

Lobbying, Business Appointment Rules and Disclosure

Written Evidence Submissions

July 2026

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

April 2026

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Summary of Inputs & Recommendations

Lobbying is a legitimate part of policymaking only when influence is transparent, disclosed, and subject to enforceable rules. The issue is not lobbying per se, but the absence of a system that allows government, Parliament, and the public to trust organised interests' engagement with policymakers.

The UK's present framework is too narrow and fragmented to perform this function effectively. It captures only a limited class of consultancy lobbyists, while much influence activity by the wider ecosystem remains outside routine scrutiny.

It also focuses on a narrow set of officeholders, despite lobbying being directed across government, Parliament, agencies, and so on. This produces systemic blind spots and allows influence to migrate toward less regulated channels.

Fragmented oversight further weakens regulatory credibility. Lobbying disclosures, ethics rules, procurement transparency, and political finance reporting currently operate as disconnected systems, making it difficult to identify cumulative influence patterns, detect conflicts, or impose meaningful sanctions.

Comparative evidence shows that the UK underperforms against more integrated lobbying regulatory models such as those used in Canada, Ireland, the EU, and Chile, where broader mandatory registration and joined-up disclosure create stronger transparency and enforcement capacity.

The strategic case is that delayed reform carries escalating democratic and security costs. Weak disclosure regimes heighten risks of ethics scandals, policy capture, foreign interference, and continued erosion of public trust.

Modernising lobbying regulation should therefore be viewed as an institutional resilience and public trust measure essential to restoring confidence in the integrity of government decision-making.

Reform should begin with a broader statutory definition of lobbying. Regulation should move beyond third-party consultants and capture all organised interests that seek to influence public decisions.

A functional definition based on activity would close the largest current transparency gap and provide a more accurate map of influence in government.

Institutional coverage must be expanded across the full policymaking chain and across the policymaking cycle. Disclosure obligations should apply not only to ministers but also to MPs, parliamentary staff, special advisers, senior civil servants, regulators, and implementation officials.

This is essential to prevent “venue shopping” where lobbyists redirect efforts to less regulated decision points. Capturing the full lobbying footprint would also allow scrutiny of influence from agenda-setting through legislation to delivery.

Dual disclosure by policymakers as well as lobbyists would materially improve reliability and create a more robust and auditable account of influence.

A single integrated oversight architecture is recommended. Responsibility for lobbying transparency should sit with a dedicated authority or clearly designated department able to combine related information and data.

This would move the UK from passive publication of fragmented data toward active regulatory intelligence capable of spotting patterns of undue access or repeated privileged contact. Data collection requirements should be strengthened and integrated with already existing information.

These reforms in combination with “cooling off” periods are likely to reduce the revolving door phenomenon. Where policymakers move to government affairs at the end of their career.

Lobbying strategies continuously evolve. Incorporating **an “update clause” requiring a review of the reform’s impact** after a specified period, such as 12 months, **would provide an opportunity both to evaluate the effectiveness of the reforms and to consider the need for further action.**

Digital open-source implementation should be treated as central to reform. Standardised open-data architecture, searchable interfaces, and interoperability across UK and international systems would reduce compliance costs, enable real-time monitoring, facilitate third-party analysis, and improve public usability.

Open-by-default design also allows researchers, journalists, and civil society to act as additional accountability partners.

Business Appointment Rules Summary and Recommendations

The current framework identifies key risks, misuse of privileged information, unfair access, and perceived rewards for past decisions, and applies standard mitigation tools, including lobbying bans, restrictions on contracts, and cooling-off periods.

Recent reforms have also improved institutional independence and transparency, notably through the involvement of the Civil Service Commission and the Independent Adviser on Ministerial Standards, alongside clearer publication requirements.

However, several weaknesses persist. **The system remains fragmented**, particularly below senior levels, where decisions are still largely department-led.

The framework is better equipped to regulate direct and visible transitions than more opaque forms of influence, such as moves into consultancies, advisory roles with undisclosed clients, or positions that leverage informal networks and reputational capital rather than formal lobbying.

Enforcement remains uneven: despite stronger sanctions for ministers, the broader system still relies heavily on self-reporting and ex ante conditions rather than systematic monitoring.

The absence of a sufficiently risk-based approach **risks deterring younger and more diverse talent** by making public service appear restrictive relative to private-sector careers.

Reform should therefore be guided by five principles: proportionality, independence, traceability, transparency, and talent sustainability. OECD evidence highlights that post-public employment rules are most effective when tailored to varying levels of risk and supported by credible oversight.

At the same time, transparency and traceability are increasingly important in a context where influence often operates through complex organizational structures such as consultancies and advisory firms.

Crucially, **talent sustainability must be treated as a core objective**: while restrictions are necessary to prevent capture, they should not unduly penalize or discourage entry into public service.

Comparative evidence reinforces the need for balance.

Research on EU lobbying and career trajectories shows that mobility between public and private sectors does not necessarily equate to capture, but often reflects longer-term patterns of expertise and institutional trust (Coen et al, 2021; Coen and Vannoni, 2016).

By contrast, the Japanese case, which is very close in spirit to the UK case, demonstrates both the benefits and risks of structured post-public employment systems (Coen and Vannoni, 2025). **Japan combines strict legal constraints, such as limits on brokering reemployment and mandatory disclosure, with active public–private job-matching mechanisms.**

This approach helps attract talent in a context of relatively lower public-sector pay but also highlights the risk of favoritism and preferential access if oversight is insufficient. **The key lesson is that mobility should be managed rather than restricted outright, within a transparent and risk-based framework.**

Building on these insights, the UK should adopt a tiered BAR system. Low-risk roles should be approved quickly with minimal conditions. Medium-risk roles should involve targeted restrictions (e.g. lobbying bans, sectoral limits, client transparency). High-risk roles should trigger longer cooling-off periods or, where necessary, refusal. **This would align with existing practice while making the system more coherent and predictable.**

Reform should explicitly recognize the trade-off between preventing regulatory capture and attracting talent.

Where cooling-off periods impose real costs on individuals, the state should consider compensatory mechanisms such as continued pay or structured transition support. This would enhance fairness, reduce incentives for circumvention, and strengthen the attractiveness of public service careers, without weakening integrity safeguards.

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Submission to the Ethics and Integrity Commission

Lobbying, Disclosure and Access to Government Review

Respondent: Dr Barry Solaiman

Capacity: Personal academic submission

Date: 20 April 2026

1. This submission is made in a personal academic capacity. It draws on my research on lobbying regulation in the United Kingdom, including my published work on robust lobbying regulation, my doctoral research at the University of Cambridge on “institutional diversion”, and my forthcoming book on lobbying, politics and public trust (Hart Publishing). My doctoral research developed an analytical framework called ‘institutional diversion’ for identifying and testing when lobbying diverts decision-makers from acting in the public interest. I have published on lobbying regulation in Parliamentary Affairs (‘Lobbying in the UK: Towards Robust Regulation’, 2023), in edited volumes with Cambridge University Press, Oxford University Press, and Routledge, and my forthcoming book, “Lobbying, Democracy and Public Trust: An Institutional Diversion Framework”, is under contract with Hart Publishing for publication in 2027. I also assisted Lord Brooke of Alverthorpe in developing the Lobbying Transparency Bill 2017 and have interviewed the heads of the three self-regulatory lobbying bodies in the UK and the Lobbying Registrar when undertaking my thesis.
2. My central submission is that the present regime is too narrow and too procedural. It produces fragments of transparency without adequately addressing the underlying risks of undue influence, revolving-door dependence, and political inequality. The test for reform should be whether the system protects the public interest by preserving both integrity and objectivity (as defined in the relevant codes of conduct) in decision-making. I believe that test should be primarily applied to the office holders. It is hard to regulate lobbyists because they come in all forms and guises (legitimate or otherwise). It is more straightforward to focus regulation on officeholders in government and parliament. Unfortunately, regulations are insufficient, whether the focus is on the lobbyist or the officeholder.
3. Questions 1 to 5 should be approached together. The current focus on consultant lobbyists communicating personally with ministers and permanent secretaries misses much of the real lobbying ecosystem. In practice, lobbyists often target special advisers, directors general, directors, senior policy officials, private offices, and others who shape agendas, filter access, draft advice, and influence outcomes before a minister makes any formal decision.
4. The registration requirement should therefore be expanded to cover lobbying of: special advisers; directors general; directors; equivalent senior civil servants; senior members of ministers’ private offices; and any official with substantial policy-development, procurement, regulatory, gatekeeping, or agenda-setting functions. A narrow focus on the final decision-maker creates an obvious loophole because influence is often exerted earlier in the process.

5. Consultant lobbyists should be required to record, at a minimum: the date of the contact; the identity of the lobbyist; the organisation and beneficial client on whose behalf lobbying is undertaken; the recipient and their office; the subject matter; the specific policy, procurement, contract, licence, bill, or regulatory issue concerned; the outcome sought; the form of communication used; and whether any supporting material, hospitality, or related benefit was involved.
6. There is clear merit in replacing the current Register of Consultant Lobbyists with a broader register that captures all lobbying of government, regardless of who is doing it. The principal advantages are coherence, fewer loopholes, a better public record, and a reduced ability to avoid scrutiny by choosing a particular contractual form. The main disadvantages are administrative burden and implementation cost. Those concerns are real but manageable.
7. Burden can be reduced without sacrificing principle. Smaller businesses, charities and think tanks should not be broadly exempted, because they can still exert significant influence. Instead, they should be offered simplified reporting, tiered fees, standardised online forms, and clear guidance. Ordinary constituents lobbying on their own behalf should remain outside the registration regime.
8. Questions 6 and 7 also require a broader response than more civil penalties alone. The Registrar's powers are not sufficient if the underlying register is narrow and disconnected from the other transparency systems. An effective regulator should be able to require information, conduct audits, initiate investigations, cross-check entries against ministerial and departmental returns, and impose meaningful sanctions for late, false, or missing declarations.
9. The resource implications of a broader regime would be significant, particularly if all lobbying of government were captured. But the present system is under-powered precisely because it was designed too narrowly. Costs can be mitigated through a tiered fee structure, digital filing, risk-based audits, a single UK-wide online portal, and harmonisation across Westminster and the devolved administrations. A properly designed regime could be substantially self-funding.
10. Questions 8 to 12 should likewise be treated as part of one transparency architecture. The quality of government transparency data on meetings, gifts, and hospitality is weakened by fragmentation, vague descriptions, inconsistent fields, and delay. The data should be published through a single searchable and downloadable portal using mandatory common fields across departments.
11. Transparency returns should identify the recipient of the lobbying, everyone present, the organisation represented, the beneficial interest behind the meeting where relevant, the precise subject matter, the channel used, the location, and whether the engagement occurred in an official or non-official setting. Descriptions such as "general discussion", "industry issues", or "Africa issues" are not sufficient for meaningful scrutiny.
12. The forms of communication that must be disclosed should be broadened. The definition of a "meeting" should include all non-public interactive dialogue that would count if it occurred face to face. That should include WhatsApp and other messaging platforms, texts, Signal, telephone calls, video calls, private dinners, receptions, donor events, party-conference meetings, hospitality settings, and other informal encounters where public business is discussed.

13. Officeholders should be under a contemporaneous duty to record such contacts within a short period, and official record-keeping rules should prevent deletion, migration into private channels, or reliance on private devices to evade scrutiny. Informality should not be allowed to become invisibility.
14. Oversight of government transparency returns should sit with an independent body, not solely within departments. That body should be able to audit returns, require corrections, investigate omissions, publish compliance findings, and recommend sanctions. Repeated or serious non-compliance should lead to escalating consequences, including public correction notices, financial penalties where appropriate, disciplinary action, and referral to the relevant standards body.
15. I have long argued that reconciling the current consultant-lobbying register with departmental transparency returns is difficult and often artificially so. The datasets do not align well on dates, coverage, or detail. That difficulty is itself evidence of design failure. A person should not need to piece together partial transparency from disconnected systems in order to understand who sought to influence whom.
16. Questions 13 to 15 on the Business Appointment Rules go to the heart of the revolving door. The strengths of the present system are limited but real: it recognises the risk, requires applications, and publishes at least some advice and conditions. However, its weaknesses are much greater. The regime has historically depended too heavily on voluntary compliance, its conditions have been weakly enforceable, and its coverage has left too much room for former officeholders to monetise privileged access and networks.
17. The Rules should be guided by six principles: independence; protection of the public interest; prevention of actual and perceived conflicts of interest; legal enforceability; transparency of both applications and reasons; and proportionality grounded in risk, not convenience. The key question should be whether a new role would allow a former officeholder to exploit privileged information, privileged access, or the appearance of traded influence.
18. The bodies applying the Rules should ask, in every case: did the applicant regulate, contract with, or make policy affecting the prospective employer; did they have access to sensitive non-public information; would the appointment confer privileged access to government; is there a realistic risk of unfair advantage; and what conditions are necessary to protect trust? Cooling-off periods, no-lobbying conditions, matter-specific bans, and restrictions on advisory roles should be legally binding, not merely advisory.
19. Questions 16 to 19 concern financial interests. The current arrangements have one clear strength: there is some disclosure through ministers' interests, parliamentary registers, and departmental processes. But the weaknesses are structural. Disclosure is fragmented, delayed, and often partial. Gifts and hospitality, financial holdings, and external relationships are spread across multiple systems. The result is form without enough substance.
20. The current approach also relies too heavily on self-declaration and on the idea that transparency alone is enough. It is not enough. A system that permits substantial gifts, hospitality, accommodation, sponsored travel, or other benefits to be accepted so long as they are eventually declared still leaves serious questions about dependence, access, and perceived obligation.
21. The present system should be replaced with regular published financial disclosure forms for ministers and senior officials using a single standard template and a single public portal.

The disclosure should cover: shareholdings; directorships; partnerships; beneficial ownership; trusts; options; significant debts; property interests; remunerated outside roles; major clients; sponsored travel; gifts and hospitality; and close family interests where those create a realistic conflict risk.

- 22.** Disclosure should occur on appointment, annually, and within a short period after any material change. High-risk interests should trigger mandatory management measures, including recusal, divestment, blind-trust arrangements where appropriate, or refusal of certain gifts and benefits altogether. Publication should be prompt, searchable, and capable of being cross-checked against other official registers.
- 23.** The broader lesson from my research is that symbolic regulation is not enough. Transparency matters, but transparency without coherent scope, meaningful detail, and independent enforcement risks becoming an appearance of accountability rather than accountability itself. Reform should aim to create a unified ethics framework that protects integrity, objectivity, and public trust across lobbying, business appointments, and financial interests.

Supplementary Note Following Roundtable

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

Dr Barry Solaiman

7 May 2026

This short note follows the Commission’s academic roundtable and the subsequent circulation of prior lobbying recommendations made by the former Committee on Standards in Public Life (CSPL). The main point I wish to emphasise is that many of those earlier recommendations remain sound and, in important respects, unfinished business. In my view, the Commission can add real value by treating them as the starting point for a practical package of immediate reforms, whilst also explaining why those quick wins matter within a wider framework of integrity, objectivity, and public trust in decision-making. I shall refer to my own research in the passages below.

1. Recommendations

I continue to think the following are sensible, concrete, and still highly actionable:

- a centrally managed, searchable database bringing together departmental transparency releases;
- stricter minimum standards for the descriptions of meetings and stronger compliance with those standards;
- monthly rather than quarterly publication of transparency returns;
- inclusion in transparency returns of meetings involving directors general, directors, and special advisers;
- express guidance that informal lobbying, and lobbying through channels such as WhatsApp, Zoom, Signal, texts, and similar media, must be recorded and reported;
- closure of loopholes by which informal or non-standard contacts drop out of departmental releases;
- and fuller disclosure by consultant lobbyists, at minimum including the date, recipient, and subject matter of lobbying.

Taken together, these measures would not solve every lobbying problem. They would, however, materially reduce opacity, improve usability, and pick up important strands of earlier reform work that have never been fully implemented (Solaiman 2023; Solaiman 2026).

2. Why this is important

The present regime is too narrow and too procedural. It produces fragments of transparency without adequately addressing the underlying risks of undue influence, revolving-door dependence, and political inequality (Solaiman 2026).

In practice, the current focus on consultant lobbyists communicating personally with ministers and permanent secretaries misses much of the real lobbying ecosystem. Influence is often exerted earlier in the chain, through special advisers, directors general, directors, senior policy officials, private offices, and informal dialogue before any minister makes a formal decision (Solaiman 2026; Solaiman 2017).

That matters because, under my “institutional diversion” framework, the relevant question is whether lobbying undermines integrity or objectivity in public decision-making. A transparency regime that misses where influence actually happens cannot do the protective work it is supposed to do (Solaiman 2017; Solaiman forthcoming).

In short, a person should not need to piece together partial transparency from disconnected systems in order to understand who sought to influence whom, on what, and through which route (Solaiman 2026).

3. A practical sequence of reforms

Immediate administrative and guidance-based reforms

- Create one centrally managed and searchable portal for lobbying-related transparency data.
- Move to monthly publication and use mandatory common data fields across departments.
- Set enforceable standards for meeting descriptions so that entries such as “general discussion” or “industry issues” are no longer acceptable.
- Make clear that all non-public interactive dialogue about public business, including messaging apps, video calls, private dinners, receptions, and similar informal settings, falls within disclosure expectations.
- Impose a contemporaneous duty on officeholders to record such contacts within a short period.

These reforms are attractive because they are practical, visible, and capable of improving the existing system relatively quickly, even before more ambitious legislative reform is completed (Solaiman 2023; Solaiman 2026).

Short-term legislative repair

- At minimum, bring special advisers within the statutory scheme. As I note in my doctoral work, the TLA 2014 already contemplates this possibility through future regulations, which makes it a particularly concrete next step (Solaiman 2017).
- Broaden the statutory focus beyond communications made personally to ministers and permanent secretaries, so that the law better reflects how influence is actually exerted.
- Require consultant lobbyists to disclose not only the date, recipient, and subject matter of lobbying, but also the beneficial client, the precise policy or procurement issue concerned, the outcome sought, and the communication channel used (Solaiman 2026).

Wider institutional reform

- Broaden the definition of lobbying and lobbyists to include in-house lobbyists. Cover directors general, directors, senior policy officials, and senior private office staff. Cover anyone with agenda-setting, gatekeeping, procurement, regulatory, or policy-development influence.
- Move beyond departmental self-policing by giving an independent body the ability to audit, cross-check, require corrections, investigate omissions, and recommend or impose meaningful sanctions (Solaiman 2026; Solaiman forthcoming).
- Treat lobbying reform as part of a wider ethics architecture that also addresses the revolving door and financial interests, rather than dealing with each issue in isolation (Solaiman 2026; Solaiman forthcoming).
- Recognise that transparency is necessary but not sufficient. Without coherent scope, meaningful detail, and independent enforcement, transparency risks becoming the appearance of accountability rather than accountability itself (Solaiman 2026; Solaiman forthcoming).

4. A point that may be worth making explicitly in the final report

If the Commission wishes to explain why these recommendations matter in normative as well as practical terms, I would suggest a formulation along the following lines: the problem is not only opacity in a technical sense, but the way a narrow and fragmented system fails to protect integrity, objectivity, and the public interest where influence is exercised informally, early in the decision-making chain, or through unequal relationships. Framed that way, the quick wins above are rooted in addressing the deeper risks of

institutional corruption, undue influence, and political inequality (Solaiman 2017; Solaiman 2026; Solaiman forthcoming).

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Ethics and Integrity Commission Review of Lobbying, Disclosure and Access to Government April 2026

About the authors.

David Coen and Alexander Katsaitis have written numerous academic articles, books, and reports on interest group representation and lobbying. They are currently working on a book on comparative lobbying regulation. They have previously prepared a policy report on MEPs attitudes to lobbying, and EU interest group activity for the European Parliament's Committee on Constitutional Affairs.

1. Introduction: The Conditional and Embedded Role of Lobbying

Lobbying is an integral part of any democratic and policy making process. When lobbying is done well it provides legitimacy to the policy process providing credible expertise and information, and representative inputs from society and business that would otherwise be absent from policymaking. Lobbying tends to be viewed negatively, and becomes problematic, when influence occurs opaquely with selective disclosure or biased access. Legitimate lobbying operates within rules and norms that are visible, enforced, and shared transparently across the political system. In that sense, legitimate lobbying is about the conditions under which influence is exercised.

2. Limitations of Current Lobbying Regulation in the UK

The UK's current approach to lobbying regulation reflects a relatively narrow and fragmented model that does not fully capture the realities of contemporary lobbying practices. These limitations are particularly evident in the scope of the actors covered, the range of policymaking targets included, and the overall structure of the regulatory system. We outline the key limitations below.

2.1 Narrow Conceptions of Lobbying Actors

A central limitation lies in how lobbying actors are defined. In some jurisdictions, including the UK, only professional consultancy lobbyists are required to register, while in-house lobbyists and other organized interests are excluded. This distinction does not align with the broader reality of lobbying ecosystems. Interest groups include businesses, NGOs, think tanks, professional associations, and other organizations that seek to influence policy. All these actors engage in lobbying activities, often using similar strategies and pursuing comparable objectives.

The consequence of narrow definitions is not simply incomplete coverage but a **systematic distortion of transparency**. Registers that capture only a subset of

actors provide a partial and potentially misleading picture of lobbying activity. Broader definitions of lobbying tend to address a wider set of interest group types and offer a more nuanced understanding of influence within a political system.

At the same time, expanding definitions introduces trade-offs. Broader coverage can increase administrative burdens and raise concerns about proportionality, particularly for smaller or resource-poor organizations. This highlights a key tension within lobbying regulation: the need to balance **comprehensive transparency** with **feasible implementation**. Current UK arrangements appear to take the worst of both worlds with limited coverage and little implementation.

2.2 Limited Scope of Policymaking Targets

A second limitation concerns the range of public officials covered by regulation. Lobbying is directed not only at ministers but also at members of parliament, their assistants, members of the civil service, political advisors, and others. Policymaking itself takes place across multiple venues and levels, involving legislative, executive, and administrative actors. However, the UK regulatory framework focuses on a limited subset of these actors. This creates **institutional blind spots**, where lobbying activity is not systematically recorded or disclosed.

This limitation is particularly significant in the context of multi-level and multi-venue policymaking. Interest groups operate strategically across different institutional arenas of the UK, targeting actors at various stages of the policymaking process. Uneven or partial regulation incentivizes lobbying arbitrage, allowing organizations to shift their activities toward less regulated spaces.

Thus, the issue is not only one of incomplete coverage but also one of **strategic adaptation**. Interest groups respond to regulatory environments, and gaps in coverage can shape the distribution of lobbying activity. Without substantive institutional scope, it is difficult to track lobbying across the policymaking process or to understand how influence is exercised in practice. This makes it significantly harder to address issues that arise from it and impacts adversely public trust.

2.3 Fragmentation and the Limits of Existing Approaches

The UK has a fragmented ecosystem of lobbying practices. Policies addressing lobbying such as registers, political finance rules, and ethical standards, are compartmentalized within separate institutional frameworks. This fragmentation contrasts with the integrated nature of lobbying strategies. The resulting mismatch between **integrated lobbying practices** and a **disjointed regulatory system** which further limits the effectiveness of the current approach.

The UK's fragmented approach also reduces the ability of regulators to identify patterns of influence or to assess cumulative effects across different domains. Without integration, regulatory systems provide snapshots rather than a comprehensive view of lobbying activity. In turn, this exacerbates the relatively limited capacity UK lobbying regulation to penalise misbehaviour.

