

Independent research on government transparency releases

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Summary

1. The Ethics and Integrity Commission asked Spotlight on Corruption, Transparency International UK and Unlock Democracy to conduct research into the operation of government transparency releases as part of *Lobbying, Disclosure, and Access to Government Review*. The terms of reference for this research are available on the Ethics and Integrity Commission's website.¹
2. We have found overall that, although there has been some improvement in transparency releases since this government came into office, there is enormous room for improvement in several ways:
 - a. Although there has been an improvement in **timeliness** since Q4 2024, there is no guarantee that this will continue, and transparency releases are still not published until 3-6 months after the meetings have taken place. This lack of timeliness can mean that the public is not aware of who the government is meeting in the crucial stages before bills are passed or decisions are made.
 - b. The **meaningfulness** of descriptions has remained the same throughout the past three years, with no noticeable improvement and the continued use of generic descriptors in contravention of Cabinet Office guidance.

¹ [Ethics and Integrity Commission, EIC review into lobbying, disclosure, and access to government. Terms of reference for independent research on government transparency releases, accessed April 2026](#)

- c. There are significant **gaps** in the data where officials have not included meetings that we know from other sources took place.
- d. The files are difficult to **find** and even more difficult to **search**, being published across 24 locations per quarter (for ministerial releases alone), in different file formats, with different file names, despite five years passing since CSPL and the Boardman review recommending transparency releases be centralised. This compares unfavourably to the searchability of other countries' equivalent transparency releases.
- e. Transparency releases are difficult, and sometimes impossible, to **reconcile with the Lobbying Register**, such as where it is not stated in the transparency register which client a consultant lobbyist is representing and where they are listed as having multiple clients in the Lobbying Register.
- f. The transparency releases do not have explicitly stated **objectives**. We can infer objectives for them, including informing the public, holding politicians to account, and improving public trust, but the releases do not seem to be meeting these.

Current framework

Policy and legislative context

- 3. Currently, the UK has two key means for providing proactive transparency over those with access to key decision makers in Government: departmental transparency releases and the statutory register of consultant lobbyists.

Departmental disclosures

- 4. Departments began publishing transparency releases in late 2009.² Under the Ministerial Code, ministers are obliged to report any discussions concerning official business – including during social occasions – to their departments, who must release this information quarterly.³ Similar releases are published for engagements with senior civil servants but not special advisors, who only disclose meetings with newspaper and media proprietors.⁴
- 5. Ministerial and senior civil servant transparency releases should include:⁵
 - a. the lead minister/official
 - b. the date
 - c. the purpose of the discussion, including any policy or legislation affected
 - d. attendees

² For example: [DfT, ministerial and special adviser meetings 2009 to 2013](#)

³ [HM Government, Ministerial Code, paragraph 8.13, October 2025](#)

⁴ [Cabinet Office, Code of Conduct for Special Advisers, paragraph 16, September 2024](#)

⁵ [Cabinet Office, Ministers' overseas travel and meetings: publication guidance, January 2025](#)

6. Historically, departments tended to only publish in-person meetings, leaving all other forms of communication off the public record. Guidance published in January 2025 updated this and makes it clear that transparency releases should include a wide range of discussions, including those via audio calls e.g. phone, '*where these replace or take the format of an official meeting*'.⁶ However, these requirements do not extend to non-meeting discussions; for example, communications via email or instant messaging services.

Statutory Register of Consultant Lobbyists

7. The 'Lobbying Act' in 2014 requires those undertaking consultant lobbying activities (see definition in Annex I) to register and declare basic information, covering:⁷
 - a. their name, address, senior management and company number (if applicable)
 - b. details of any industry code they are signed-up to
 - c. the names of their clients during a relevant quarter
 - d. anything else prescribed in regulations.
8. According to the UK government, when analysed together, departmental disclosures and the statutory register are expected to give an adequate picture of lobbying in the UK.⁸

Findings

Quality of the government's transparency releases

Timeliness

9. Due to time and resource constraints, and in accordance with the project's terms of reference, we have focussed on ministerial meeting transparency releases alone. Since 2017, Transparency International UK has maintained a search tool to increase the accessibility of ministerial meetings data for the public, journalists and other interested parties.⁹ As part of its publication process for this tool, it collects, codes, standardises and augments ministerial meetings transparency releases to increase their searchability and linkability. We used meta data and the combined datasets from this platform for our analysis, covering the years 2023 to 2025.
10. We included 24 departments and offices within the scope of our analysis (see Annex II). We have excluded departments with less than two years' worth of releases,¹⁰ and

⁶ [Cabinet Office, *Ministers' overseas travel and meetings: publication guidance*, January 2025](#)

⁷ [Transparency Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, Sections 4 and 5](#)

⁸ [Cabinet Office, *Impact statement: a statutory registry of lobbyists \(as part of the Transparency Lobbying, Non-Party Campaigning and Trade Union Administration Bill\)*, July 2013, page 1](#)

⁹ [Transparency International UK, Open Access, accessed April 2026](#)

¹⁰ The Department for International Trade, and the Department for Business, Energy and Industrial Strategy.

merged the identities of departments which have been renamed during this period, but whose policy brief has remained substantially the same.¹¹

11. Processing this data fell into two key stages:

- a. **Collection:** identifying files on the gov.uk domain, downloading them,¹² and standardising their names for ease of storage and analysis.¹³ Currently, this process is manual and involves searching for, downloading and saving each individual file. There were 288 files for this research.¹⁴
- b. **Consolidation:** merging the files into one master file.

12. By saving files with a standardised naming convention, we were able to export our entire file directory into Excel, and parse the file names to create a dataset of publication dates and file types by department.

13. Cabinet Office guidance recommends the following publication deadlines for transparency releases (though, being subject to the grid, they can change):¹⁵

- a. *'Data for the period of:*
 - i. *1 January to 31 March should be published by the end of June*
 - ii. *1 April to 30 June should be published by the end of September*
 - iii. *1 July to 30 September should be published by the end of December*
 - iv. *1 October to 31 December should be published by the end of March.'*

14. It also requests that departments submit their draft transparency releases to the Cabinet Office Transparency Data Team for review within one calendar month after the end of a quarterly reporting period.¹⁶ Although we could not analyse compliance within this internal deadline for review, we had sufficient data to measure the government's performance against its own external publication timelines.

15. During the period covered in our research, the government's compliance with the publication schedule varied substantially between years. In 2023, departments published just under half of transparency releases on time, dropping further to only a quarter in 2024, followed by a substantial increase to over 90 per cent in 2024.

Figure 1: Timelines of ministerial meetings publication by year (2023 to 2025)

¹¹ Department for Levelling Up, Housing and Communities was merged with the Ministry for Housing, Communities and Local Government, and the Department for Digital, Culture, Media & Sport was merged with the Department for Culture, Media and Sport.

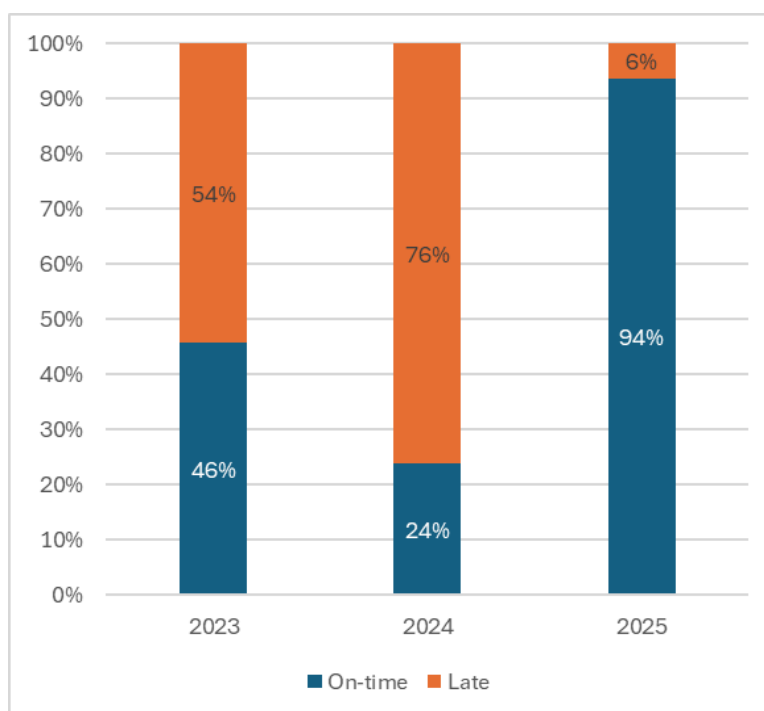
¹² Prioritising csv where there are multiple file formats.

