff by Members.³³³

The Commissioners for Standards investigates allegations of bullying, harassment or sexual misconduct involving members of the House of Lords or their staff. Complaints may be made directly to the commissioners or via the Parliament-wide Independent Complaints and Grievance Scheme (ICGS) (see description above). The Commissioner is usually supported

³²⁰ Enforcement Procedure: general.

³²¹ Enforcement Procedure: general, paragraph 6.

³²² Enforcement Procedure: general, paragraph 3.

³²³ Enforcement Procedure: general, paragraph 4.

³²⁴ Enforcement Procedure: general, paragraph 9.

³²⁵ Review of the Code of Conduct, paragraph 91.

³²⁶ Enforcement Procedure: general, paragraph 18-26.

³²⁷ Enforcement Procedure: general, paragraph 37.

³²⁸ Enforcement Procedure: general, paragraph 40.

³²⁹ Enforcement Procedure: general, paragraph 41.

³³⁰ Enforcement Procedure: general, paragraph 42.

³³¹ Enforcement Procedure: general, paragraph 50.

³³² Ellenbogen, N. 10 July 2019. [An Independent Inquiry into Bullying and Harassment in the House of Lords](#).

³³³ Ellenbogen, 10 July 2019, page 7.

in their investigation by an independent ICGS investigator. The procedures followed by the commissioners are similar to those that operate under the ICGS.³³⁴

Allowances and expenses

Most members do not receive salaries but are entitled to receive a daily allowance and the reimbursement of expenses to cover the costs of attending the House of Lords.³³⁵ Members who are in receipt of a salary as a Minister or an officeholder within the House are not eligible for the daily allowance. The rules relating to financial support are contained in the Guide to Financial Support for Members.³³⁶

The rules of the scheme are applied by the Finance Director on behalf of the Clerk of the Parliaments who is the Accounting Officer for the House of Lords.³³⁷ Breaches of the rules constitute a breach of the Code of Conduct and may be investigated by the commissioners.³³⁸

Register of Lords' Interests

The Register was instituted in 1995; prior to this Members had been required to make declarations of interests whenever they arose, but they had not had to register interests publicly. The Register is maintained by the Registrar of Lords' Interests.³³⁹ The Registrar can also advise Members on whether to register an interest, and if they disclose all the relevant information and follow this advice then they have fulfilled the requirements of the Code.³⁴⁰

In 1994, the House of Lords set up a Sub-Committee to the Procedure Committee to consider the declaration and registration of interests. Its recommendations, published in the Griffiths Report, suggested a voluntary register of interests coupled with limits on lobbying.³⁴¹ The resulting register was more modest than the Commons' register, but two of the three categories for registration – consultancies for providing parliamentary services and financial interests in businesses involved in lobbying – were made mandatory, with the third category of other interests left to the discretion of Members.³⁴²

With the introduction of the new Code of Conduct in 2009 (see above), Members were required to register all relevant interests and to register new interests within one month.³⁴³ The current Code outlines seven categories of registrable interest, which is a reduction from the 10 included in the previous Code.³⁴⁴ Significantly, two of the previous categories for registration were removed by the recent review, including "People with significant control of a company" and "Non-financial interests".³⁴⁵ The current categories for registration include remunerated employment, shareholdings, land and property, sponsorship, overseas visits, gifts, benefits and hospitality, and miscellaneous financial interests.³⁴⁶

The financial thresholds for registering interests are higher than those in the House of Commons: all single benefits above £1000 should be registered, as well as all those that originate from the same source but add up to £1000 in a single year.³⁴⁷ In the case of category 6 (gifts, benefits and hospitality), the threshold is lower at £300 for benefits given to the Member or their spouse or partner that relates substantially to membership of the House.³⁴⁸

Conduct Committee

Until May 2019, the House of Lords Committee for Privileges and Conduct oversaw the Code of Conduct and the Commissioner for Standards and largely delegated its functions relating to

³³⁴ Enforcement Procedure: Bullying, harassment and sexual misconduct, paragraph 2 & 60.

³³⁵ UK Parliament. [Members allowances and expenses](#).

³³⁶ House of Lords. April 2025. [Guide to Financial Support for Members](#).

³³⁷ Guide to Financial Support for Members, paragraph 1.1.1

³³⁸ Guide to Financial Support for Members, paragraph 2.7.1

³³⁹ Guide to the Code of Conduct, paragraph 37.

³⁴⁰ Guide to the Code of Conduct, paragraph 31.

³⁴¹ Hine and Peele 2016, page 133.

³⁴² Hine and Peele 2016, page 133.

³⁴³ Hine and Peele 2016, page 143.

³⁴⁴ Guide to the Code of Conduct, paragraphs 35, 36.

³⁴⁵ Review of the Code of Conduct, paragraph 71.

³⁴⁶ Guide to the Code of Conduct, paragraphs 49-77

³⁴⁷ Guide to the Code of Conduct, paragraph 43.

³⁴⁸ Guide to the Code of Conduct, page 27.

conduct to the Sub-Committee on Conduct. A new Conduct Committee was appointed in May 2019 to take over this role. The Committee comprises five peers and four lay members, who also have full voting rights.³⁴⁹ By convention, the Committee is chaired by a Crossbench member of the House of Lords.

The Conduct Committee has taken on the role of reviewing the Code of Conduct, Guide to the Code, Code of Conduct for Members' Staff and overseeing the work of the Commissioner for Standards and the Registrar of Lords' Interests.

Resolution of inquiries

The Conduct Committee receives reports from the Commissioner on complaints made under the Code of Conduct, including those relating to bullying, harassment and sexual misconduct.³⁵⁰ These reports are submitted at the Commissioner's discretion and where a breach is found and remedial action has not been agreed between the Commissioner and the Member, a report is submitted to the Committee with recommendations.

Members have the right to appeal the findings and the sanctions recommended by the Commissioner and appeals are considered by the Committee.³⁵¹ The Committee may endorse, reduce or increase the recommended sanction on appeal. The Committee is required to report to the House of Lords, where the final decision-making power rests.³⁵² The House votes on the report and any resolution relating to sanctions without debate.³⁵³

³⁴⁹ UK Parliament. [Conduct Committee – Membership](#); see also Ellenbogen, 10 July 2019, page 32.

³⁵⁰ Enforcement Procedure General, paragraph 42 and Enforcement Procedure BHSM paragraph 36.

³⁵¹ Enforcement Procedure General, paragraphs 46-49 and Enforcement Procedure BHSM paragraph 40-44.

³⁵² Enforcement Procedure General, paragraph 50 and Enforcement Procedure BHSM paragraph 45.

³⁵³ Enforcement Procedure General, paragraph 50 and Enforcement Procedure BHSM paragraph 4.

6. Local Government

- Local Authorities and Councils
- Monitoring Officer
- Standards Committees
- Local Government and Social Care Ombudsman

Summary of standards

Across the United Kingdom, local government is organised and administered in either a two-tier structure of county and district authorities or a unitary structure of borough or city councils. At the local level there are parish and town councils. In England and Wales most local council services are administered by the principal authority, which is either the unitary authority or, in a two-tier structure, the county council. Many local authorities now share the administration of local services, and some have formally joined forces in new combined authorities, often based on a city region. At the local level, parish, community and town councils also have responsibility for local issues, such as community centres and neighbourhood planning.³⁵⁴

It is important to acknowledge the scale and scope of local government as well as the complexity of modern governance arrangements for service delivery. There are tens of thousands of elected councillors representing all the major parties with a growing independent sector. Most of these elected representatives have strong ties with the areas they represent, not least because they live in the locality. This can pose challenges in relation to the management of conflicts of interests and can test ethical standards more generally. Local government has legal duties to provide a wide range of local services as effectively and efficiently as possible. To fulfil these duties, authorities increasingly contract-out services or work in partnership with neighbouring authorities, the voluntary sector and private providers.

The responsibility for ethical standards in local authorities has undergone much change in recent years, which rather than mirroring the increased codification of standards elsewhere in the standards regime has resulted in much greater freedom for councils themselves to set and maintain standards. The 2011 Localism Act stripped back regulation and oversight to a bare minimum, resulting in a regime that has resorted to “hard law, almost complete local autonomy, with minimum direction and intervention from the centre”.³⁵⁵ The Act placed responsibility for the conduct of councillors in the hands of local authorities, which are responsible for maintaining a Code of Conduct and a register of disposable pecuniary interests, and must also deal with alleged breaches of the Code and registration requirements.³⁵⁶ There is no mandatory requirement for local authorities to provide a Code of Conduct for local authority staff, but many do so.³⁵⁷

The 2011 Act dismantled the regime that had been in place since 2000 with centralised powers of oversight and monitoring. The Local Government Act 2000 had instituted measures of oversight, including a model Code of Conduct, which local authorities were required to integrate into their own; a Standards Board for England to promote high standards and investigate complaints; Adjudication Panels to adjudicate on investigations; and Standards Committees in each local authority to promote high standards of conduct.³⁵⁸ However, both

³⁵⁴ UK Gov. [Understand how your council works](#).

³⁵⁵ Hine and Peele 2016, page 263.

³⁵⁶ Sandford, M., February 2025. [Local Government Standards in England](#), House of Commons Library, page 12.

³⁵⁷ Sandford, February 2025, page 9.

³⁵⁸ Committee on Standards, 10 February 2015, Appendix 1, 74.

the functioning and the reception of this system of regulation was highly criticised with the Standards Boards, at least initially, taking an extended time to resolve complaints.³⁵⁹

Following significant criticism, including from the CSPL, adjustments were made through the Local Government and Public Involvement in Health Act 2007,³⁶⁰ which primarily provided increased opportunities for resolving complaints at the local level.³⁶¹ The assessment of allegations was now made by Standards Committees, and the Standards Board (now named Standards England) took on an oversight role and acted as a “strategic regulator”.³⁶² Despite the changes, sustained criticism led to an overhaul of the regime in 2011, including the abolition of Standards England.³⁶³

Strengthening local government standards

In 2019, the CSPL reported on its investigation into ethical standards in local government.³⁶⁴ While it recommended increasing the consistency and independence of the system overseeing the conduct of local councillors, it did not recommend the reintroduction of a centralised oversight body.³⁶⁵ Amongst its 26 recommendations it suggested that the Local Government Association should provide an updated model Code of Conduct, which it did in 2020,³⁶⁶ and that councillors should be required to register non-pecuniary interests,³⁶⁷ record gifts and hospitality over a value of £50, or totalling £100 over a year from a single source,³⁶⁸ and recuse themselves from discussions and votes in which they have an interest or would be reasonably perceived to do so.³⁶⁹ The Government’s response to the CSPL’s report accepted some recommendations, but argued that some recommendations for legislative change would be better framed as “best practice” for local authorities to take forward.³⁷⁰

In November 2025, the Ministry of Housing, Communities and Local Government published the outcome of their consultation on “Strengthening the standards and conduct framework for local authorities in England”.³⁷¹ The outcome of the consultation expresses an intention to amongst others:

- Introduce a mandatory Code of Conduct with an embedded Behavioural Code
- Require all principal authorities to convene a formal Standards Committee
- Require all principal authorities to provide individual support during investigations to complainants and those under investigation
- Introduce a “right for review” at the authority level for both the complainant and the subject of the complaint to have their case reassessed
- Introduce powers to enable councils to suspend councillors for breaches of the Code for up to six months with the option to withhold allowances, access to premises and facilities
- Introduce powers to suspend councillors on an interim basis in response to serious allegations involving a police investigation
- Introduce a disqualification for councillors subject to a maximum period suspension more than once within 5 years
- Create a new national appeals function for councillors subject to suspension and/or withholding of allowances, and for complainants who consider their complaint was mishandled.³⁷²

³⁵⁹ Hine and Peele 2016, page 249.

³⁶⁰ CSPL. 2013. Standards Matter: A review of best practice in promoting good behaviour in public life, page 19.

³⁶¹ Sandford, February 2025, page 11.

³⁶² Hine and Peele 2016, page 259; see also Committee on Standards, 10 February 2015, Appendix 1.

³⁶³ Committee on Standards, 10 February 2015, Appendix 1, page 75.

³⁶⁴ CSPL. 2019. Local Government Ethical Standards: A review by the Committee on Standards in Public Life.

³⁶⁵ CSPL 2019, page 10.

³⁶⁶ CSPL 2019, page 14, recommendation 1. See also Local Government Association. Model Councillor Code of Conduct 2020.

³⁶⁷ CSPL 2019, page 14, recommendation 5.

³⁶⁸ CSPL 2019, page 14, recommendation 6.