3. Comparative Regulatory Approaches

The UK is not the only state currently looking to update its lobbying regulations. Nevertheless, different systems offer different strengths/ weaknesses to lobbying regulation. See annex for comparative tables assessing registers from the world. In the annex we provide a simplified set of tables assessing different registers transparency (to shine-light into lobbying), regulatory capacity (ability to regulate), and their interoperability (ability to use information across different registers).

3.1 Centralised and Integrated Systems

Centralised lobbying systems tend to consolidate information and regulations, such as the Canadian or Chilean cases, offering substantial transparency while tracking activity across interest group types, policymakers, and lobbying strategies. Such systems offer clear advantages in terms of transparency. By providing a comprehensive catalogue of interest groups and their activities, they allow both individual interactions and broader patterns of lobbying to be tracked.

Moreover, this enhances regulatory capacity i.e. the ability to regulate lobbying activity. By collecting a wider range of information, including details on interactions, policy areas, and financial activities. Centralised registers can act as focal points for coordination, bringing together different strands of lobbying regulation under a single framework. This reflects a broader emphasis on **regulatory consolidation** as a means of improving effectiveness. Furthermore, this means that centralised lobbying systems are better able to implement penalties which uphold lobbying policy, accountability, and trust into the political system.

3.2 Less Integrated and Fragmented Systems

Less integrated systems are characterised by narrower scope, weaker coordination, and more limited enforcement mechanisms. These systems may function primarily as lists of interest groups, with limited capacity to monitor or regulate behaviour, the Polish or Dutch registers are examples of this. While such approaches may be easier to implement, they provide limited transparency or ability to regulate lobbying. Registers that collect insufficient information or operate on a voluntary basis restrict scrutiny and may create a false sense of security about transparency.

Fragmented systems also face challenges in enforcement. Dispersed regulatory authority can lead to inconsistent standards and reduced compliance, undermining the credibility of the regulatory framework.

3.3 Interoperability and Transnational Dimensions

A key dimension of contemporary lobbying regulation is interoperability. That is the ability to import/ export data systems and data from different registers. Lobbying is increasingly a transnational activity, with interest groups operating across multiple jurisdictions simultaneously. Therefore, being able to share information across lobbying ecosystems is crucial. Limited interoperability allows interest groups to obscure the full scope of their activities and to engage in lobbying arbitrage. Improving interoperability requires coordination between regulators, standardized data formats (such as “open by design”), and mechanisms for information exchange. This dimension is closely linked to the broader challenge of aligning regulatory systems with the multi-level nature of lobbying activity.

4. Recommendations for Reform

4.1 Broaden the Definition of Lobbying

Updating the current lobbying and access disclosure to government should adopt a broader and more functionally grounded definition of lobbying that captures the full range of organized interests engaging with policymakers. Interest groups include businesses, NGOs, think tanks, professional associations, and other actors that attempt to influence public policy through formal and informal activities. Limiting regulatory scope to consultancy lobbyists excludes a substantial proportion of lobbying activity and produces an incomplete representation of influence within the political system.

4.2 Expand Institutional Coverage Across the Policy Process

Regulation should extend beyond a narrow focus on ministers to include a broader range of public officials involved in policymaking, including members of parliament, their assistants, and members of the civil service. Expanding coverage is necessary to reduce institutional blind spots and to reflect the multi-level and multi-venue character of contemporary lobbying strategies. Without such expansion, regulatory systems risk incentivizing lobbying arbitrage, whereby interest groups shift their activities toward less regulated actors or institutions. Comprehensive institutional scope is thus essential for capturing the full trajectory of influence across the policymaking process.

4.3 Promote Regulatory Consolidation and System Integration

A central priority for reform is the consolidation of fragmented regulatory measures into a more integrated system. That is to bring lobbying regulation under the guise of a specific department/ agency. This approach aligns with the broader emphasis on regulatory consolidation as a means of improving the effectiveness of lobbying regulation and addressing the limitations of fragmented systems.

4.4 Strengthen Regulatory Capacity Through Comprehensive Data Collection

The effectiveness of lobbying regulation depends on the breadth, depth, and quality of information collected. This includes tracking diverse lobbying activities, legislative footprints, and interactions with various policymakers, as well as linking this information to related domains such as political financing and public procurement. In addition, mandatory registration and the requirement to adhere to a code of conduct can further strengthen regulatory capacity by establishing clear expectations for behaviour and creating enforceable norms.

The effectiveness of these measures depends on enforcement mechanisms and institutional resources. Registers that are poorly enforced or that collect limited information may create a false sense of transparency without providing meaningful oversight. Strengthening regulatory capacity therefore requires both comprehensive data collection and the institutional ability to process, verify, and act on that information.

4.5 Enhance Interoperability Across Jurisdictions and Policy Domains

Improving interoperability requires formal coordination between registers, standardized data formats, and mechanisms for information exchange across jurisdictions. Enhancing interoperability is therefore essential for addressing the limitations of national-level regulation in a transnational lobbying environment.

4.6 Implementation and Leveraging Digital Open-Source Implementation

We acknowledge that effective reform should aim to balance breadth with proportionality, ensuring that regulatory obligations reflect the scale and intensity of lobbying activity while avoiding unnecessary burdens on participation. Comprehensive coverage improves visibility, it also increases reporting obligations and administrative demands, particularly for smaller or resource-constrained organisations. Nevertheless, there are solutions to this issue.

Digital lobbying registers provide a cost-effective and scalable means of improving transparency and regulatory oversight. Online platforms reduce administrative costs, enable real-time updates, and allow for broader public access to information.

They also facilitate data analysis and monitoring, making it easier for regulators to identify patterns of behaviour and potential cases of non-compliance.

Open-source implementation can further enhance the effectiveness of digital systems by enabling collaboration with trusted third parties, including researchers, civil society organizations, and the public. Making data available in accessible and user-friendly formats supports external scrutiny and contributes to a broader ecosystem of accountability.

Significantly, we need to consider the cost of non-acting. Lack of fit-for-purpose lobbying regulations carries real costs in terms of public trust, future scandals, security breaches, and risk of foreign interference through international and nationally based lobbying organisations.

4.7 Integrate Policymaker Disclosure and Address Information Asymmetries

Enhancing the UK's lobbying regulatory capacity involves requiring policymakers and civil servants to report their interactions with interest groups, thereby complementing and verifying information provided by lobbyists. This dual-reporting approach can reduce information asymmetries and improve the accuracy and completeness of lobbying data.

It also aligns with the broader objective of tracking the full “lobbying footprint” across the policymaking process. By capturing interactions from both sides, regulatory systems can provide a more comprehensive and reliable account of influence, reducing the potential for omissions or discrepancies in reporting. Integrating policymaker disclosure into lobbying registers therefore represents an important step toward more robust and effective regulation.

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Annex: Comparison of Lobbying Registers.

The following tables provide a simple comparative of different lobbying registers, noting their performance across different indicators.

Figure 1. Transparency

	EU	A	AUS	BE	CAN	CH	FR	DE	GR	EIR E	SL	LT	NL	USA	UK	PL
Breadth of information collected																
Tracks activities																
Tracks legislative footprint																
Tracks meetings with elected representatives																
Tracks meetings with ministers																
Tracks meetings with public administrators																
Website is in user-friendly format																
Data is in user-friendly format																

Registers vary in terms of scope of disclosure requirements. Ireland, Canada, and Chile appear to be the most open and transparency registers, tracking who engaged with whom, and also attempting to tackle the tricky question of tracking the legislative footprint – that is, attempting to follow interest group involvement from agenda-setting to implementation. At the other extreme are Belgium, the Netherlands and UK, which have limited information gathering in terms of who and where interest groups participate in the policy cycle and what interest groups request.

Regulatory capability in Figure 2, shows the greatest variation in take-up and perhaps the greatest opportunity for policy transfer and establishment of best practice via international organisations such as the OECD. While most transparency registers are obligatory – the definition of interest groups and who counts as a regulated target for lobbying continue to vary. Most transparency registers are also constrained by their ability to cross reference with public procurement financing and political financing. Moreover, when inappropriate activity is observed, fire alarm and whistleblowing mechanisms have only been established in a few jurisdictions.

Figure 2. Regulatory Capability

	EU	A	AUS	BE	CAN	CH	FR	DE	GR	EIR E	SL	LT	NL	USA	UK	PL
Obligatory registration																
Code of Conduct																
Cross-references with political financing																
Cross-references with public procurement data																
Interinstitutional register																
Provides whistleblowing option																

Interoperability in Figure 3 provides opportunities to improve the functioning of transparency registers and reduces venue shopping by interest groups and information asymmetry between policymakers and lobbyists. We observe a different approach to how openness and interoperability are treated by registers. Significantly, across most interoperability-indicators registers seem to underperform. Thus, even systems that are examples of performance, see for example Chile or Canada, show limited cooperation with regulators outside of their jurisdiction. Overall, this underscores the need for further work in this area across the board.

Figure 3. Interoperability

	EU	A	AUS	BE	CAN	CH	FR	DE	GR	EIR E	SL	LT	NL	USA	UK	PL
Coordinates with regulators within jurisdiction																
Coordinates with regulators outside of jurisdiction																
3d party contributions/ participation																
Is built with open-by-default principle																

Adapted from Katsaitis 2024

Introduction

1. Arden Strategies is a consultant lobbying firm registered with the Office of the Registrar of Consultant Lobbyists (ORCL).
2. Done properly, consultant lobbying is an important way of ensuring public policy drives economic growth in the UK. When the UK's employers and businesses engage constructively with government, the whole country benefits. Business can help offer the practical expertise, the on-the-ground insight, and the thinking that can help governments turn good intentions into sound policy. Well-regulated, transparent lobbying supports this.
3. In our submission we suggest substantial improvements for consultant lobbying rules in the UK, making recommendations across four areas.

More power for the Registrar

4. Currently, the Registrar does not operate its own independent code of conduct. The ORCL should establish a code of conduct to which registrants are required to adhere. This code should be independent of third-party commercial interests.
5. Responses to breaches of that code should include a restriction on the ability of the company to practise lobbying.
6. As a minimum, the code of conduct should focus on behaviours, practices, and enforcement.

Greater transparency

7. The guiding principle for determining which communications must be registered should be greater transparency about who is lobbying government. The requirement to register communications should be expanded to include directors, director generals and special advisers.
8. Current exemptions that do not support this principle should also be removed. The requirement that only VAT registered consultant lobbying firms are registered should be brought to an end. All consultant lobbying should be registered regardless of the VAT status of the company undertaking the lobbying.
9. The current incidental exemption for companies that are not primarily consultant lobbyists, but who nonetheless effectively engage in consultant lobbying, should be removed.
10. Regardless of the nature of the business or organisation that conducts consultant lobbying, that activity should be registered. Organisations lobbying government on their members' behalf are undertaking many of the same functions as a traditional public affairs firm and similarly, their lobbying should be registerable. Likewise, the Commission should consider whether think tanks providing research papers and reports for paying clients aimed at influencing government policy should be included if the incidental exemption were to be removed.

Consultant lobbying firms employing serving Peers

11. The rules on Members of the House of Lords working for consultant lobbying firms must change. Currently, Peers may be employed by consultant lobbying firms but according to the code of conduct for Members of the House of Lords, they may not offer "parliamentary advice or services to clients, directly and indirectly."

12. Serious consideration must be given to introducing a blanket ban on consultant lobbying firms from employing Peers, even in non-lobbying roles. As an alternative to a blanket ban, the Commission may wish to recommend that Peers take a leave of absence from the Lords if they wish to be employed by consultant lobbying firms, including in non-lobbying roles. If the Commission is not minded to make this recommendation, other action should be taken given there is currently insufficient accountability. A new system should be introduced where it is for individual Peers to certify their adherence to the code of conduct for Members of the House of Lords. Peers should be required to provide a regular written declaration to House of Lords authorities that they have adhered to the rules requiring that they do not offer “parliamentary advice or services to clients, directly and indirectly.”

Politicians covered by consultant lobbying rules

13. The Commission should consider whether an additional group of politicians should be included within the scope of registerable consultant lobbying. It may make sense that the Shadow Cabinet of the party that forms the Official Opposition is considered within the scope of lobbying rules for the period that can fairly be considered as their active manifesto preparation period.
14. This period could commence at the beginning of the fifth year of any Parliament. In the absence of a fixed-term Parliament there is no guarantee that a Parliament will run its full five-year term. In those circumstances there may be additional timeframes that could be considered, such as the regulated period of a General Election campaign. The Commission may wish to consider whether this recommendation would extend to the leaders of all major parties during their manifesto-formation period in advance of a General Election.

Question 1 Response

15. The guiding principle for determining which communications must be registered should be greater transparency about who is lobbying government.
16. The requirement to register communications should be expanded to include directors, director generals and special advisers.
17. It may make sense that the Shadow Cabinet of the party that forms the Official Opposition is considered within the scope of lobbying rules for the period that can fairly be considered as their active manifesto preparation period.
18. This period should commence at the beginning of the fifth year of any Parliament. In the absence of a fixed-term Parliament there is no guarantee that a Parliament will run its full five-year term. In those circumstances there may be additional timeframes that could be considered, such as the regulated period of a General Election campaign.
19. The Commission may wish to consider whether this recommendation would extend to the leaders of all major parties during their manifesto-formation period in advance of an election.

Question 2 Response

20. Current exemptions that do not support this principle should also be removed. The requirement that only VAT registered consultant lobbying firms are registered should be brought to an end. All consultant lobbying should be registered regardless of the VAT status of the company undertaking the lobbying.

Question 3 Response

21. As well as recording the organisation on whose behalf lobbying activity has been undertaken (the status quo), records in the Register should also show who was lobbied, when they were lobbied, and the topic of the lobbying activity.

Question 4 Response

22. The current incidental exemption for companies that are not primarily consultant lobbyists, but who nonetheless effectively engage in consultant lobbying, should be removed.
23. Regardless of the nature of the business or organisation that conducts consultant lobbying, that activity should be registered. Organisations lobbying government on their members' behalf are undertaking many of the same functions as a traditional public affairs firm and similarly, their lobbying should be registerable. Likewise, the Commission should consider whether think tanks providing research papers and reports for paying clients aimed at influencing government policy should be included if the incidental exemption were to be removed.

Question 5 Response

24. Organisations lobbying government on their members' behalf are undertaking many of the same functions as a traditional public affairs firm and similarly, their lobbying should be registerable.
25. The Commission should consider whether think tanks providing research papers and reports for paying clients aimed at influencing government policy should be included if the incidental exemption were to be removed.

Question 6 Response

26. The ability of the Registrar to levy fines should be expanded so that fines are more punitive. The Review may wish to recommend a consultation on what those new fines should be.
27. The ORCL should establish a code of conduct to which registrants are required to adhere. This code should be independent of third-party commercial interests.
28. Responses to breaches of that code should include a restriction on the ability of the company to practise lobbying.

Question 7 Response

29. Expanding or replacing the current register to ensure greater transparency and consistency of registerable activity would produce benefits that outweigh any increase in administrative burden.
30. Expanding the register to include date, type of activity, the subject matter of the lobbying would require limited additional resource.

Question 8 Response

31. Updates to the rules on this data should ensure it is easily accessible to the public and as transparent as possible.
32. The data required for these declarations should match the information required for consultant lobbyists when registering any lobbying activity.
33. Rules on the forms of communications included must keep pace with the changes in the channels available.

- 34. Quarterly submissions strike a reasonable balance between timely information transparency and administrative resource required to report the information.
- 35. A searchable, centralised database of departmental declarations would increase transparency further.

Question 9 Response

- 36. We interpret this question as being a second part to question 8, i.e. it refers to information published by the Government, not by consultant lobbyists.
- 37. The data required for these declarations should match the information required for consultant lobbyists when registering any lobbying activity.
- 38. Rules on the forms of communications included must keep pace with the changes in the channels available.
- 39. Quarterly submissions strike a reasonable balance between timely information transparency and administrative resource required to report the information.
- 40. A searchable, centralised database of departmental declarations would increase transparency further.

Question 11 Response

- 41. Consultant lobbying is registerable regardless of the channel, location or medium used, and this should be maintained.
- 42. To further increase transparency, as well as recording the organisation on whose behalf lobbying activity has been undertaken (the status quo), records in the Register should also show who was lobbied, when they were lobbied, and the subject of the lobbying activity.

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

**Submitted by: The Chartered Institute of Public Relations (CIPR)
April 2026**

Introduction

The Chartered Institute of Public Relations (CIPR) is the world's only Royal Chartered body for public relations practitioners representing over 11,500 professionals, including lobbyists. We have been campaigning for lobbying reform since the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 came into force, through our Lobbying for Good Lobbying campaign. Our evidence base includes published research reports, international comparisons and industry surveys (see Appendix).

The findings are stark: the current regime is not fit for purpose, it is an international outlier, and it commands almost no confidence from those working within it. This review must deliver the meaningful reform that has been missing for more than a decade.

Consultant lobbyists are required to register lobbying of Ministers and permanent secretaries. Should this requirement be expanded to include communications made to others, such as special advisers, director generals and directors. If yes, which groups should be included and why?

Yes. The current scope does not reflect how political influence works in practice. Policy is shaped long before a final ministerial decision is taken and the CIPR believes the regime must be expanded to include office holders who influence policy, including special advisers and senior civil servants. There is a strong argument to be made for including the lobbying of all MPs and peers and, indeed, industry polling conducted by the Institute reflects this position.

Reforms of this nature are straightforward. Expanding the register to include lobbying of special advisers, for example, can be achieved through a Statutory Instrument and should be done without delay (as granted in Part 1, section 2, sub-section 5 of the Lobbying Act). Widening the scope further to include MPs and peers would require primary legislation, and as our comparative research makes clear, this would bring us into line with comparable democracies.

Across eight comparable democracies we analysed, the UK has the narrowest register in scope.

Westminster only requires the registration of lobbying of Ministers and permanent secretaries. Every other jurisdiction we examined requires significantly more, covering parliamentarians or their equivalents, special advisers, senior civil servants and in many cases local government officials too. If that standard is considered essential to transparency in other western democracies, it is hard to argue why the UK should be any different.

Should the current requirement for only those consultant lobbyists who are VAT registered to comply with the regulations, be removed? Should a de-minimis provision be set and if so, what should the threshold be?

Yes. The VAT threshold should be removed for two reasons;

First, a lobbyist's turnover has no bearing on their influence, yet under the current rules it determines whether they need to register at all. This means a well-connected individual or small consultancy operating below the VAT threshold can lobby Ministers on behalf of paying clients without any obligation to declare it, even where the lobbying itself is substantial.

Second, and arguably more serious, any business located outside the UK that is not VAT registered has no obligation to register its lobbying activity at all. This means foreign commercial interests can lobby Ministers and senior officials in Westminster with no public record of that activity whatsoever, leading to serious questions over undue foreign influence on our politics. (NOTE: The recent Foreign Influence Registration Scheme (FIRS) only covers lobbying that is "directed by any foreign power".)

Harry Rich, who served as the Registrar of Consultant Lobbyists for seven years until September 2025, told the Public Administration and Constitutional Affairs Committee in October 2025 that the VAT threshold "excludes some quite significant lobbyists" and that the problem it creates for non-UK businesses is a particular concern. He concluded that using VAT registration as the mechanism for determining who must comply with the rules simply does not make sense.

In principle, the CIPR is opposed to any de-minimis provision.

Our research showed that in 20% of investigations into unregistered lobbying conducted by ORCL, they found that the VAT registration of the company in question exempted it from signing the Register.

What information should consultant lobbyists be required to record in the Register about their lobbying activity (for example, date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place)?

At a minimum, the Register should capture: the date of the communication; who carried out the lobbying; on whose behalf; who was lobbied; and the subject matter, with descriptions specific enough to be meaningful and searchable. Under the current rules, the only requirement is to record which clients a lobbyist has acted for.

Canada's register provides a useful model of what good practice looks like. It requires lobbyists to disclose the specific subject matter of communications, the institutions and officials contacted, and the techniques used, all updated on a regular basis. That level of detail provides genuine transparency and can be implemented through secondary legislation.

This is also something backed by professionals across the sector. Our industry survey found that 85% of respondents believe the public should have access to information about meetings between lobbyists and politicians, yet the current register falls far short of providing this.

Is the 'incidental lobbying' exemption to the requirement to register as a consultant lobbyist clear and reasonable? Are any amendments required, and if so, what changes are needed and why?

It is not clear or reasonable. The former Registrar himself described the incidental lobbying exemption as potentially "the most contentious, vague and problematic drafting in the legislation," and said he sought legal advice on it "two or three times" during his seven years as Registrar. He concluded he had "not yet met anybody who understands what it means".

Our research found that in eight per cent of ORCL investigations into unregistered lobbying, they found no registration was needed on account of the incidental lobbying exemption.

In practice the exemption allows a wide range of organisations, including law firms, consultancies, trade associations and advisory businesses, to undertake substantial lobbying activity without registering, on the basis that lobbying is not their primary operation as a business. This is a significant gap. Many of the most influential organisations engaging with the government are not primarily lobbying firms, but that does not make their engagement with Ministers and officials any less deliberate or impactful.

As such, the CIPR believes the exemption should be removed so that all organisations, regardless of their primary business activity, must register any lobbying activity they undertake.

Is there merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government, regardless of who is doing it? If so, what are the pros and cons? Are there ways of ensuring that any requirement to register is not disproportionately burdensome for smaller businesses, charities and think tanks?

Yes. This is the CIPR's central recommendation. The current system treats lobbying as a job title rather than an activity. That is the root of its failure. Transparency International estimated just 4% of lobbying activity is captured by the register, while consultant lobbyists make up only around 20% of UK lobbyists. Those working in-house at banks, law firms, trade unions, think tanks and charities can communicate with Ministers daily without being able to register at all.

The international comparison is damning. As of March 2025, Westminster's register covered just 249 organisations, compared with 7,957 in Canada, 17,067 in the EU and 13,699 in the US. Even Scotland's Holyrood register covers over 1,400 organisations despite serving a population of only 5.5 million. Westminster is not merely lagging, it is majorly out of step with most comparable democratic systems.

The industry supports reform emphatically. Our 2024 survey found 86% of professionals want greater transparency around who is lobbying Westminster politicians, 83% support expanding the register to cover

all lobbyists, and 83% support a statutory code of conduct. Only 2% believed ORCL had improved transparency a lot.

This approach would benefit:

- the public who would get a true picture of who is seeking to influence our politics;
- parliamentarians as they will be able to demonstrate that they are engaging with a wide range of voices on a topic; and
- the lobbying industry as greater access will be encouraged as Parliamentarians will be held to account for who they are meeting as well as who they are not meeting.

The main argument against a broader register is the administrative burden it would place on smaller organisations, charities and think tanks that engage with the government as part of their normal activity rather than as paid lobbyists. While we understand these concerns, we do not think it is a reason to maintain the status quo and most organisations engaged in lobbying will be maintaining their own records already.

A clear and narrow definition of what counts as registrable lobbying activity, accompanied by a free and simple digital registration tool would go a long way to addressing the proportionality question. Ireland and Canada both demonstrate that broad registers can work without placing unreasonable burdens on civil society organisations. In Ireland registration is free; in Canada the system is widely described by those using it as straightforward and not unduly onerous while also contributing to a greater understanding of their work from the public and business stakeholders. With relatively small investment in a new, easy-to-use digital registration tool, there is no reason the UK could not achieve the same.