¹³ Naming convention: [YYYY]-[department]-[quarter] ([quarter description]) [YYYY-MM-DD publication].[file format] NB. publication dates were taken from the relevant [gov.uk](https://www.gov.uk) webpages. Where departments have updated files, we have stored this data.

¹⁴ The Scotland Office is missing a file for January to March 2024.

¹⁵ [Cabinet Office, Ministers' overseas travel and meetings: publication guidance, January 2025, paragraph 9](#)

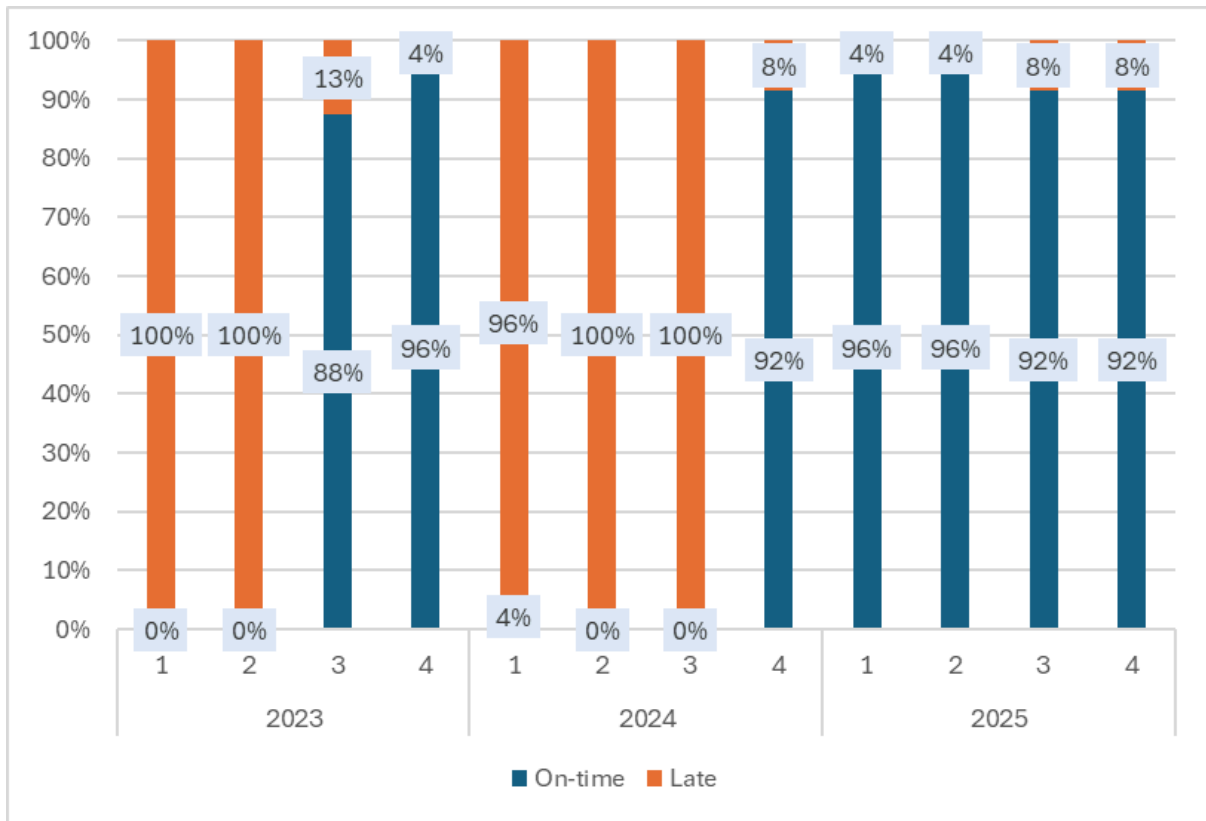
¹⁶ [Cabinet Office, Ministers' overseas travel and meetings: publication guidance, January 2025, paragraph 8](#)



16. Even within these sample years there was substantial variance. For example, in 2023, all departments published transparency releases late during the first two quarters, whereas they achieved 86 per cent and 96 per cent compliance for quarters three and four of the same year. Similarly, departments published late for the first three quarters of 2024 – which coincided with the period just before and after the general election – a compliance rate that was then inverted for the final quarter of that year. Given the publication process is driven by the grid,¹⁷ it seems possible that political factors were a key determinant in lower compliance levels during particular periods.

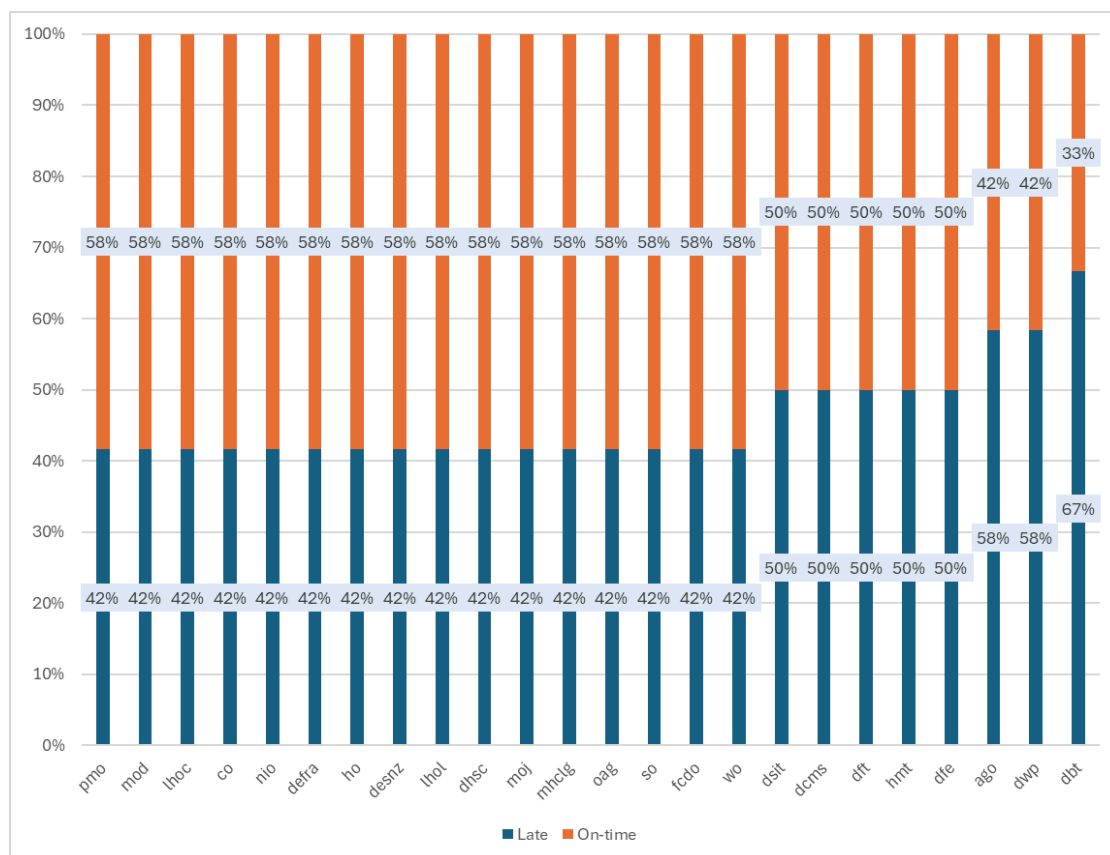
Figure 2: Timelines of ministerial meetings publication by percentage and quarter (2023 to 2025)

¹⁷ [Cabinet Office, *Ministers' overseas travel and meetings: publication guidance*, January 2025, paragraph 9](#)



17. Drilling down to departmental level, there are also differences in compliance rates despite most transparency releases going out on the same day each quarter. The Department for Business and Trade (DBT), the Department for Work and Pensions (DWP), and the Attorney General’s Office (AGO) all published late more frequently than their peers during the research period. We have insufficient data to say why with high confidence, though DBT was only created in 2023 so administrative disruption could explain their tardiness.