³⁶⁹ CSPL 2019, page 15, recommendation 7.

³⁷⁰ Government response to the Committee on Standards in Public Life review of local government ethical standards, page 2.

³⁷¹ Ministry of Housing, Communities and Local Government. 2025. Strengthening the standards and conduct framework for local authorities in England.

³⁷² Ministerial Foreword, Strengthening the standards and conduct framework for local authorities in England.

The review does not commit to adopting the CSPL's recommendations on the registration of non-pecuniary interests, recording of gifts and hospitality or recusal from decisions in which they have an interest.³⁷³ However, all three of these concerns are addressed in the LGA's Model Councillor Code of Conduct.³⁷⁴

Current Codes of Conduct and Guidance

Since 2012, local authorities have been responsible for creating their own Codes of Conduct, which should incorporate the Seven Principles of Public Life. These Codes are much less consistent than previously, where the rules and provisions of a model code had to be incorporated. The Department for Communities and Local Government has published an illustrative text,³⁷⁵ but states explicitly that councils can "choose" whether they use it as the basis for their own Codes of Conduct.³⁷⁶ In 2013, the Department also provided a guidance document for Councillors on dealing with their personal interests. The Guidance makes it clear that it is a criminal offence to fail to tell the Monitoring Officer about disposable pecuniary interests, or to knowingly provide false or misleading information.³⁷⁷

The Local Government Association also provides a model Code of Conduct for local authorities to use as a basis for their own. In its 2019 review of local government standards, the CSPL proposed that the Local Government Association should be responsible for updating a model code of conduct, in consultation with councillors at all levels.³⁷⁸

The primary upholders of standards in local government are the **Local Authorities**, the **Monitoring Officer** and the **Local Government and Social Care Ombudsman**.

Institutions

Local Authorities and Councils

The Localism Act 2011 creates several duties for local authorities,³⁷⁹ these include developing a Code of Conduct that complies with the Seven Principles of Public Life and to specify sanctions from breaching it; requirements for the registration and disclosure of pecuniary and other interests.³⁸⁰ They are also required to appoint a Monitoring Officer to oversee the Code of Conduct and establish the Register of Interests.³⁸¹

Monitoring Officer

The Monitoring Officer has a legal duty to ensure that councils fulfil their statutory obligations. This includes reporting on matters they believe to be illegal, maladministration or that relate to the conduct of councillors and officers. They are often the head of legal services of a local authority.³⁸²

Registration of interests

Councillors are required to register their relevant pecuniary interests with the Monitoring Officer within 28 days of their election; they must also disclose their interests if they arise and are relevant to a discussion at a meeting of the council.³⁸³ Dispensations are available to enable councillors to take part in debates, from which they would otherwise be barred, including for example in the case of owning property in an area, while also deciding on levels

³⁷³ Strengthening the standards and conduct framework for local authorities in England.

³⁷⁴ Local Government Association. Model Councillor Code of Conduct 2020.

³⁷⁵ See: Illustrative text for code dealing with the conduct expected of members and co-opted members of the authority when acting in that capacity.

³⁷⁶ Illustrative text for code dealing with the conduct expected of members and co-opted members of the authority when acting in that capacity.

³⁷⁷ Department for Communities and Local Government. 2013. Openness and Transparency on Personal Interests: A Guide for Councillors.

³⁷⁸ CSPL. 2019. Local Government Ethical Standards, page 14.

³⁷⁹ Localism Act 2011, chapter 7.

³⁸⁰ Stanford, February 2025, pages 12-13.

³⁸¹ Local Government and Housing Act 1989, section 5.

³⁸² Local Government and Housing Act 1989. See also: Roles and Duties of Statutory Officers.

³⁸³ Localism Act 2011, paragraph 30 & 31.

of council tax.³⁸⁴ The Monitoring Officer should be notified and maintain and publish a register of interests; the interests required to be registered include those of a councillor's spouse, partner or civil partner.³⁸⁵

Breaches of the Code

There should be mechanisms in place to investigate breaches of the Code, although these can vary depending on the processes put in place by the local authority; these might include the creation (or maintenance) of a Standards Committee, but this is not a requirement.³⁸⁶

There are provisions for the appointment of an Independent Person, which must be consulted during an investigation into an alleged breach of the Code, and can also be consulted by the accused individual.³⁸⁷ The 2011 Act, abolished the requirement of having independent lay people on Standards Committees, previously the requirement was for 25%. The CSPL criticised the reduced role of lay members in its 2013 report.³⁸⁸ In 2019, the CSPL recommended that the views of the Independent Person should be formally recorded in any decision notice or minutes.³⁸⁹

The local authority makes a final decision and there is no higher authority for appeals of decisions, except through the courts, although the Local Government Ombudsman can investigate the process by which decisions were reached (see below).³⁹⁰

Sanctions

There has been a considerable weakening of sanctions in the 2012 regime compared to those that preceded it. In 2013, the CSPL raised concerns about the sanctions available to local authorities where misconduct was identified. It argued that:

The only sanctions now available, apart from through the use of party discipline, are censure or criminal prosecution for deliberately withholding or misrepresenting a financial interest. We do not think these are sufficient.³⁹¹

There are two criminal offences that apply under the Localism Act 2011. These include failure to register or disclose relevant pecuniary interests or taking part in discussions when precluded from doing so by a conflict of interest; and providing false or misleading information in relation to pecuniary interests.³⁹² The Guide for Councillors provides a list of pecuniary interests that should be disclosed.³⁹³

In 2019 the CSPL described the criminal offences related to disclosure of pecuniary interests, introduced in the 2011 Act, as "disproportionate in principle and ineffective in practice, and should be abolished".³⁹⁴ It also proposed that local authorities should be given the power to suspend a councillor for breaches of the Code for up to six months.³⁹⁵

Local Government and Social Care Ombudsman

The Local Government and Social Care Ombudsman is run by the Commission for Local Administration, which is an independent body funded by a Government grant.³⁹⁶ The Ombudsman is its chair and has three advisers. The commissioners have their own Code of Conduct and disclose their interests.³⁹⁷

The Ombudsman has the power to investigate complaints about a local authority's handling of a complaint.³⁹⁸ The Ombudsman's powers are limited to undertaking investigations into the

³⁸⁴ Sandford, February 2025, page 14.

³⁸⁵ Sandford, February 2025, page 14.

³⁸⁶ Sandford, February 2025, page 15.

³⁸⁷ Committee on Standards, 10 February 2015, Appendix 1, 79; see also Sandford, February 2025, page 15.

³⁸⁸ CSPL, 2013. Standards Matter, page 55.

³⁸⁹ CSPL, 2019. Local Government Ethical Standards, page 15.

³⁹⁰ Sandford, February 2025, page 15.

³⁹¹ CSPL, 2013. Standards Matter, page 55.

³⁹² Sandford, February 2025, page 16; Localism Act 2011 paragraph 34.

³⁹³ Department for Local Government, September 2013, Annex A.

³⁹⁴ CSPL, 2019. Local Government Ethical Standards, page 11.

³⁹⁵ CSPL, 2019. Local Government Ethical Standards, pages 15-16.

³⁹⁶ Local Government and Social Care Ombudsman. [Who we are](#).

³⁹⁷ Local Government and Social Care Ombudsman. [Who we are](#).

³⁹⁸ Sandford, February 2025, page 15.

local authority's decision-making process; it can make non-binding recommendations, including that an investigation should be re-run. It cannot re-investigate the breach itself or recommend sanctions.³⁹⁹ The remit of the Ombudsman does not currently extend to parish and town councillors, although the CSPL has recommended that it should do so, and that it should also provide an appeal mechanism for standards decisions at the local level.⁴⁰⁰ These recommendations were addressed in the recent consultation (see above).

³⁹⁹ CSPL, 2019. Local Government Ethical Standards, page 60.

⁴⁰⁰ CSPL, 2019. Local Government Ethical Standards, page 61.

7. Civil Service

- Civil Service Commission
- Parliamentary and Health Service Ombudsman
- Public Administration and Constitutional Affairs Committee

Summary of standards

The Civil Service provides the core administration of the state and assists the Government to develop and deliver its policies as effectively as possible. It runs central Government departments, agencies and many non-departmental public bodies (NDPBs).⁴⁰¹ It is non-partisan and its core characteristic is its impartiality, the intention being that it can work successfully with and win the trust of any incoming political leadership.

The Head of the Civil Service is also Cabinet Secretary and is responsible for supporting all Ministers in the running of Government and providing professional leadership to the civil service. The Chief Operating Officer is Permanent Secretary to the Cabinet Office, chairs the Transformation Board, and also leads the reform and efficiency programme. Permanent Secretaries, the most senior civil servants in each department, work to support the department's Minister, who is ultimately accountable to Parliament.⁴⁰²

The accountability of Ministers to Parliament for the work of their departments, with Permanent Secretaries providing support and advice, is an essential component in maintaining the impartiality of the Civil Service, which is also underpinned by a merit-based recruitment system for civil servants and the principles embedded in the Civil Service Code. The basis for an impartial Civil Service was originally laid out in the Northcote-Trevelyan settlement in 1854, which recognised that the public administration was suffering “both in internal efficiency and in public estimation”.⁴⁰³ These “twin concerns” of efficiency and accountability have been in tension ever since and continue to be the “driving force” of reform.⁴⁰⁴

The Nolan Report referred to the “very large changes to the management and structure” of the Civil Service, and the need to respond to “greater delegation and diversity”.⁴⁰⁵ In particular, the introduction of New Public Management, which brought in business management structures, the use of arms-length bodies and the increasing move to contract-out elements of public service delivery have changed the Service's working practices.⁴⁰⁶ The Civil Service Reform Plan 2012 set out the challenges and aspirations of the Service clearly: with an emphasis on changing the culture and behaviours of the civil servants to become “pacier, more flexible, focused on outcomes and results rather than process”.⁴⁰⁷ Changes to the cultural practices of an institution inevitably also throw up ethical challenges.

As a result, the standards regime has had to evolve in step with significant changes to the underlying structures and management of the Civil Service. These changes have been described as a move from a system that placed trust in a self-regulating culture of public integrity (or public service ethos) towards one that emphasises effective public service delivery and formal accountability.⁴⁰⁸ The result is that, while there is a rich institutional regime for standards in the public administration, it also remains a “patchwork” that struggles

⁴⁰¹ Civil Service. [About us](#).

⁴⁰² Civil Service. [Our governance](#).

⁴⁰³ [Northcote Trevelyan Report](#), page 4.

⁴⁰⁴ Dobson, R. and Heywood, P. 2019. “Clean but Compromised: Corruption in the UK Public Administration”.

⁴⁰⁵ Nolan Report 1995, page 5.

⁴⁰⁶ See Heywood, P.M. 2012. “Integrity management and the public service ethos in the UK: patchwork quilt or threadbare blanket?”, *International Review of Administrative Sciences* 78(3): pages 474-493.

⁴⁰⁷ HM Government. June 2012. [Civil Service Reform Plan](#), page 9.

⁴⁰⁸ Heywood 2012.

to keep pace with and adapt to the changing expectations, complexity and structure of public life.⁴⁰⁹

Civil Service Code

The Constitutional Reform and Governance Act 2010 provides the statutory underpinning for a non-partisan civil service. The Civil Service Code was first introduced in 1996 and has been updated several times since. It was made statutory in November 2010 and updated in March 2015 to include standards of behaviour when dealing with the media.⁴¹⁰ The Code is issued by the Minister for the Civil Service and outlines the core values of the Civil Service, which include:

- Integrity: putting the interests of the public above private interests
- Honesty: being truthful and open
- Objectivity: advice and decisions should be based on rigorous analysis of the evidence
- Impartiality: acting solely on the merits of the case and serving governments of different political persuasions equally.⁴¹¹

The impartiality value refers to both non-discrimination in the treatment of others, including the requirement to be fair, just and equitable, and also to be politically impartial, including not allowing personal political views to determine advice or actions. This second requirement is particularly important in the relationships between Civil Servants in their advice-giving role to Ministers. The increased use of Special Advisers, to advise Ministers, as temporary rather than permanent members of the Civil Service, has been interpreted as presenting certain challenges to this arrangement. In 2012, the Public Administration Select Committee acknowledged this sensitivity arguing that although Special Advisers have a “legitimate and valuable function ... protecting the impartiality of the Civil Service”, their influential positions also have “the potential to destabilise the relationship between ministers and officials”.⁴¹²

Special Advisers

While Special Advisers are required to conduct themselves in accordance with the Civil Service Code, they are not required to behave with impartiality and objectivity or retain the confidence of future governments.⁴¹³ Special Advisers are subject to a Code of Conduct, which differs in several respects from that applicable to civil servants. It recognises the “political dimension to [their] advice and assistance”.⁴¹⁴ Special Advisers are also subject to the Business Appointment Rules when leaving the service (see below).⁴¹⁵

Following recommendations made by the CSPL as early as 2003,⁴¹⁶ the Constitutional Reform and Governance Act 2010 introduced the Code of Conduct for Special Advisers and limited their role in several important respects: Special Advisers must not ask civil servants to do anything inconsistent with their obligations under the Civil Service Code, authorise the expenditure of public funds or have responsibility for budgets, exercise any management role in relation to the civil service, or exercise any statutory or prerogative power.⁴¹⁷

Civil Service Management Code

The Civil Service Management Code, on the authority of the Constitutional Reform and Governance Act 2010 and the power of the Minister for Civil Service, sets out the terms of service of civil servants, and in particular provides detail on their recruitment in line with the recruitment principles issued by the Civil Service Commission (see below), conduct and discipline, and procedures for senior civil servants, including the application of the Business Appointment Rules.⁴¹⁸

⁴⁰⁹ Heywood 2012, page 474.