Are the Registrar of Consultant Lobbyists' enforcement powers sufficient to deter non-compliance? If not, what is needed?

No. The issue is not primarily the powers available to ORCL, but how little activity the Lobbying Act requires it to enforce against. Between June 2019 and February 2024, ORCL conducted 53 investigations into suspected unregistered lobbying. In 96% of cases it found no requirement to act, not because no lobbying occurred, but because the Act's exemptions placed it out of scope. The David Cameron-Greensill case was the most prominent example. It generated significant public scandal, and yet ORCL was unable to find a breach or impose a penalty.

The priority therefore should be to fix the underlying legislation. A broader register that captures more lobbying activity would give a registrar far more to work with. Alongside that, sanctions should be reviewed to ensure they are sufficient to change behaviour, and could include consequences beyond financial penalties, such as bans from government buildings, which in other jurisdictions have proven an effective reputational deterrent.

What would be the resource implications of a) expanding the register and as it stands and b) replacing the current register with a new register that captures all lobbying of government? How could these resource implications be mitigated?

The resource implications of expanding or replacing the register are likely to be modest in the long run, though some upfront investment would be needed. Building or upgrading the digital infrastructure to handle a broader register, developing clear guidance for new registrants, and ensuring adequate staffing for compliance and oversight would all require initial expenditure. However, once established, a well-designed digital registration system should be largely self-sustaining and relatively low cost to operate. It is also worth noting that the current system is not without costs of its own. The narrowness of the register means ORCL spends considerable time and resources on investigations that go nowhere because of exemptions, and on cross-referencing departmental transparency data from different sources because there is no single searchable location. A better-designed system would improve efficiency.

The government publishes transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials. How can the quality, timeliness and accessibility of the data be enhanced?

The current transparency data is too often late, inconsistent and difficult to access. Descriptions of meetings are often very vague as to be meaningless. Entries such as "meeting to discuss energy" or "introductory discussion" tell the public nothing about the lobbying which took place. This needs to change.

At a minimum, transparency returns should be published to a consistent timetable across all departments, in a single searchable format, with standardised data fields that are specific enough to identify the policy area and the commercial or other interests involved. At present, the scattered and inconsistent nature of the data makes it almost impossible to build a clear picture of who is engaging with the government and on what basis.

It is also worth questioning why this information needs to exist in two separate places. Consultant lobbyists record their activity on the lobbying register while Ministers and officials record meetings in departmental transparency returns. The result is two incomplete datasets that are difficult to reconcile and between them still fail to capture the full picture. A single unified register of lobbying activity would be simpler, more transparent and far easier for the public to use.

For meetings with Ministers, special advisers and senior officials, does the transparency data include the right information about the following:

- a. The recipient(s) of the lobbying.**
- b. The type of information and level of detail that is reported.**
- c. The forms of communications that should be included.**
- d. When and how the transparency data is published.**

No. The current data falls short on all four counts.

- a. On recipients, entries often fail to specify the role of the individual met, making it impossible to assess the significance of the interaction.
- b. On detail, entries routinely rely on generic descriptions that tell the public nothing meaningful about what was discussed or why.
- c. On forms of communication, informal channels such as WhatsApp are effectively invisible even where they relate to official business.
- d. On publication, timelines vary across departments and data is scattered and unsearchable. Returns should be published to a regular timetable in a single searchable location with consistent data fields across all departments and office-holders.

What oversight mechanism should be put in place for ensuring adherence with the requirements for government transparency returns and what should the consequences be for non-compliance?

For such a system to work, those with a responsibility to provide oversight will require sufficient powers of enforcement to support both the administrative and investigative functions. This is currently lacking.

How can any lobbying that takes place through non-corporate communications channels (eg. WhatsApp and other instant messaging platforms) or non-official settings (such as party conferences, non-official meetings) be made transparent?

The most effective way to ensure lobbying through non-corporate channels and non-official settings is transparent is to require that any communication between government and outside interests on matters of official business takes place through official channels and creates a proper, retainable record. This does not mean banning informal tools altogether, but where Ministers, special advisers or senior officials are engaging with lobbyists or outside interests, they should be required to do so in a way that can be logged and disclosed, and the use of disappearing messages in any such communications should be prohibited.

Have you tried reconciling the Register of Consultant Lobbyists with the Government's transparency returns on external meetings? If so, how easy or difficult was this to do?

There is no reconciliation to be done. They are two different data sets that fail to complement each other or create a complete picture of lobbying. One is a list of consultant lobbyists and, if you click further, a list of their clients. The 24 government departments each publish a chronological list of meetings.

What are the strengths and weaknesses of the current system for considering applications under the Government's Business Appointment Rules?

The rules provide a reasonable procedural framework but are undermined by the absence of meaningful sanctions, weak oversight, and a culture of self-regulation that can be easily exploited.

Ultimately, the rules exist to prevent unfair advantages for those who have left office or senior positions in Whitehall. It is this perceived advantage that needs to be addressed through transparency and accountability that can be achieved through a wider and comprehensive register of all lobbying activity.

What principles should guide the Government when reviewing the Business Appointment Rules?

NA

What principles should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort?

NA

What are the strengths and weaknesses of the current arrangements for the declaration and publication of financial interests for Ministers and senior government officials?

NA

What improvements can be made to the current system for the declaration and publication of financial interests for Ministers and senior government officials?

NA

Are there different arrangements in place in other countries for the declaration and publication of financial interests for Ministers and senior government officials that should be considered for implementation in the UK?

NA

What arrangements in place for the declaration and publication of financial interests of directors of large corporations could be adopted for use within government?

NA

Appendix: CIPR Evidence Base

The following publications inform this submission:

1. No Rules Britannia? The UK's lobbying laws exposed on the global stage (CIPR, April 2025).
https://www.cipr.co.uk/common/Uploaded%20files/Policy/Lobbying/CIPR_No_Rules_Britannia.pdf
2. Failure by Design: the Lobbying Act at Ten (CIPR, June 2024).
https://www.cipr.co.uk/common/Uploaded%20files/Our%20work/POLICY/CIPR_Failure_by_Design_Lobbying_Act_at_Ten.pdf
3. CIPR Survey of of UK lobbyists and public relations professionals (CIPR, February 2024).
<https://newsroom.cipr.co.uk/nearly-nine-in-ten-uk-lobbyists-and-prs-say-that-greater-lobbying-transparency-is-needed/#:~:text=According%20to%20a%20poll%20by%20the%20Chartered,standards%20of%20behavior%20for%20those%20lobbying%20politicians>
4. The Never-Ending Scandal: an investigation into Parliament's view of lobbying reform (CIPR, April 2023).
https://www.cipr.co.uk/common/Uploaded%20files/Our%20work/UK%20lobbying/CIPR_Never_Ending_Scandal_Lobbying%20Report.pdf
5. Transparency International UK, submission to the post-legislative review of Part 1 of the Lobbying Act 2014 (2021).
<https://www.transparency.org.uk/sites/default/files/2025-11/Post-legislative%20review%20of%20Part%201%20of%20the%20Lobbying%20Act%202014%20%20FINAL.pdf>

6. Harry Rich, oral evidence to the Public Administration and Constitutional Affairs Committee, The work of the Registrar of Consultant Lobbyists, HC 1346, 14 October 2025.

<https://committees.parliament.uk/oralevidence/16521/pdf/>

Further information

[CIPR's Guide to Professional Lobbying](#)

EIC Lobbying, Disclosure and Access to Government Review

Response from Network Rail

1. This response represents the views of Network Rail. Network Rail is a Non-Departmental Public Body, sponsored by the Department for Transport. It owns, operates, maintains and upgrades the railway network in Great Britain, working with train operators to deliver passenger and freight services.
2. This submission is being made to address engagement of elected representatives and officials by public bodies, and the potential to extend registration and disclosure to public bodies.
3. Network Rail has a national public affairs & policy function and public affairs staff in each of the 14 rail routes across the country. The function of the teams is to provide information to elected and government bodies at a national, devolved and local level on railway services, projects and issues which impact millions of rail users and lineside neighbours.
4. As a public body, in receipt of significant taxpayer funding, it is a clear obligation of the Principles of Public Life and the Code of Conduct for Board Members of Public Bodies that we are fully accountable to the public and their elected representatives for our activity. Network Rail fully accepts and agrees with this responsibility, ensuring that accurate and timely responses are provided to questions and issues raised. This also means we proactively engage with the public, elected representatives and government officials on changes to railway services, construction projects and other upgrades that offer benefits as well as create potential disruptive impacts to rail users, lineside neighbours and the public.
5. Network Rail also fully complies with the requirement to be impartial in our activity, to be even-handed with all political parties, and to not engage in political activity or make political statements. Nevertheless, with operations and property in almost every constituency in Great Britain, our activity interacts with politics at many levels, and has to reflect how different national, devolved and local governments exercise legitimate powers and influence on railway activity.
6. As a public monopoly, Network Rail has expertise and direct experience of technical, operational and financial issues that cannot be fully provided by other bodies. Our duty must then be to inform and engage with stakeholders on options for services or projects in an open and transparent way, for example, advising where a proposed project from a local authority or campaign may not fully address a transport, technical or financial requirement. Network Rail always reflects government policy of the day, but many specific technical issues are not directly covered by policy.
7. This situation, on one hand an obligation to be fully open and accountable while on the other hand, not seeking to influence political decisions, can create some ambiguous or conflicting situations. Providing clear technical advice on the effectiveness of a proposal is clearly in the public interest and serves good political decision making. However, those taking other views can regard this as unhelpful

influence. We ensure that our advice is based on technical expertise and clear evidence, and that while we have a legitimate requirement to translate government policy into clear advice and proposals, that this is not an independent or self-motivated agenda.

8. It is therefore essential that Network Rail engages effectively with political leaders, elected representatives and officials. We must inform our work with a full understanding of the transport, planning, finance and other relevant policy choices that impact our activity and the services we provide. Likewise, it is imperative that we explain and consult on our plans and activity fully with those who fund and shape our work, and those who represent areas impacted. This activity can include promotional activity for a service or project delivered as part of government policy. Indeed, we would be failing in our observance of public body guidance and our wider duty as a service provider funded by the taxpayer were we not to do this. Public affairs activity is not only legitimate, but also an essential part of being a responsive public service and fulfilling the expectation of guidance for public bodies.
9. Yet recent debates on political engagement imply that public bodies are either operating under the radar or have an advantage over others seeking to engage politicians. It is more accurate to say that public bodies operate in a parallel system, with accountabilities and requirements for transparency that are not replicated in other organisations. As an arms-length body delivering government policy, Network Rail has continuous interaction with Ministers and officials as a required part of our governance. Information on policy and project development is routinely shared, within the guidelines of the Civil Service Code and our Framework Agreement. It is inaccurate to describe this as 'access' or 'lobbying' in the same terms as a private company or a charity.
10. Network Rail also fully complies with government rules which prevent us from using lobbying firms to engage politicians or officials on our behalf. Network Rail always arranges and represents itself in any meetings or other engagements with elected representatives and officials. We do not attend party conferences or any private or paid-for political party events. We do not allow political party activity in our stations or on any railway land. We do not make any donations to political parties or pay for any services, events or other activity undertaken by political parties. We comply fully with pre-election rules for national, devolved and local elections to avoid any implication of partiality.
11. Network Rail, as with other public bodies, is held to account through its Board, and is subject to direction and guidance from the Secretary of State as our shareholder, and as described in statute and regulation. We are subject to Freedom of Information laws, to providing government with answers to Parliamentary Questions and questions asked to Ministers in correspondence or other engagement. We are required to attend Parliamentary select committees, and equivalent scrutiny in the London Assembly, Scottish Parliament and Welsh Senedd. We provide accurate and timely responses to correspondence and queries from elected members and the public, and have a clear, structured and compliant process for complaints.
12. Any system which might require staff of public bodies to join a lobbying register must make clear who is to be included. Interaction and information sharing with

Ministers and officials is part of the governance and daily business of government, informing policy, project and funding decisions as an arms-length expert delivery body of government. This does not align with the definition of lobbying.

13. For engagement outside of government, such as meeting and sharing information with elected representatives and officials from other authorities, categorising this as lobbying gives an inaccurate impression of undue influence and separate agendas. It is not evident, for example, that meeting with an MP, Mayor or local councillor to discuss or explain a change to railway services or the redevelopment of a station, is to be counted as lobbying. Explaining how we, as a public delivery body, are undertaking specific works in line with broader government policy (which must necessarily be understood and informed by representatives and their constituents), is an essential and legitimate task for a public body. It is not analogous to an individual company, developer or charity promoting their own agenda, however legitimate, or drawing comparisons with their competitors or others in their sector.
14. Network Rail fully supports transparency and accountability, operating under the rules set by government for public bodies. Any regime for registration or disclosure that includes public bodies must make clear what activity and intent is described and must avoid any false equivalence between the open engagement expected of public bodies, and lobbying activity undertaken by private companies, charities, campaigns and other non-public bodies. It may be that a separate category or label is applied to public bodies to make this important distinction clear and may include specific assurance of internal policies and practices to comply with public body rules and guidance.
15. Network Rail also supports the value of lobbying and political engagement undertaken by non-public bodies. With a large supply chain and partnerships with many public, private and voluntary organisations, it is evident that responsible lobbying leads to better decision making, offering technical expertise, local knowledge and the lived experience of the public which government does not always have access to elsewhere. It is the responsibility of all sides to ensure this is transparent and compliant, and to demonstrate how it leads to better decisions on services, investment and policy to improve public understanding and confidence.

Written evidence submitted by Professor Anne Cronin

Introduction

1.1 Anne Cronin is Professor of Cultural Sociology at Lancaster University. I am responding as an individual rather than as a representative of Lancaster University.

1.2 My response is based on data from a recently completed research project that analyses the practices of lobbying in Parliament and the significance of transparency in society. The project analyses lobbying from the perspective of those who lobby (Public Affairs practitioners based both in agencies and in-house across a range of organisations including Non-Profits) and those who are lobbied (MPs and former MPs/Ministers and Peers). This qualitative research project comprised a total of 30 interviews lasting between 30 and 80 minutes each. This research is not yet published. Parameters: further research is needed with sitting MPs as I was able to interview only one current MP due to their time pressures. However, I was able to interview a significant number of Peers and also former MPs and Ministers alongside lobbyists (Public Affairs practitioners).

1.3 I have considerable prior experience of researching the significance of transparency measures and the Public Relations industry (Public Affairs or lobbying is a specialised subsection of this industry). Publications related to transparency and Public Relations can be viewed here: <https://www.lancaster.ac.uk/arts/people/anne-cronin>

Response to call

2.1 My response to the call for evidence is based on key themes that emerged from my interviewees' experiences of lobbying and being lobbied. I include selected interviewee quotations for illustrative purposes. Responses listed here are relevant to several of the questions.

2.2 *QUESTION 1 Consultant lobbyists are required to register lobbying of Ministers and permanent secretaries. Should this requirement be expanded to include communications*

made to others, such as special advisers, director generals and directors. If yes, which groups should be included and why?

Yes. My data show that Public Affairs (lobbying) practitioners target special advisers and staffers extensively because they are viewed as a valuable route to accessing and influencing decision-makers (MPs, Ministers, chairs of committees). As one lobbyist in my study noted, 'once you know a staffer, then you've got a network to other staffers'. This creates a network of influence that is not captured by transparency measures. Civil servants are also targeted as they are understood to be powerful intermediaries or gatekeepers who can shape decision-makers' attitude to lobbying approaches from specific organisations.

2.3 QUESTION 3 What information should consultant lobbyists be required to record in the Register about their lobbying activity (for example, date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place)?

All lobbyists should include full details of their lobbying activities, as outlined in the question. However, simply adding further detail to reports of lobbying activities will not necessarily enhance democratic accountability (for which transparency measures are surely designed). In order to boost both transparency and accountability, there should be a requirement for organisations which lobby to declare their annual spending on lobbying/Public Affairs work. This would cast light on what is perceived by the general public and the media to be the 'shady business' of well-funded persuasion and influence. It may go some way to shoring up public trust in parliamentary processes.

2.4 QUESTION 5 Is there merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government, regardless of who is doing it? If so, what are the pros and cons? Are there ways of ensuring that any requirement to register is not disproportionately burdensome for smaller businesses, charities and think tanks?

There is considerable merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government. The volume of lobbying is immense, as

a former MP described: 'I was lobbied all day every day for 23 years' and there is a general sense among lobbyists that the current legislation and Register 'isn't fit for purpose', as one noted. Furthermore, my data show that many lobbyists are unclear about what activities and details should be included on the Register.

2.5 My data reveal that there is a considerable amount of lobbying that is not captured by the current legislation and Register. For instance, lobbying at party conferences is intense and lobbying via social media is widespread. Both these forms of lobbying escape scrutiny. Additionally, the role of All Party Parliamentary Groups (APPGs) should be monitored as a form of lobbying, as they are widely used by lobbyists as useful interfaces for networking and influence.

2.6 The benefits of capturing all these forms of lobbying far outweigh any administrative burden: widening the scope of the material that is understood, and captured, as lobbying would support transparency measures, and the judicious use of technology would minimize the administrative work involved. The UK Public Relations industry trade bodies, the Chartered Institute of Public Relations (CIPR) and the Public Relations and Communications Association (PRCA) (which encompass Public Affairs/lobbying) could shoulder some of the administrative requirements.

2.7 It is important to note that lobbying plays an essential role in democracy as it embodies the right of any individual or group to represent its interests to government. It can also provide crucial information to decision-makers such as MPs and Peers, as this former MP noted: '[it's] just a good way of getting information on stuff and informing yourself about things you don't know about because the problem being an MP... [is that] you actually have to get an absolutely amazing spread of understanding and knowledge about a vast number different things'. However, several lobbyists and one former Junior Minister in my study noted that some MPs do not recognise when they are being lobbied.

2.8 General recommendation: there should be regularly updated training provided for MPs, Peers, advisors and staffers on how to recognise certain forms of lobbying – including from foreign actors – and how to deal with it appropriately.

2.9 QUESTION 8 The government publishes transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials. How can the quality, timeliness and accessibility of the data be enhanced?

Lobbyists consider hospitality and gifting a very valuable form of ‘soft power’ which builds relationships with decision-makers and smooths lobbyists’ path to influencing policy (or ‘policy capture’, as they term it). In sociological studies, this form of gifting and hospitality has been shown to create bonds of reciprocity and indebtedness which can be powerful and sustained.

2.10 Drawing on former MPs’ responses, it appears that the principle of gifting and hospitality is viewed negatively by their constituents who consider it an unwarranted ‘perk’ at best and at worst a form of corruption.

2.11 However, a more detailed and thorough process of registering gifts and hospitality - which would reveal the full extent of the practice - may have an unintended and detrimental impact as it may further compound public distrust of the parliamentary system and of parliamentarians. Further, the significant time lag between registering and publishing information on gifts and hospitality means that its value is minimized. One senior political advisor described the impact of this delay: ‘So that then really takes the heat out of it, because.... so much time has passed’.

2.12 It may be more appropriate to ban gifting and hospitality entirely as such practices are not a necessary element of relations between decision-makers and those who seek influence through lobbying. The potentially beneficial provision of information by lobbyists to decision-makers as part of democratic debate and representation can be achieved without gifting and hospitality.

Ethics and Integrity Commission Review of Lobbying, Disclosure and Access to Government April 2026

Submission from Robert Hazell, Professor of Government and the Constitution, Sir Peter Riddell, Honorary Professor, and Lisa James, Senior Research Fellow, UCL Constitution Unit.

The Constitution Unit

1.1 The Constitution Unit is a research centre based in the UCL Department of Political Science. We conduct timely, rigorous, independent research into constitutional change and the reform of political institutions. Since our foundation in 1995, the Unit's research has had significant real world impact. Robert Hazell and Peter Riddell's work on preparing for a hung Parliament and changes of government led the UK government to introduce the Cabinet Manual in 2010. More recently, their 2024 report *Trust in Public Life: Restoring the Role of Constitutional Watchdogs* proposed that the Ethics and Integrity Commission should be created by re-branding and strengthening the Committee on Standards in Public Life.

Introduction and Summary

1.2 Lobbying of government by outside interests is a legitimate activity and should not be discouraged. But transparency is crucial to establish who is lobbying and about what. The key is the interaction between the register of consultant lobbyists and the requirements for ministers, special advisers and senior officials to declare meetings with outside groups. On the outside, there needs to be a strengthening of the Register of Lobbyists; on the inside, strengthening the transparency requirements in government. The two should be made more consistent, and dovetail with each other in their requirements.

1.3 The Civil Service Commission and the Independent Adviser on Ministerial Standards have both made a strong start in administering the Business Appointment Rules. But, like ACOBA before them, they have few powers to deal with non-compliance apart from naming and shaming offenders, some of whom are impervious to shaming. Only legislation can cure this defect. Legislation is also required to strengthen the regulatory regime for lobbyists.

Regulation of Lobbying

Weakness of the Lobbying Act 2014

2.1 The Lobbying Act 2014 has never been particularly effective. It stems from a commitment in the Conservative-Lib Dem coalition agreement to 'tackle lobbying through introducing a statutory register of lobbyists'. Nothing was done until a lobbying scandal in 2013 forced some action. The Conservatives wanted to do nothing; the Lib Dems to tick off another commitment. The resulting compromise was a very weak piece of legislation.

2.2 Because political debate focused on the other parts of the bill (on third party campaigning by NGOs and trade unions), the proposals on lobbying went largely unscrutinised. The main exception was the Commons Political and Constitutional Reform Committee. In a series of critical reports in 2013 and 2014, the committee urged the government to extend the bill to include in-house lobbyists, to expand the list of people lobbied to include senior civil servants and special advisers, and to extend the information to be recorded to include the subject matter and purpose of the lobbying. These criticisms have been repeated ever since. For the Lobbying Act to be effective, it needs to be strengthened in the following ways.

Extend the regulatory regime to in house lobbyists

2.3 The fiercest critics of the weakness of the legislation have been representatives of consultant lobbying, seeking to create a level playing field. They estimate that only 4 per cent of lobbying activity is caught by the Lobbying Act, and they have consistently argued for extending the registration requirement to in house lobbyists. To give just one example, David Cameron's activities on behalf of Greensill did not count as registrable lobbying, because as an employee of Greensill he was an in-house lobbyist. At the time his lobbying was behind the scenes: it only emerged after the collapse of Greensill at the subsequent inquiry. Much of the most significant lobbying for government contracts is done in-house by leading international companies in, for example, the big tech and defence sectors.

Extend reporting requirements to Senior Civil Servants and Special Advisers

2.4 The Lobbying Act only requires lobbyists to report their contacts with Ministers and Permanent Secretaries. This requirement should be expanded to include Special Advisers; and to a much wider range of civil servants. Lobbyists will target those officials at working level responsible for the policy area they are interested in: this can be SCS 1 to 3 or Grade 7s. It would be too burdensome to extend the requirement to Grade 7s; but the requirement should apply to all members of the Senior Civil Service. To ensure consistency all the above should be required to report their contacts with both consultant and in-house lobbying activities in their regular transparency returns.