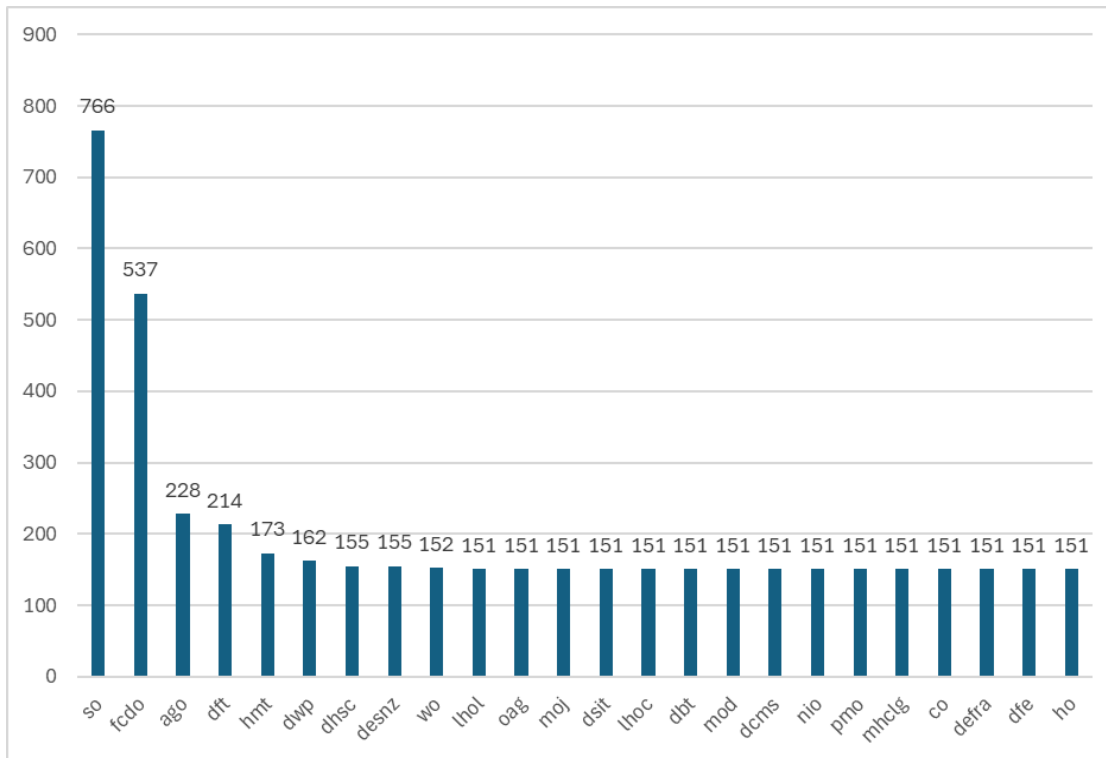
Figure 3: Timeliness of ministerial meetings by percentage and department (2023 to 2025)



18. We also examined the maximum delay in days between the end of a reporting period and publication to identify any outliers or trends. Overwhelmingly, quarters one and two of 2024 saw the longest delays, with all departments publishing their transparency releases 150 days or more after the end of the reporting period. The Scotland Office was a particular outlier, not publishing their quarter one data until we contacted them for this research – 766 days after the end of March 2024 – due to an ‘administrative error’. The FCDO also published their quarter two 2024 data particularly late, almost a year and a half after the end of that reporting period, again due to an ‘administrative error’.¹⁸

Figure 4: Maximum number of days between the end of reporting period and publication, by department (2023 to 2025)

¹⁸ [FCDO, FCDO ministerial gifts, hospitality, travel and meetings, April to June 2024, December 2025](#)



19. Overall it would be reasonable to claim there has been a significant improvement in the timeliness of Government disclosures since quarter four 2024, with some important caveats.
20. The government's own deadlines are very generous, allowing departments to publish a quarter in arrears i.e. up to six months after some meetings happened. Despite this very low bar, some still do not meet it, giving credence to the view that a key reason ministers have not moved publications to a monthly cycle, as recommended by the CSPL and the Government's Boardman review, is that it is not capable of doing so. This raises significant questions as to the efficiency of the current process, and how much the Government itself has a timely view on who it is engaging with and why.
21. It is the grid and ultimately ministers who drive the publication cycle, meaning current progress could easily lapse under different leadership or a change in political circumstances. Currently ministers are making a virtue of compliance with their own deadlines, which should be welcomed. However, there is scant guarantee that this will continue in the future.
22. The data also shows that there can be both serious individual lapses in compliance and systemic ones, seemingly without consequence. That it took our request for this research to secure publication of a departmental transparency release – two years late – raises questions about the effectiveness of relying on the government to follow its own rules.

Consequence of the lack of timeliness

23. The lack of timeliness can have significant consequences, obscuring who the government is meeting in the critical months before decisions are made. We detail below examples of bills where meetings surrounding the first readings were not revealed until after the event.¹⁹
24. Firstly, the **Border Security, Asylum and Immigration Act**, which had its first reading on 30 January 2025, had an impact on the processing of asylum seekers. However, the fact that the transparency releases were published only quarterly concealed, until after first reading of the Bill, that the most senior levels of government had had limited engagement with organisations concerned about the rights of asylum seekers.
25. The releases also revealed that ministers did not meet leading asylum-focused organisations Asylum Aid, the Refugee Council, Refugee Action or the British Red Cross between July and December 2024. Monthly reporting of meetings would have flagged this earlier.
26. Specifically:
 - a. There were no references to asylum in any of the descriptions of Home Office Ministers' meetings in the quarterly transparency release covering the period July and September 2024 (published on 30 January 2025), when work on drawing up the Bill would most likely have started.
 - b. There were references to asylum in the ministerial transparency release for the following quarter, October to December 2024 (published on 27 March 2025), but most were late in the quarter and unlikely to have had much impact on the drafting of the Bill.
 - c. There are three references to asylum in the meeting transparency releases for senior officials between July and September 2024. These meetings were held in September 2024, including one with the Refugee Council and the British Red Cross. However, from the meeting's description it is not clear whether it was focused on the Bill or its impact on asylum seekers' rights.
 - d. There are no references to asylum in the transparency releases for Home Office senior officials between October and December 2024. There were also no entries on asylum for Special Advisers meeting senior media figures during this period.
27. If one of the objectives of the ministerial transparency releases is to assist ministers with meeting the following commitment in the Ministerial Code that they 'consider a wide range of views,' this objective would not appear to have been met.

¹⁹ We assumed that once the first reading of a Bill has taken place, the scope for amending a Bill is limited and lobbying post the first reading is less effective.

28. Secondly, the **Data (Use and Access) Act**²⁰ (previously called the Digital Information and Smart Data Bill), which had its first reading on 23 October 2024, affected, in numerous respects, data privacy and data handling. However:

- a. There was just one reference in the ministerial transparency release covering the period July to September 2024 (published on 30 January 2025) to a discussion about the Digital Information and Smart Data Bill. This was on the 4th September 2024 with the Data and Marketing Association. This is the period when the draft of the Bill would have been finalised.
- b. In the Ministerial transparency releases for October to December 2024, there are references to:
 - i. A meeting with Big Brother Watch on the 22nd October 2024: Discussion on the Data (Use and Access) Bill. This meeting took place a day before the Bill's first reading.
 - ii. There is also a reference to a meeting on 6 November 2024 with the Open Rights Group, Institute for the Future of Work, Which?, Trades Union Congress, Ada Lovelace Institute, Big Brother Watch, 5Rights Foundation, Defend Digital Me to discuss the Data (Use and Access) Bill. This meeting took place two weeks after the Bill's first reading.
- c. In the transparency releases for senior officials between July and September 2024 there were a small number of references to 'data', but no specific references to the Data (Use and Access) Bill, and the meeting descriptions do not appear to be relevant to the Data (Use and Access) Bill.
- d. In the transparency releases for senior officials between October and December 2024 there were no references to the Data (Use and Access) Bill. References to data in the meeting descriptions do not appear relevant to the Data (Use and Access) Bill.
- e. There were no entries for Special Advisers meeting senior media figures to discuss the Act during the period July to December 2024.