⁴¹⁰ [Civil Service Code](#), 16 March 2015.

⁴¹¹ Civil Service Code.

⁴¹² PASC. 14 October 2012. [Special Advisers in the Thick of It](#). Sixth Report of Session 2012-13, page 3.

⁴¹³ Code of Conduct for Special Advisers, paragraph 8.

⁴¹⁴ Code of Conduct for Special Advisers, paragraph 1.

⁴¹⁵ Code of Conduct for Special Advisers, paragraph 25.

⁴¹⁶ CSPL. 2003. *Defining the Boundaries within the Executive*.

⁴¹⁷ Code of Conduct for Special Advisers, paragraph 5.

⁴¹⁸ [Civil Service Management Code](#), November 2016.

The Management Code emphasises “the need for civil servants to be, and to be seen to be, honest and impartial in the exercise of their duties”.⁴¹⁹ It provides four main principles for civil servants’ conduct:

- Not to misuse information or disclose information without authority, or frustrate the policies, decisions or actions of Government
- Not to take part in any public political activity that would compromise their impartiality
- Not to misuse their position or information to further their private interests or those of others; and where conflicts arise they must be declared to senior management
- Not to receive gifts or benefits of any kind that could compromise their judgement and integrity.⁴²⁰

The departments and agencies deal with the disciplinary processes for breaches of the Management Code internally.⁴²¹

The primary upholders of standards for the Civil Service are the **Civil Service Commission**, the **Parliamentary and Health Service Ombudsman**, and the **Public Administration and Constitutional Affairs Committee**.

Institutions

Civil Service Commission

There have been Civil Service commissioners in place since 1855, but the Constitutional Reform and Governance Act 2010 put the Commission on a statutory footing for the first time.⁴²² There are currently 12 commissioners, including the First Civil Service Commissioner, appointed by the Monarch on the recommendation of the Minister for the Civil Service; and as such they are not civil servants. They register any interests that might influence their judgement or could be perceived to do so.⁴²³

The Commission is independent of the Government and the Civil Service and is an executive non-departmental public body sponsored by the Cabinet Office. It has two main responsibilities: to ensure that appointments to the Civil Service are made on merit based on fair and open competition; and to help safeguard an impartial Civil Service.⁴²⁴ As of October 2025, the Commission is also responsible for providing advice to Senior Civil Servants and Special Advisers on the application of the Business Appointment Rules.⁴²⁵

Merit-based recruitment

The Constitutional Reform and Governance Act 2010 requires that the recruitment of civil servants is based on merit and follows a fair and open competition. The Commission’s Recruitment Principles outline its interpretation of this legal requirement.⁴²⁶ There are some cases where there are exceptions to this legal requirement, which include short-term appointments, support for Government employment programmes, secondments, highly specialised skills and the re-appointment of civil servants.⁴²⁷ Special Advisers, despite being temporary civil servants, are also exempt from the merit requirement. They are appointed directly by the Minister they will serve, and their appointment is approved by the Prime Minister (see above).

The Commission assesses each government department on its compliance with the Recruitment Principles; departments are given a rating of good, fair, needs improvement and requires regulatory intervention.⁴²⁸ The Commission provides guidance to civil servants on

⁴¹⁹ Civil Service Management Code, paragraph 4.1.3.

⁴²⁰ Civil Service Management Code, paragraph 4.1.3(a-d).

⁴²¹ Civil Service Management Code, paragraph 4.1.6

⁴²² Maer, L., 18 March 2015. [The Civil Service Code](#), Standard Note SN/PC/6699, House of Commons Library.

⁴²³ Civil Service Commission. [Civil Service Commissioners](#).

⁴²⁴ Civil Service Commission. [About the Commission](#).

⁴²⁵ Civil Service Commission. [Business Appointment Rules](#).

⁴²⁶ Civil Service Commission, [Recruitment Principles](#), April 2018.

⁴²⁷ Recruitment Principles Annex 1.

⁴²⁸ Civil Service Commission. [Departmental Compliance](#).

making complaints in relation to external recruitment processes and hear complaints if concerns have already been raised with the department concerned.⁴²⁹ Once the Commission has reached a decision it can make recommendations to the department and ask what action it will take to resolve the situation, request an apology, ask the department for assurances that it is reviewing its process, publicise the complaint and make a public statement. There is no appeals process following the Commission's decision.⁴³⁰

In 2023-24, the Commission received 216 complaints relating to recruitment procedures, but the majority of these (183) were outside the Commission's remit. The Commission considered 32 complaints and found breaches in 11 of those. The Commission also conducted audits of the recruitment practices in all departments and found 234 breaches of the Recruitment Principles.⁴³¹

Civil Service Code

The Commission has responsibility for working with departments to uphold the Civil Service Code. In 2007, in conjunction with the Cabinet Office and Permanent Secretaries, it issued a best practice checklist,⁴³² to help departments in upholding and promoting the Code.⁴³³

In situations where a civil servant is asked to do something in conflict with the Civil Service Code or is aware of another civil servant acting against its provisions, the first line of complaint is managed within the department. Each civil service employer should have a "Raising a Concern" policy and should also provide "nominated officers" to advise staff and take complaints where raising issues with a line manager is not appropriate. However, if the outcome of this complaint is unsatisfactory, complaints can be raised with the Civil Service Commission; only in exceptional circumstances will the Commission take a complaint directly without the complaint first being raised with the civil service employer.⁴³⁴

Complaints should be made in writing and can only be made by civil servants in relation to the Civil Service Code and should concern the public interest rather than an internal, human resources or management issue. The Commission aims to respond within 10 days to complaints to indicate whether they are within its remit, and if they are found to be so, an investigation takes place. When a decision is reached, a Decision Notice is sent to the complainant and to the relevant department, and each are given 20 days to respond to its factual accuracy, after this time the Notice is published on the Commission's website, but individuals concerned are not identified by name.⁴³⁵

The Commission's recommendations focus on constructive engagement, and it aims to ensure that the breach is unlikely to recur. Recommended remedial measures may include changes to internal processes or training needs. There is no mechanism for appealing the decision of the Civil Service Commission and the Commission does not have the power to award compensation or change decisions made by an organisation.⁴³⁶

In 2023-24, the Commission received 150 complaints under the Code, all of which were judged to be out of scope because either the complainant was not a civil servant or the complaint involved bullying, harassment or other human resources concerns.⁴³⁷

Business Appointment Rules

Since the closure of ACOBA in October 2025 (see discussion above), the Civil Service Commission has taken over responsibility for issuing advice on the Business Appointment Rules for Crown Servants to Permanent secretaries and SCS3 (and equivalents, including

⁴²⁹ Civil Service Commission. 2017. [A Guide to Bringing a Recruitment Principles Complaint to the Civil Service Commission](#).

⁴³⁰ The Recruitment Principles 2019.

⁴³¹ Civil Service Commission. 2025. [Annual Report and Accounts 2023-24](#), page 8.

⁴³² Civil Service Code. [Best Practice: Checklist of actions for departments](#).

⁴³³ Civil Service Commission. [Promotion of the Code](#).

⁴³⁴ Civil Service Commission. 2025. [The Civil Service Code: A Guide for Civil Servants Bringing an Appeal to the Civil Service Commission](#).

⁴³⁵ Civil Service Commission, 2025. [A Guide for Civil Servants](#).

⁴³⁶ Civil Service Commission. 2025. [A Guide for Civil Servants](#).

⁴³⁷ Civil Service Commission, 2025. [Annual Report and Accounts 2023-24](#), page 39.

special advisers of equivalent standing).⁴³⁸ The Commission has also provided advice to the Cabinet Office on changes to the Rules for civil servants.⁴³⁹

The Rules are applicable to all civil servants and aim to avoid any reasonable concerns about undue influence, the exploitation of privileged contacts or information on leaving office, and the acquisition of improper advantages by future employers.⁴⁴⁰ The Rules apply to senior Civil Servants for two years after leaving the Civil Service, but only for one year for those at lower levels of seniority. Permanent Secretaries are also subject to a minimum three-month waiting period before they can take up any position outside the Civil Service.

When applying for a new role, former civil servants must consider whether an application is necessary under the Rules. Permanent Secretaries, Senior Civil Servants (at SCS 3), Senior Diplomats and Special Advisers of a similar standing should apply to the Civil Service Commission. The Commission provides advice to the Prime Minister who makes the final decision. In these cases, there is a standard ban on lobbying the Government for two years, which can be reduced and modified to enable some contact with Government on matters integral to the normal course of business for the organisation concerned.

At lower levels of seniority (SCS 2&1) and for Special Advisers of a similar standing the Rules apply for two years after leaving office, while Civil Servants at levels below this are only subject to the Rules for one year. For both these groups, applications are only required when certain triggering conditions are met, and applications are made to departments rather than the Civil Service Commission. This has led to concerns that there is inadequate scrutiny of civil servants at these levels, where individuals can still be involved in commercial decisions and have access to valuable information and contacts. The Commission is currently designing and implementing an audit of how the Rules are applied at the departmental level to assess and monitor this risk.⁴⁴¹

Following controversy over the enforceability of the Rules,⁴⁴² the Government agreed in 2023 that the Rules for Civil Servants would be incorporated into civil service contracts to make them legally binding, but this has not yet happened.⁴⁴³

Whistleblowers

Neither the Civil Service Code nor the Civil Service Management Code refers directly to whistleblowing procedures for civil servants who become aware of unethical behaviour in conflict with the public interest. The Civil Service Commission is not a prescribed person or body designated to receive whistleblowing disclosures. Disclosures made to it do not therefore afford the legal protection provided by the Employment Rights Act 1996 (amended by the Public Interest Disclosure Act 1998).⁴⁴⁴

A list of prescribed people and bodies capable of receiving whistleblowing disclosures is provided by the Government,⁴⁴⁵ and they can receive reports of wrongdoing relating to criminal offences, failure to comply with legal obligations, miscarriages of justice, danger to health and safety, damage to the environment and the deliberate covering up of any of the above forms of wrongdoing.⁴⁴⁶ The National Audit Office has also published guidance for dealing with civil service whistleblowers internally.⁴⁴⁷ Any complaints raised with the Commission should relate to a potential breach of the Civil Service Code.⁴⁴⁸

⁴³⁸ Cabinet Office. 2025. [Business Appointment Rules for Crown Servants](#), 13 October.

⁴³⁹ Armstrong, H. and Rhodes, C. 22 July 2025. [The Business Appointment Rules](#). House of Commons Library, page 4.

⁴⁴⁰ Business Appointment Rules for Crown Servants.

⁴⁴¹ Armstrong and Rhodes 22 July 2025, pages 4 & 18; ACOBA, 21st report, paragraph 8.

⁴⁴² See CSPL. 2021. [Upholding standards in public life](#); Boardman, N. 2021. [Review into the Development and Use of Supply Chain Finance \(and associated schemes\) in Government](#); PACAC. 2022. [Propriety of Governance in Light of Greensill](#). Fourth Report of Session 2022-2023.

⁴⁴³ Cabinet Office. 2023. [Strengthening Ethics and Integrity in Central Government](#), page 9.

⁴⁴⁴ Civil Service Commission, 2025. [A Guide for Civil Servants](#); see also the [Public Interest Disclosure Act 1998](#).

⁴⁴⁵ Department for Business and Trade. 2025. [Whistleblowing: list of prescribed people and bodies](#), 26 November.