Expand to include details of who was lobbied, on what, and when

2.5 Consultant lobbyists are required to record on the register the names of any clients paying for lobbying activity in the previous quarter, and names of clients for whom lobbying was done. But the quarterly returns give no indication of who has been lobbied, nor the subject of the lobbying activity. This information, together with the date, could

probably be added by Regulations. This would make for greater transparency; and it would then be much easier to match up against the transparency returns of external meetings held by ministers and senior officials.

End the exemption for ‘incidental lobbying’, and for people below the VAT threshold

2.6 The incidental lobbying exemption is too large a loophole; if anyone is engaged in lobbying, they should register. The exemption for those below the VAT registration threshold (currently £90k) is also too wide, and excludes all overseas lobbyists who will not be registered for VAT in the UK. To avoid an excessive burden the level of fees could be made variable depending on the level of turnover.

Resource implications of expanding the Register

2.7 In 2024-25 there were only 240 consultant lobbyists on the Register. Extending the registration requirement to in-house lobbyists would increase significantly the workload of the Registrar, but should also lead to a significant increase in fees. The office was intended to be self-financing, but in 2024-25 its running costs were £375k, while the fees collected amounted to only £235k: a shortfall of £140k. The Cabinet Office are failing in their duty ‘to ensure that the total paid to the Registrar in charges is sufficient to offset the total of the costs incurred by the Registrar’ (Lobbying Act s22). Working with the CIPR and PRCA, Cabinet Office should be able to forecast the likely level of demand if in-house lobbyists are included, and set the fees accordingly. There should be a sliding scale of fees, so as not to penalise smaller NGOs and charities, but no compunction about raising fees, in particular for larger organisations. The initial registration charge is a mere £12.50, and the annual maintenance charge of £950 a year for remaining on the register has not been increased since 2015. Lobbying can be extremely profitable: David Cameron was reportedly paid over \$1m a year by Greensill for 25 days’ work per year.

Sufficiency of enforcement powers

2.8 Unlike many of the other watchdogs, the Registrar does have effective powers of enforcement, and uses them. 12 notices of intention to issue a civil penalty for non-compliance were issued in 2024-25, the bulk of which resulted in a penalty (maximum £7,500) being issued. In addition it is a criminal offence under s12 of the Act for a person to lobby whilst unregistered, or for a registered person to submit incomplete or inaccurate returns, to file late returns, etc. Prosecutions require the consent of the DPP, but none have been brought; which suggests that the sanction of a civil penalty is sufficient, or alternatively that a criminal prosecution involves too much time and trouble.

Summary of changes requiring legislation

2.9 The following changes recommended could only be made by legislation:

- Extending the regulatory regime to in house lobbyists, by deleting ‘consultant’ throughout, and repealing the exemption in para 4 of Sch 1 to the Lobbying Act 2014;

- Extending the reporting requirements to contacts with senior civil servants, by expanding the definition of lobbying in section 2; and
- Ending the exemption for people below the VAT threshold, and for incidental lobbying, by repealing the VAT exemption in s 2(1)(b), and the exemption for incidental lobbying in Sch 1 para 1.

One of the changes could be made by Regulations:

- Extending the reporting requirements to contacts with Special Advisers, under s 2(5) of the Lobbying Act 2014.

And one of the changes could probably be made by Regulations; but if legislating on other matters, it would be safer to legislate on this also:

- Expanding the reporting requirements to include details of who was lobbied, on what, and when, under the Regulation making power in s 23(2)(b).

Strengthening transparency data of meetings with external organisations

3.1 Registered lobbyists have to declare their communications with senior government officials; ministers and senior officials have to declare their meetings with external organisations. So although they overlap, the external and internal data record different kinds of activity. And their coverage is different: an in-house lobbyist will not be required to register a meeting with a minister, but the minister will be required to record it in the department's transparency returns.

Meeting data to be reported monthly, in a central register

3.2 Meeting data are reported quarterly, and published by individual departments. Meanwhile gift and hospitality data are reported monthly, and published in a central register.¹ This suggests that central publication on a monthly basis should be perfectly possible. The Cabinet Office said it would do this for meeting data in July 2023:

The Cabinet Office is developing a single platform to collate and publish departments' transparency returns. This will provide a single public source of transparency data, replacing the system of separate publications. Following the deployment and adoption of an integrated database, the Government will look to move departments' transparency publications from a quarterly to a monthly basis.²

In November 2024 the government appeared to row back on this, in a Written Answer in the House of Lords:

This Government will introduce a register for ministers' gifts and hospitality bringing publication of ministerial transparency data on a broadly equivalent basis to the parliamentary

¹ The central register can be viewed at <https://www.gov.uk/government/collections/register-of-ministers-gifts-and-hospitality>

² Cabinet Office, *Strengthening Ethics and Integrity in Central Government*, CP 900, July 2023, p5.

register ... Transparency data for ministerial meetings and overseas travel, special advisers and senior officials will continue to be published quarterly as it has been under previous administrations.³

3.3 No reason was given for this apparent abandonment of the previous commitment.

Publication by the Cabinet Office in a central register should help to ensure timeliness and consistency in the quality of the data. Releases should also be provided in a searchable format. At present, someone wishing to understand, for example, contacts between government and a particular company over the course of a year, would need to consult and manually cross-reference a significant number of different documents, published in different places.

Extend reporting requirement to all senior civil servants

3.4 The requirements for recording meetings reflect a limited view of who might be the target of lobbying. At present, permanent secretaries, directors general, financial and commercial directors and the SROs of major projects are required to record meeting data. But civil servants at director and deputy director level are also likely to be the targets of lobbying. Special advisers, meanwhile, are required only to record their meetings with senior media figures. The previous government's objections – in its reply to the 2021 CSPL report – that special advisers are not decision makers ignores their substantial real influence on decisions. This seems a clear gap in the data, given their role in policy, and as ministerial 'gatekeepers'. The reporting requirement should be extended to all senior civil servants, and special advisers should be required to record all meetings with external organisations.

Include fundraisers and meetings at party conferences

3.5 Cabinet Office guidance states that 'Ministers' meetings with external organisations at party conferences will generally be in a political capacity, so there is no need to normally declare these'.⁴ This seems a specious distinction: lobbyists will pay big sums to meet ministers at party conferences, in the hope of influencing government policy, and such meetings should be declared. Likewise with 'meet the minister' fundraising events. When Robert Jenrick as Housing Secretary approved a £1 billion luxury housing development of 1,500 homes on Westferry Road, Isle of Dogs by Richard Desmond, a Conservative party donor, it subsequently emerged that Desmond had lobbied him at a fundraising dinner at the Savoy hotel. Jenrick had not publicly disclosed the meeting with Desmond, and did not contest the subsequent judicial review, conceding that his approval was unlawful by reason of apparent bias.

³ Baroness Twycross, Written Answer 1 November 2024, <https://www.parliament.co.uk/question/HL1765/ministers-disclosure-of-information>.

⁴ Cabinet Office, *Ministers' Overseas Travel and Meetings: Publication Guidance*, January 2025, Annex B para 6: <https://www.gov.uk/government/publications/ministers-overseas-travel-and-meetings-publication-guidance/ministers-overseas-travel-and-meetings-publication-guidance>.

Include extended interchange of messages, by whatever medium

3.6 Nigel Boardman's report following the Greensill Capital affair argued that:

an extended interchange of messages on an instant messaging platform can serve as effective a lobbying device as a physical meeting. **I therefore recommend government extends the definition of 'meeting' to include all forms of non-public interactive dialogue which, were it face to face, would constitute a meeting requiring inclusion in the transparency return (Recommendation 14).**⁵

3.7 Extending the definition of meeting in this way would constitute a major change, and might prove difficult to apply in practice. Boardman suggests

a principles-based approach to help ministers determine whether any given policy related encounter should lead to a disclosure. **Any discussion relating to official business which is substantive should always be declared irrespective of the medium through which that discussion occurs... Lobbying relating to procurement [including grants or other financial assistance] should always be considered higher risk ...**

And he suggests a further range of criteria, based on the

- substantiveness of discussion
- sensitivity of subject matter
- duration of the exchange
- for meetings or calls, circumstances (pre-arranged or not, by whom, etc)
- relationship between minister and lobbyist (e.g. close friend, party donor)
- status of the lobbyist (e.g. former minister)
- medium of access (arguing that more privileged access routes such as personal phone numbers are more likely to require disclosure, and that disappearing messages make disclosure far more important).

3.8 If there is doubt about the feasibility of applying Boardman's principles in practice, one approach could be to try piloting them in a single department. The Cabinet Office could lead such a pilot, perhaps with one other frontline department which receives a lot of lobbying, such as the Department for Business and Trade, or the Department for Science, Innovation and Technology. The Cabinet Office will find it easier to persuade other

⁵ Nigel Boardman, *A report by Nigel Boardman Into the Development and Use of Supply Chain Finance (and Associated Schemes) Related to Greensill Capital in Government: Recommendations and Suggestions*, August 2021, p21:
<https://www.gov.uk/government/publications/findings-of-a-review-into-the-development-and-use-of-supply-chain-finance-in-government>.

departments if it has applied (and if necessary adapted) Boardman's principles and criteria to the disclosure logs of its own ministers and senior officials.

Oversight of transparency releases

3.9 Oversight of these arrangements is not straightforward. One option would be to task the Registrar with oversight of broader transparency releases. This would change the nature of the office, from a recorder to a regulator of lobbying. An alternative would be to give the role of oversight and enforcement to the Information Commissioner, since the subject matter is similar to that covered by Freedom of Information legislation.

Strengthening the Business Appointment Rules

Weakness of the current system: the need for a statutory foundation

4.1 The main weakness of the current system is that the Business Appointment Rules (BARs) are unenforceable. Boris Johnson ignored the need to seek advice from ACOBA more than once, receiving only an aggrieved letter by way of reprimand. Bill Crothers, the government's Chief Commercial Officer 2012-15 failed to obtain clearance from ACOBA before becoming a director of Greensill in 2016: again with complete impunity.

4.2 The system remains one of voluntary compliance. In his 2022 report Nigel Boardman suggested a system of enforcement through inserting restrictive covenants into civil servants' contracts of employment, and Ministers being required to sign a legally binding deed of undertaking. Four years on, it has to be accepted that this employment law solution is not working, or has not really been tried. Nick Thomas-Symonds has written that 'where people seek to evade the Rules or engage with them in bad faith, we must be robust in dealing with them'.⁶ For effective sanctions to be available in cases of non-compliance, the only credible legal regime has to be one embedded in statute, along the lines of the offences and civil penalties provided in the Lobbying Act 2014. Sanctions should be available against future employers hiring people in breach of the Rules, as well as employees.

4.3 If this conclusion is accepted, the statute will need to define the bodies which can administer the sanctions, and the circumstances in which sanctions can properly be applied. In short, there needs to be a whole statutory regime underpinning the Business Appointment Rules and their enforcement. This is a bottom up argument which complements that made by CSPL in its 2021 report *Upholding Standards in Public Life*. CSPL recommended that ACOBA and the Independent Adviser should be given a statutory foundation, to underpin their independence, and strengthen and standardise their remit and powers.

The government's review of the Business Appointment Rules (BARs)

⁶ Nick Thomas-Symonds, Letter to First Civil Service Commissioner Gisela Stuart, 9 July 2025: <https://civilservicecommission.independent.gov.uk/wp-content/themes/csc/download-document.php?file=2025-07-09-MCO-to-FCSC-on-BARs.pdf>

4.4 In October 2025 ACOBA was abolished, and responsibility for administering the BARs was transferred to the Civil Service Commission (CSC) in the case of Crown servants, and to the Independent Adviser on Ministerial Standards in the case of Ministers. The Civil Service Commission was charged with streamlining the applications process to make it less slow and cumbersome, and with auditing implementation of the Rules by departments, which are responsible for all applications from officials below the level of SCS 3. The CSC has revamped its website, to make the system more transparent, and the First Commissioner is reporting every three months on their progress in streamlining the process, and on their audit of departments.

4.5 The CSC is also conducting a strategic review of the BARs in the light of their early experience, and may propose revisions to the Rules as well as the application process. The CSC will need to liaise closely with the Independent Adviser, who has had a heavy caseload in the first six months: from October 2025 to March 2026 the CSC has issued advice in 35 cases, and the Independent Adviser in 46. Close liaison is essential not merely to benefit from the Independent Adviser's experience, but to ensure consistent application of the BARs as between ministers and officials.

Principles to guide the bodies administering the BARs

4.6 The CSC and the Independent Adviser have both made a strong start in their new responsibility for administering the BARs, publishing their advice letters in a very clear and accessible way. But there are already signs of difference in their approaches: the advice letters differ slightly, in layout and language; the CSC has a triage system, with Level 1 (light touch) and Level 2 (higher risk) cases; the CSC publishes data every three months on the time taken to process applications. The substance of their advice may be the same, but it will be important to avoid the impression that there is any difference in the way ministers' and officials' applications are handled. The Independent Adviser may wish to publish similar performance data to that provided by the CSC, and will certainly need to contribute to the CSC's review of the BARs.

Submission to the UK Lobbying, Disclosure and Access to Government Review

April 2026

Background

InfluenceMap is a global non-profit think tank on climate and sustainability, headquartered in London. Our LobbyMap platform is the world's only database assessing corporate climate lobbying, now covering over 1,000 companies and 350 industry associations globally.

Our work tracking and assessing corporate climate lobbying has given us global expertise in how disclosure, transparency and governance rules can mitigate the risks of policy capture. We have contributed to multilateral processes and international standards including the OECD Recommendation on Transparency and Integrity in Lobbying, the UN High-Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities, the ISO standard on Net-Zero Aligned Organisations, and the investor-led Global Standard on Responsible Climate Lobbying.

Our 2025 report, [Climate and Energy Lobbying in the UK](#), detailed how opaque industry lobbying takes advantage of weak transparency rules and undermines UK Government policy. InfluenceMap was subsequently invited to give evidence to the UK All-Party Parliamentary Group on Sustainable Finance on lobbying transparency and reform.

Submission

- 1. Consultant lobbyists are required to register lobbying of Ministers and permanent secretaries. Should this requirement be expanded to include communications made to others, such as special advisers, director generals and directors. If yes, which groups should be included and why?**

Yes. Officials at all levels can be targeted and influenced by lobbying activity. This is affirmed by the OECD Council Recommendation on Transparency and Integrity in Lobbying and Influence, which applies to “all branches and levels of government”, given the shared responsibility for ensuring transparency and integrity in government decision-making.

There is a pragmatic argument for excluding the most junior government officials from the scope of formal requirements, based on the limited impact that engagements at this level can have on policy.

However, there is also a risk of creating a loophole whereby mid-level officials with significant stakeholder engagement and policy development responsibilities (e.g. Grade 6 and 7 officials) are targeted specifically because of their exemption. InfluenceMap therefore recommends initially expanding the scope to all Senior Civil Servants and special advisers (in line with the recommendations of the Chartered Institute for Public Relations (CIPR)), with monitoring to understand if more junior officials are being targeted to avoid requirements.

Looking at other jurisdictions makes it clear that a much wider scope is possible. Lobbying registers in Canada and the US apply to all senior officials, and the European Commission requires all officials with management responsibilities to publish minutes of meetings with stakeholders.

- 2. Should the current requirement for only those consultant lobbyists who are VAT registered to comply with the regulations, be removed? Should a de-minimis provision be set and if so, what should the threshold be?**

No response.

- 3. What information should consultant lobbyists be required to record in the Register about their lobbying activity (for example, date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place)?**

The information required should include, for each specific instance of lobbying activity (i.e. each engagement):

- Date of the engagement
- Type of engagement (meeting, phone call, email etc.)
- Target body and individuals involved
- Specific policy or legislative objective of the engagement
- Supporting documentation (e.g. policy papers, recommendations)
- Overall policy priorities and objectives of the lobbyist

- 4. Is the 'incidental lobbying' exemption to the requirement to register as a consultant lobbyist clear and reasonable? Are any amendments required, and if so, what changes are needed and why?**

The exemption and related guidance are reasonable on their own terms, however as currently applied they exempt industry associations whose lobbying is undoubtedly a substantive part of their offering to paying member companies.

InfluenceMap's decade of research shows the significant influence that industry associations have with governments around the world, with many engaging on climate policy more strategically and intensively than their largest member companies. Our June 2025 report on lobbying in the UK, for example, identified six industry alliances actively lobbying on hydrogen policy alone.

The strategic partnership announced by the Trade Association Forum (TAF) and the Confederation of British Industry (CBI) in January 2026 highlights the “vital role” of trade associations in policymaking, and notably highlights the CBI’s organisational focus on “advocacy, economic research and direct engagement with government and policymakers”. UK Finance, Airlines UK, Offshore Energies UK and many other industry associations publicly put engagement with government at the centre of their activity and offer to members. Even in the absence of wider reform there is a strong case for reconsideration of the role of industry associations by the Commission, the Government and the Registrar.

5. Is there merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government, regardless of who is doing it? If so, what are the pros and cons? Are there ways of ensuring that any requirement to register is not disproportionately burdensome for smaller businesses, charities and think tanks?

Yes. Westminster’s regulation is almost unique in how limited the information it captures is. Transparency International estimated in 2015 that less than 4% of lobbyists are covered by the register. Excluding the vast majority of lobbying activity in this way can only serve to confuse and undermine the UK’s lobbying transparency system overall.

The determination here should be guided by the necessity of capturing and making transparent the most intense and influential lobbying that takes place across the policymaking process, which is what the current register fails to do. This can be achieved only through combined responsibilities for both government and lobbyists, so that accountability is ensured at both sides of lobbying activity.

The Committee on Standards in Public Life noted in 2021 that “should government transparency obligations continue to remain poor, the case for an expanded lobbying register would strengthen.” This has borne out. Likewise, the cross-party Public Administration and Constitutional Affairs Committee concluded in its post-legislative scrutiny of the Lobbying Act: “Should the Government’s transparency releases continue to prove inadequate, the case for a statutory register of all lobbying activity should be reconsidered.”

6. Are the Registrar of Consultant Lobbyists’ enforcement powers sufficient to deter non-compliance? If not, what is needed?

As the CIPR notes, ORCL’s available penalties of £7,500 are far smaller than the EU (£50,000), Germany (£50,000), Canada (£113,000 and up to 2 years in prison) and the US (£154,000 and up to 5 years in prison). In the EU, access to Government buildings can also be removed following a breach of the code of conduct for lobbyists. Both weaknesses in enforcement powers should be considered to effectively deter non-compliance.

- 7. What would be the resource implications of a) expanding the register and as it stands and b) replacing the current register with a new register that captures all lobbying of government? How could these resource implications be mitigated?**

The information above that InfluenceMap recommends to be included in the register is all readily and promptly available to lobbyists leading engagement with government, and is increasingly easy to record using automated tools. Organisations' ability to resource the recording of information will broadly track their level of engagement with government, meaning the most influential organisations are the most able to meet the requirements of a new register. Smaller organisations with less resource will generally have the least information to record.

Creating formal exemptions for smaller organisations would significantly risk creating incentives allowing lobbying to be channeled through intermediaries, undermining the transparency of the system.

- 8. The government publishes transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials. How can the quality, timeliness and accessibility of the data be enhanced?**

Transparency data on gifts, hospitality and external meetings should be published by the Cabinet Office monthly, in one central database, per the recommendation of the Committee on Standards in Public Life (and accepted by the previous Government). The database should be cross-referencable and linked to entries in the lobbying register, allowing the multiple different approaches to Government ministers and officials to be properly connected to one another and open to public scrutiny.

The Cabinet Office guidance to "state any specific area(s) of government policy/ legislation etc. affected" should be properly enforced, so that the objective of the engagement is clearly recorded.

- 9. For meetings with Ministers, special advisers and senior officials, does the transparency data include the right information about the following:**
- a. The recipient(s) of the lobbying.**
 - b. The type of information and level of detail that is reported.**
 - c. The forms of communications that should be included.**
 - d. When and how the transparency data is published.**
-
- a. Meeting transparency data should be provided for Special Advisors (for all engagements, not just meetings with senior media figures), SCS1 and above (i.e. including Deputy Directors), and MPs (which some have already taken to doing so voluntarily, following comparable practice in the European Parliament).
 - b. Records should include the specific policy or legislative objective of the engagement.

- c. Records should cover non-diarised engagements, including WhatsApps, impromptu phone calls and meetings and emails, whenever there is a lobbying effort that takes place through these methods.
- d. Data should be published at least monthly, as soon as possible following the end of the period. This is essential for timely scrutiny and increasingly efficient through automated administrative tools.

10. What oversight mechanism should be put in place for ensuring adherence with the requirements for government transparency returns and what should the consequences be for non-compliance?

No response.

11. How can any lobbying that takes place through non-corporate communications channels (eg. WhatsApp and other instant messaging platforms) or non-official settings (such as party conferences, non-official meetings) be made transparent?

Both government and lobbyists have a shared responsibility to ensure that genuine lobbying activity is captured by any functioning lobbying transparency system. In the case of informal lobbying, which as the Committee on Standards in Public Life noted is “an increasingly common way for external organisations to attempt to influence government”, dual requirements are essential. This means that meeting records (for government representatives) and the lobbying register (for lobbyists) should work in tandem to ensure that accountability cannot be evaded by one or other actor. Wherever there is a genuine effort to influence government policy, it should be subject to transparency requirements.

12. Have you tried reconciling the Register of Consultant Lobbyists with the Government’s transparency returns on external meetings? If so, how easy or difficult was this to do?

Yes. The absence of overlap or connection between the two systems makes this almost impossible to do.

13. What are the strengths and weaknesses of the current system for considering applications under the Government’s Business Appointment Rules?

No response.

14. What principles should guide the Government when reviewing the Business Appointment Rules?

No response.

- 15. What principles should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort?**

No response.

- 16. What are the strengths and weaknesses of the current arrangements for the declaration and publication of financial interests for Ministers and senior government officials?**

No response.

- 17. What improvements can be made to the current system for the declaration and publication of financial interests for Ministers and senior government officials?**

No response.

- 18. Are there different arrangements in place in other countries for the declaration and publication of financial interests for Ministers and senior government officials that should be considered for implementation in the UK?**

No response.

- 19. What arrangements in place for the declaration and publication of financial interests of directors of large corporations could be adopted for use within government?**

No response.

Institute for Government submission to EIC review

This document sets out the Institute for Government's views on the three questions set out in the prime minister's letter to the EIC of 11 March 2026.

1. Financial declarations

The Institute for Government has not looked in detail at the way in which ministers or officials declare their financial interests. We do not have a specific recommendation but want to highlight a key principle on this issue. When requiring ministers or officials to declare their financial interests, there are two key objectives for government to balance: the ability to properly manage those interests, and any potential conflicts they present; and the importance of protecting the personal information and privacy of the individual in question. If government is serious about encouraging people from different walks of life to consider joining public life – whether as a politician or an official – they need to ensure that those people's privacy is protected.

2. Lobbying

The CSPL made many recommendations on how improvements to government processes would improve how government manages lobbying in its 2021 report 'Upholding Standards in Public Life'. Many of these continue to be relevant and the government should implement them. While some will require legislation, others are changes to administrative processes that will happen if ministers set clear expectations to their departments. Taking those two categories in reverse order:

Administrative changes

The government should take on the CSPL's recommendations (recommendations 26, 27, 28) to improve the accessibility, quality and frequency of departmental declarations of ministers' meetings, hospitality and gifts. This means bringing the declarations of meetings in line with those on hospitality – publishing monthly. It also means creating a searchable, common database that collates all departments' returns, rather than the current system where each department publishes its own releases. The previous Conservative government had committed to implement each of these recommendations (though had not made a great deal of progress on them) and it is a shame that the current government overturned this decision on entering office. The quality of declarations has improved over recent years, and ministers should ensure this remains the case through setting clear expectations of their departments.