29. In the case of the Data (Use and Access) Act, monthly reporting of meetings would have flagged earlier the lack of engagement with organisations interested in privacy issues and increased the likelihood of this engagement happening at a point when the Bill was being drafted.

30. Thirdly, the **Sentencing Act 2026**, which had its first reading on 2 September 2025, overhauled sentencing in England and Wales by reducing the use of short prison terms, strengthening community sentences, and tightening rules for dangerous offenders. In this case:

²⁰ The Digital Information and Smart Data Bill retained aspects of the Data Protection and Digital Information Bill which had failed to be passed at the end of the Conservative government.

- a. There were no references to sentencing in the ministerial, senior official, or special adviser meetings transparency releases July to September 2024 (published on 30 January 2025).
 - b. However, there were multiple references to sentencing in the ministerial and senior official transparency releases covering October to December 2024 (published on 27 March 2025) though no references in the special adviser releases.
 - c. There were multiple references to sentencing in the ministerial and senior official meeting transparency releases covering January to March 2025 (published on 26 June 2025) though no references in the special adviser releases.
 - d. There were multiple references to sentencing in the ministerial and senior official transparency releases covering April to June 2025 (published on 25 September 2025) though no references in the special adviser releases.
 - e. There were multiple references to sentencing in the ministerial and senior official meetings transparency releases covering July to September 2025 (published on 16 December 2025) though no references in the special adviser releases.
31. In the case of the Sentencing Act, the publication of transparency releases demonstrated that, in this instance, the government engaged with a wide range of organisations interested in sentencing policy. The longer lead-in time for the Bill also meant engagement with multiple organisations and institutions happened at a point when it was possible to influence the nature of the Bill.

Accuracy/meaningfulness

32. The Government's guidance to departments on meeting descriptions is that:

7. 'Departments should make every effort to provide a meaningful and clear description of the 'purpose of the meeting', succinctly capturing

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

33. However, because departments compile the list of meetings and not the lobbyist meeting the ministers, the description represents what the government thinks the conversation was about, not what the lobbyist was intending to influence, or use

information from the discussion for. Therefore, they are always only going to be providing one part of the picture, and at a relatively high level.

34. Specifically, the example provided in the guidance above references a 50 page Government strategy²¹ and a general reference to UK investment opportunities. It does not mention any specifics about these topics, which would need to be accessed through Freedom of Information requests. It also does not reference any specific grant, policy, process, or piece of legislation that the lobbyist might want to influence, which is the kind of information other countries' lobbying registers tend to require of registrants. Consequently, as with timeliness, the government has set itself a relatively low bar.
35. Even then, some departments struggle to follow the government's own guidance. For example, in quarter three of 2023 the Department for Culture, Media and Sport published 125 meetings all with the purpose 'To discuss policy with regards to specific industry'. How this is supposed to inform the reader as to the contents of discussion is unclear. Similarly, within our sample period there are 114 entries reporting merely 'Introductory meeting' despite the Cabinet Office guidance asking departments not to do so. The description 'To discuss the UK economy and financial services sector' could also cover an extremely broad range of issues.
36. To provide a visual illustration of the data, we produced a word cloud (see below).²² Prominent in this graphic are some generic terms used repeatedly in descriptions, such as 'discussion', 'discuss', and 'introductory'. This suggests there are standard filler words and terms used in disclosures that add little, save for possibly clarifying the format of the engagement e.g. 'meeting', 'roundtable' etc.

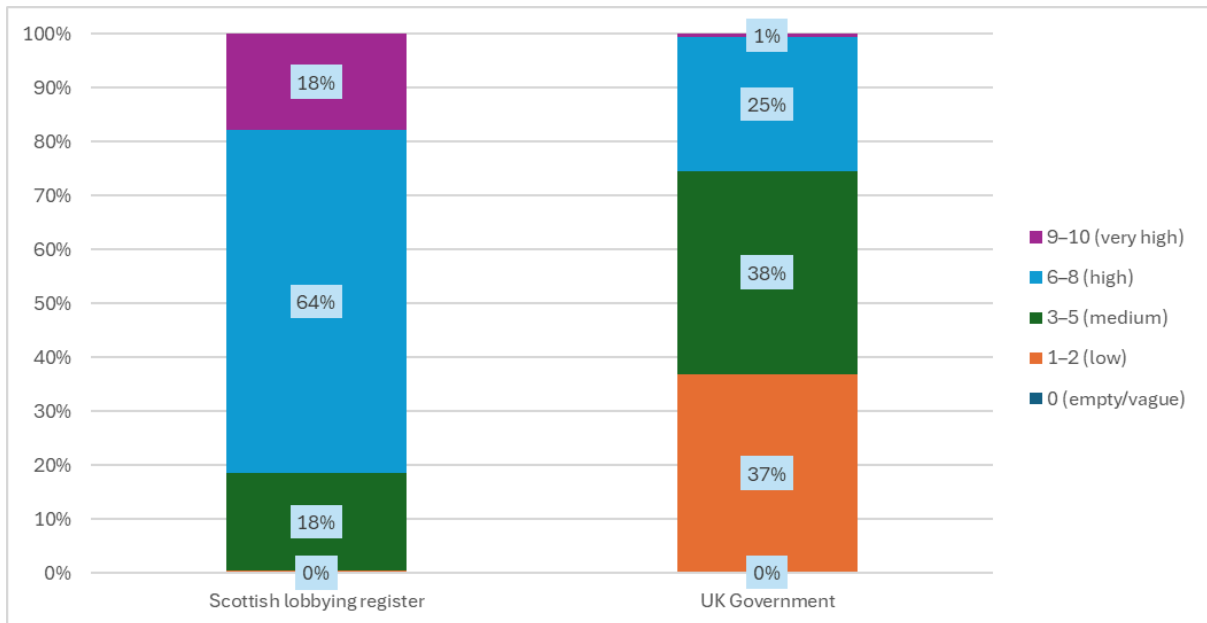


²¹ HM Government, *National Space Strategy*, September 2021

²² Using wordcloud and matplotlib in python.