⁴⁴⁶ Civil Service Commission, [A Guide for Civil Servants](#).

⁴⁴⁷ National Audit Office. 2024. [Whistleblowing in the Civil Service: Good practice guide](#).

⁴⁴⁸ Civil Service Commission, 2025. [A Guide for Civil Servants](#).

Parliamentary and Health Service Ombudsman

The Parliamentary and Health Services Ombudsman has responsibility for making final decisions on complaints that have not been resolved by government departments and other public organisations.⁴⁴⁹ Anyone can complain to the Ombudsman, but if the complaint is about a government department or other public organisation then it should be made via the complainant's MP.⁴⁵⁰

The Ombudsman has a statutory role, is accountable to Parliament and reports to the Public Administration and Constitutional Affairs Committee (see below). The Board is led by the Ombudsman and includes non-executive members, which bring an external perspective into the Ombudsman's governance.⁴⁵¹

The Ombudsman aims to right individual wrongs suffered, but also to provide an opportunity for learning and for the improvement of services.⁴⁵² The remedies for maladministration or poor service that has led to "injustice or hardship" include:

- an apology, explanation and acknowledgement of responsibility
- remedial action, including reviewing or changing a decision, or making changes to a policy or process
- financial compensation.⁴⁵³

In 2024-25, the Ombudsman worked on 38,045 complaints about government departments, their agencies and other public organisations.⁴⁵⁴

Public Administration and Constitutional Affairs Committee

Parliament provides oversight of the Civil Service through its committee system. The Public Administration and Constitutional Affairs Committee (PACAC), established in 2015, took over the responsibilities of the Public Administration Select Committee (2010-15). It is made up of 11 members, the Chair is elected and the others are appointed from parties across the House of Commons.⁴⁵⁵ The Committee has responsibility for overseeing constitutional matters and the administration of the Civil Service. It also scrutinises the reports of the Parliamentary and Health Service Ombudsman.⁴⁵⁶

⁴⁴⁹ A full list of the organisations under their remit can be found [here](#).

⁴⁵⁰ Parliamentary and Health Service Ombudsman. [What to do before you come to us](#).

⁴⁵¹ Parliamentary and Health Service Ombudsman. [Who we are](#).

⁴⁵² Parliamentary and Health Service Ombudsman. [Ombudsman's introduction to the Principles](#).

⁴⁵³ Parliamentary and Health Service Ombudsman. 10 February 2009. [Principles for Remedy](#), page 10.

⁴⁵⁴ Parliamentary and Health Service Ombudsman. 2025. [Annual Report and Accounts 2024-2025](#), page 34.

⁴⁵⁵ UK Parliament. [Public Administration and Constitutional Affairs Committee – Membership](#).

⁴⁵⁶ UK Parliament. [Public Administration and Constitutional Affairs Committee – Role in relation to the Parliamentary and Health Service Ombudsman](#).

8. Judiciary

- Lady Chief Justice and Lord Chancellor
- Judicial Conduct Investigations Office
- Judicial Appointments Commission
- Judicial Appointments and Conduct Ombudsman
- Supreme Court Justices
- Judicial Committee of the Privy Council

Summary of standards

The independence and impartiality of the Judiciary is an essential pillar in the UK's democracy, underpinning liberty and the rule of law.⁴⁵⁷ Judicial independence is maintained in three main ways. First, institutional independence maintains the independence of judicial business from political interference and from civil liabilities relating to judges' decisions. Second, personal independence protects judicial independence by securing their tenure and excluding them from interests that could either affect or could be seen to affect their duties and judgements. Third, internal independence maintains the freedom of judges from influences within the Judiciary, from their peers or more senior judges.⁴⁵⁸ The regulatory framework surrounding the Judiciary aims to maintain independence on all three fronts.

The legal underpinning for judicial independence and discipline was considerably strengthened in the Constitutional Reform Act 2005, which was influenced in part by international law and the provisions of the European Convention on Human Rights (Article 6.1).⁴⁵⁹ The 2005 Act aimed to achieve a clearer separation of powers between the legislature and the Judiciary, distancing judicial office holders from political influence and executive power and thus increasing the extent of judicial independence. In doing so, the Act modified the office of the Lord Chancellor, sharing the judicial responsibilities of the Lord Chancellor with the Lord Chief Justice; created the Supreme Court; and made provisions for a Judicial Appointments Commission and a Judicial Appointments and Conduct Ombudsman.⁴⁶⁰

Causes for complaint relating to the Judiciary broadly fall into two categories: complaints relating to judicial decisions and case management, which are initially dealt with through the Court, and complaints relating to the conduct of judicial office holders, which are dealt with by the Judicial Conduct Investigations Office. The Court of Appeal plays an important role in the former category,⁴⁶¹ as the right to appeal provides opportunities for litigants to appeal judicial decisions to a higher court.⁴⁶² The Court can order a retrial in civil cases and can quash criminal convictions.⁴⁶³ In the latter case of judicial conduct, accountability mechanisms have been supplemented since 2005 by the provision that where first-tier complaints are not satisfactorily resolved, they can be referred to the Ombudsman (see below).

In August 2025, the Judicial Conduct Investigations Office published a report on the changes made to the judicial disciplinary system in 2023 following an extensive review and a public consultation.⁴⁶⁴ The report found that the 2023 changes had "improved what was already a robust and well-regarded system of judicial discipline" and in particular had made the system of considering complaints more streamlined and consistent.⁴⁶⁵

⁴⁵⁷ Shetreet, S. and Turenne, S. 2014. *Judges on Trial: The Independence and Accountability of the English Judiciary*. Cambridge: Cambridge University Press, page 1.

⁴⁵⁸ See Shetreet and Turenne 2014, pages 5-6.

⁴⁵⁹ Shetreet and Turenne 2014, page 7.

⁴⁶⁰ [Constitutional Reform Act 2005](#).

⁴⁶¹ Shetreet and Turenne 2014, page 7.

⁴⁶² Shetreet and Turenne 2014, page 13.

⁴⁶³ Shetreet and Turenne 2014, page 220.

⁴⁶⁴ Judicial Conduct Investigations Office. 2025. [The 2023 Changes to the Judicial Disciplinary System in England and Wales](#).

⁴⁶⁵ Judicial Conduct Investigations Office. 2025, page 21.

The Judicial Discipline (Prescribed Procedures) Regulations 2023 and The Judicial Conduct Rules 2023 provide the procedures and rules by which complaints should be made and handled.⁴⁶⁶ There are separate rules for Magistrates.⁴⁶⁷

Guide to Judicial Conduct

The Guide to Judicial Conduct (the Guide) provides guidance to judges on their conduct. This Guide is not statutory, but is underpinned by the oath taken by judges on their appointment:

“I, _____, do swear by Almighty God that I will well and truly serve our Sovereign Lord King Charles the Third in the office of _____, and I will do right to all manner of people after the laws and usages of this realm, without fear or favour, affection or ill will.”⁴⁶⁸

The Guide was first published in 2003, and is designed to advise judges, coroners and magistrates on their conduct. It was most recently updated in July 2023.⁴⁶⁹ As implied in its title, the Guide is not a Code or a set of rules to judicial conduct; rather it constitutes “a set of core principles” for the Judiciary, and where there is doubt, advice should be sought from the relevant leadership Judge.⁴⁷⁰ The Guide sets out three principles for judicial conduct: judicial independence, impartiality and integrity.⁴⁷¹ These are underpinned by the values contained in the Bangalore Principles, which were endorsed by the United Nations Human Rights Commission in 2003.⁴⁷²

The Guide not only covers conduct in relation to judicial functions, but also judges’ conduct in their private lives to the extent to which it affects those functions.⁴⁷³ The extension of the remit of the Guide to private lives – highly contested in the Codes for politicians – is well established in Judicial institutions, where explicit restrictions are placed on judges’ extra-judicial activities. These include their non-judicial activities, contacts with the legal profession, use of judicial titles in a non-judicial capacity, engagement in political activity and the public discourse and the provision of references.⁴⁷⁴ There are additional restrictions on salaried judges, which are set out formally in their Terms and Conditions. These include being banned from holding commercial directorships, other than those managing family assets and non-commercial directorships if the activities are controversial in nature; undertaking any political activity or having ties with a political party,⁴⁷⁵ and accepting or giving media interviews without first seeking advice from the relevant leadership. They are also subject to restrictions on receiving remuneration in addition to their judicial salary and cannot take any other remunerated employment.⁴⁷⁶

There are lesser restrictions on fee-paid judges, Magistrates and coroners, although they should avoid conflicts with their judicial office. Retired judges are free to engage in political activity and public debate, but “should take care to avoid any activity that may tarnish the reputation of the judiciary and the perception of its independence”.⁴⁷⁷ There are also reporting requirements for judges, which include personal involvement in court proceedings and criminal charges, and also in relation to any complaints or disciplinary proceedings they might be involved in. Failure to report could lead to disciplinary action.⁴⁷⁸

The 2023 Code introduced additional provisions on the media and social media usage and includes a Statement of Expected Behaviour in Annex 1.⁴⁷⁹ This Statement was issued by the Senior President of Tribunals and the Lord Chief Justice in early 2023, and it makes explicit the standards of behaviour expected in relationships between judges, judicial staff and users of the justice system. It emphasises respect for diversity and the treatment of all with dignity,

⁴⁶⁶ [The Judicial Discipline \(Prescribed Procedures\) Regulations 2023; Judicial Conduct Rules 2023.](#)

⁴⁶⁷ [Judicial Conduct \(Magistrates\) Rules 2023.](#)

⁴⁶⁸ Courts and Tribunals Judiciary. [Oaths.](#)

⁴⁶⁹ Guide to Judicial Conduct, July 2023.

⁴⁷⁰ Guide to Judicial Conduct, July 2023, page 5.

⁴⁷¹ Guide to Judicial Conduct, July 2023, page 8.

⁴⁷² [Bangalore Principles of Judicial Conduct](#), 2002.

⁴⁷³ Guide to Judicial Conduct, July 2023, page 8.

⁴⁷⁴ Guide to Judicial Conduct, July 2023, page 11-19.

⁴⁷⁵ The ban on engaging in political activity has long been in practice but was underlined by the Constitutional Reform Act 2005 and included in the Terms of Appointment and Terms of Service.

⁴⁷⁶ Guide to Judicial Conduct, July 2023.

⁴⁷⁷ Guide to Judicial Conduct, July 2023, page 16.

⁴⁷⁸ Guide to Judicial Conduct, July 2023, page 20.

⁴⁷⁹ Guide to Judicial Conduct, July 2023, page 4, Annex, 26. A table of the 2023 amendments can be found [here](#).

as well as the appropriate reporting procedures for bullying, harassment or discrimination, and referral to the Judicial Conduct Investigations Office.

A major concern of the Guide is to manage conflicts of interest effectively when carrying out judicial activities. This includes managing bias and perceived bias in the process. The Equal Treatment Bench Book provides extensive guidance to support judges in their understanding of fair treatment and equality.⁴⁸⁰ Judges should not sit on a case where there is a close relationship with any party or their spouse or partner, and similarly friendship or animosity or a business relationship with any party should also exclude the Judge from sitting.⁴⁸¹ If circumstances could give rise to bias, then these should be disclosed and followed by recusal from the case, unless all parties, including the Judge, consent to the continuation. There are some cases in which the situation will be brought to the attention of the parties, but on consideration, despite them not giving consent for continuation the Judge can decide to proceed.⁴⁸² Judges are not required to register their interests in advance.

The primary upholders of standards for the Judiciary are the **Lord Chancellor and Lady Chief Justice**, the **Judicial Conduct Investigations Office**, the **Judicial Appointments Commission** and the **Judicial Appointments and Conduct Ombudsman**. There are separate arrangements for the **Supreme Court** and the **Judicial Committee of the Privy Council**.