The government should also expand the scope of who has to declare their meetings, and what counts as lobbying for these purposes (recommendations 29, 30, 31 and 32). Requiring directors general, directors and special advisers to declare the same information that ministers currently have to (on a monthly basis) would help show the detail of who is actually lobbying the key experts and policy advisers in departments. Similarly, capturing informal lobbying, including via digital communications, is essential for these registers to be meaningful in today's world. Of course, there will always need to be a 'de minimis' threshold for what is declared – defining that is not easy, but is necessary to aid compliance and ensure the information provided is useful.

Legislative changes

The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 was the last piece of legislation looking at lobbying. This made some important first steps but, over a decade on, there is more for government to do.

In 2021, the CSPL recommended that lobbyists should have to register when they lobby special advisers, directors general, and directors (recommendation 33) and that they should have to declare the date, recipient, and subject matter of their lobbying (recommendation 34).

We think these recommendations are even more necessary now and that the government should commit to implementing them. We believe that this would require primary legislation. If the government is planning a Bill to strengthen the requirements on what consultant lobbyists have to declare (and potentially other aspects of the ethics landscape), it should use that Bill to broaden the 2014 Act in other ways:

- The CIPR and PRCA have repeatedly called for lobbying requirements to be extended to in-house lobbyists, which they argue carry out the vast majority of lobbying of government. The government should look into how this would work and what the scope of extending the requirement in this way would be. Focusing on the activity undertaken, rather than the type of organisation, is the best way to capture everything as desired.
- Other jurisdictions manage lobbying in different ways and the government should look to international examples to update the UK system in a way that follows best practice.
- If the requirement to register is extended to all organisations that meet government to call for them to change policy or processes, the cost to register with the Registrar should be removed – many other jurisdictions with a lobbying register do not charge external organisations to register.

If the requirement to register is extended in this way, there is the potential for this to become a sort of ‘kitemark’ that all organisations aspire to obtain, in order to show that they meet a certain standard (and, if they lobby on behalf of clients, that they can use to market the quality of their services).

Any new system (whether underpinned by legislation, administrative changes or both) should be developed with the needs of its users in mind. That means that it needs to be easy to fill in information (whether as a registered lobbyist or as an official completing departmental declarations) and easy to find information (as a member of the public, journalist or other interested party). Only if the system works for *all* its users will it be a success.

3. Business Appointment Rules

When looking at the Business Appointment Rules, the first thing to note is that the Civil Service Commission is reviewing the application of the Rules for civil servants, and the Independent Adviser on Ministerial Standards is doing the same for ministers. Any review here should align with those reviews to ensure there is a clear sense of what, if anything, should change in the Rules. There are then two related questions to answer about the rules: the content and the enforcement.

Content of the rules

Ensuring that people can find jobs after leaving a public role is essential to attracting good people into public life, whether as politicians or officials. Broadly speaking, the content of the rules as they currently stand are clear. The separation of roles into Level 1 and Level 2 categories for ministers is helpful, as it streamlines easier applications. The CSC may want to set out a similar categorisation for the people it oversees. When making any changes, clarity on what people can expect when it comes to leaving is key.

Enforcement of the rules

The government's recent announcement that it would expect repayment of any severance payment paid to a former minister who subsequently broke the rules was welcome, though of course has yet to be tested. With no formal mechanism for securing repayment, political pressure will be key.

Nigel Boardman recommended that clauses should be added to civil service contracts to enforce the BAR for officials. We do not know whether this has happened or not – if not, the government should set out when it intends to do this or, if it does not, what it is going to do instead.

The government should commit to not signing new contracts with organisations who employ former ministers or officials in breach of their BAR recommendations, in order to incentivise those leaving government and private sector organisations to ensure they abide by the rules.

4. Conclusion

This review was prompted by the Mandelson scandal. It is an important moment to reflect on how standards are upheld in the UK's public life and the government should use this opportunity to strengthen the system. The EIC's review will undoubtedly provide lots of useful, practical recommendations that the government can take forward – if ministers do not do so, they will miss a key chance to show that they care about improving ethics and integrity. These changes will help those outside government understand how ministers and officials spend their time, and what may influence their decisions – both important factors for trust in government.

But it is also important to note that no process is a replacement for judgement. Had the above measures been in place before Mandelson was appointed ambassador, they would not have provided any more reason not to appoint him than was already surfaced in the Cabinet Office's due diligence checks. The failure in the Mandelson case was ultimately one of political judgement and only judgement will stop such a failure happening again.

Ethics and Integrity Commission: Lobbying, Disclosure and Access to Government Review. Submission from Culture Unstained.

Background and context

1. [Culture Unstained](#) is a research and engagement organisation which supports the transition away from sponsorship of cultural institutions by fossil fuel producing companies, and promotes greater transparency and more robust ethical standards around corporate sponsorship of the culture sector.
2. As a small not-for-profit organisation we regularly draw upon transparency data and other information to scrutinise government and institutional activity. Gaining meaningful information in a context of limited data, incomplete disclosures and protracted Freedom of Information processes is resource and time intensive and inhibits the role we and similar organisations seek to play as part of a wider democratic function.
3. While lobbying is an essential part of the democratic process that can ensure a range of views are heard by government, power and access to decision-makers is not equally distributed. Many of those lobbying government represent powerful vested interests seeking to gain commercial advantage, leading to a distortion of policy making so that it no longer works in the public interest.
4. The fossil fuel industry has a long history of lobbying to oppose and delay policy measures that meet the urgent demands of climate science, and continues to invest in fossil fuel exploration and production in contradiction to national and international commitments. Recent [analysis](#) by Fossil Free Parliament found Government Ministers met fossil fuel representatives the equivalent of twice every working day in their first year of power, while [Influence Map shows](#) how their “*entrenchment [...] warps the policy process, undermining consistent progress in the energy transition [working] against the overarching interest of the business community.*”

High risk industries and highly developed strategies on lobbying

5. Corporate sponsorships of cultural organisations are transactions that form part of companies’ influence strategies: a company purchases a package of benefits to promote positive associations with its brand, position itself favourably with decision makers and create lobbying opportunities. Such benefits are an explicit part of the marketing of such partnerships: The [British Museum, for example, offers companies](#) the opportunity to engage “*key stakeholders*” through special access to events; to “*enhance your brand*” and to “*Expand your networks, by attending British Museum events with donors, corporate supporters, collectors, designers, artists, academics and government representatives.*”
6. Such relationships are a common tactic of high risk and well resourced sectors of industry, such as tobacco and fossil fuel producers. ‘*Social licence to operate*’, a term developed within extractive industries, refers to the creation of trust and consent from society so companies can pursue their business activities. Sponsorship is an important mechanism to cultivate that consent, and sustain a company’s cultural and political power, sitting alongside parallel public relations efforts to [promote disinformation](#) on the impacts of their products, with the intention of shaping the discursive space in which legislation and policy is developed.

7. In his memoir, Herb Schmertz, former Vice President for Mobil Oil, discusses such initiatives as "discretionary projects" offering *"the opportunity to present your top management [...] as corporate statesmen whose concerns go beyond the bottom line [...] intellectually entitled to be listened to on vital public-policy issues."*
8. [Internal documents](#) from fossil fuel companies, obtained for a [U.S. Congressional report](#) and [reported on by Desmog](#), reveal the central role sponsorships play in the industry's broader influence strategy. For example, one [memo](#) from BP details how sponsorship recipients, referred to as "*strategic relationship partners*", could be "*powerful 3rd party advocates for issues that are critical to our business. Direct benefit comes when our partners engage as influencers, supporters or defenders on regulatory, legislative, or other policy matters. Indirect benefits comes (sic) in our ability to access the network and platform provided by our partners to deliver our messages.*" It also notes how these relationships can help to "*mitigate potential litigation or other sensitive matter (sic)*" for BP.

Corporate sponsorship as a vehicle for unaccountable lobbying

9. In the UK, BP has leveraged its sponsorships to [influence and engage with](#) decision makers in regions where it hopes to do business, and to network with and enhance its reputation among UK policy-makers whose practical backing it requires. As a former [BP Vice President](#), [said](#) of the company's British Museum exhibition sponsorship: "*naturally we are going to try to match a particular exhibition with somewhere we have an interest.*"
10. These relationships also create a range of opportunities for unaccountable engagement and influence. These interactions are not adequately or accurately recorded in existing transparency data, if they are recorded at all. For example:
11. In 2015, BP gave The British Museum additional funding to have its name attached to the Museum's Mexican-themed ['Day of the Dead'](#) festival, ahead of BP's bid for new drilling licences from the Mexican government. FOI disclosures show BP hosted a VIP reception at the event and worked with the Museum to secure representation from members of both the Mexican and UK Government.
12. At the time that BP held a 19.75% stake in the Russian state-owned oil and gas company Rosneft, it sponsored an exhibition on archaeology from Russia at The British Museum as well as the 'Cosmonauts' exhibition at the Science Museum in London, both initiatives involving direct collaboration with Russian cultural entities. [Emails](#) disclosed under FOI show BP attempting to shift the exhibition launch away from days when "*you'd struggle to engage senior officials*" in Russia. BP's then CEO Bob Dudley personally invited John Whittingdale, then Secretary of State for Culture, Media and Sport, to the launch dinner. This is [recorded](#) in transparency data as an invitation from the Science Museum with no mention of BP.
13. In 2019, BP and Rosneft jointly invited then Culture Secretary Nicky Morgan to a performance by the Britten-Shostakovich Festival Orchestra and to 'drinks and canapés' following the performance. The published [transparency data](#) makes no reference to BP and Rosneft's invitation.
14. Other sponsorship tied to UK-Russia relations included sponsorship of the Mariinsky Ballet & Orchestra and of their tour to the UK to perform at the Royal Opera House, which BP also sponsored. Crucially, this ran in parallel with sustained direct engagement with government, with cultural sponsorship clearly complementing wider lobbying aims.

15. BP sponsors the Science Museum Group (SMG)'s STEM Academy for teachers and educators, which emerged from a research project between the SMG, Kings College London and BP. While BP is outwardly referred to as the funder of the project with no influence over its content, internal documents revealed how it was BP that [sought to engage with](#) the Department of Education on behalf of the project, as opposed to the partners developing its content.
16. Other meetings are omitted from transparency data, even when they take place in an official setting. In October 2021, then Prime Minister Boris Johnson met the billionaire Chairman of the Adani Group, Gautam Adani, at the Science Museum. Adani was there to attend the government's 'Global Investment Summit', hosted at the museum that day, and to sign an agreement to sponsor the Science Museum's new climate and energy gallery.
17. This meeting concerned official business and was pre-mediated: it was choreographed in coordination with the Science Museum and BEIS had prepared a [clutch card](#) for the meeting with top-lines and suggested questions. Despite this, the meeting was not recorded in the Cabinet Office's [transparency data](#) which only listed Johnson's "informal engagement" with a "Range of business leaders at the Global Investment Summit", and only came to light after Adani posted on social media.
18. Culture Unstained argued the public interest in details of the meeting was heightened by the controversy surrounding Adani's operations, including evidence of corruption, human rights abuses and undue influence, as well as the controversy surrounding the decision to allow the world's biggest private producer of coal to put its name to a renewable energy gallery.
19. Documents from the meeting were finally released as a consequence of a First Tier Tribunal process, which concluded in 2025, where [the judge found](#) *"a very high public interest in transparency of relations between the Government and Mr. Adani or the Adani group and a very high public interest in transparency in relation to meetings between Mr. Adani and the then Prime Minister, given the seniority of the Prime Minister and the issues highlighted above relating to the Adani Group."*

Recommendations

Timeliness, extent and detail of publication of transparency data

20. **Timeliness:** Transparency data is published with a significant delay, meaning details of some meetings are only available six months after they have taken place. These delays inhibit effective scrutiny, allowing public bodies to evade accountability. There is no good reason why this information cannot be published more regularly. We recommend **it should be published fortnightly**, and certainly no less frequently than on a monthly basis.
21. [2017 Cabinet Office Guidance](#) already advises that this data is "compiled proactively over a weekly/monthly period". Other departmental data, such as expenditure, is already published monthly. Previous recommendations to move transparency publications from a quarterly to a monthly basis date back to at [least 2013](#).
22. **Accessibility:** Transparency data is distributed across tens of departmental webpages and hundreds of individual documents, each of which must be individually downloaded. This means accessing and analysing this information to understand the influence of a particular industry or lobbyist is an unnecessarily burdensome process, creating a significant barrier to transparency.

23. Tools such as the [Open Access UK](#) tool created by Transparency International go some way to addressing issues with the accessibility of meeting data, but it should not be necessary for non-governmental organisations to expend significant resources on this. For the government to fulfil its obligations on transparency, it is not enough to publish information; it must also ensure it is meaningfully accessible. We again note previous [commitments](#) to create a “**single platform to collate and publish departments’ transparency returns**”. Such a platform is vital for meaningful transparency.
24. This should also **include lobbying carried out by all lobbyists** so a full picture of lobbying activity is accessible. The current Register of Consultant Lobbyists only captures a small proportion of lobbying activity.
25. **Meaningfulness:** Overall, information provided on the content of meetings remains grossly inadequate, with descriptions that often appear designed to obfuscate rather than enlighten. They may merely name the industry concerned, for example “Gambling operators Roundtable” (Gambling operators Roundtable, Fiona Twycross, DCMS 21 Oct 2025), or are so general that they convey no meaningful information beyond the access granted, for example: “To discuss reflections on the current business environment” (BP, Peter Kyle, DBT, 16 September, 2025).
26. This means it is often necessary to submit FOI requests to find out more, a process which adds further significant time delays (often well beyond the statutory 20 working day limit, and with the Information Commissioner having only limited powers to enforce), and puts the onus on individuals to submit and pursue FOI requests to access meaningful information.
27. While the information currently disclosed about the content of meetings still regularly doesn’t meet even the standards set out in Cabinet Office guidance, the bar should be set higher: **meeting minutes should be routinely published**.
28. Proactively providing meaningful information, in as much detail as possible, should be seen both as desirable, and as a democratic duty for government, rather than what now too often seems to be an exercise in evasion.
29. **Comprehensiveness:** As we have set out, non-official settings are a key part of corporate lobbying strategies, and details of contact in this setting must be disclosed if policy-makers are to be accountable and for the public to be assured that vested interests are not subverting the policy-making process. Informal meetings and contact over non-corporate communication channels are, in fact, often an indication of special access, ‘insider relationships’ and the ability of lobbyists to position themselves as partners or allies of policy-makers. It has already been extensively documented how such channels have been used to influence public policy. We agree with previous recommendations that **lobbying in these settings should be subject to the same disclosure regime** as other forms of contact.

Transparency and controls on lobbying and engagement with high risk individuals and sectors of industry

30. Government should consider stricter limits on formal and informal interactions with high risk individuals and sectors of industry and, where these interactions are deemed necessary, enhanced disclosure of the content of these meetings or communications.
31. Tobacco control is one area where the government has already [recognised](#) a “*fundamental and irreconcilable conflict*” between the vested interests of an industry and public policy,

and set limits on interactions with public officials. Article 5.3 of the World Health Organisation's Framework Convention on Tobacco Control (FCTC), ratified by the UK in 2004, says: "*Parties shall act to protect [public health policies with respect to tobacco control] from commercial and other vested interests of the tobacco industry.*"

32. While government guidance recognises that some interactions with the industry may be necessary, there are strict limits on the scope and extent of such interactions and they "should be conducted with maximum transparency." This includes the [routine publication of correspondence](#) and meeting minutes (with the ability to make necessary redactions in accordance with the FOIA).
33. These rules also recognise the role of CSR initiatives in companies' influence strategies and state that "*Organisations should not endorse, support, form partnerships with, or take part in activities of the tobacco industry that could be described as 'socially responsible'.*" They apply to all parts of government, including arms length bodies. In 2025 the British Museum [ended](#) its sponsorship arrangement with Japan Tobacco International (JTI) after it was highlighted as a potential breach of the UK's treaty obligations under the FCTC.
34. These principles and proportionate controls should be extended to other high-risk industries, such as the "[unhealthy products industries](#)" and the fossil fuel industry, which use a common playbook including [tactics](#) of denial, delay and distortion to undermine public policy as part of well-resourced and integrated lobbying and social licence strategies.
35. Clear principles and control frameworks in this area are already being developed and, in many cases, implemented; [more than 12](#) UK councils have adopted some form of restriction on high carbon advertising, and the UK membership body for museums, the Museums Association, states in its '[Code of Ethics](#)' (2025) that museums should, '*Transition away from sponsorship from organisations involved with environmental harm (including fossil fuels)*'.

LOBBYING, DISCLOSURE AND ACCESS TO GOVERNMENT

Transparency International UK's response to the Ethics and Integrity Commission Call for Evidence, 17 April 2026

1. INTRODUCTION

1.1 Transparency International (TI) is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, TI has extensive global expertise and understanding of corruption.

1.1 Transparency International UK (TI-UK) is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at local, national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK. We are independent, nonpolitical, and base our advocacy on robust research. TI-UK welcomes the Ethics and Integrity Commission's Lobbying, Disclosure and Access to Government Review and the opportunity to submit evidence.

2. SUMMARY

2.1 International good practice standards recommend there should be transparency over the impact of lobbying.¹ However, transparency reforms of the last decade have done little to improve public knowledge of what happens in Westminster or Whitehall. New legislation is needed for the UK to catch-up with its counterparts, including to meet the standard set by the Scottish lobbying register.² This should ensure that the public are able to answer key questions:

- *Who* is lobbying?
- *When* are they lobbying?
- *What* are they lobbying about and *why*?
- *How* are they lobbying?

2.2 The current regime of ministerial meetings data and register of consultant lobbyists is simply not providing necessary transparency about those with access and potential influence in UK politics. Our research suggests the statutory consultant register covers at most 4 per cent of lobbyists.³

2.3 Additionally, some of the most frequently labelled ministerial meetings in 2025 were "to discuss the industrial strategy", "to discuss trade strategy" and "to discuss criminal courts and wider reform" – impenetrable descriptions that fail to provide a meaningful summary to the public.

1.1 We recommend both the introduction of a statutory lobbying register (a register of lobbying interactions provided by all lobbyists, not just consultant lobbyists) and the retention of a ministerial meetings register provided by the Government. Both should be centralised and

¹ The International Standards for Lobbying Regulation <https://lobbyingtransparency.net/standards/introduction/> [accessed 7 April 2026]

² <https://www.lobbying.scot/> [accessed 17 April 2026] The Scottish lobbying registrar will be re-launching the web portal with improved functionality on 8 May 2026

³ <https://www.transparency.org.uk/sites/default/files/2024-12/Understanding%20Access%20and%20Potential%20Influence%20in%20Westminster.pdf> [accessed 17 April 2026]

easily searchable. Transparency International UK's position paper lays out the current arrangements in more detail and the case for change.⁴

- 2.4 Meanwhile, the current rules covering lobbying in the House of Lords are too permissive, allowing peers to work for firms selling political access to paying clients. This is a clear conflict of interest. We recommend that the Lords' Code of Conduct is strengthened, and that peers should be required to dispense of these interests or leave the House of Lords.
- 2.5 It is also notable that the Business Appointment rules, notwithstanding the structural change in 2025, have not seen an overhaul since their introduction in 2012. They are well overdue an update. The current rules governing the revolving door do not sufficiently address the risks of ministers benefiting from privileged access and misusing confidential information. We recommend that the Business Appointment rules should be extended, and their enforcement strengthened.

3. LOBBYING TRANSPARENCY

- 3.1 Transparency of access to and influence over decision-makers is essential for the public to understand how decisions are made, to be able to trust they are being made in the public interest, and to maintain the social contract. Providing transparency over lobbying is also crucial for preventing and identifying potential misconduct by ministers and those seeking to influence them.
- 3.2 Too little of this activity is currently captured on the public record at Westminster. That the revelations over Greensill,⁵ Westferry⁶ and the COVID-19 'VIP lane'⁷ for public contracts all came from the work of journalists instead of the statutory lobbying register or departmental disclosures, illustrates the ramifications of this transparency gap.
- 3.3 Annex 2 provides a short summary of international examples and how they compare to Westminster's approach. While all have their pros and cons, we would suggest that the Canadian approach⁸ to regulating lobbying provides a model to build from that would deliver more meaningful openness over attempts to influence key decision makers through a proportionate and more comprehensive statutory register.
- 3.4 In relation to the specific questions in the call for evidence, we would suggest that communications made to special advisers, non-executive directors and other senior civil servants should be included in the definition of lobbying activity.
- 3.5 We consider the VAT registration requirement presents a problematic loophole, and would note that similar registers of consultant lobbyists do not provide exemptions.⁹ If a minimum threshold is deemed appropriate we would suggest alternative methodologies be considered

⁴ <https://www.transparency.org.uk/sites/default/files/2024-12/Understanding%20Access%20and%20Potential%20Influence%20in%20Westminster.pdf> [accessed 7 April 2026]

⁵ <https://www.transparency.org.uk/news/lessons-greensill-scandal-how-bring-lobbying-out-shadows> [accessed 15 April 2026]

⁶ <https://www.thetimes.com/uk/politics/article/were-going-ahead-with-this-jenrick-has-made-his-mind-up-lets-get-this-sorted-2rskbwhnf> [accessed 15 April 2026]

⁷ <https://www.transparency.org.uk/news/report-landmark-investigation-finds-corruption-red-flags-ps153-billion-u-k-covid-contracts> [accessed 15 April 2026]

⁸ <https://lobbycanada.gc.ca/app/secure/oc/lrs/do/guest> [accessed 7 April 2026]

⁹ Exceptionally, the United States includes a low income based threshold - US consultant lobbyists do not have to register if total income from clients towards lobbying activities is less than \$3,500
https://www.senate.gov/legislative/Public_Disclosure/new_thresholds.htm [accessed 15 April 2026]

for triggering registration and disclosure. These could be financial but should be relatively low. We would recommend allowing voluntary registration regardless of any threshold set.