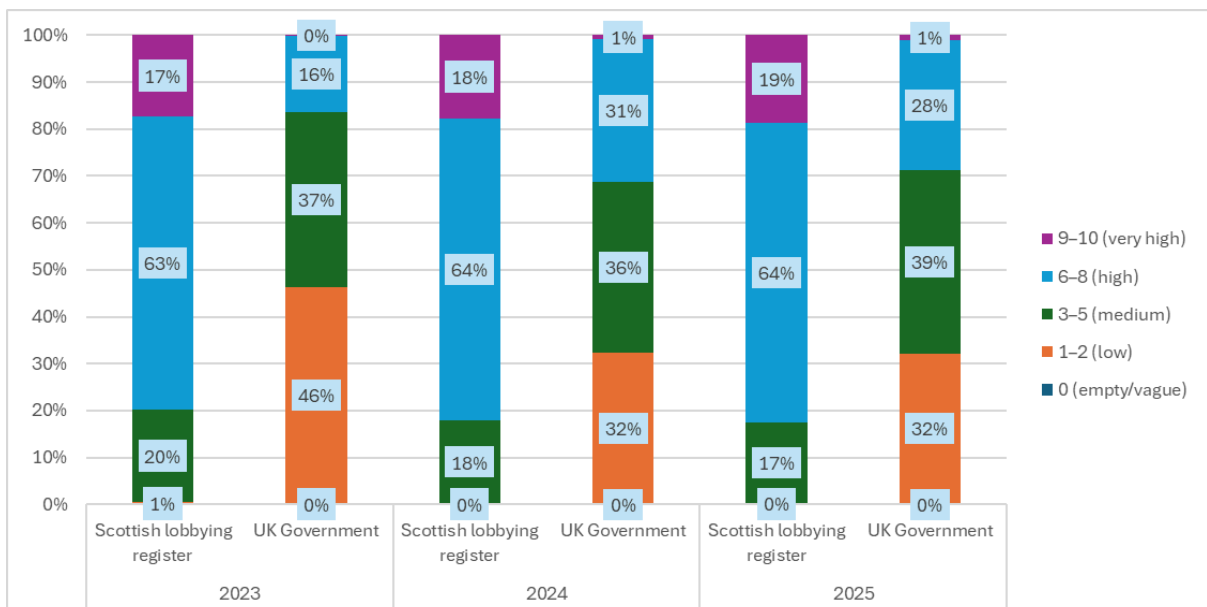
37. To analyse the data more systematically, we produced a heuristic method for scoring the meaningfulness of meeting purpose descriptions covering:
- a. **Length of text** with the broad assumption that longer entries provide more detail, albeit with text over 25 words attracting fewer points on the basis that those words are unlikely to provide significant additional detail.
 - b. **Generic words and phrases** with the assumption that repeated uses of the general buzzwords and descriptions e.g. 'introductory meeting', 'general discussion', 'to discuss', were either less specific or filler text that should be discounted when measuring the length of text.
 - c. **Keywords** e.g. 'Bill', 'Regulation', 'framework', 'strategy', with the assumption these indicate reference to a specific law, policy document or topic.
 - d. **Format**, recognising the means of discussion provides useful context to the reader.
38. In total, there were 28,843 UK Government meetings in our sample. Transparency International UK also collects data from the Scottish register of lobbyists, which was included for comparison. This covered 21,375 in-person or videoconference meetings between lobbyists and senior officials, MSPs, and/or Scottish ministers.
39. Using our heuristic analysis, there is clearly a significant and ongoing problem with the quality of Government's transparency releases. Only 7,326 (25 per cent) of meetings within our sample dataset had a meaningful score of 'high' or 'very high', with 21,486 (74 per cent) containing either 'low' or 'moderate' levels of detail. In comparison, 17,399 (81 per cent) entries in the Scottish lobbying register had a meaningful score of 'high' or 'very high' with less than a fifth containing only moderate levels of information – almost the inversion of the UK Government scores.

Figure 5: Meaningfulness rating of transparency disclosures - UK Government vs. Scottish lobbying register (2023 to 2025)



40. Breaking the data down over time, there have been some marginal increases in the quality of UK transparency releases – the proportion of meetings with high or very high levels of detail almost doubled from 2023 to 2024 and has remained around those levels since. However, these findings reinforce what users of this data already knew – that the meaningfulness of ministerial meeting disclosures have not improved substantially in recent years.

Figure 6: Meaningfulness rating of transparency disclosures - UK Government vs. Scottish lobbying register, by year (2023 to 2025)



Gaps in the data

41. Our analysis has found significant gaps in the transparency releases, revealed when we looked at government social media pages and at gift and hospitality releases.
42. Please see Annex III for a list of when meetings announced in social media posts were not declared in ministerial transparency releases. The key findings from this analysis are that:
 - a. A trawl of four ministers' social media accounts (focused mainly on X) reveals that there are numerous posts on social media about events which do not appear in the transparency releases.
 - b. It is sometimes difficult to link meetings listed in the transparency reports with social media posts because the dates differ.
 - c. Ministers are speaking at events – publicised on social media – that they do not declare in the ministerial transparency reports, when it is likely that meetings with the organisers or panellists are being held before or after the events.

Case study: Varun Chandra

The Guardian reported in May 2026 that Varun Chandra, a business adviser to the PM and special envoy²³ to the US on trade and investment, undertook a series of meetings with tech companies without needing to declare them, as business advisers are exempt from transparency requirements.²⁴

His case illustrates in the clearest way possible why rules that apply to ministers, senior officials and special advisers should be extended to other ministerial advisers. The meetings, their nature and content, can have the same level of influence to those conducted by ministers, senior officials and special advisers.

Case study: Kwasi Kwarteng

Incomplete transparency releases are not a new phenomenon. Several examples involving Kwasi Kwarteng illustrate this problem:

- The Guardian reported on the failure of two ministers, Kwasi Kwarteng (then the Business Secretary) and Nadhim Zahawi (then the Education Secretary) to report a

²³ [Prime Minister's Office, Press release: Varun Chandra appointed as PM's Special Envoy to the United States on Trade and Investment, January 2026](#)

²⁴ [Wall, Tom., The Guardian, Starmer adviser held 16 undisclosed meetings with top US tech bosses, May 2026](#)

meeting in June 2022 with Mr Bashagha, a Libyan national.²⁵ Mr Bashagha was aligned with a Libyan faction that was not recognised by the UK Government as part of the official Libyan government. Ministers are not expected to report meetings with foreign governments. However as Mr Bashagha was not part of the Libyan government, the meeting should arguably have been reported by both Ministers.

- The Guardian had previously reported on Mr Kwarteng in relation to meetings with Saudi oil companies.²⁶
- The BEIS quarterly transparency releases covering July to September 2021 make no reference to a meeting between Kwasi Kwarteng and a number of industry representatives on the 26th September 2021.²⁷ Yet a tweet from @beisgovuk on the 26 September 2021 referred to a meeting he held with, amongst others, Shell and ExxonMobil.²⁸ This tweet is no longer accessible.
- Kwasi Kwarteng tweeted from his personal account (rather than the BEIS Twitter) that he met Tokamak Energy on 15 July 2021.²⁹ However, there is no mention of this meeting in the July to September 2021 BEIS quarterly report of ministerial meetings.³⁰ This tweet is also no longer accessible.

Unlock Democracy highlighted these last two examples in its evidence to the PACAC Select Committee on the post-legislative scrutiny of the Lobbying Act.³¹

43. There are also instances where gifts and hospitality are being declared with no corresponding meeting being declared. Given that gifts and hospitality almost always accompany meetings, this suggests that meetings are being left off the releases:

Company/Entity	Hospitality or gift	Transparency releases
Hospitality: North Sea Energy Corporation	DESNZ: Ministers' Hospitality – November 2025: ³² Michael Shanks	No record of related meeting in government meeting publications: DESNZ ministerial meetings, October to December

²⁵ [Wintour, Patrick., Mason, Rowena., Guardian, No 10 chief of staff's position untenable amid lobbying claims, says Labour, October 2022](#)

²⁶ [Dyer, Henry., The Guardian, Kwasi Kwarteng's secret meetings with Saudi oil firms revealed, October 2022](#)

²⁷ [BEIS, ministerial meetings, July to September 2021](#)

²⁸ [BEIS, tweet from 26 September 2021](#)

²⁹ [Kwasi Kwarteng, tweet from 15 July 2021](#)

³⁰ [BEIS ministerial meetings, July to September, 2021](#)

³¹ [Unlock Democracy, Written evidence to PACAC for post-legislative scrutiny of the Lobbying Act 2014 and related matters inquiry, 2024](#)

³² [Cabinet Office, Register of ministers' gifts and hospitality: November 2025](#)

	5 November 2025 Dinner	2025 ³³
Hospitality: Anthropic and Focaldata	DSIT: Ministers' Hospitality – November 2025: Kanishka Narayan ³⁴ 6 November 2025 Dinner	No record of related meeting in government meeting publications: DSIT ministerial meetings, October to December 2025 ³⁵
Gift: Nvidia	Cabinet Office: Keir Starmer Ministers' Gifts – September 2025: ³⁶ Keir Starmer 18 September 2025 Display model of Nvidia AI Supercomputer	No record of related meeting in government meeting publications: Keir Starmer meetings, July to September 2025 ³⁷ Came at the same time as the announcement of a £2bn investment from Nvidia in AI Growth Zones. ³⁸
Hospitality: Bezos Earth Fund	DESNZ: Ministers' Hospitality – 5 July to 31 October 2024: ³⁹ Ed Miliband 23 October 2024 Dinner	No record of related meeting in government meeting publications: DESNZ: Ministers' Hospitality - 5 July to 31 October 2024 ⁴⁰