Institutions

Lord Chancellor and Lady Chief Justice

The Lord Chancellor is the head of the Ministry of Justice, appointed by the Monarch on the advice of the Prime Minister. Until the changes made by the 2005 Constitutional Reform Act, the Lord Chancellor was also the head of the Judiciary and speaker in the House of Lords, but this is no longer the case. The Lord Chancellor cannot sit as a Judge.⁴⁸³

The Lady Chief Justice has over 400 statutory responsibilities but shares responsibility with the Lord Chancellor for judicial discipline. This responsibility is joint and equal and is supported by the Judicial Conduct Investigations Office (see below).⁴⁸⁴ The Lady Chief Justice is appointed by a panel convened by the Judicial Appointments Commission (see below).⁴⁸⁵

In undertaking their responsibilities for upholding judicial standards, the Lord Chancellor and Lady Chief Justice may choose to pay regard to the Guide to Judicial Conduct, but they “are not obliged to follow it”.⁴⁸⁶ This structure means that a government official is directly involved in decisions relating to judicial discipline, which could be construed as a challenge to the principle of judicial independence.⁴⁸⁷ However, the involvement of a political actor also means that the Judiciary is not wholly self-regulating and so provides a safeguard against judges’ potential reluctance to discipline one of their own. The Lord Chancellor and Lady Chief Justice are responsible for making final decisions about the discipline of judges, but a crucial criterion in their decision-making is that they must agree, which also provides a safeguard against concerns of disciplinary action being taken on political grounds.⁴⁸⁸

Judicial Conduct Investigations Office

The Judicial Conduct Investigations Office (JCIO) is an independent statutory body, which supports the Lord Chancellor and Lady Chief Justice in considering complaints about the conduct of the Judiciary.⁴⁸⁹ The JCIO is made up of officials appointed by the Lord Chancellor

⁴⁸⁰ Judicial College. 2024. [Equal Treatment Bench Book](#). Updated Feb. 2026.

⁴⁸¹ Guide to Judicial Conduct, July 2023, page 22.

⁴⁸² Guide to Judicial Conduct, July 2023, page 23.

⁴⁸³ UK Parliament. [Lord Chancellor](#).

⁴⁸⁴ Courts and Tribunals Judiciary. [Lady Chief Justice](#).

⁴⁸⁵ Courts and Tribunals Judiciary. [Lady Chief Justice](#).

⁴⁸⁶ Guide to Judicial Conduct, July 2023, page 7.

⁴⁸⁷ Courts and Tribunals Judiciary. [Judicial Conduct](#).

⁴⁸⁸ Courts and Tribunals Judiciary. [Judicial Conduct](#).

⁴⁸⁹ [Judicial Conduct Investigations Office](#).

with the agreement of Lady Chief Justice, the Lord President of the Court of Session and the Lord Chief Justice of Northern Ireland.⁴⁹⁰ Appointments to the JCIO are regulated by the Commissioner for Public Appointments and comply with the Governance Code on Public Appointments (see above).⁴⁹¹

The JCIO does not deal with complaints about the decisions made by judges or the management of cases, which can be subject to appeals, but rather considers complaints relating to the misconduct of judicial office holders.⁴⁹² The JCIO is principally an advisory body, without powers to make findings or issue sanctions. It convenes nominated judges, investigating judges and Disciplinary Panels to hear the complaints (see below). Disciplinary Panels are appointed by the Lord Chancellor and Lady Chief Justice, and include an office holder of higher rank than the office holder concerned and two other members who have not been an office holder or a practicing or employed lawyer.⁴⁹³ In September 2023, the Lord Chancellor approved 15 lay panel members to sit on the Disciplinary Panels.⁴⁹⁴

Complaints and investigations

Complaints should be made within three months of the matter occurring, should be made in writing and can be submitted online.⁴⁹⁵ In certain circumstances the JCIO can consider the evidence and then either dismiss the case or recommend sanctions to the Lord Chancellor and Lady Chief Justice. A summary process is appropriate in cases where for example an office holder has been convicted of a criminal offence.⁴⁹⁶

In all other cases, a nominated Judge, appointed by the Lord Chancellor and Lady Chief Justice, considers the case. The nominated Judge should consider the complaint and determine the facts of the case and whether this amounts to misconduct and what disciplinary sanctions should be issued.⁴⁹⁷ The nominated Judge may dismiss a complaint, recommend a disciplinary sanction or refer the case to an investigating Judge if the complaint is sufficiently serious or complex.⁴⁹⁸

An investigating Judge must consider the complaint and determine the facts of the case, whether the facts amount to misconduct and what disciplinary sanctions should be issued.⁴⁹⁹ They must also decide how to conduct their investigation and inform the JCIO.⁵⁰⁰ They then report their findings to the Lord Chancellor and Lady Chief Justice recommending whether a complaint should be dismissed or a disciplinary sanction issued.⁵⁰¹

A Disciplinary Panel will be convened by the JCIO where the office holder concerned requests a Panel to hear the case; the Lord Chancellor and the Lady Chief Justice refer a case to the Panel where further investigation is required or where they disagree with a recommendation given to them and wish to remove or suspend the office holder concerned from office; or where the Ombudsman refers a case to the Panel.⁵⁰² The Disciplinary Panel may consider and review any findings of fact; any recommendation as to the conduct of the office holder concerned; and any proposed disciplinary sanction.⁵⁰³

When a disciplinary sanction has been issued, the JCIO normally publishes a Disciplinary Statement on its website; these statements remain on the website for one year or, if they result in a removal from office, remain on the website for five years. The Lord Chancellor and

⁴⁹⁰ The Judicial Discipline (Prescribed Procedures) Regulations 2023, paragraph 4.

⁴⁹¹ Ministry of Justice. 2023. [Appointment of 15 lay panel members of disciplinary tribunals to the Judicial Conduct Investigations Office](#), News Story, 5 September.

⁴⁹² [Judicial Conduct Investigations Office](#).

⁴⁹³ In the case of Magistrates the composition is slightly different – including an office holder of higher rank than the office holder concerned, a justice of the peace (Magistrate) and another member who has not been an office holder or a practicing or employed lawyer. The Judicial Discipline (Prescribed Procedures) Regulations 2023, paragraph 11.

⁴⁹⁴ Ministry of Justice. 2023. [Appointment of 15 lay panel members of disciplinary tribunals to the Judicial Conduct Investigations Office](#).

⁴⁹⁵ Judicial Conduct Rules 2023, paragraph 12. See also JCIO. [Making a Complaint](#).

⁴⁹⁶ Judicial Conduct Rules 2023, paragraph 47.

⁴⁹⁷ Judicial Conduct Rules 2023, paragraph 57.

⁴⁹⁸ Judicial Conduct Rules 2023, paragraph 63 & 68.

⁴⁹⁹ Judicial Conduct Rules 2023, paragraph 83.

⁵⁰⁰ Judicial Conduct Rules 2023, paragraph 84.

⁵⁰¹ Judicial Conduct Rules 2023, paragraph 93.

⁵⁰² Judicial Conduct Rules, paragraph 105. See also The Judicial Discipline (Prescribed Procedures) Regulations 2023, paragraphs 13 & 14.

⁵⁰³ Judicial Rules of Conduct 2023, paragraph 107.

Lady Chief Justice can decide jointly whether to issue a press statement or delete statements, depending on the individual case.⁵⁰⁴

Judicial Appointments Commission

The Judicial Appointments Commission is independent and responsible for selecting candidates for judicial office in England and Wales.⁵⁰⁵ There are 15 commissioners; the Chair of the Commission is a lay member, and of the remaining 15, six must be judicial members, two must be professional members, five must be lay members, and one must be a non-legally qualified judicial member.⁵⁰⁶ Twelve of the commissioners are appointed in an open competition and the Judicial Council or the Tribunal Judges' Council select the remaining three.⁵⁰⁷

The selection process includes a statutory consultation and other background checks into the character of the candidates.⁵⁰⁸ The Commission also conducts a quality assurance check throughout the process and appoints an Advisory Group to review the test and selection materials.⁵⁰⁹ It also has a process for receiving complaints through its complaints manager.⁵¹⁰ If complaints are not successfully handled the Judicial Appointments and Conduct Ombudsman can investigate further (see below).

Judicial Appointments and Conduct Ombudsman

The Ombudsman is independent and has responsibility for handling complaints related to judicial appointments and the conduct of the Judiciary.⁵¹¹ The Ombudsman is appointed for five years, and the appointment is overseen by the Commission for Public Appointments (see above).⁵¹²

The Ombudsman can only investigate complaints that have not been resolved by the first-tier complaints processes and investigates these processes rather than the complaints themselves. If the Ombudsman determines that the complaint is within remit, an Investigating Officer will investigate and report back to the Ombudsman, who decides the outcome of the complaint and sends a report to the Lord Chancellor and Lady Chief Justice to see if they want to comment.⁵¹³

With regards to complaints about appointments, the Ombudsman can:

- Make recommendations to the Lord Chancellor and Judicial Appointments Commission on how to proceed
- Recommend a change in procedures.

In relation to complaints about judicial conduct, the Ombudsman can:

- Ask for a reinvestigation of a complaint by the JCIO or ask a Disciplinary Panel to examine the complaint
- Recommend a change in procedure
- Propose that compensation be paid to a complainant.⁵¹⁴

It is not possible to appeal the final decision on complaints made by the Ombudsman.⁵¹⁵

⁵⁰⁴ JCIO. [Disciplinary Statements](#).

⁵⁰⁵ [Judicial Appointments Commission](#); see also [The Judicial Appointments Commission Regulations 2013](#).

⁵⁰⁶ JAC. [Our people](#).

⁵⁰⁷ Courts and Tribunals Judiciary. [Judicial Appointments Commission](#).

⁵⁰⁸ JAC. [Statutory consultation](#).

⁵⁰⁹ JAC. [Quality Assurance](#).

⁵¹⁰ JAC. [Contact us – complaints](#).

⁵¹¹ [Constitutional Reform Act 2005, Schedule 13](#); Judicial Appointments and Conduct Ombudsman. [About us](#).

⁵¹² Ministry of Justice and Judicial Appointments and Conduct Ombudsman. 2021. [Appointment of Judicial Appointments and Conduct Ombudsman](#), News Story, 4 March.

⁵¹³ [How to complain about the judicial conduct investigations process](#), page 7.

⁵¹⁴ Judicial Appointments and Conduct Ombudsman. [About us](#).

⁵¹⁵ Judicial Appointments and Conduct Ombudsman. [Complaints procedure](#).

Supreme Court Justices

The 12 Supreme Court Justices are appointed by an independent selection Committee convened by the Lord Chancellor.⁵¹⁶ In 2009, the Justices of the Supreme Court also adopted a Guide to their own judicial conduct, which drew upon the guidance provided in the Guide to Judicial Conduct for Judges. It covers judicial independence, impartiality, integrity, propriety, equality of treatment to all, competence and diligence.⁵¹⁷ The responsibility for deciding on an appropriate course of conduct, however, remains with the individual Justice, although they can seek advice from the President or Deputy President of the Court.⁵¹⁸ Justices are not required to register their interests.⁵¹⁹

The Court also has a procedure for judicial complaints, which can be made by any member of the public using an online complaints form, which takes administrative and judicial complaints.⁵²⁰ Complaints are mainly dealt with internally and there is no external oversight body. In the first instance complaints are passed to the Chief Executive, who decides whether the complaint should be investigated; if the complaint relates to a judicial decision or provides no grounds for the complaint, then no action is taken and the complainant is informed. Where there is a case the complaint is referred to the most senior member of the court to which the complaint does not relate, usually the President.

If a formal action is considered the Justice is informed, along with the Lord Chancellor, who is also consulted about the action to be taken. A formal action involves a Tribunal including the Lady Chief Justice, the Lord Chancellor and others, and the Lord Chancellor makes the decision on whether to remove the Justice from office and may also publish the Tribunal's report.⁵²¹ In the case of Justices on the Court's Supplementary Panel, which the Court can call when additional judges are needed, the procedure is abbreviated and complaints are heard and adjudicated by the President of the Court.⁵²²

Judicial Committee of the Privy Council

The Judicial Committee of the Privy Council is the final court of appeal for UK overseas territories and Crown dependencies, and some Commonwealth countries.⁵²³ The Council shares many of the features of the Supreme Court, including in the main its judges.⁵²⁴ The appointment process is aligned, as is its own Guide to Judicial Conduct.⁵²⁵

⁵¹⁶ Supreme Court. [Appointment of Justices](#); 26 to 27B of the Constitutional Reform Act 2005 and The Supreme Court (Judicial Appointments) Regulations 2013.

⁵¹⁷ Supreme Court. [Judicial conduct](#); Supreme Court, [Guide to Judicial Conduct 2019](#).

⁵¹⁸ Supreme Court, 2019, paragraph 1.4.

⁵¹⁹ Supreme Court. [Justices' Financial Interests](#).

⁵²⁰ Supreme Court. [Online Complaints Form](#).

⁵²¹ [Judicial Complaints Procedure: UK Supreme Court](#).

⁵²² [Supplementary Panel Judicial Complaints Procedure](#).

⁵²³ [Judicial Committee of the Privy Council](#).

⁵²⁴ Judicial Committee of the Privy Council. [Appointment of Justices](#).