3.6 RECOMMENDATIONS

- 3.6.1 **Include in-house lobbyists and consultant lobbyists within the scope of the statutory register.** Certain exemptions may be considered in order to remove the risk of imposing undue burdens on those who are not undertaking substantive influencing activities.
- 3.6.2 Require meaningful information on all forms of communication between lobbyists and government, including details of the:
- form of communication; for example, email, letter, phone call etc.
 - subject matter discussed, which would link back to their registration summary report
 - specific public officials they engaged
 - date of the communication
- 3.6.3 **Require lobbyists to report on communications with government at least monthly,** as is the case in Canada.
- 3.6.4 **Require clarity about the objectives of lobbyists and the topics they discuss with relevant officeholders,** as is the case in most other registers (see Annex 2). This should include a summary report from registrants, updated at least every six months, outlining their key objectives, such as the specific legislation, policy, contract or other official business they are seeking to influence. It should also provide an estimate of expenditure on lobbying activities.
- 3.5.5. Registrants should also have to **report the details of anyone they employ involved in lobbying activity that at any point has been a public official,** which could apply to those from a select list of institutions.
- 3.5.6 The definition of lobbying activity should **include communications made to special advisers, non-executive directors and other senior civil servants.**

4. MINISTERIAL MEETINGS

- 4.1. While the timeliness of the disclosures has improved, with all four quarters of 2025 meeting the Government's own deadlines, these are generous timescales. Government should have more ambitious targets of how quickly they publish the data, moving to a monthly schedule instead. This would be more aligned with the CSPL and Boardman recommendations.
- 4.2. The CSPL previously suggested that the descriptions of ministerial meetings data should be substantially improved, and we agree. Through our analysis, we do not see a material difference in the quality of the meetings descriptions since the CSPL published its *Standards Matter 2* report.¹⁰
- 4.3. Some of the most frequently labelled meetings in 2025 were "to discuss the industrial strategy", "to discuss trade strategy", "introductory meeting" and "to discuss criminal courts and wider reform"- impenetrable descriptions that fail to provide meaningful transparency to the public.
- 4.4. Our analysis shows that the average number of words used in the 'purpose' field of the disclosures in the last two quarters of 2025 (July – December) is just 11. This is a decline

¹⁰ <https://www.gov.uk/government/collections/standards-matter-2> [accessed 15 April 2026]

from the average of 13 words in the comparable meetings data for 2024. Whilst word count is a crude measure, we would compare this with the lengthier descriptions provided by the Scottish lobbying register which gives the public a much better insight into why the meeting was held, what was discussed, and any agreed outcomes. The average number of words for submissions to the Scottish lobbying register in the same period was 118.¹¹

- 4.5. The previous government committed to introducing a central register of ministerial meetings with outside interests that would have been a key piece in improving lobbying transparency. Disappointingly, the current government is yet to have allocated funding to make progress in delivering this commitment.¹²
- 4.6. The Call for Evidence specifically asks about non-corporate communication channels. Evidence provided to the Covid-19 inquiry suggests that use of informal messaging was prevalent across government, and there is little external evidence of any change in behaviour. We have previously recommended personal phones be prohibited for use in official government business. If this is considered unfeasible, we recommend the Scottish Government-commissioned Martins Review¹³ as a starting point for considering how best to handle non-corporate communication channels.
- 4.7. We also note the specific question on whether the data provided by the register of consultant lobbyists can be reconciled with the ministerial meetings data. Using official records from 2020, our analysis suggested that at most only 4 per cent of lobbyists who appear in the external meetings data are registered with the Registrar of Consultant Lobbyists.¹⁴ This data is however inconclusive due to the difficulty of undertaking the analysis. To do this at scale one would need to:
 - download, clean and consolidate departmental disclosures
 - split out the attendee field so you have one row per attendee
 - download, clean and consolidate the register of consultant lobbyist entries
 - fuzzy match the two datasets
 - go back through and manually search each consultant lobbyist

This will set out only when a consultant lobbyist who features on the statutory register met with a minister or senior civil servant, and vaguely what they discussed. This analysis will not reveal:

- on whose behalf they were lobbying
- about lobbying activity that was not a meeting
- the objective of that lobbying
- how much the lobbyist has been paid to pursue that objective
- whether the lobbyist employs former public officials e.g. someone who used to work with or for the advocacy target

¹¹ Data available on request due to size of file.

¹² UK Parliament, *Government Departments: Disclosure of Information*, 7th April 2025, <https://questions-statements.parliament.uk/written-questions/detail/2025-03-31/42570> [accessed 7 April 2026]

¹³

<https://www.gov.scot/publications/independent-review-scottish-governments-use-mobile-messaging-apps-non-corporate-technology/> [accessed 15 April 2026]

¹⁴ <https://www.transparency.org.uk/publications/understanding-access-and-potential-influence-westminster>

3.6 Arguably the datasets could be more easily reconciled if government created unique identities for those organisations and individuals referenced in departmental disclosures, which would also provide a clearer cross-departmental view of Government's engagements with external stakeholders. However, this would only ease the data matching element of the missing pieces listed above. It would not improve the quality of the datasets, or the meaningfulness of information provided through this analysis.

3.7 RECOMMENDATIONS

3.7.6 **The Cabinet Office should collate all departmental disclosures and publish them in one centrally managed database**, as recommended by the CSPL.

3.7.7 **These datasets should include unique identities for individuals and organisations meeting with government** to provide a clearer cross-departmental view of Government's relationships with key stakeholders, and improved data matching with relevant datasets, including the register of consultant lobbyists.

3.7.8 **The description of meetings should be improved** to provide more meaningful information about what was discussed and, if possible, why.

3.7.9 The timeliness of **publication of the meetings should move to monthly**.

4. LOBBYING AND THE HOUSE OF LORDS

5.1. Under current rules, members of the House of Lords are allowed to retain interests in lobbying firms so long as they do not directly or indirectly offer clients parliamentary services and may also seek to influence ministers or parliamentary debates so long as this does not exclusively benefit their employers. We argue these rules are too permissive: being a peer and working for a firm that sells political access to paying clients is a clear conflict of interest.

5.2. We are currently undertaking an analysis of Lords' financial interests in organisations engaged in lobbying and political advisory services, and have found peers enjoying paid employment relating to the provision of political advice, strategic advice, public policy and similar— some of which may be proxy terms for activities such as paid lobbying that are prohibited by the Lords Code of Conduct. We are currently drafting our analysis for publication which we will share with the Ethics and Integrity Commission.

5.3. We consider that peers should not sit in the House of Lords while holding registerable interests in firms lobbying on behalf of private clients, or while they engage in paid work for foreign governments.

5.4. RECOMMENDATIONS

5.4.1. **The Lords' Code of Conduct should be tightened, with its lobbying rules brought in line with the Commons'.**

5.4.2. **Peers should be required either to dispense of their interests in lobbying firms or leave the House of Lords.**

5.4.3. **The Lords' Commissioner should impose harsher sanctions for serious breaches of the code of conduct.**

5.4.4. **The House of Lords Appointment Commission (HOLAC) should have a role in re-assessing peerages where Lords have committed serious wrongdoing that would have triggered a recall petition were they an MP.**

6. BUSINESS APPOINTMENT RULES (BARs)

- 6.1. There has been little substantive change to the BARs since 2012, and the current government has not announced any changes to update them despite their manifesto commitment.¹⁵ The rules could have been updated as part of reforms from July 2025, which included the establishment of the Ethics and Integrity Commission and outlined a new process for administering the rules on the revolving door, but the Government chose not to modernise them.¹⁶
- 6.2. In our research “*Managing revolving door risks in Westminster*”¹⁷ we outline the key risks that the Business Appointment rules should mitigate against:
- Public officials might favour organisations while in office with a view to ingratiating themselves with them and securing a reward of future employment.
 - Former public officials might seek to influence their former government colleagues to make decisions in a way that is sympathetic to their new employer.
 - Former public officials may use confidential information to benefit their new employers – for example during procurement procedures.

Our research found that between January 2017 and June 2022:

- Nearly a third (29 per cent) of all new jobs taken up by former ministers and senior officials had a subject overlap with their previous government brief (177 out of 604 roles).
 - Nearly one in ten (19 out of 217) of those seeking advice from ACOBA did so in relation to taking up roles in a consultant lobbyist firm.
- 6.3. Whilst we welcomed the July 2025 policy recommendations for potential new fines (for example expecting former ministers who breach the rules on the revolving door to repay their severance pay as a financial penalty for rule breaking) and plans for the oversight of former ministers and public officials leaving government, it is unclear how these will be enforced and the rules themselves remain unchanged. Therefore, our position remains that the current BARs still do not sufficiently protect the policymaking process from the risks posed by the revolving door and remain in urgent need of reform. Past scandals have demonstrated for example, in the case of Greensill Capital, how a former Prime Minister could have unparalleled access to policy makers without consequence – putting billions of pounds of public money at risk.

6.4. **RECOMMENDATIONS**

- 6.4.1. **The Government should further extend the scope of the Business Appointment Rules** so that they prohibit appointments for two years where the applicant has had significant and direct responsibility for policy, regulation or the awarding of contracts relevant to the hiring company.
- 5.2.2. **The lobbying restriction should be extended to at least five years**, with consideration of an extension for the most senior roles such as Prime Minister and Chancellor of the Exchequer.

¹⁵ [Labour Party Manifesto](#) 2024 [accessed 7 April 2026]

¹⁶

<https://www.transparency.org.uk/news/new-ethics-commission-welcome-stronger-rules-backed-law-are-needed> [accessed 7 April 2026]

¹⁷ Transparency International UK, *Managing revolving door risks in Westminster*, March 2023, accessible at: <https://www.transparency.org.uk/sites/default/files/2024-12/Managing%20Revolving%20Door%20Risks%20in%20Westminster%20-%20Transparency%20International%20UK.pdf> [accessed 7 April 2026]

- 5.2.3. **The lobbying ban should include a prohibition on any work for lobbying firms within a set time limit.**
- 5.2.4. **The Government should introduce more meaningful sanctions**, including binding monetary penalties, for those who breach the Business Appointment Rules.

ANNEX 1: PROGRESS ON THE COMMITTEE ON STANDARDS IN PUBLIC LIFE'S STANDARDS MATTERS 2 RECOMMENDATIONS ON
MINISTERIAL STANDARDS, REVOLVING DOOR AND LOBBYING:

Recommendation from Committee on Standards in Public Life, Standards Matter 2	Implementation progress	TI-UK Commentary
The government should pass primary legislation to place the Independent Adviser on Ministers' Interests, (2) the Public Appointments Commissioner, and (3) the Advisory Committee on Business Appointments on a statutory basis.		No progress
The Ministerial Code should be reconstituted solely as a code of conduct on ethical standards.		While not solely a code of conduct for ethical standards, the ministerial code was restructured so that conduct, interests and procedures are separate in the 6 th November 2024 Ministerial Code.
A requirement for the Prime Minister to issue the Ministerial Code should be enshrined in primary legislation.		Not included in 6 th November 2024 Ministerial Code updates and no explicit answer in ministerial questions: https://questions-statements.parliament.uk/written-questions/detail/2024-07-23/1231
The Independent Adviser should be consulted in any process of revision to the Ministerial Code.		3.1 of the Ministerial Code
The Ministerial Code should detail a range of sanctions the Prime Minister may issue including, but not limited to, apologies, fines, and asking for a minister's resignation.		2.7 of Ministerial Code. Introduced in the December 2022 Ministerial Code.
The Independent Adviser should be appointed through an enhanced version of the current process for significant public appointments.		Independent Adviser appointed by the Prime Minister's predecessor during his term of office.
The Independent Adviser should be able to initiate investigations into breaches of the Ministerial Code.		6 th November 2024 Ministerial code introduced this provision.
The Independent Adviser should have the authority to determine breaches of the Ministerial Code.		The 6 th November 2024 Ministerial Code formalised the Independent Adviser's ability to advise the Prime Minister if a breach has occurred, not determine it, which remains the responsibility of the PM.
The Independent Adviser's findings should be published no more than eight weeks after a report has been submitted to the Prime Minister.		Code states in a "timely manner". Rather than the specified eight weeks
The Business Appointment Rules should be amended to prohibit for two years appointments where the applicant has had significant and direct responsibility for policy, regulation, or the awarding of contracts relevant to the hiring company.		Business Appointment Rules currently last updated in 2016, not mentioned in July 21st 2025 announcement .
The Business Appointment Rules should be amended to allow ACOBA and government departments to issue a ban on lobbying of up to five years.		Business Appointment Rules currently last updated in 2016, not mentioned in July 21st 2025 announcement .
The lobbying ban should include a ban on any work for lobbying firms within the set time limit.		Business Appointment Rules currently last updated in 2016, not mentioned in July 21st 2025 announcement .
The government should make adherence to the Business Appointment Rules an enforceable legal requirement for ministers, civil servants, and special		When CSPL made this recommendation, it acknowledged that "part of this legal framework already exists as both the Civil Service Management Code and the Model

advisers, and set out what the consequences for a breach of contract may be.		Contract for Special Advisers contain provisions on the Business Appointment Rules".
ACOPA rulings should be directly binding on applicants.		No statutory underpinning or 'ministerial deed' equivalent.
ACOPA should have the power to undertake investigations into potential breaches of the Business Appointment Rules, and be granted additional resources as necessary. The Cabinet Office should decide on sanctions or remedial action in the case of a breach.		Implementation ambiguity in Government's 21 st July 2025 announcement. States that "in the event of a serious breach of the Business Appointment Rules, ministers will in future be asked to repay any severance payment they have received." Which would imply an investigation to determine a breach - presumably by the Independent Adviser on Ministerial Standards with the PM deciding the sanction under current arrangements - more clarity needed.
Government departments should publish anonymised and aggregated data on how many applications under the Business Appointment Rules are submitted, approved, or rejected each year.		Many departments now publishing figures in their annual accounts (see Cabinet Office, Defra , DCMS) but not all (see DSIT).
The Cabinet Office should ensure the Business Appointment Rules are applied consistently across all government departments, and work with ACOPA to promote best practice and awareness of the rules.		21 st July 2025 announcement stated that: "To improve the consistency of the application of the Rules in departments, the Civil Service Commission, which already audits departments for compliance with the Civil Service Recruitment Principles, will in the future undertake regular audits of departmental decisions of Business Appointment applications for grades below the level currently administered by ACOPA" Due to the splitting of responsibilities between Independent Adviser and the Civil Service Commission there will now need to also be consistency of the rules between these two bodies.
The Cabinet Office should collate all departmental transparency releases and publish them in an accessible, centrally managed and searchable database.		Gifts and hospitality are now collated but not searchable. Meetings' accessibility and centrality not improved.
The Cabinet Office should provide stricter guidelines on minimum standards for the descriptions of meetings and ensure compliance by government departments.		New guidelines first published in December 2023 provide more detailed guidelines on minimum standards.
The government should publish transparency returns monthly, rather than quarterly, in line with the MPs' and peers' registers of interests.		Gifts and hospitality published monthly but meetings still quarterly.
The government should include meetings held between external organisations, directors general, and directors in transparency releases.		
The government should include meetings held between external organisations and special advisers in transparency releases.		
The government should revise the categories of published information to close the loophole by which informal lobbying is not disclosed in departmental releases.		

The government should update guidance to make clear that informal lobbying, and lobbying via alternative forms of communication such as WhatsApp or Zoom, should be reported to officials.		Guidance issued in December in 2023 states that "Remote formal meetings using video or audio-conferencing technology should be included. Audio calls should also be reported where these replace or take the format of an official meeting." But no mention of WhatsApp or other social media messaging platforms.
Consultant lobbyists should also have to register on the basis of any communications with special advisers, directors general, and directors.		
Consultant lobbyists should have to declare the date, recipient, and subject matter of their lobbying.		

ANNEX 2: LOBBYING REGISTERS INTERNATIONAL COMPARISON

	Nearest to best practice
	In-between
	Furthest from best practice

	Scope: Lobbyists		Scope: Public officials			Form of communication			Reporting		
Country	In-house	Consultant	Ministers	Special advisors	Legislators	Face-to-face	Written	Oral (remote)	Purpose of lobbying	Spending	Reporting period
Canada (statutory register) Est. 1989	Section 7	Section 5	Section 2(1)	Section 2(1)	Section 2(1)	SOR/2008-116 (Sections 6 and 9) Section 5(1)(a)	Section 5(1)(a) NB. is included in registration details	Section 5(1)(a) NB. is included in registration details	Section 5(2) Example		Monthly SOR/2008-116 (Sections 6 and 9)
Germany (statutory register) Est. 2021	Section 1(4) Section 2	Section 2	Section 1(1)	Section 1(2) Includes contact with employees	Section 1	Section 1(3) Any contact	Section 1(3)	Section 1(3)	Section 3(1)(4)	Section 3(1)(8)	Without delay and by the end of the quarter at the latest Section 3(3)
Ireland (statutory register) Est. 2015	Section 5(2)	Section 5(1)	Section 6(1)(a)	Section 6(1)(e)	Section 6(1)(b)	Section 5(4)	Section 5(4)	Section 5(4)	Section 12 Example		Every four months (Sections 7 and 12)
Scotland (statutory register) Est. 2016	Section 1	Section 1	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1 incl. video conferencing			Section 6 Example		Biannually (Section 11)
US (statutory register) Est. 1946	SEC 3(7) 2 USC 1602	SEC 3(9) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(4) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 5 2 USC 1604 Example		Quarterly
Westminster (statutory register) Est. 2014		Section 2	Section 2(3)	Can be introduced via S.I.		Section 2(3)	Section 2(3)	Section 2(3)	Section 5 Example		Quarterly (Section 5)
Westminster (ministerial code)									Example		Quarterly (Para 3.14) NB subject to the grid

Ethics and Integrity Commission Lobbying, Disclosure and Access to Government Review Call for Evidence

Dr Ben Worthy (Birkbeck College) and Dr. Michele Crepaz (QUB)

Drawing on our research and elsewhere¹, we argue that.

- At present transparency is limited in scope, weakened by loopholes and incomplete.
- The EIC should work towards publishing data in an accessible, centrally managed and searchable database.
- Transparency needs to be connected to clear and robust sanctions, as without adequate sanctions, voters see the 'crime not punishment'.

Current problems: scope, loopholes and compliance

1.1 Transparency around lobbying can improve standards in two ways: directly by politicians being 'caught out', or through a continual sense of being 'watched', which can deter poor behaviour before it happens. In the UK, lobbying transparency is insufficient in numerous ways. Data at present are scattered across various locations, full of loopholes and subject to growing gaps and non-compliance.²

1.2 One problem concerns the **scope and coverage of transparency**: At present, the UK's lobbying transparency system is made up of different overlapping and fragmented sources. Data are estimated to be held across 20 different websites, in various forms.³

1.3 Another weakness concerns **the loopholes**, especially important in the 'evolving' and complex world of communications. At present, the regulations fail to capture key institutions-such as the Houses of Parliament-and the growing informal methods of contact between lobbyist and lobbied, from texts to WhatsApp⁴.

1.4 A final concern is **data incompleteness**, across all the different tools available. As CSPL and others pointed out, transparency data are 'scattered, disparate, and not easily cross-referenced'⁵. Cabinet Office data on Ministerial meetings and interests are held in CSV, while lobbying meeting can be best seen on Transparency International's own open access site⁶. There is also a question of the accuracy of the data itself. Rose Wiffen wrote of how

¹ See Michele Crepaz, Ben Worthy, Cleaning Up UK Politics: What Would Better Lobbying Regulation Look Like?, Parliamentary Affairs, Volume 77, Issue 3, July 2024, Pages 435–449, <https://doi.org/10.1093/pa/gsad024>

² Transparency International (2022) 'Restoring Trust in our Lobbying System', Written evidence from Transparency International UK (LOB10). 10 August 2022
<https://www.transparency.org.uk/uk-government-lobbying-transparency-department-disclosure-delays>.

³ See Whiffen, R (2023) Do the government's proposals on standards and integrity go far enough? *Civil Service World*
<https://www.civilserviceworld.com/in-depth/article/do-the-governments-proposals-on-standards-and-integrity-go-far-enough>

⁴ CSPL (2021) *Upholding Standards in Public Life Final report of the Standards Matter 2 Review*, p4.

⁵ CSPL (2021) *Upholding Standards in Public Life Final report of the Standards Matter 2 Review*, p19

⁶ See the site at <https://openaccess.transparency.org.uk/>

among the latest data releases ‘there were almost 30 instances where the description of the meeting listed little more than the Department’s name or remit’.⁷

Specific changes

In responding to the call, we would make the following points

- 2.1 The scope of any regulations should be as **wide as possible**: it should be **expanded** to include communications made to others, such as special advisers, director generals and directors as well as Parliament, as all are subject to lobbying.
- 2.2 In line with more robust regimes, data should include date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place. It should also seek to capture informal communications such as WhatsApp, where possible, in line with government guidance.
- 2.3 The Registrar of Consultant Lobbyists should include **all lobbyists**. The information above can be created in an easy to capture way, to reduce the burden, possibly through the use of simple online forms.
- 2.4 The Registrar of Consultant Lobbyists’ enforcement powers should more actively used, especially the **‘name and shame’ and removal power**-with use made automatic.
- 2.5 Government transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials should be automatically published with **as little delay** as possible, perhaps with a view to automation.
- 2.6 Non-compliance with government transparency returns should result in a requirement for **explanation and/or naming and shaming**.
- 2.7 The declaration and publication of financial interests for Ministers and senior government officials is often delayed and needs to be made (i) timely (ii) easier to search and cross-reference. Serial non-compliance (over 2-3 publication cycles) should result in **an investigation (perhaps by the Advisor on Ministerial Interests)**.

What can the EIC do generally about transparency?

3.1 Push for centralised and accessible data: The EIC has been ‘tasked with improving public understanding of the ethics system and...as a ‘one-stop shop’ for members of the public looking for information on standards in public life’⁸. The ideal first step would be to ‘collate all departmental transparency releases and publish them in an accessible, centrally managed and searchable database’⁹. Further into the future, experiments and innovations such as the

⁷ See Whiffen, R (2023) Do the government's proposals on standards and integrity go far enough? *Civil Service World*
<https://www.civilserviceworld.com/in-depth/article/do-the-governments-proposals-on-standards-and-integrity-go-far-enough>

⁸ See Gov.uk (2025) Ethics and Integrity Commission to drive up standards across the public sector
<https://www.gov.uk/government/news/ethics-and-integrity-commission-to-drive-up-standards-across-the-public-sector>

⁹ See Transparency International (2022)
<https://www.transparency.org.uk/uk-government-lobbying-transparency-department-disclosure-delays>

Westminster Accounts or work by Desmog offer models of how data can be collated into accessible form, and made accessible and useable¹⁰.

3.2 Push for clear and robust sanctions, as without adequate sanctions, voters see the ‘crime not punishment’. There needs to be stronger accountability and sanctions, to deter and, if necessary, punish. Such mechanisms must be clear, powerful and publicised, to have a full effect.

3.3 Championing and supporting the new regime: Any openness reform needs high-profile and sustained support. We have argued that ‘one final important ingredient is vocal support for high standards and openness, which can act as a **deterrent and help reassure the public something is being done**’. In recent years, lobbying has been undermined by a lack of support for the system from political elites and leaders. The EIC, working with campaigners, advocates, journalists and others, can help build a coalition of support to champion openness.

¹⁰ See Sky (2023)

<https://news.sky.com/story/westminster-accounts-search-for-your-mp-or-enter-your-full-postcode-12771627>

and Desmog (2026)

<https://www.desmog.com/2026/04/18/mapped-nigel-farage-reform-uk-money-income-donations-tracker/>

Ethics and Integrity Commission

Lobbying, Disclosure and Access to Government Review

Call for Evidence. April 25 2026.

This submission is supplied as suggested by EIC secretariat as I asked several questions about corruption with the way our system in government is not working. This hopefully will be accepted as a Late Submission as I was not aware that this was under review.

My name is Gordon Sim.

I have become very angered and frustrated by the manner our so-called politicians, "lie, mislead, & misinform" the public !

We are a sovereign country which can afford to do more but our politicians & media continue to mislead including in Parliamentary debates.

In supplying this submission I wish that the questions I have raised in my email will be answered and also taken into account and be applied to "All Submissions".

The questions about APPG's and Friendship groups need to be taken into account when concerns are raised about decisions made on behalf of our country which have been influenced by outside concerns which are not in the best interests of our public !.

Call for Evidence.