³³ [DESNZ, ministerial overseas travel and meetings: October to December 2025](#)

³⁴ [Cabinet Office, Register of ministers' gifts and hospitality: November 2025](#)

³⁵ [DSIT, ministerial overseas travel and meetings, October to December 2025](#)

³⁶ [Cabinet Office, Register of ministers' gifts and hospitality, September 2025](#)

³⁷ [Cabinet Office, ministerial overseas travel and meetings, July to September 2025](#)

³⁸ [Nvidia, press release: NVIDIA Announces £2 Billion Investment in the United Kingdom AI Startup Ecosystem, September 2025](#)

³⁹ [Cabinet Office, register of ministers' gifts and hospitality: July to October 2024](#)

⁴⁰ [DESNZ, ministerial overseas travel and meetings, October to December 2024](#)

Accessibility of the government's transparency releases

Searchability

44. Cabinet Office guidance advises departments to do the following when publishing new ministerial meetings data:⁴¹

- a. *'create a new gov.uk webpage for each data release*
- b. *create a collection for these transparency disclosures, so there is an index of links to each year and quarter in one location for that department*⁴²
- c. *consider publishing the data as collections on data.gov.uk, the UK Government's data portal.*⁴³

45. In our research, there were 24 departments and offices publishing ministerial meetings data quarterly. Following Cabinet Office guidance, users wanting to use this data would have to identify 24 files spread over 21 pages on the gov.uk domain.⁴⁴ While 20 departments publish their data in collections, making it slightly easier to find, four still do not, leaving the user to find the relevant file using either the gov.uk search function or a third-party search engine, such as Google.

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

47. Using scrapers to scan, download, and catalogue files automatically could be a timesaver. However, the efficiency of this approach is dependent on data being published in consistent locations with consistent naming conventions and url names. This is not the case. Some departments refer to quarters numerically in their urls, for example:

<https://www.gov.uk/government/publications/dcms-ministers-gifts-hospitality-travel-and-meetings-q23-2526>

48. Whereas most others refer to them in long form; for example

<https://www.gov.uk/government/publications/dsit-ministerial-overseas-travel-and-meetings-july-to-september-2025>

49. The name of the department within the url can change over time; for example, from

<https://www.gov.uk/government/publications/ago-transparency-data-october-to-dece>

⁴¹ [Government Digital Service, Guidance: How to publish ministerial overseas travel and meetings, February 2025](#)

⁴² For example: [Cabinet Office, Ministers' transparency publications collection, March 2026](#)

⁴³ For example: [Cabinet Office, Ministerial meetings, March 2024](#)

⁴⁴ Files for the Prime Minister's Office, Cabinet Office, Leader of the House of Lords, and Leader of the House of Commons are also published in one location by the Cabinet Office.

[mber-2023 to
https://www.gov.uk/government/publications/attorney-generals-office-transparency-da
ta-january-to-march-2024](https://www.gov.uk/government/publications/attorney-generals-office-transparency-data-january-to-march-2024)

50. Some departments call the releases ‘ministerial-overseas-travel-and-meetings’ while others label them ‘gifts-hospitality-travel-and-meetings’ despite gifts and hospitality now being published in a central location, separate from ministerial meetings.⁴⁵ File names can be relatively intuitive or more obscure; for example ‘WO JulSept25 - Min Meetings’.⁴⁶
51. The overwhelming majority of files in our sample (270 or 94 per cent) were published in csv format, which are easier to compile using automated and semi-automated processes. However, 17 were not with one file published as a pdf document⁴⁷ in clear contravention of Cabinet Office guidance.⁴⁸
52. Every one of these variations adds an extra layer of complexity to automating the collection of this data, which grows exponentially with every new type of official (ministerial, senior civil servant, and special adviser), year and disclosure type (meetings or overseas visits). This time cost is also multiplied by the number of researchers, journalists and members of the public undertaking this task separately.
53. Transparency International UK has tried to reduce these time costs for users by collecting them, standardising the data⁴⁹ and publishing it in a central location.⁵⁰ However, they have only been able to do so by focussing solely on ministerial meetings: including senior officials’ meetings and special advisors’ engagements with newspaper and media proprietors would have been beyond their means. And as a charity, their ability to do so is contingent on funding from trusts and foundations, who are essentially paying for work both the CSPL⁵¹ and the Boardman review⁵² recommended the UK Government should do itself.

Searchability compared to other countries’ releases

54. The searchability of the UK’s transparency releases, and the frequency of their publication, stands in sharp contrast to several other countries’ transparency

⁴⁵ [Cabinet Office, Register of ministers’ gifts and hospitality, January 2025](#)

⁴⁶ [Wales Office, Ministerial transparency return, July to September 2025](#)

⁴⁷ [Office of the Secretary of State for Scotland, Ministerial quarterly transparency return: October 2023 to December 2023, March 2024](#) NB. The Scotland Office updated the file to CSV following our correspondence with them for this research.

⁴⁸ [Cabinet Office, Ministers’ overseas travel and meetings: publication guidance, January 2025, paragraph 12](#)

⁴⁹ For example ministers’ names and departments, which can also vary over time and do not link Parliament’s datasets without our data processing.

⁵⁰ [Transparency International UK, Open Access, accessed April 2026](#)

⁵¹ [CSPL, Final report of the Standards Matter 2 review, Recommendation 26, November 2021, pages 83-85](#)

⁵² [Nigel Boardman, Review into the development and use of supply chain finance \(and associated schemes\) in Government, Part 2: Recommendations and suggestions, Recommendation 13, July 2021, page 20](#)

releases. Twelve OECD countries publish ministerial agendas online,⁵³ including details of who the minister has met, with Luxembourg also having a lobbying register,⁵⁴ enabling cross-checking.

55. Of the five examples below, almost all are easier to search than the UK's transparency releases. Whereas the UK's releases are on downloadable spreadsheets, with separate files for each month or quarter, other countries' agendas are on single webpages, enabling users to search across time periods, ministers, departments, and meeting descriptions. All are updated more frequently than the UK's, with most being updated daily and the least frequent being updated within a few weeks of the meetings taking place.

56. Where the agendas differ is in the level of detail they provide about the subject of the meeting, with some, such as Spain's, providing only the names and organisations of the attendees, while others, such as Luxembourg's, providing a detailed explanation of the purpose of the meeting and pieces of legislation or regulation discussed.

Country	Details	Frequency of publication
European Union - MEP meetings ⁵⁵ - Commissioner meetings ⁵⁶	There are separate pages for meetings with MEPs and European Commissioners. Commissioners, Commission staff in management positions, and MEPs are only allowed to meet lobbyists registered on the Transparency Register.⁵⁷ MEPs are required to publish details of meetings with lobbyists. These meetings are searchable by a wide range of search terms, including the MEP, the interest group, date, and key words. However, the database does not contain any information about the purpose of the meetings. The lists of meetings held by Commissioners and Commission staff in management positions are downloadable into searchable Excel files. These	For the European Commission: the Code of Conduct for commissioners does not set a frequency,⁵⁹ but they are generally published within a few days or weeks. For the European Parliament: Article 7 of the European Parliament Code of Conduct does not set a timeframe for MEPs publishing details of their meetings.⁶⁰

⁵³ [OECD. *Anti-Corruption and Integrity Outlook, 2026*, page 54](#)

⁵⁴ [Luxembourg, Transparency register, accessed April 2026](#)

⁵⁵ [European Parliament, search MEP meetings, accessed May 2026](#)

⁵⁶ [European Commission, transparency, accessed May 2026](#)