⁵²⁵ Judicial Committee of the Privy Council. [Guide to Judicial Conduct 2019](#).

9. Political Parties

- Electoral Commission
- Speaker's Committee on the Electoral Commission

Summary of standards

Although political parties are not strictly public institutions, they play an integral part in the political system, and their conduct has a profound effect on public trust. There has been an increasing awareness of the need to regulate political parties, particularly their financing and campaign spending. A challenge for regulators is that in the fast-moving environment around elections, by the time any wrong-doing is identified and investigated, the election will have likely already taken place and the electorate's opportunity to impose political sanctions will have passed.⁵²⁶ A reasonable balance needs to be struck, however, as political parties, while often powerful, high profile and increasingly professionalised, are also largely administered by volunteers and part-time staff.⁵²⁷

In 1997, following a manifesto promise, and a scandal in which the Labour Party was forced to return a £1 million donation, the remit of the CSPL was expanded to consider party funding.⁵²⁸ It produced its first report on political parties in 1998,⁵²⁹ which led directly to the Political Parties, Elections and Referendums Act 2000. The Act established the Electoral Commission and increased transparency around the sources of party donations and party expenditure during election campaigns and also banned donations from foreign sources.⁵³⁰ While making progress in the regulation of political parties and their activities around elections, the changes were not sufficient to eradicate concerns over their conduct. In particular, the regulations failed to get to grips with spending that exceeded incomes, including spending that was not specifically campaign related, and the increasing tendency for funding to come from large donations and loans.⁵³¹ Loans to parties did not have to be recorded and yet had the effect of placing parties in positions of dependency, in which loan providers could potentially call in debt if they were dissatisfied with party policy or activities.⁵³² In response to unregistered loans and other outstanding challenges, the 2006 Electoral Administration Act provided some resolution with the regulation of "non-commercial loans", requiring the declaration of borrowings, and improving the timeliness of reporting and increasing possible sanctions for breaches.⁵³³ In 2009 the issues of campaign finance and the powers of the Electoral Commission were also addressed in the Political Parties and Elections Act, including addressing sanctions and investigatory powers.⁵³⁴

A number of issues remained outstanding, however, including party dependence on large donations and loans.⁵³⁵ In its 2011 report, the CSPL drew up a three-pronged plan for reform of the system in order to address the issue of big donors, including caps on donations, tighter limits on expenditure and additional funding for political parties from the public purse.⁵³⁶ The report did not receive universal approval, two political members provided dissenting opinions,⁵³⁷ and the proposals were largely rejected.⁵³⁸ In recognition of the increasing prominence of third-party campaigners in the 2010 election, the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, put in place additional

⁵²⁶ See Hine and Peele 2016, for discussion of challenges faced by regulators over time, page 227.

⁵²⁷ CSPL. 2007. Review of the Electoral Commission, page 2.

⁵²⁸ See Hine and Peele 2016, 221.

⁵²⁹ CSPL 1998. The Funding of Political Parties in the United Kingdom.

⁵³⁰ Hine and Peele 2016, pages 221-2.

⁵³¹ Hine and Peele 2016, pages 223-5.

⁵³² Hine and Peele 2016, page 225.

⁵³³ Hine and Peele 2016, page 227.

⁵³⁴ Hine and Peele 2016, page 229.

⁵³⁵ Hine and Peele 2016, page 233.

⁵³⁶ CSPL. 2011. Political Party Finance: Ending the Big Donor Culture.

⁵³⁷ CSPL. 2011. Political Party Finance, Appendix 8.

⁵³⁸ Hine and Peele 2016, page 234.

regulations to limit their spending, in a move that has been subject to considerable controversy.⁵³⁹

Following the 2016 European Union Membership Referendum, concerns have heightened not only about spending in campaigns and the origins of funds, but also about the quality of the discourse, the danger of disinformation and fake news, and the regulation of online campaigning.⁵⁴⁰ In June 2018, the Electoral Commission issued recommendations in their Digital Campaigning report.⁵⁴¹ These included more detailed reporting on digital spending by campaigning groups, increased checks and limits on groups paying for digital campaigns, and more enforcement powers to gather information. It also restated its longstanding recommendations about requiring digital political material to include an imprint of its origin and increasing sanctions for breaches of the rules. The final report of a Digital, Culture, Media and Sport Committee inquiry, in February 2019,⁵⁴² supported many of the Commission's recommendations and those made by the CSPL in 2017 on the use of digital imprints.⁵⁴³ The report also addressed the risk of foreign influence and concluded that, "the UK is clearly vulnerable to covert digital influence campaigns".⁵⁴⁴

In November 2019, the Public Administration and Constitutional Affairs Committee published a report on its urgent inquiry into requirements for electoral reform;⁵⁴⁵ in 2020 the Law Commission published its report on electoral law;⁵⁴⁶ and in 2021, the CSPL published its report on regulating election finance.⁵⁴⁷ There were commonalities across the three reports, including recommendations to consolidate and simplify the law and concerns about digital imprints, intimidation of candidates and electoral offences. The Elections Act 2022 implemented several new requirements to address these concerns, including specifying the information that must be included in electronic communications, which should identify the promoter of the material and on whose behalf it is being promoted.⁵⁴⁸

Codes of Conduct

The Electoral Commission issues a Code of Conduct for Campaigners at UK Parliamentary general elections in Great Britain, local elections in England and Police and Crime Commissioner Elections.⁵⁴⁹ The Code provides guidance on acceptable conduct during an election and covers electoral registration and absent vote applications, postal voting documents, campaigning outside polling places and complaints and allegations about electoral fraud.

Any concerns relating to breaches of criminal offences referred to in the Code are dealt with by the police; other concerns should first be raised with the candidate, political party or campaigner in question, and further concerns can be brought to the Electoral Commission, which can raise them with the relevant party and agree appropriate actions to remedy or prevent a reoccurrence.⁵⁵⁰

Political parties also have their own codes of conduct. In 2019 the CSPL Secretariat reviewed the codes of the major political parties represented in Parliament at that time. It found that the codes varied in their approaches to disciplinary procedures for breaches, with a lack of clarity on whether the range of sanctions – from formal warning or a reprimand through to barring from standing from election and revocation of party membership – was uniformly applied across the parties.⁵⁵¹

⁵³⁹ Hine and Peele 2016, page 209.

⁵⁴⁰ Electoral Commission, 2018. Digital Campaigning.

⁵⁴¹ Electoral Commission, 2018 Digital Campaigning, pages 24-26.

⁵⁴² Digital, Culture, Media and Sport Committee. 18 February 2019. [Disinformation and "fake news": Final Report](#).

⁵⁴³ CSPL. 2017. [Intimidation in Public Life](#).

⁵⁴⁴ Digital, Culture, Media and Sport Committee, 18 February 2019, page 71.

⁵⁴⁵ PACAC. 2019. [Electoral Law: The urgent need for review](#). First report of Session 2019.

⁵⁴⁶ Law Commission & Scottish Law Commission. 2020. [Electoral Law: A joint report](#).

⁵⁴⁷ CSPL. 2021. [Regulating Election Finance](#): A review by the Committee on Standards in Public Life.

⁵⁴⁸ [Elections Act 2022](#), paragraph 41.

⁵⁴⁹ Electoral Commission. 2023. [Code of Conduct for Campaigners at UK Parliamentary general elections in Great Britain, local elections in England and Police and Crime Commissioner Elections](#).

⁵⁵⁰ Code of Conduct for Campaigners 2023.

⁵⁵¹ CSPL. 2019. [Review of Political Parties' Codes of Conduct](#), paragraph 15.

Guidance

The Electoral Commission provides guidance for parties, candidates and agents, campaigners and other organisations and individuals. The guidance for parties covers registration, donations and loans, reporting campaign spending and the submission of party accounts.⁵⁵²

The Political Parties, Elections and Referendums Act 2000 regulates the donations and loans political parties can accept. A donation or loan includes any money, goods or services that are given to a party without charge or on non-commercial terms that have a value over £500.⁵⁵³ Parties can only accept donations or loans from permissible donors, a list of which can be found on the Electoral Commission's website,⁵⁵⁴ but in all cases the donation must come from within the UK, or from individuals included on the electoral register. (Northern Irish campaigners are, however, able to accept donations from Irish based sources.) All donations and loans should be recorded, including the value and the name and address of donor.⁵⁵⁵

Certain information must be reported directly to the Electoral Commission. This includes any impermissible donations or loans that were made to the party (these should be returned); all single permissible benefits (donations and loans) over the value of £11,180 whether these are a single benefit to that amount or multiple benefits that add up to that amount in a calendar year. Some political parties also have local branches, called accounting units. Political parties must also report donations or loans worth over £2,230 received by their accounting units. They must submit returns to the Commission once a quarter; and once a general election is called, returns must be made weekly.⁵⁵⁶

Parties are also required to report on their campaign spending in the run up to elections (regulated period) and there are different limits on spending for different kinds of elections.⁵⁵⁷ During a general election, parties can spend up to £54,010 times the number of seats the party is contesting in each part of Great Britain.⁵⁵⁸ Parties must report their spending to the Electoral Commission following an election period, including details of their spending, receipts and invoices for anything over £200, along with a declaration from the person responsible that the return is complete and correct. It is a criminal offence to make a false declaration knowingly or recklessly.⁵⁵⁹ Reports must be made within either three or six months of the election, depending on whether the amount spent is under or over £250,000.⁵⁶⁰

The primary upholder of standards for political parties is the **Electoral Commission**, which is overseen by the **Speaker's Committee on the Electoral Commission**.

Institutions

Electoral Commission

The Electoral Commission is an independent statutory body, established by the Political Parties, Elections and Referendums Act 2000 (PPERA). It oversees elections and regulates political finance in the UK.⁵⁶¹ It has 10 commissioners appointed by the Monarch, four of which are nominated by political parties, and then reviewed and evaluated by an Independent Panel. The Panel reports to the Speakers' Committee (see below), which then makes recommendations to Parliament.⁵⁶² The commissioners have their own Code of Conduct, which provides clear guidance on the behaviour expected of them.⁵⁶³

⁵⁵² Electoral Commission. [Guidance: Political Party](#).

⁵⁵³ Electoral Commission. [Which donations are covered by the rules?](#)

⁵⁵⁴ Electoral Commission. [Who can you accept donations and loans from?](#)

⁵⁵⁵ Electoral Commission. [What must you record when you accept a donation?](#)

⁵⁵⁶ Electoral Commission. [Which donations and loans do you need to report?](#) see also [Pre-poll reporting](#).

⁵⁵⁷ Electoral Commission. [About this guidance](#).

⁵⁵⁸ Electoral Commission. [The spending limit](#).

⁵⁵⁹ Electoral Commission. [Your spending return](#).

⁵⁶⁰ Electoral Commission. [Campaign reporting deadlines](#).

⁵⁶¹ Electoral Commission. [About us](#).

⁵⁶² Electoral Commission. [Selecting our Commissioners](#).

⁵⁶³ Electoral Commission. [Code of Conduct for Electoral Commissioners](#).

The Elections Act 2022 implemented changes to the role and responsibilities of the Electoral Commission, which have raised concerns about political interference with its independence.⁵⁶⁴ In particular, the Act gave the Secretary of State the power to produce a strategy and policy statement for the Commission, to which the Commission must “have regard ... when carrying out [its] functions”. The Speaker’s Committee examines the Commission’s performance against the strategy and policy statement.⁵⁶⁵ This has been seen as reorienting the accountability and oversight of the Commission away from Parliament and towards Government.⁵⁶⁶

The Commission has supervisory, investigation and sanctioning powers and the Enforcement Policy provides guidance on how these are carried out, except for in relation to controls on information to be included on electronic material for which there is separate guidance.⁵⁶⁷

Publishing information

The Commission keeps a register of donations and loans to parties, which is publicly available; and reports on campaign spending following an election.⁵⁶⁸ The information provided to the Commission is published on the Commission’s financial database, Political Finance Online, which includes information on party donations and loans, spending and registration and accounts.⁵⁶⁹

Supervision

Supervisory powers enable the Commission to monitor and check information related to income and expenditure of individuals and organisations regulated under the PPERA. This can include obtaining information from or visiting the premises of regulated entities, which is usually done voluntarily. The Commission can issue a Disclosure Notice requiring the disclosure of a specific document or piece of information relating to income and expenditure, but it must be a reasonable request in relation to carrying out its functions. It is a criminal offence to fail to comply with a Disclosure Notice within the deadline unless there is a reasonable excuse, to intentionally obstruct the Commission in its work or to knowingly or recklessly provide false information. If the Commission is unreasonably refused access or information, it can request an Inspection Warrant. Failure to comply with the Warrant, obstructing it or providing false information is a criminal offence.⁵⁷⁰

Investigations

If the Electoral Commission suspects a breach of the rules, it considers whether investigating it is in the public interest and is justified in terms of the use of its resources.