5. Is there merit in replacing the "Register of Consultant Lobbyists" ?.

There should be no need to replace but to enhance/expand the register.

All forms of formal and informal Lobbying should be a requirement of all MP's .

This could be done via their secretarial assistants just as written requests from their public/voters do.

All messages via phones should also be logged on a monthly basis.

We have the technology there should be no problem in recording these details.

6. Is the "Register of Consultants" enforcement powers sufficient ?.

There is no deterrent to "Non-Compliance" that is enforced or even properly policed !.

The Deterrent needs to be properly policed and acted upon. Information received by whom ? . Then action taken !. No second chance !. The respondent is removed from post !, MP or Lobbyist !.

7. Resource implications should be minimal as stated in 5. We have the technology inc AI !.

9. Meetings with Ministers etc, the transparency of data is not easily or always available !.

This data should include a) b) c) d) and all those involved. The decisions made or promises/suggestions as to what happens next. A full copy of agenda & attendee's also.

10. Oversight or enforcement for Non-Compliance of Government Transparency.

There will be excuses, but these excuses should be declared publicly to the House of Commons within 1 month of request and repeated every 2 weeks or person removed from post !.

16-17-18-19. All financial interests must be declared and how received, when and where !.

Comments:-

This submission is supplied as suggested by EIC secretariat as I asked several questions about corruption with the way our system in government is not working.

My email to EIC on April 23 2026 was to raise my concern.

As a member of the public I am very concerned at the Influence on MP's via funding of APPG's, the donations of support to Ministers & MP's via influential groups and the growth of "Friends of Israel", Friends of America" and other friendship groups.

I have read through the 7 Nolan points & your own ref Ethics, but these items appear missing.

Listening to several select committee's, there is a distinctive positive attitude to some items being discussed !.

In fact the "Home Affairs Select Committee" chair asked how many members were "Friends of Israel" !.

This turned out to be 3 x Labour, 2 x Conservative & 1 x Liberal !.

My concern is that these committee's are supposed to be making decisions on behalf of their electorate & country, not being swayed on behalf of another country or state.

These politicians have taken an Oath of Allegiance to "King & Country" yet feel it is ok to sell their allegiance to others !. In another time as friends have said these would be considered as "traitors" to their country !

Which would no doubt apply to the present situation with Peter Mandelson & the King's brother !.

I urge you to take urgent steps to correct this situation.

State clearly who the submission is from, i.e. whether from your or sent on behalf of an organisation.

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

I have become very angered and frustrated by the manner our so-called politicians, "lie, mislead, & misinform" the public !.

We are a sovereign country which can afford to do more but our politicians & media continue to mislead including in parliamentary debates.

In supplying this submission I wish that the questions I have raised in my email will be answered and also taken into account and be applied to "All Submissions".

The questions about APPG's and Friendship groups need to be taken into account when concerns are raised about decisions made on behalf of our country which have been

influenced by outside concerns which are NOT in the best interests of our public !.

From the Charity Commission regarding charity campaigning and political activity:

- As the expert regulator of charities in England and Wales, the Commission is not the voice for the charity sector. However, we do have unique perspectives and insights with which to advise government on policy matters relating to charities.
- The Charity Commission's role in relation to lobbying is framed by our established [guidance on campaigning and political activity](#) by charities. Our guidance recognises that many charities will legitimately seek to influence public policy or decision-makers where this furthers their charitable purposes and is in the best interests of the charity. Campaigning and political activity can be appropriate activity for a charity to undertake, provided it is undertaken solely in furtherance of the charity's purposes and the charity remains independent of any political party or candidate.
- Our guidance is clear that charities must never have a political purpose (charities can only exist to further one of [13 charitable purposes](#)) and must not support or oppose, or be seen to support or oppose, a political party or candidate. Trustees are responsible for ensuring that any campaigning activity furthers the charity's purposes. In making these judgements, trustees are expected to consider both the benefits and the risks of proposed activity, including reputational, legal and financial risks, and to ensure that the charity is independent of party politics and perceived to be independent of party politics.
- A key principle within our regulatory framework is the proper stewardship of charitable resources. We expect charities to use their funds and assets reasonably and only in the best interests of the charity. In that context, trustees should exercise particular care when considering whether to spend significant sums on external consultants, including consultant lobbyists, to undertake activity on its behalf. Extensive or high-cost use of such services may be difficult to justify as being in the best interests of the charity, especially where it does not clearly and demonstrably advance the charity's purposes.
- In general, all decisions taken by trustees, including those relating to campaigning and political activity, must be in the charity's best interests, be made according to the Commission's [decision-making principles](#), and be properly recorded.
- This framework aims to support legitimate charitable advocacy while promoting public trust and confidence in charities and ensuring that charitable resources are used responsibly and transparently.



Evidence Submission to the
Ethics and Integrity Commission
Lobbying, Disclosure, and Access to Government Review

Submitted by Dr. Alexander Fitzpatrick

Dr. Alexander Fitzpatrick is a Lecturer in Public Policy at Queen's University Belfast and a Core Member of the Centre for Public Policy and Administration. Dr. Fitzpatrick holds a PhD from University College London, where he researched the utility and design of lobbying/transparency registers in a comparative context, and is a United Nations CEPA-recognised expert on lobbying registers. Dr. Fitzpatrick's research examines how lobbying/transparency regulations are designed across different jurisdictions, and how these policies and transparency interfaces are engaged with by lobbyists and policy-makers in practice. As such, Dr. Fitzpatrick researches both how transparency policies are designed by states, as well as the consequences of these policies once established.

Drawing on my research, and the research of other leading scholars in the field, in this submission I provide evidence and argue for:

- **The establishment of a managed, online, and searchable lobbying register.** This register should have a *de minimus* definition of lobbying based on actions and expand the range of political actors covered by the regulation. This approach acknowledges the reality of who is actually lobbying and being lobbied in the UK, producing genuine (not symbolic) transparency.
- **International best practice alignment.** The EIC should engage in policy learning, looking to the best practice cases of Ireland, Germany, France, Canada, and the EU as models of relatively robust lobbying regulations. By engaging with their contemporaries, the EIC will be better equipped to anticipate resource requirements and mitigate issues identified elsewhere.
- **Centralised, accessible, and interoperable lobbying data.** To empower citizens, the media, and others, the data generated by this new register should be centralised and interoperable. By creating a 'one stop shop' for transparency, benefits are provided in terms of accessibility while also potentially reducing administrative burdens, such as FOI requests to Government Departments, or civil service units.
- **Devolved harmonisation.** The EIC should engage with the Devolved Administrations of the UK to harmonise transparency efforts. This could see the EIC develop a robust lobbying register that may act as a blueprint for new registers in Northern Ireland and Wales, and a potential reform of the Scottish register. This could encourage a coherent UK-wide agenda of transparency that acknowledges that many organisations lobby in different jurisdictions of the UK.

1. Establishing a New, Managed, Online, Searchable Lobbying Register

- 1.1. To begin, it should be stressed that research has highlighted that **robust lobbying transparency has benefits of improving trust in politics**.¹ As such, improved lobbying transparency should be framed as a public good rather than a potential 'tax' on lobbying.
- 1.2. Robust lobbying registers should be seen as providing a public good of information to the public, other organisations that lobby, and policy-makers. **For lobbyists, this data can potentially level the 'information playing field'** by providing information to groups that do not necessarily have the means to gather data themselves.² **Research has highlighted that for policy-makers, lobbying register data (in jurisdictions with relatively high levels of transparency) is used to learn about groups that approach them and understand the lobbying landscape more fully.**³ As such, robust lobbying registers have practical benefits for those that lobby as well as those that receive lobbyists.
- 1.3. When weighing the costs and benefits of establishing a robust agenda of lobbying transparency, a lobbying register with **accessible and searchable data may facilitate a reduction in other administrative burdens placed on Government, such as reducing Freedom of Information (FOI) requests made to Government Departments, or civil service units.** This may positively change the ways in which the public engage with transparency information by lowering the burden of access and by democratising information.
- 1.4. The UK's existing Register of Consultant Lobbyists is considered among the weakest and least 'robust' lobbying regulations globally.⁴ Notably, it has a very narrow scope of capture, containing only consultant lobbyists that lobby a small subset of public officials. As a result, **the existing framework of lobbying regulation fails to reflect the reality of who is lobbying and who is being lobbied.**
- 1.5. Research has highlighted the in-practice minimal overlap between those that must register, and those who 'meet' (and *de facto* lobby) ministers, with **just 4% of groups that are disclosed in ministerial meeting logs appearing in the Register of Consultant Lobbyists.**⁵ Any new lobbying register should have a capture that is as wide as possible. **Any new lobbying register should have a *de minimus* definition of 'lobbying' based on actions rather than actor type.** This approach would ensure that *any* organisation that lobbies must register, reflecting the

¹ Fitzpatrick, A. and Coen, D. (Forthcoming 2026). 'Shining a light on lobbying: Understanding knowledge of lobbying rules and attitudes towards trust.' In Chari, R. Crepaz, M., Junk, W. M., and Korkea-Aho, E. (eds) *The Oxford Handbook of Lobbying and its Regulation*. Oxford: Oxford University Press.

² See, Fitzpatrick, A. (2024a) *The strategic utility of lobbying registers: A study of three European states*. PhD Thesis. University College London; Crepaz, M. (2020). 'To inform, strategise, collaborate, or compete: What use do lobbyists make of lobby registers?' *European Political Science Review* 12 (3), pp. 347-369. DOI: 10.1017/s1755773920000156; Fitzpatrick, A. and Coen, D. (2025) 'How do policy-makers engage with lobbying registers? Evidence from Ireland and France.' *Interest Groups & Advocacy* 14, pp. 298-324. DOI: 10.1057/s41309-025-00245.

³ Fitzpatrick, A. and Coen, D. (2025).

⁴ Chari, R., Hogan, J., Murphy, G., and Crepaz, M. (2019). *Regulating Lobbying: A Global Comparison*. 2nd Edition. Manchester: Manchester University Press.

⁵ McKay, A. M. and Wozniak, A. (2020). 'Opaque: An empirical evaluation of lobbying transparency in the UK.' *Interest Groups & Advocacy* 9, pp. 102-188. DOI: 10.1057/s41309-019-00074-9.

reality of the UK's lobbying population. This would also enable communications via less formal channels such as WhatsApp or non-office/non-parliament-based meetings to be registered.

- 1.6. **Any new lobbying regulation should apply to lobbying not only ministers, but also senior civil servants of at least Permanent Secretaries and above as well as any official that heads a State or Semi-State agency. Special advisors should also be covered by the legislation given their increasingly important role in UK politics.** This model follows that of Ireland, where all elected officials at national and local level, senior civil servants, special advisors, and many agency heads are considered 'Designated Public Officials' (DPOs).
- 1.7. **Revolving door 'cooling-off' provisions form a core component of any new lobbying regulation,⁶ and should be applied to all DPOs.** Research has highlighted the need for these for 'elected' policy-makers whose networks may facilitate undue influence via lobbying careers after leaving office.⁷ **For UK special advisors, research highlights their most common post-office job to be corporate lobbying,⁸** raising genuine concerns over the need for these actors to be governed by lobbying regulations and cooling-off periods while in office.
- 1.8. While some have discussed lobbying regulations' potential to be taxing on smaller organisations,⁹ I would strongly argue that these concerns do not outweigh the public benefit of lobbying transparency. By designing an easy-to-use register, the administrative burden of registering lobbying actions may be reduced. Furthermore, **by framing transparency as a public good, and by emphasising the potential benefits of generating information on lobbying for lobbyists,¹⁰ this may create practical incentives for registration and compliance.** Additionally, research has shown there to be perceived **reputational benefits of lobbying registration,¹¹** with registration facilitating group legitimacy. **Accessible education efforts in conjunction with a well-designed register platform will lower any potential 'costs' of registration for smaller groups, and concerns for any onus placed on these groups should not discourage the EIC from moving forward with this plan.**
- 1.9. The justification for establishing a new lobbying register rather than amending the existing Register of Consultant Lobbyists is found on the basis that **a 'from scratch' approach would not provide any first mover knowledge or reputational advantage to those already registered.** Establishing a new register also opens up the space to design something that works for the objectives needed, rather than trying to fit new regulations into the existing space. An attempt should be made, however, to provide a link between an archived version of the Register of Consultant Lobbyists for transparency purposes. If anything, this will serve as a measure for the EIC and Government to report on the scale of lobbying that may have not

⁶ See Chari et al. (2019).

⁷ See Chari et al. (2019, 10-12) for a full discussion.

⁸ Orchard, D., Gough, A., and Pickering, H. (2024). 'Life after Whitehall: The career moves of British special advisers.' *The British Journal of Politics and International Relations* 26 (1), pp. 149-169. DOI: 10.1177/13691481221144228.

⁹ See Chari et al. (2019, 10-12) for a full discussion.

¹⁰ See Fitzpatrick (2024a).

¹¹ Năstase, A. and Muurmans, C. (2020). 'Regulating Lobbying in the European Union: A voluntary club perspective.' *Regulation and Governance* 14 (2), pp. 238-255. DOI: 10.1111/rego.12200.

been captured under the current regulatory structure, and report on the relative policy success of any new register.

2. A Policy-Learning Approach

- 2.1. **The EIC should not look at developing a new lobbying regulation from the ground up in a *tabula rasa* mindset, but rather, should adopt a policy-learning approach looking to the best practice cases of Ireland, Canada, France, Germany, and the EU.** These jurisdictions are considered to have among the most robust lobbying regulation globally, each with a searchable, accessible, and downloadable data format.¹² By drawing lessons from each of these registers, and considering the domestic structure of state-society relations in the UK, **the EIC may seek to adopt a programme of ‘adaptation’ where positive and negative lessons from these other jurisdictions are adapted to suit the local context, and ‘hybridisation’ where multiple positive elements of these registers may be combined to develop a new approach to lobbying transparency.**¹³
- 2.2. As the EIC has raised questions about the functioning, resource costs, and management of a robust lobbying register, **a policy-learning approach that engages with the management bodies of these best practice lobbying registers will facilitate opportunities for issues to be foreseen and mitigated.** Additionally, this approach will enable the EIC to learn in a positive ‘what works’ manner, encouraging the design of a new robust register that builds on the lessons of other jurisdictions. **The cases of France, Germany, and the EU will be particularly important to learn from, as all three have amended and updated their systems of lobbying regulation in an incremental fashion.**¹⁴ As the EIC is starting from a position of *some* lobbying transparency via the Register of Consultant Lobbyists, these cases may provide meaningful insights into how the UK system of lobbying regulation may be updated in an effective fashion. **Meanwhile, Ireland and Canada are best practice cases of lobbying regulation in states with similar institutional histories and structures.**
- 2.3. As will be discussed below, **by adopting a policy-learning approach, the EIC can also learn about what does not work.** A key case of this is perhaps the US where, while the regulation is ‘robust’, the in-practice design of the register and its data is relatively inaccessible. This has potentially negative consequences for the quality of the transparency created.

¹² Chari et al. (2019).

¹³ See Rose, R. (1993). *Lesson-Drawing in Public Policy: A guide to learning across time and space*. Chatham, New Jersey: Chatham House Publishers Inc.

¹⁴ For a full discussion of the French case, see Fitzpatrick (2024b) ‘Lobbying in France.’ In Coen, D. and Katsaics, A. *Edward Elgar Handbook on Lobbying and Public Policy*. Cheltenham: Edward Elgar. For a full discussion of the German and EU’s lobbying registers’ reviews, see Chari et al. (2019).

3. Accessible & Interoperable Lobbying Data

- 3.1. **Any new lobbying register should be searchable and accessible online.** Data should be downloadable in clear and readable formats such as csv. All efforts should be made to avoid following a US-style system where search results may be limited or register data is available in primarily isolated PDFs. This US approach has facilitated the privatisation and monetisation of services that clean public data and sell it on for commercial purposes,¹⁵ or have necessitated the existence of NGOs that simplify the data for research purposes.¹⁶ **By creating a new register that is searchable and with accessible data formats, the EIC has the opportunity establish the UK as a best practice example of transparency excellence.**
- 3.2. **By making lobbying data accessible, searchable, and easily downloadable, the EIC can facilitate the democratisation of lobbying information.** This has the benefit of ensuring that smaller groups or average citizens may actively engage with lobbying data. **This is important as research has highlighted that only through active engagement can the trust-based objectives of lobbying regulations be achieved.**¹⁷
- 3.3. Building on the policy-learning approach discussed above, **efforts should be made to ensure that the data generated by any new lobbying regulation is interoperable.** This is important, as **research has highlighted that the fragmented nature of the data produced by many lobbying regulations inhibits comparisons or the analysis of groups that lobby in multiple jurisdictions.**¹⁸ Many UK organisations, for example, continue to lobby the EU institutions, but the differences between the UK and EU lobbying regulations makes tracking their lobbying across borders difficult. **By learning from the best practice examples of other jurisdictions, the EIC should look to produce data that has similar variable labels and data formats. This will directly contribute to the overall quality of transparency.** For the EIC too, this will enable accurate measures of the regulation's success relative to other jurisdictions, providing the opportunity to reflect, adapt, or improve the policy based on comparative evidence.

4. Devolved Harmonisation

- 4.1. **The EIC should not view the establishment of any new UK-level lobbying register as an isolated undertaking. Rather, the EIC should seek to work with the Devolved Administrations to establish a UK-wide system of lobbying transparency.** Currently, there only exists lobbying regulations for the UK-level (via the Register of Consultant Lobbyists) and for Scotland (via the Scottish Lobbying Register). Wales and Northern Ireland are without any form of lobbying regulation. Similarly, devolved English regions and local government across the UK do not have lobbying registers in place.

¹⁵ For example, *Fiscal Note* commercialises this data as a public/government affairs tool that tracks spending, while *Legistorm* allows subscribers to search its database of lobbyists and organisations to map the legislative landscape at the federal and state level.

¹⁶ *OpenSecrets.com* is the most notable in the US space.

¹⁷ Fitzpatrick, A. and Coen, D. (Forthcoming 2026).

¹⁸ Coen, D., Katsaics, A., and Vannoni, M. (2004). 'Regulating government affairs: Integrating lobbying research and policy concerns.' *Regulation and Governance* 18 (1), pp. 73-80. DOI: 10.1111/rego.12515.

- 4.2. Given the constitutional arrangement of the UK, policy is not only made in London. As such, significant powers and competences are held by the Devolved Administrations of the UK. **This means that the geography of lobbying is widely dispersed, and efforts should be made to provide genuine transparency that reflects the reality of who is lobbying and who is being lobbied.**
- 4.3. **By spearheading a reform of a robust UK-level lobbying register, the EIC can function as a policy entrepreneur for transparency, with this new register acting as a blueprint for the establishment or improvement of similar policies at the devolved level.** Acknowledging that the authority to regulate these issues is held at the devolved level, the EIC should adopt a collaborative approach and work with the Devolved Administrations. This may also have the added benefit of producing economies of scale if a similar-in-design lobbying register is adopted beyond the UK-level, reducing the relative expense of the lobbying regulation process.

June 2026

Ethics and Integrity Commission evidence submission

The National Council of Voluntary Organisations is the membership body for charities and volunteering in England. We have over 17,000 members from the largest charities to the smallest community organisations.

The relationship between civil society and government

Civil society includes a range of organisations, including charities, social enterprises and small community groups. These organisations play a vital role in building communities and supporting voluntary action, delivering essential public services and raising up the voices of those often not heard by decision-makers. They bring deep, specialist knowledge of their communities or causes, offering essential insight that can inform better service design and policy making.

The [Civil Society Covenant](#), launched by the Government in July 2025, recognises the value of national and local government engaging with civil society organisations of all types and sizes. In particular, it references a commitment to work as strategic partners with civil society to achieve shared goals and respect for our advocacy role. The Covenant recognises that the Government cannot achieve its aims without the expertise of civil society organisations. Any recommendations to improve the transparency of lobbying should not undermine this aim.

Charity regulation

In England and Wales, charities must only have purposes for [public benefit](#), and trustees must carry out purposes for public benefit. Unlike other organisations that lobby government, charities do not lobby for private gain. Charities already operate with a high level of transparency and are regulated by the Charity Commission. All charities must maintain accounting records and prepare accounts covering each financial year. Most registered charities must prepare an annual report. An annual report would include how that charity has carried out the charities' purposes for the public benefit. These reports would include a summary of advocacy work if that were a key part of the organisation's activity.

Implications of expanding the consultant lobbyist register

A third of active UK charities are micro-organisations with annual income below £10,000, and a further two fifths are small (£10,000 to £100,000). Only 5.5% have income above £1 million. Smaller organisations often don't have any paid staff, and are less likely to have staff or teams dedicated to advocacy or lobbying activity. Trustees of charities are voluntary. It is therefore important to reduce unnecessary regulatory burden on these organisations.

Civil society organisations vary greatly in their advocacy activity. For some advocacy may be a core pillar of their work, with a dedicated team and frequent meetings with government. For others, they may have no dedicated advocacy staff and may infrequently meet with a government representative. [Research from the Sheila McKechnie Foundation](#) indicates a chilling effect following the introduction of the Lobbying Act, in part due to administrative burden and ambiguity in the legislation. We are concerned that for smaller organisations, the introduction of an additional reporting process could deter them from engaging especially if they are risk-averse and concerned about falling foul of the rules.

Organisations, of all types and sizes, are experiencing high demand and higher costs without an increase in income. Examples include rising rents, increasing wages, and higher

energy bills. We would be concerned about the introduction of a system that increases the operating costs of civil society organisations.

Organisations may need to have conversations with government representatives about sensitive topics, either commercial matters or emergency response. Any new or expanded register would need to ensure these conversations could still take place. We are receiving anecdotal evidence from our members that they are concerned about threats made to their leaders and staff, especially online, due to increasing polarisation. Any system would need to safeguard individuals from threats of harm.

Recommendations

We are broadly supportive of a principle of transparency in how government operates and support the transparency of charities under charity law and regulation. However, we question whether charities need to be subject to further scrutiny through expanded reporting. We recommend that government representatives take responsibility for recording engagement rather than additionally requiring civil society organisations to record the same engagement activity.

If the reporting requirements were to be expanded to include charities, we would urge the Commission to ensure requirements are easy to understand, free, and proportionate. We propose taking learning from the model in Scotland, which focuses on face-to-face lobbying and has an exemption for smaller organisations.

Spotlight on Corruption response to the EIC's lobbying review

1. Spotlight on Corruption is a charity (registration number: 1185872) that works to end corruption in the UK and wherever the UK has influence. Our Defending Democracy programme looks at how to ensure the UK's system for regulating political integrity is fit for purpose. This includes working to improve standards regulation, make lobbying fairer and more transparent, and ensure political finance is better policed.

1. Consultant lobbyists are required to register lobbying of Ministers and permanent secretaries. Should this requirement be expanded to include communications made to others, such as special advisers, director generals and directors. If yes, which groups should be included and why?