⁵⁷ European Commission: [The European Union. *Annual report on the functioning of the transparency register, 2024*, page 8](#)

MEPs: [European Parliament. *Code of conduct for members of the European Parliament regarding integrity and transparency*, 2019, Article 7](#)

⁵⁹ [European Commission. *Code of Conduct for Commissioners*, 2018, Article 7](#)

⁶⁰ [European Parliament. *Code of conduct for members of the European Parliament regarding integrity and transparency*, 2019, Article 7](#)

	contain a brief description of the purpose of the meeting. Commissioners must also publish minutes of their meetings with lobbyists. ⁵⁸	
Netherlands ⁶¹	The Netherlands has a central agenda page for ministers and state secretaries. The central page can be filtered by date, keyword, period, government official, and type. The interface has an accompanying guide for ease of use.⁶² However, research by the Open State Foundation found in 2024 that not all meetings were being registered and those that were registered were not all being done correctly.⁶³	Generally published a week in advance. If, for national security reasons, they need to be published afterwards, they must be published within two weeks.
Spain ⁶⁴	There is a central website that lists the daily agendas for government ministers, searchable by date, though not ministers. It gives very little information about the purpose of the meetings.	Updated daily
Lithuania For example: - Ministry of Energy ⁶⁵ - Ministry of Environment ⁶⁶ - Ministry of Defence ⁶⁷	The Ministry of Energy has a search function to search by key word, date, and minister. The Ministry of Environment's and the Ministry of Defence's agendas are not searchable. They give very little information about the purpose of the meetings.	Updated daily
Luxembourg ⁶⁸	Luxembourg publishes daily agendas for its ministers. The database is easily searchable, and can be filtered by date, minister, administration,	Updated daily

⁵⁸ For example: the [European Commission, Meetings of President Ursula von der Leyen with interest representatives, accessed April 2026](#)

⁶¹ [Netherlands, National Government, agenda, accessed May 2026](#)

⁶² [The Netherlands, Reading guide for government ministers' public agendas, June 2025](#)

⁶³ [Dutch News, Dutch cabinet has made a 'false start' with transparency pledge, September 2024](#)

⁶⁴ [Spain, Government agendas, accessed May 2026](#)

⁶⁵ [Lithuania, Ministry of Energy, agenda, accessed May 2026](#)

⁶⁶ [Lithuania, Ministry of Environment, agenda, accessed May 2026](#)

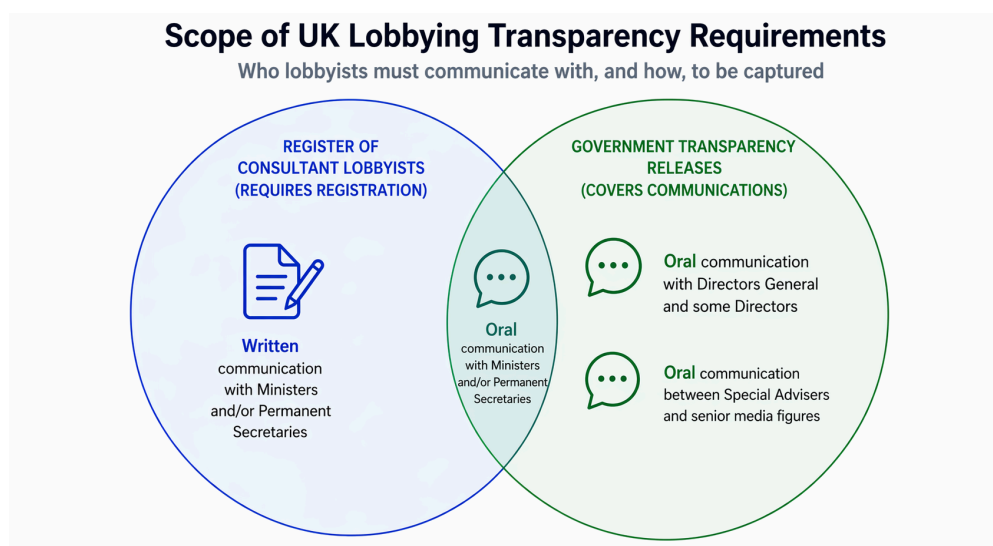
⁶⁷ [Lithuania, Ministry of Defence, agenda, accessed May 2026](#)

⁶⁸ [Luxembourg, agenda, accessed May 2026](#)

	and theme. It is accompanied by a PDF of meetings over the last two years, which details the subject of each meeting and the piece of legislation/regulation under discussion. ⁶⁹	
Norway ⁷⁰	Norway publishes daily agendas for all ministers, which can be filtered by date, person, and ministry, though not by the name of the other attendees. However, it doesn't contain any information about the purpose of the meeting.	Updated daily

Reconcilability with the Register of Consultant Lobbyists

57. The Register of Consultant Lobbyists and the government transparency releases are extremely difficult to reconcile – and were never designed to be reconcilable.
58. Whereas the transparency releases cover meetings hosted by ministers, permanent secretaries, directors general, and some directors – plus some meetings held by special advisers – the Register only covers meetings held with ministers and permanent secretaries. In addition, while consultant lobbyists are required to sign the Register if they make written communications with ministers or permanent secretaries, the transparency releases only cover meetings.



⁶⁹ [The Luxembourg Government, Register of meetings, April 2026](#)

⁷⁰ [Norway, government, calendar, accessed May 2026](#)

59. This results in there being consultant lobbyists registered as having lobbied on behalf of clients in the Register where there is no record of the lobbyist having met any government ministers or permanent secretaries. For example:

Lobbyist	ORCL Details	Transparency releases
Ardesey Ltd	Ardesey lists two clients in July–Sept 2024. ⁷¹	No record of any meetings
Charlesbye Limited	Charlesbye lists a currently active client list and has had active clients for every registered period. ⁷²	No record of any meetings
Fullbrook Strategies Limited	Fullbrook Strategies lists a currently active client list and has had active clients for every registered period bar four. ⁷³	No record of any meetings
Eterna Partners Limited	Eterna Partners list clients between 2021–2025. ⁷⁴	No record of any meetings
Red Flag Consulting	Red Flag Consulting lists clients between 2022–2025. ⁷⁵	No record of any meetings

60. This suggests that either:

- the meetings between these consultant lobbyists and ministers/permanent secretaries were not declared in the transparency releases,
- the transparency releases listed meetings with the clients but not the consultant lobbyists,
- all communication between the consultant lobbyist and the government ministers/permanent secretaries was in writing and so would not appear in the transparency releases, or
- the consultant lobbyist registered in error.

⁷¹ [ORCL, Ardesey, previous client lists: July-September 2024](#)

⁷² [ORCL, Charlesbye, accessed May 2026](#)

⁷³ [ORCL Fullbrook Strategies, accessed May 2026](#)

⁷⁴ [ORCL, Eterna Partners, previous client lists 2021-2025](#)

⁷⁵ [ORCL, Red Flag Consulting, previous client lists 2022-2025](#)

61. Finding out which of these possible explanations is correct would be extremely time consuming, involving submitting Freedom of Information requests.