In cases where the Commission has grounds to suspect a breach of the rules, it has a range of powers available. It can issue an Investigation Notice requiring the disclosure of information and documentation. Where an Investigation Notice is not complied with the Commission can apply to the High Court for a Disclosure Order. To do this, the Commission must demonstrate it has reasonable grounds to suspect that a criminal offence has been committed under PPERA, the necessary information has not been provided in response to the Investigation Notice, and that it needs this information to investigate. It is a criminal offence to fail to comply with the Notice or Order without reasonable excuse, obstruct it or knowingly or recklessly provide false information.

The Commission may also conduct a Statutory Interview; issue a Stop Notice, which requires the regulated organisation either to not begin or to cease a given activity; or a Forfeiture, which enables the Commission to apply to a Court for the forfeit of funds received by a regulated entity from an impermissible donor.⁵⁷¹

⁵⁶⁴ House of Lords Business. 2024. [Electoral Commission Strategy and Policy Statement](#), 6 February.

⁵⁶⁵ Elections Act 2022, paragraphs 16 & 17.

⁵⁶⁶ Power, S. 2025. [The Electoral Commission](#), House of Commons Library, page 14. In March 2026, the Government announced its intention to abolish the power of the Government to set a strategy and policy statement for the Electoral Commission, see [Second Reading of the Representation of the People Bill](#), Monday 2 March.

⁵⁶⁷ Electoral Commission, [Enforcement Policy](#), September 2023.

⁵⁶⁸ Electoral Commission. [Financial reporting](#).

⁵⁶⁹ Electoral Commission. [Political Finance Online](#).

⁵⁷⁰ Enforcement Policy, September 2023.

⁵⁷¹ Enforcement Policy, September 2023.

There are three possible outcomes to an investigation: the Commission is satisfied beyond reasonable doubt that an offence or contravention of the rules has been committed; the Commission is not satisfied beyond reasonable doubt that an offence has been committed; or the Commission decides that it would not be in the public interest to continue the investigation and closes it without making a determination of offence.⁵⁷²

Sanctions

Where a breach in the rules is found, the Electoral Commission has powers to impose civil sanctions. In applying sanctions, the Commission will consider amongst others the seriousness of the offence, the harm caused, the financial gain or other advantage and the frequency and duration of the offence.

In cases of serious breaches, the Commission refers the case to the police for investigation.⁵⁷³

Speaker's Committee on the Electoral Commission

The Speaker's Committee on the Electoral Commission is a statutory body, established by the Political Parties, Elections and Referendums Act 2000.⁵⁷⁴ The Committee has 10 members from the House of Commons, and the Speaker of the House of Commons is the Committee chair.⁵⁷⁵

It oversees the work of the Electoral Commission with duties to recommend the appointment and re-appointment of commissioners and to examine the Commission's estimates and five-year plans. Since the Elections Act 2022, it has also had the power to examine whether the Commission had given "regard" to strategy and policy statements published by Government when carrying out its functions.⁵⁷⁶

⁵⁷² Enforcement Policy, September 2023; for further information see Electoral Commission. [How investigations work](#).

⁵⁷³ Electoral Commission. [Our enforcement work](#).

⁵⁷⁴ UK Parliament. [Speakers Committee on the Electoral Commission](#).

⁵⁷⁵ UK Parliament. [Speakers Committee on the Electoral Commission](#).

⁵⁷⁶ In March 2026, the Government announced its intention to abolish the power of the Government to set a strategy and policy statement for the Electoral Commission.

10. Third-party actors

Lobbyists

- Office of the Registrar of Consultant Lobbyists
- Voluntary lobbying registers

Public service providers

- Government Commercial Function

Context

The last 30 years have seen the shape of political life change considerably, as third-party actors have become increasingly involved in the way politics is done and how decisions are implemented and public duties are fulfilled. Consequently, there have been increasing concerns about the need to regulate actors that are not strictly public servants but are closely involved in the making of public policy and take on responsibilities for the delivery of public services.

This general trend towards bringing third-party actors into the standards regime is reflected in the CSPL's changing remit and the areas it explored in its reports over the years. Its remit expanded first in 1997 to include political parties and again in 2013 to include "all those involved in the delivery of public services", including the employees of private sector companies contracted to provide public services.⁵⁷⁷ The pattern of the Committee's reports over time also track changing interests and pressures on standards in public life: first tackling the accountability of ministers' special advisers in 2003; considering lobbying for the first time in 2013; and addressing the integrity challenges of private providers of public services in 2014, an issue it revisited in 2015 and again in 2018.⁵⁷⁸

This section focuses on the ways in which regulation has evolved to encompass lobbyists, campaigning groups and third-party providers of public services. Extending regulation to actors who are not public officials but have considerable involvement in and responsibility for public policy and service delivery poses several challenges. These relate to the different institutional contexts in which third parties work, the different pressures and expectations placed on them in terms of performance, and the difficulties of incentivising and monitoring certain types of ethical conduct. In the case of lobbyists the solution has been to concentrate on increasing transparency rather than attempting to impose codes of conduct or proscribe particular types of behaviour.⁵⁷⁹ In the case of the providers of public services a larger framework is in place to monitor performance and financial accountability, but it does not necessarily cover ethical behaviour or incorporate standards that would be expected of public officials and civil servants.⁵⁸⁰ In its 2018 report, the CSPL highlighted the particular tension inherent in the imposition of ethical standards, such as the Nolan Principles, on private and voluntary organisations. These include conflicts between the selflessness principle and the profit motive, the balance of value for money and ethics, and the varying obligations and burdens imposed by transparency and openness.⁵⁸¹ Despite these challenges, there is an increasing awareness that ethical standards are both necessary and expected of all providers of public services and that systems need to be improved to ensure that they are a core component of commissioning and continuing oversight.

⁵⁷⁷ In 2013, the remit was also restricted so as not to include the devolved legislatures. See: CSPL. Terms of Reference.

⁵⁷⁸ A full list of reports can be found [here](#).

⁵⁷⁹ See Hine and Peele 2016, page 209.

⁵⁸⁰ CSPL. 2014. [Ethical Standards for Providers of Public Services](#), page 24.

⁵⁸¹ CSPL. 2018. [The Continuing Importance of Ethical Standards for Public Service Providers](#), pages 33-37.

Lobbyists and campaigning organisations

Lobbying is a legitimate practice and can be beneficial to the political process, providing essential channels for expertise, representation and dialogue between Government and society. However, it can also enable practices that lead to a “lack of trust and confidence in political decision making”.⁵⁸² Concerns arise around two dimensions, first that individuals and groups do not have equal resources to enable them to lobby on a level playing field, and second that there might be improper forms of benefit or exchange involved that compromise the ability of public officials to fulfil their duties.⁵⁸³ The considerable rise in the extent and intensity of lobbying activity in recent years has led to calls to regulate the industry.

In 2009, an inquiry by the Public Administration Select Committee (PASC) recommended the promotion of ethical behaviour by lobbyists and the introduction of a mandatory register for “all those involved in accessing and influencing public-sector decision makers” to be managed by an independent body.⁵⁸⁴ In 2012, the Political and Constitutional Reform Select Committee issued a follow-up report to the Government’s consultation on introducing a statutory register. It reiterated the PASC recommendations and addressed the question of whether charities and other third-party campaigning groups should be included.⁵⁸⁵

The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act (Lobbying Act) delivered a partial solution to the regulation of lobbyists.⁵⁸⁶ The CSPL produced a report in 2013, as the legislation was making its way through Parliament, which expressed doubts that the Register proposed by the Government “would be enough to allay public concern”.⁵⁸⁷ The Act brought in a compulsory register, but it limited its coverage to consultant lobbyists, or “multi-client lobbying firms”, contrary to the recommendations of the Committees. This means that in-house lobbyists and PR departments are not required to register. The justification for their exclusion from the Register was that their interactions would already be captured by Ministerial meeting reports,⁵⁸⁸ which are published by departments on a quarterly basis; and that the content of their lobbying activity is already transparent – i.e., who they are representing is consistent with their affiliation.⁵⁸⁹ In 2021, the CSPL resisted calls to expand the Register to include in-house lobbyists and other groups engaged in lobbying, arguing that the burden and obligations of transparency should fall on public officials rather than those making representations. It suggested that expanding the Register would “place an unnecessary hurdle to the exercise of the democratic right to make representations to government”.⁵⁹⁰

As such, regulation has tended to place the onus on public officials rather than lobbyists. In its response to CSPL and Boardman recommendations, in 2023 the Government committed to adopting an integrated Transparency Platform and increasing the frequency of Ministerial releases from quarterly to monthly.⁵⁹¹ The CSPL had also recommended expanding the transparency obligations of Senior Civil Servants and Special Advisers. While the Government accepted the recommendation for Civil Servants, it rejected expanding the requirements on Special Advisers as unnecessary because they “cannot authorise public expenditure nor exercise any statutory powers”.⁵⁹² Another area of concern, particularly raised by the Greensill scandal, was the use of informal communication channels for lobbying purposes, which presented a blind-spot for transparency releases. Following recommendations from Boardman and the CSPL, the Government issued new guidance on “non-corporate communication channels”, which imposes reporting requirements on Ministers

⁵⁸² CSPL. 2013. [Strengthening Transparency around Lobbying](#), page 5.

⁵⁸³ See Hine and Peele 2016, page 197.

⁵⁸⁴ PASC. 2009. [Lobbying: Access and Influence in Whitehall](#), First Report of Session 2008-9, page 51.

⁵⁸⁵ Political and Constitutional Reform Committee. 2012. [Introducing a Statutory Register of Lobbyists](#). Second Report of Session 2012-13, page 5

⁵⁸⁶ [Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014](#).

⁵⁸⁷ CSPL. 2013. [Strengthening Transparency around Lobbying](#), page 5.

⁵⁸⁸ Cabinet Office. [Ministers’ Transparency Publications](#).

⁵⁸⁹ Cabinet Office. 2013. [A statutory register of lobbyists. Impact assessment](#).

⁵⁹⁰ CSPL. 2021. [Upholding Standards in Public Life](#), paragraph 6.27.

⁵⁹¹ Cabinet Office. 2023. [Strengthening Ethics and Integrity in Central Government](#), page 16.

⁵⁹² Cabinet Office. 2023. [Strengthening Ethics and Integrity in Central Government](#), page 18-19.

to report any discussions of official business, even if they take place at a social occasion.⁵⁹³ The Government did not accept that transparency requirements should also cover “letters, WhatsApps, impromptu phone calls or emails”.⁵⁹⁴

A 2024 PACAC report scrutinised the Lobbying Act and made several comments and recommendations.⁵⁹⁵ It criticised the exclusion of Special Advisers’ meetings, and the exclusion of WhatsApp and other non-corporate communication channels from transparency requirements.⁵⁹⁶ However, while it recognised frustrations with the narrow scope of the Act, it found questions related to expanding the Register and the role of the Registrar to be “beyond the scope of post-legislative scrutiny”.⁵⁹⁷

Office of the Registrar of Consultant Lobbyists

The Lobbying Act provided statutory regulation of parts of the lobbying industry for the first time in UK history with the establishment of the Register.⁵⁹⁸ The Office of the Registrar is an independent statutory body, sponsored by the Cabinet Office, but accountable to Parliament.⁵⁹⁹ The Registrar’s responsibilities include:

- Setting up and managing the statutory Register of Consultant Lobbyists
- Ensuring that the industry follows the requirements of the Register
- Publishing detailed guidance on the industry’s duties
- Publishing an annual statement of accounts.⁶⁰⁰

The Register

The Register is published online,⁶⁰¹ and includes both the current list and previous editions. The main obligations of those engaged in consultant lobbying activity are to register as a consultant lobbyist before conducting any lobbying; and to provide quarterly updates to the Register of the lobbyists’ clients.⁶⁰² All individuals and organisations that have engaged in consultant lobbying must register regardless of whether they consider themselves to be lobbyists – the test is the nature of the activity they conduct on behalf of their clients.⁶⁰³

When joining the Register basic information must be declared. All organisations must register their VAT registration number, name or names under which the person or persons carries out consultant lobbying and a statement about whether they comply with a relevant Code of Conduct and where this can be inspected.⁶⁰⁴

Only certain communications are subject to registration; these include direct communications with a UK Government Minister or Permanent Secretary that relate to government business. They do not include communications with a government department or Special Adviser.⁶⁰⁵ Registered consultant lobbyists must submit a Quarterly Information Return within 14 days of the end of each quarter.⁶⁰⁶ The Quarterly Information Return should include the names of clients who have paid for consultant lobbying services in that quarter, regardless of whether the lobbying has yet taken place, the names of clients on whose behalf consultant lobbying was done, regardless of whether they have yet paid, or a statement that the registrant did not engage in lobbying or receive payment for lobbying in that quarter.⁶⁰⁷ Registrants do not need to list how many individual communications were made on behalf of each client.⁶⁰⁸

⁵⁹³ Cabinet Office. 2023. Strengthening Ethics and Integrity in Central Government, page 19; See also Ministerial Code paragraph 8.13.

⁵⁹⁴ Cabinet Office. 2023. Strengthening Ethics and Integrity in Central Government, page 19.

⁵⁹⁵ PACAC. 2024. Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters, Fourth Report of Session 2023-24.

⁵⁹⁶ PACAC, Lobbying and Influence, page 26 & 27.

⁵⁹⁷ PACAC, Lobbying and Influence, page 27 & 28.

⁵⁹⁸ Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014.

⁵⁹⁹ Office of the Registrar of Consultant Lobbyists. About our governance.

⁶⁰⁰ Office of the Registrar of Consultant Lobbyists. About the registrar.

⁶⁰¹ Office of the Registrar of Consultant Lobbyists. Join or log in to the Register.

⁶⁰² Guidance from the Registrar of Consultant Lobbyists, February 2025, introduction.

⁶⁰³ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 2.1.

⁶⁰⁴ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 3.4.

⁶⁰⁵ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 2.3.

⁶⁰⁶ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 4.

⁶⁰⁷ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 4.1.

⁶⁰⁸ Guidance from the Registrar of Consultant Lobbyists, February 2025, paragraph 4.1.

It is possible to complain to the Registrar, but if the complainant is still dissatisfied following the Registrar's response the complaint can be escalated to the Parliamentary and Health Service Ombudsman (see above).

Voluntary registers

The Chartered Institute of Public Relations (CIPR) runs the UK Lobbying Register for individual lobbyists and organisations involved in lobbying.⁶⁰⁹ Membership is voluntary, but the Register ensures that all members are bound by a relevant Code of Conduct. Where members are not already bound by a professional Code, the CIPR Code of Conduct automatically applies.⁶¹⁰

The Register provides channels for the public to complain about the conduct of a registered lobbyist. The sanctions available for breaching Codes of Conduct include termination of membership or the repayment of fees for substandard work. Where the Code is found to have been breached, the decision is usually made public.⁶¹¹

The Public Relations and Communications Association (PRCA) also runs a Professional Lobbying Register. It lists all the Association's members who are engaged in professional lobbying, their clients and other specified information. It is publicly available and updated quarterly.⁶¹² All members of the PRCA sign up to a Code of Conduct, and lobbyists sign up to a Code for Professional Lobbying.⁶¹³

The PRCA provides channels for the public to complain about the conduct of its members. The sanctions available for breaches of the Code of Conduct include censure, training, changes to company procedure, suspension of membership of up to three years, removal of status, and removal of membership. Where the Code is found to have been breached, the decision is usually made public.⁶¹⁴

Public service providers

In 2023-24, the Government spent about a third of its budget – or £341 billion – on procurement.⁶¹⁵ Central departments commission the delivery of services at a national level, and local authorities also have responsibilities for commissioning services within their remit. It is essential that these services deliver value for money and there are robust systems in place for ensuring that they do so. However, maintaining the ethical standards in the delivery of these services once commissioned is a more challenging endeavour, particularly given the wide range of new ways of delivering services and the complexity of arrangements involving long supply chains and the use of sub-contractors.⁶¹⁶

Third-party organisations and their employees work within different institutional cultures to those that have developed in the public sector. In its 2014 report, the CSPL concluded that, “services being delivered by people not previously involved in public service was a live risk to ethical standards in public life”.⁶¹⁷ It proposed a range of recommendations to improve standards, including ensuring that third-party providers were aware of their ethical obligations, were required to formally sign up to them, and that they should also be provided with training and guidance as to how to carry them out.

Concerns were also raised that the commissioners of public services were in need of “guidance on how to embed ethical standards in the commissioning and procurement process”.⁶¹⁸ The report found that while there were some established and transparent frameworks in place, they were “fragmented, piecemeal and inconsistent”.⁶¹⁹ In contrast to the

⁶⁰⁹ UK Lobbying Register.

⁶¹⁰ UK Lobbying Register. [About](#).

⁶¹¹ UK Lobbying Register. [Making a complaint](#).

⁶¹² PRCA. [The Register](#).

⁶¹³ PRCA. [Professional standards](#).

⁶¹⁴ PRCA. [Complaints Procedure](#); see also Professional standards.

⁶¹⁵ Booth, L. 28 July 2025. [Procurement Statistics: A short guide](#), paragraph 1.1.

⁶¹⁶ CSPL. 2014. [Ethical Standards for Providers of Public Services](#), page 14.

⁶¹⁷ CSPL, 2014. [Ethical Standards for Public Services](#), page 12.

⁶¹⁸ CSPL, 2014. [Ethical Standards for Public Services](#), page 7.

⁶¹⁹ CSPL, 2014. [Ethical Standards for Public Services](#), page 24.

expectations of the public, which is concerned not only with outcomes but also with processes, it found that the “primary focus” of commissioners was on “costs and outcomes”.⁶²⁰

The CSPL returned to the issue of third-party providers of services in 2018, and found that “very little has been done to implement” their previous recommendations.⁶²¹ Although the CSPL praised the introduction of the Suppliers Code of Conduct and the Commissioners’ Working Manual on Standards, and recognised the increased awareness of ethical obligations among service providers, it also argued that more needed to be done to “encourage strong and robust cultures of ethical behaviour in those delivering public services”.⁶²²

Government Commercial Function

The Government Commercial Function owns and oversees the Supplier Code of Conduct. This was updated in 2023 to emphasise the joint nature of public service delivery, strengthen the principles of working together and clarify the standards and behaviours expected when working on a government contract.⁶²³

Supplier Code of Conduct

The first issue of the Supplier Code of Conduct was published by the Government Commercial Function in September 2017; and updated in February 2019 and June 2023. The Code lays out both what is expected of suppliers and what suppliers can expect from the civil servants they interact with. It is not legally enforceable and does not create any legally enforceable obligations or rights.⁶²⁴

The Code requests suppliers to be “mindful of the need to maintain public trust and protective of government’s reputation”.⁶²⁵ The Code also provides guidance on conflicts of interest and outlines its expectations of suppliers in relation to managing conflicts of interest and whistleblowing.⁶²⁶ The final section of the Code outlines expected behaviours of suppliers, which include requirements of ethical behaviour,⁶²⁷ adherence to anti-corruption legislation⁶²⁸ and the transparency requirements in the Transparency Principles,⁶²⁹ to deal fairly with sub-contractors and suppliers in their own supply chains,⁶³⁰ to be fair and reasonable in their payment practices,⁶³¹ and to adhere to the UK Corporate Governance Code.⁶³²

The Code’s guidance on ethical behaviour references the CSPL’s 2014 report and 2015 guidance.⁶³³ However, while it requests that suppliers are “explicit about the standards they demand [of employees] and to have governance and processes to monitor adherence to these standards”, it does not require observance of the CSPL guidelines or the Seven Principles of Public Life.⁶³⁴

Monitoring, complaints and compliance

It is not clear how commissioners of services undertake to assess or monitor ethical standards and conduct in the services they commission. In 2018, the CSPL raised concerns about the “continuing lack of transparency and accountability around vital aspects of service delivery, including complaint-handling mechanisms”.⁶³⁵ It also questioned whether ethical

⁶²⁰ CSPL, 2014. *Ethical Standards for Public Services*, page 24.

⁶²¹ CSPL. 2018. *The Continuing Importance of Ethical Standards for Public Service Providers*, page 5.

⁶²² CSPL. 2018. *The Continuing Importance of Ethical Standards for Public Service Providers*, page 7.

⁶²³ Government Commercial Function. *Supplier Code of Conduct*, June 2023, foreword.

⁶²⁴ Supplier Code of Conduct 2023, compliance.

⁶²⁵ Supplier Code of Conduct 2023, paragraph 2.7.

⁶²⁶ Supplier Code of Conduct 2023, paragraph 2.11 & 2.12; see also Procurement Policy Note 04/21: [Applying Exclusions in Public Procurement, Managing Conflicts of Interest and Whistleblowing](#).

⁶²⁷ Supplier Code of Conduct 2023, paragraph 3.1.

⁶²⁸ Supplier Code of Conduct 2023, paragraph 3.2.

⁶²⁹ Supplier Code of Conduct 2023, paragraph 3.3.; see also Cabinet Office, [The Transparency of Suppliers and Government to the Public](#), March 2023.

⁶³⁰ Supplier Code of Conduct 2023, paragraph 3.4.

⁶³¹ Supplier Code of Conduct 2023, paragraph 3.5.

⁶³² Supplier Code of Conduct 2023, paragraph 3.6; see also [UK Corporate Governance Code](#).

⁶³³ See, CSPL. 2015. [Ethical Standards for Providers of Public Services: Guidance](#).

⁶³⁴ Suppliers Code of Conduct 2023, paragraph 3.1.

⁶³⁵ CSPL. 2018. *The Continuing Importance of Ethical Standards for Public Service Providers*, page 7.

considerations were considered when decisions were made on commissioning services or whether there was sufficient transparency throughout the contracting process or monitoring of the service delivery.⁶³⁶

The Supplier Code of Conduct expects both parties to be open and transparent, and to report any instances of non-compliance with the Code. Where appropriate the parties agree acceptable suitable remedial actions, but where this is not possible issues can be escalated to the Central Commercial Teams in the Cabinet Office and the Government Chief Commercial Officer.⁶³⁷ The Code does not mention any avenues for complaints in relation to the Code. However, there are opportunities for those in receipt of public services to make complaints, which in the first instance should be directed at the service provider. Central departments can also handle complaints and in the last resort complaints can be directed to Parliamentary and Health Care Ombudsman or if relating to local services can be directed to the local authority and then the Local Government and Social Care Ombudsman.

⁶³⁶ CSPL. 2018. The Continuing Importance of Ethical Standards for Public Service Providers, page 25.

⁶³⁷ Supplier Code of Conduct 2023, compliance.

11. Conclusion

High standards in public life are essential because they form the bedrock of both democracy and justice. This report has examined the system of standards that governs the conduct of public officials and others involved in the making of public policy and the delivery of public services. It provides a snapshot of the regime at the end of 2025, but within the context of both background and regulatory changes that occurred in the 30 years that the Committee on Standards in Public Life (CSPL) existed. The pattern that emerges from this report – and illustrated in figure 1 – is one of a complex ethical landscape that has developed on the one hand organically and in response to demand and requirement, and on the other, has been shepherded by the considered guidance of the CSPL, which time and again foresaw ethical challenges and made the case for reforms long before Government had appetite to implement them.

In some regards this has advanced positive democratic safeguards. The analysis highlights the integration of lay member decision-makers across the political and judicial institutions, which fortifies their independence and brings in diverse external perspectives; and the complex array of advisers and institutions across the system providing opportunities for complaints and appeal, which deliver an accountability framework that protects against arbitrary decision-making. In others, however, the system has resisted reform, and this is most evident in the reluctance of Government to provide a statutory basis for political integrity institutions and surrender its executive power to either an independent watchdog or Parliament.⁶³⁸ This is notable because the political turmoil of the last decade has led many to question the ongoing feasibility of the long-standing principle of parliamentary self-regulation.⁶³⁹

As the standards in public life system enters a new era with the Ethics and Integrity Commission at its helm, the ethical landscape is beset by challenge and complexity as politics and public life appear to be getting more adversarial, more polarised and less predictable. An ethics system will at times be ahead of the curve, anticipating change and challenge before it happens, and at others behind it, playing catch up and paying dearly in reputation for missteps along the way. The Commission will be an essential leader in the years ahead to ensure that integrity challenges are carefully navigated, and the UK's institutions deliver on their duty of accountability to the British people.

⁶³⁸ Hazell, R. and Riddell, P. 2024. Trust in Public Life: Restoring the Role of Constitutional Watchdogs. Constitution Unit, page vii.

⁶³⁹ David-Barrett. 2022. Shirking self-regulation?