62. The lack of detail in the transparency releases also means that there are meetings listed with consultant lobbyists where it is not clear which client the lobbyist was representing, and where the Register shows the lobbyist had multiple clients:

Lobbyist	Meeting Details	ORCL Details
Brunswick Group Advisory	Met Rachel Reeves (HMT) on 16 Dec 2024 to 'discuss opportunities for economic growth'. ⁷⁶	ORCL page details 3 clients for the same period: Canal+, NatWest, IHI Corporation. ⁷⁷
Global Counsel	Met Lord Vallance (DSIT) on 11 Sept 2024 to discuss 'R&D ecosystem and policy'. ⁷⁸	ORCL page details 22 clients for the same period. ⁷⁹
Boscobel & Partners	Met with Kwasi Kwarteng (BEIS) on 5 April 2022 to 'discuss Liquified Natural Gas'. ⁸⁰	ORCL page details 3 clients for the same period: Hargreaves Lansdown Marshall Wace, Tellurian. ⁸¹
Hanbury Strategy	Met Simon Hart (Whip's office) on 22 Feb 2023. The meeting details the purpose as 'political'. ⁸²	ORCL page details 11 clients for the same period. ⁸³
Teneo Strategy	Met with Greg Hands (BEIS) on 12 November 2021 to 'discuss energy retail suppliers'. ⁸⁴	ORCL page details 9 clients for the same period. ⁸⁵

63. In this circumstance, finding out which client the lobbyist was representing would involve submitting a Freedom of Information request to the department to request the

⁷⁶ [Transparency International, Open Access, meeting between Brunswick Group Advisory and Rachel Reeves, 16 December 2024](#)

⁷⁷ [ORCL, Brunswick Group Advisory, previous client list October-December 2024](#)

⁷⁸ [Transparency International, Open Access, meeting between Global Counsel and Lord Vallance, 11 September 2024](#)

⁷⁹ [ORCL, Global Counsel, previous client list July-September 2024](#)

⁸⁰ [Transparency International, Open Access, meeting between Boscobel & Partners and Kwasi Kwarteng, 5 April 2022](#)

⁸¹ [ORCL, Boscobel & Partners, previous client list April-June 2022](#)

⁸² [Transparency International, Open Access, meeting between Hanbury Strategy and Simon Hart, 22 February 2023](#)

⁸³ [ORCL, Hanbury Strategy, previous client list January-March 2023](#)

⁸⁴ [Transparency International, Open Access, meeting between Teneo Strategy and Greg Hands, 12 November 2021](#)

⁸⁵ [ORCL, Teneo Strategy, previous client lists October-December 2021](#)

minutes of the meeting. However, if the meeting took place several years ago, it is far from guaranteed that officials will still have a record of the meeting.

Lack of quality assurance

64. It is clear that not all releases are quality assured before they are published, despite the Cabinet Office asking departments to submit their draft releases to the Cabinet Office Transparency Data Team for review within one calendar month after the end of a quarterly reporting period.⁸⁶ This is evident in the striking number of typos in the releases.⁸⁷ This could go some way towards explaining why so many of the descriptions of meetings published are so poor.

Improvements in transparency releases

65. The Minister for the Cabinet Office, Nick Thomas-Symonds, highlighted to Simon Hoare, Chair of the Public Administration and Constitutional Affairs Committee on 8 December 2025 that the government has made improvements to the transparency regime.⁸⁸ These measures have been relatively effective but are not comprehensive:

Improvement	Comment
A new Register of Ministers' Gifts and Hospitality published monthly by the Cabinet Office, within one month of the reporting period, rather than on the previous quarterly schedule.	This is an improvement but begs the question of why the same publication schedule cannot be achieved for meetings.
Declaring the estimated value of any hospitality received where possible.	This is an improvement and is widely adhered to.
Since the start of 2025, over 87% of other datasets ⁸⁹ have been published by departments on time, as opposed to an equivalent figure of 73% for the period 2015-2021 from the Institute for Government.	While 87% is an improvement, it is unclear why the government cannot achieve the same success rate as the Netherlands, Spain, and Lithuania, which publish their

⁸⁶ [Cabinet Office, Ministers' overseas travel and meetings: publication guidance, January 2025, paragraph 10](#)

⁸⁷ For example: [Transparency International, Open Access, meeting between Peter Kyle and 'Anthropi', October 2024](#), and [Transparency International, Open Access, meeting between Peter Kyle and the 'Allen Institute', October 2024](#), and [Transparency International, Open Access, meeting between Feryal Clark and 'Ontario Teacher's Pension Plan', August 2024](#), and [Transparency International, Open Access, meeting between Kanishka Narayan and NScale to discuss AI 'infrastructure', September 2025](#).

⁸⁸ [Letter from Nick Thomas-Symonds, Minister for the Cabinet Office, to Simon Hoare, Chair of PACAC, 8 December 2025](#)

⁸⁹ Ministers' meetings and overseas travel; Special Advisers' gifts, hospitality, and meetings with senior media figures; Senior Officials' meetings, hospitality, and business expenses; and advice given to former Senior Officials under the Business Appointment Rules.

	meetings daily on time.
Senior Officials' transparency data includes all Director General (SCS3) level appointments, and extends further to some Director (SCS2) level appointments, notably Finance and Commercial Directors and Directors who are Senior Responsible Owners (SROs) for projects in the Government's Major Projects Portfolio.	This is an improvement but the transparency rules should be extended to cover all directors, given the influence they can have over policy making.

Objectives of transparency releases

66. The transparency releases themselves do not have explicitly stated objectives but we can assume that they include:

- a. Enabling the public to be aware of who the government is meeting,
- b. Encouraging ministers to 'meet many people and organisations and consider a wide range of views as part of the formulation of government policy' as required by the ministerial code.⁹⁰
- c. Increasing public confidence in the policy-making process.

67. The government is not, however, meeting these three objectives. To take each in turn:

- a. As we have demonstrated above, it is extremely onerous for the average member of the public, even if they are aware that the transparency releases exist, to search through them to find who the government is meeting.
- b. The government is not always considering a wide range of views when making policy. As part of separate research Spotlight on Corruption is conducting, it has found that, among the 113 meetings the government has had on data centres since it came into office, it has had no meetings with environmental groups to discuss the issue, despite data centres' significant impact on the environment.
- c. Public confidence in politicians is at all-time lows. The OECD has found that transparency is one of the key drivers of trust, particularly where trust is low to start with.⁹¹ Specifically, it has found that 51% of OECD citizens who find information about administrative processes easily available trust their government, whereas among citizens who find that information is not easily available, trust in government is only 22%.⁹² The UK is among the worst performers when it comes to trust in government – with just 27% of the

⁹⁰ [Cabinet Office, Ministerial Code 8.13, October 2025](#)

⁹¹ [OECD, Anti-Corruption and Integrity Outlook, 2024, page 60](#) and [OECD, OECD survey on drivers of trust in public institutions, 2024, page 138](#)

⁹² [OECD, Anti-Corruption and Integrity Outlook, 2024, page 55](#)

population showing trust in national government, compared to 49% in Canada and 62% in Switzerland.⁹³

68. In this context, the UK needs to explicitly articulate the objectives of the transparency releases so that it can monitor its progress against them.

⁹³ [OECD. Foundations for Growth and Competitiveness. Public integrity graph. accessed April 2026](#)

Annex I: Definition of consultant lobbying

Summarised from Section 2 and Schedule 1 of the Transparency Lobbying, NonParty Campaigning and Trade Union Administration Act 2014.

A person carries on the business of consultant lobbying if—

- (a) in the course of a business and in return for payment, the person makes communications on behalf of another person or persons,
- (b) the person is registered under the Value Added Tax Act 1994, and
- (c) none of the exceptions in Part 1 of Schedule 1 applies; for example, the lobbying is incidental to their activities; they are another public body; or they are a foreign government.

Communications are **oral or written communications** made personally to a **Minister of the Crown or permanent secretary** relating to—

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

Ministers can by regulations extend the scope of the rules to include the lobbying of special advisers.⁹⁴

⁹⁴ [Transparency Lobbying, NonParty Campaigning and Trade Union Administration Act 2014, Section 2\(5\)](#)

Annex II: List of departments/offices in analysis

Attorney General's Office

Cabinet Office

Department for Business and Trade

Department for Digital, Culture, Media and Sport

Department for Environment, Food & Rural Affairs

Department for Energy Security & Net Zero

Department for Education

Department for Transport

Department of Health and Social Care

Ministry for Housing, Communities and Local Government (formerly Department for Levelling-Up, Housing and Communities)

Department for Science, Innovation and Technology

Department for Work and Pensions

Foreign, Commonwealth & Development Office

HM Treasury

Home Office

Ministry of Defence

Ministry of Justice

Northern Ireland Office

Office of the Advocate General for Scotland

Prime Minister's Office

Scotland Office

Wales Office

Leader of the House of Lords

Leader of the House of Commons

Annex III: Ministerial meetings vs social media

[260428 Ministerial meetings versus Social Media](#)