2. Consultant lobbyists who lobby special advisers, directors general, and directors should be required to register, given that all three have significant influence over policy-making. This will ensure consistency with government transparency releases.¹
3. Registering lobbying of special advisers is particularly important, as they are the gateways to their ministers and have a significant role in policy formulation. This can be done via secondary legislation, under Part I Section 2(5) of the Lobbying Act 2014. Including directors general or directors would require primary legislation.²
4. Additionally, consideration should be given to including parliamentarians' meetings in the lobbying register, as happens in the European Parliament where MEPs publish details of scheduled meetings with lobbyists.³ Some Westminster MPs, Sian Berry MP, for example, have started doing this.⁴ According to the Chartered Institute of Public Relations, 80% of lobbyists they surveyed think that lobbying of MPs should be captured. 76% also think directors general should be captured, 80% for directors, and 76% for spads.⁵

2. Should the current requirement for only those consultant lobbyists who are VAT registered to comply with the regulations, be removed? Should a de-minimis provision be set and if so, what should the threshold be?

¹ Government transparency releases cover directors general and some directors – mainly commercial and finance directors, plus some directors who are senior responsible owners. See [Cabinet Office, Cabinet Office: business expenses, hospitality and meetings for senior officials, October to December 2025, March 2026](#)

² [Transparency of Lobbying, non-party campaigning, and trade union administration Act 2014](#)

³ [Code of conduct for members of the European Parliament regarding integrity and transparency, Article 7, accessed April 2026](#)

⁴ [Sian Berry MP, official meetings disclosure log, accessed April 2026](#)

⁵ [CIPR, Overwhelming support amongst UK lobbyists for tougher lobbying laws, research reveals, April 2026](#)

5. Yes, the VAT exemption should be removed.⁶ In particular, it exposes the UK to foreign interference. For example, ORCL's decision⁷ that Global Counsel MENA was covered by the VAT exemption because it was not based in the UK demonstrates a significant loophole for foreign lobbying firms.
6. Additionally, small businesses that fall below the VAT threshold of £90,000 can still conduct significant lobbying. As the former lobbying registrar Harry Rich said, '*you can do an awful lot of lobbying for £90,000*'.⁸ Please see our answer to question 5 for further comments.

3. What information should consultant lobbyists be required to record in the Register about their lobbying activity (for example, date, who is being lobbied, and the subject matter, as well as on whose behalf specific lobbying is taking place)?

7. In line with OECD public integrity criteria,⁹ lobbyists should be required to report the date of the lobbying, who was being lobbied, the client, the subject matter discussed, and the budget spent on the lobbying. Following the example of the European Parliament's¹⁰ and Canada's lobbying register,¹¹ it should particularly specify the piece of legislation, policy or regulation being lobbied on. This can be done via secondary legislation under Part I Section 4(5) of the Lobbying Act.¹²

4. Is the 'incidental lobbying' exemption to the requirement to register as a consultant lobbyist clear and reasonable? Are any amendments required, and if so, what changes are needed and why?

8. The ORCL found that the exemption '*is complex and the interpretation of words such as 'incidental' and 'mainly' is not always clear or universally agreed*'.¹³ The former lobbying registrar Harry Rich himself opposed it.¹⁴ It has been used as a loophole to justify not registering, for instance by Lord Dannett in September 2025 when ORCL investigated his work for Teledyde.¹⁵ Please see our answer to question 5 for further comments.

5. Is there merit in replacing the Register of Consultant Lobbyists with a register that captures all lobbying of government, regardless of who is doing it? If so, what are the

⁶ [Havenhand, George... Spotlight on Corruption. *The VAT exemption: a key weakness in the system for lobbying transparency that risks foreign influence over UK politics*. February 2025](#)

⁷ [Office of the Registrar of Consultant Lobbyists. *Summary of investigation – Global Counsel Limited*. February 2025](#)

⁸ [PACAC, oral evidence by Harry Rich, October 2025, page 10](#)

⁹ [OECD, Public integrity indicators, *Transparency of lobbying activities and prevention of undue influence*, accessed April 2026](#)

¹⁰ [European Union, Transparency register, International Road Federation, accessed April 2026](#)

¹¹ [Registry of Lobbyists, Google Canada Corporation, accessed April 2026](#)

¹² [Transparency of Lobbying, non-party campaigning, and trade union administration Act 2014](#)

¹³ [ORCL, *Consultation on the incidental exception and APPG secretariats*, March 2022](#)

¹⁴ [PACAC, oral evidence by Harry Rich, October 2025](#)

¹⁵ [ORCL, *Summary of investigation: Lord Dannatt, September 2025*. Other examples include: \[ORCL, *Summary of investigation: Lord Chadlington, July 2025*\]\(#\) and \[ORCL, *Summary of investigation: Newbridge Advisory, October 2023*\]\(#\)](#)

pros and cons? Are there ways of ensuring that any requirement to register is not disproportionately burdensome for smaller businesses, charities and think tanks?

9. In our view, the UK should adopt a similar model to the EU and introduce a comprehensive consolidated transparency register which brings together government releases and lobbyist submissions. As PACAC said in 2024 in its post-legislative scrutiny of the Lobbying Act, '*should [concerns with government transparency releases] go unaddressed, the case for a register of all lobbying activity should be revisited*'.¹⁶ That moment has now arrived.
10. A single transparency register would require all lobbyists – consultant and in-house – to register whenever they lobby ministers, special advisers, senior civil servants, and members of Parliament, filling in the full range of details, including their goals, legislative and policy proposals targeted, and intermediaries. In addition to these requirements, consideration should be given to a requirement to report on budgets used for lobbying as happens in the US.¹⁷ Meetings data from government and parliament could then be uploaded to the individual lobbyist entries as happens with the EU transparency register.¹⁸ The information on the purpose of the meeting should be submitted by the government and confirmed by the lobbyist before being published.
11. Given the ongoing issues with departmental transparency releases (see question 8), and the fact that the current lobbying register, with its exclusion for in-house lobbyists, covers just 4% of lobbyists in the UK,¹⁹ there is huge merit in replacing the register with one that captures all lobbying activities.
12. As is the case with registers in Canada, the EU, France, Germany, Scotland, and Ireland,²⁰ this would require charities and think tanks to register. This would enable the public to see if decision-makers are granting equitable access to a range of parties when formulating policy. The risk of limiting the register to commercial interests is that it could give the perception to the public that lobbying is only conducted by these interests. Including think tanks would bring much needed transparency to how the influence of this sector on government policy making works.
13. We have highlighted problems with focusing on the size of the organisation (question 2), and the 'incidental' nature of lobbying (question 4). In our view, if there is to be any limit on the scope of the register to achieve proportionality, it should be based on the **scale** of lobbying activity. For instance, in Canada organisations are only required to register if

¹⁶ [Public Administration and Constitutional Affairs Committee. *Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters*. May 2024, page 5](#)

¹⁷ For example: [European Union. Transparency register. Google, accessed April 2026](#)

¹⁸ [European Parliament. Search MEP meetings. Google, accessed April 2026](#)

¹⁹ [Transparency International UK. *Less than 4% of lobbyists covered by UK lobbying register*. September 2015](#)

²⁰ [CIPR. *No Rules Britannia*. April 2025, page 12](#)

they spend more than 8 hours in a 4-week consecutive period engaged in lobbying activity.²¹

14. As Annex B shows, the UK is increasingly lagging behind other OECD countries when it comes to lobbying transparency (including Finland, Germany, Canada, Ukraine, Chile, Ireland and France), as well as lagging behind Scotland and the EU. Of those countries or bodies shown in the table in Annex B who score higher for lobbying transparency than the UK:
 - a. All of them include both consultant and in-house lobbyists in their register.
 - b. All of them cover members of parliament as well as ministers and senior officials
 - c. Five of them have no minimum threshold of lobbying below which a lobbyist does not need to register, while four have a threshold based on the amount of lobbying conducted.
 - d. Seven have a statutory code of conduct for lobbying while two of them have a voluntary code.
15. The OECD has itself assessed that the UK's lobbying register falls short of best practice in three areas:²²
 - a. In not having a code of conduct
 - b. In not including the piece of legislation or regulation being targeted or the budget of the lobbying involved
 - c. In not being searchable by the legislation or regulation being targeted.
16. Given how far behind the UK is in the scope and detail of its lobbying register, it is important that the government invests in its improvement. As the OECD has found, transparency is one of the key drivers of trust, particularly where trust is low to start with.²³ 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%.²⁴
17. As the OECD's graph below shows, the UK is among the worst performers when it comes to trust in government – with just 27% of the population showing trust in national government, compared to 49% in Canada and 62% in Switzerland.²⁵ Greater lobbying

²¹ [Office of the Commissioner of Lobbying in Canada. Significant part of duties registration thresholds for organisations and corporations. January 2026](#)

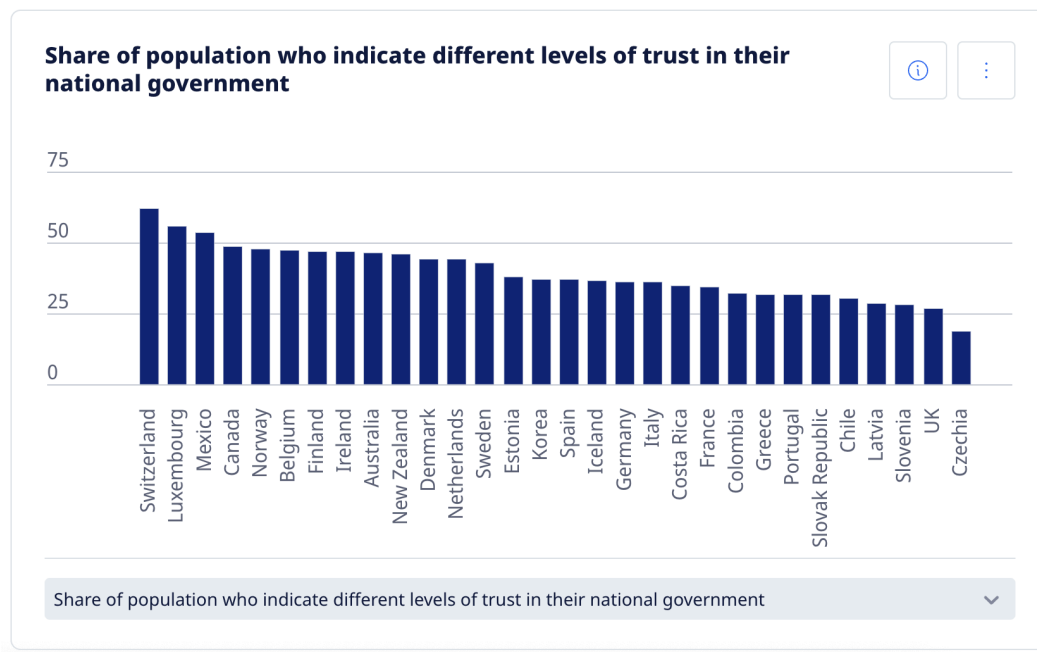
²² [OECD. Transparency of lobbying activities and prevention of undue influence. accessed April 2026](#)

²³ [OECD. Anti-Corruption and Integrity Outlook, 2024, page 60](#) and [OECD. OECD survey on drivers of trust in public institutions. 2024, page 138](#)

²⁴ [OECD. Anti-Corruption and Integrity Outlook, 2024, page 55](#)

²⁵ [OECD. Foundations for Growth and Competitiveness. Public integrity graph. accessed April 2026](#)

transparency could help the public understand how the government is making policy and can encourage the government to ensure it meets a wider range of stakeholders.



6. Are the Registrar of Consultant Lobbyists' enforcement powers sufficient to deter non-compliance? If not, what is needed?

18. The £7,500 civil sanction is far too weak to deter non-compliance, and risks being seen as a cost of doing business. While it would require primary legislation, the government should raise the maximum fine that ORCL can impose. For comparison, other countries generally impose greater fines:

Country	Maximum fine in local currency	Maximum fine in £	Maximum custodial sentence
Canada	\$200,000 ²⁶	£108,469	2 years ²⁷
USA	\$200,000 ²⁸	£149,239	5 years ²⁹
Ireland	€2,500 ³⁰	£2,163	2 years ³¹

²⁶ [Government of Canada, Lobbying Act 1985, Section 14](#)

²⁷ [Government of Canada, Lobbying Act 1985, Section 14](#)

²⁸ [2 US Penal Code § 1606](#)

²⁹ [2 US Penal Code § 1606](#)

³⁰ [Ireland, Regulation of Lobbying Act 2015, Section 20](#) and [Ireland, Fines Act 2010, Section 6](#)

³¹ [Ireland, Regulation of Lobbying Act 2015, Section 20](#)

France	€15,000 ³²	£12,978	1 year ³³
Germany	€50,000 ³⁴	£43,260	-
Austria	€60,000 ³⁵	£51,912	-
Ukraine	UAH 34,000 ³⁶	£573	-
Greece	€40,000 ³⁷	£34,608	-
Czech Republic	CZK 1,000,000 or up to 3% of the value of the assets of a legal entity ³⁸	£35,575	-
Poland	PLN 50,000 ³⁹	£10,171	-

19. Sanctions could also include a lobbying ban, as the Canadian, German, and EU equivalents can impose.⁴⁰

20. There should also be serious consideration of having a statutory code of conduct for transparency and integrity in lobbying, as is the case in fourteen OECD countries.⁴¹ CIPR polling of lobbyists found that 83% are in favour of such a code.⁴² Other countries' codes, particularly Ireland's, could be models for the UK to follow. Please see Annex A.

21. As an interim measure, the Ethics and Integrity Commission could issue guidance to ministerial private offices recommending that they should only meet lobbyists that have signed up to the PRCA's⁴³ or CIPR's⁴⁴ codes of conduct in order to encourage organisations to sign up and abide by their provisions.

22. Most importantly, if the government wants to improve enforcement, it needs to remove the loopholes from the rules it wants to enforce. The fact that only 4% of investigations

³² [France, Law No. 2013-907 of 11 October 2013 relating to transparency in public life \(1\), Article 18-9, January 2017](#)

³³ [France, Law No. 2013-907 of 11 October 2013 relating to transparency in public life \(1\), Article 18-9, January 2017](#)

³⁴ [Germany, Lobbying Register Act \(Lobbyregistergesetz\), Section 7\(3\)](#)

³⁵ [Austria, Lobbying- und Interessenvertretungs-Transparenz-Gesetz \(LobbyG\), § 13](#)

³⁶ [Code of Ukraine on Administrative Offences, Article 188-46-2](#). Non-taxable minimum income of citizens is 17 hryvnias. [Ministry of Revenues and Duties of Ukraine letter 07/29/2013 No. 7692/6/99-99-10-04-02-15/2667](#)

³⁷ [Greece, Law 4829/2021, Article 12\(1\)\(b\)](#)

³⁸ [Czech Republic, Act No. 168/2025 Coll. Lobbying Regulation Act, § 14](#)

³⁹ [Poland, Act on Lobbying in the Legislative Process, Article 19\(1\), 2005](#)

⁴⁰ [CIPR, No Rules Britannia, April 2025, page 19](#)

⁴¹ [OECD, Anti-Corruption and Integrity Outlook, 2026, page 53](#)

⁴² [CIPR, No Rules Britannia, April 2025, page 10](#)

⁴³ [PRCA code of conduct, July 2024](#)

⁴⁴ [CIPR code of conduct, accessed April 2026](#)

between 2019-2024 resulted in a sanction,⁴⁵ suggests that ORCL is being inhibited by the plethora of loopholes that need to be closed.

23. Separately, the government should also review its guidance and training for civil servants interacting with lobbyists, which was published in 1998 – it is not clear that it has been updated since.⁴⁶ This is crucial to help civil servants spot where there may be risks of policy capture by particular private interests.

7. What would be the resource implications of a) expanding the register as it stands and b) replacing the current register with a new register that captures all lobbying of government? How could these resource implications be mitigated?

24. Whether opting for a consolidated comprehensive transparency register, or opting to upgrade the statutory lobbying register and establish a single central database of government transparency releases, this will require investment. However this investment could in the long run produce savings for government departments.
25. The UK is currently spending very little on lobbying transparency. ORCL's annual budget is £375,262.⁴⁷ By contrast, Canada's Office of the Commissioner of Lobbying, which covers all lobbyists, has a budget of \$6.15m (£4.56 million).⁴⁸
26. Developing a suitable technology platform is essential. The government has stated that it has not gone ahead with the recommendation to establish a central database for government transparency releases, saying that it '*did not receive funding [under the previous government] and this remains the case*'.⁴⁹ Spotlight on Corruption has sought the cost of this database under Freedom of Information legislation and currently has a complaint with the Information Commissioner's Office after the Cabinet Office refused to release this information.
27. For potential estimates of what it might cost, it is worth comparing with the current IT upgrade to the Scottish lobbying register. The tender document for this suggests that the cost of full system implementation and set up of the register would be £300,000 with annual maintenance costs of £50-75,000.⁵⁰ The Scottish government is expecting to pay £2 million over 9.5 years. Currently we estimate that the staff costs of inputting into departmental transparency releases cost approximately £228,000 per year as an upper limit.⁵¹ While staff costs may be reduced by technology, there will need to be a suitable

⁴⁵ [CIPR, Failure by Design, June 2024, page 3](#)

⁴⁶ [Cabinet Office, Guidance for civil servants: contact with lobbyists, 1998](#)

⁴⁷ [ORCL statement of accounts, 2024-25, page 10](#)

⁴⁸ [Office of the Commissioner of Lobbying for Canada, Departmental plan 2024-25, accessed April 2026](#)

⁴⁹ [UK Parliament, Written questions, answers, and statements, Government departments: disclosure of information, March 2025](#)

⁵⁰ [BidStats, Lobbying Register System, A tender notice by Scottish Parliamentary corporate body, February 2025](#)

⁵¹ This is an upper-end estimate and is based on the assumption that each transparency return is filled in by a junior official, checked by a mid-level official, and cleared by a senior civil servant. However, the number of typos in the transparency returns suggest that they are not always quality assured, in which case the cost would be much less.

budget for ongoing staff costs, as well as oversight and enforcement of the comprehensive register.

28. One way to help fund a consolidated register would be to ensure that there is a suitable fee for all lobbyists (currently well over half of ORCL's income – £235,771 – comes from fees and with an expanded register this would rise).⁵² However, registration for lobbying registers in comparator OECD jurisdictions – including Australia, Canada, the EU, France, Germany, Scotland, USA, and Ireland⁵³ – is free, so if the UK continues to charge it will be an outlier.

29. If the UK decides to continue to charge for registration, it should ensure this is a proportionate fee that does not disincentive registration. To do this it could look at either a sliding scale, or a low flat rate fee to help subsidise the administration of the register. It should continue however to receive significant financial and staffing support from the Cabinet Office.

8. The government publishes transparency data on gifts, hospitality and the external meetings of Ministers, special advisers and senior officials. How can the quality, timeliness and accessibility of the data be enhanced?

30. Government transparency releases are split across approximately 250 spreadsheets and 100 webpages per release, making it extremely difficult to search or cross-check.

31. As we have called for above, these releases should be made in a comprehensive consolidated transparency register, or at the very least in a **single, accessible, online portal**, modelled on Transparency International's open access tracker.

32. However, there are also important changes that should be made alongside this:

- a. **Frequency:** Meeting logs should be **released at least monthly** rather than quarterly to enable timely scrutiny. In some jurisdictions, this is done in almost real-time with meeting logs updated daily in Spain,⁵⁴ Lithuania,⁵⁵ Luxembourg,⁵⁶ and Norway.⁵⁷
- b. **Scope:** government transparency releases must include meetings with all **special advisers' external meetings**, not just those with senior media executives - given the critical role they play in forming government policy. They should also include meetings with **party donors**, whose influence over policy is likely to be significantly greater than the average lobbyist.

⁵² [ORCL statement of accounts, 2024-25, page 10](#)

⁵³ [CIPR, No Rules Britannia, April 2025, page 20](#)

⁵⁴ [Government of Spain, Government agenda, accessed April 2026](#)

⁵⁵ [Ministry of Energy of the Republic of Lithuania, Agendas, accessed April 2026](#)

⁵⁶ [The Luxembourg Government, Schedule, accessed April 2026](#)

⁵⁷ [Government of Norway, Calendar, accessed April 2026](#)

33. Separately, the government should publish details of all inward and outward secondments, any conflicts of interests they pose, and mitigation plans in place for the highest risk secondments. While some departments have released this information as a result of Freedom of Information requests, none do so in a systematic or centralised way, and some departments refuse to release meaningful data in relation to FOI requests.⁵⁸

34. However, even if all the data was fully transparent and accessible, it would not be enough to ensure some individuals or firms having privileged access, and an outsized influence on government thinking and policy making. In line with the 2024 OECD recommendation on transparency and integrity in lobbying, the government needs to ensure that there are mechanisms in place to ensure **fair and equitable access to decision-makers for all stakeholders**. This is crucial to ensure that policy is made in the public interest, and to ensure value for money on public decisions.

To do this, it needs to design clear policies that ensure that it proactively engages a wide variety of stakeholders, improves its use of consultations, and employs innovative participatory mechanisms for appropriate policies. Spotlight on Corruption has developed a draft fair access policy that it is currently consulting on and will be advocating that the government adopts.

9. For meetings with Ministers, special advisers and senior officials, does the transparency data include the right information about the following:

a. The recipient(s) of the lobbying.

35. Releases would be enhanced by including all directors, not just commercial, finance directors, and senior responsible officers, and by including all special adviser meetings, not just those with senior media executives

b. The type of information and level of detail that is reported.

36. The transparency releases do not include enough detail about the content of the meetings. Between 2019 and 2024, 183 of Treasury ministers' 3,326 meetings were simply described as "*to discuss financial services*". 59 were an "*introductory meeting*" and 29 a "*general discussion*".⁵⁹

37. In comparison, the Scottish Government's transparency releases offer significantly more detail.⁶⁰

⁵⁸ [Foreign and Commonwealth Office, FOI release: outward and inward secondments, July 2016](#) and [Business, Innovation, and Skills, FOI release: current inward and outward secondments, 2014](#) and [Defra, FOI release: secondments to and from external organisations, March 2015](#)

⁵⁹ [Havenhand, George., Hawley, Sue., Spotlight on Corruption, Levelling the Playing Field, March 2025, page 27](#)

⁶⁰ As an example: [The Scottish Parliament Lobbying Register, meeting with the Scottish Grocers Federation, 18 March 2026](#)

38. The government did update its guidance in 2024, stipulating that *‘broad descriptions such as ‘general discussion’, ‘introductory meeting’, ‘informal catch-up’, ‘bilateral meeting’ etc. should not normally be used’*.⁶¹ However, the next tranche of transparency releases continued to use such phrases⁶² and this is still the case under the current government.⁶³

c. The forms of communications that should be included.

39. See our answer to question 11.

d. When and how the transparency data is published.

40. As above, transparency releases should be published at least monthly and on an accessible, online portal, and serious consideration should be given to publishing the meetings with external stakeholders of ministers on a daily basis.

10. What oversight mechanism should be put in place for ensuring adherence with the requirements for government transparency returns and what should the consequences be for non-compliance?

41. Permanent secretaries should be held to account for their department’s transparency releases, with an annual statement about compliance in the department’s annual report. A potential consequence for non-compliance could be that permanent secretaries are not able to have their performance marked as ‘exceeding’, and therefore not able to be awarded the relevant financial bonus, unless their department has published detailed and timely transparency returns. The Government Internal Audit Agency could also annually report on compliance with government transparency rules and identify departments falling behind.

42. Additional accountability mechanisms could include a central public register maintained by the Lobbying Registrar or the Ethics and Integrity Commission tracking the quality and timeliness of government releases.

11. How can any lobbying that takes place through non-corporate communications channels (eg. WhatsApp and other instant messaging platforms) or non-official settings (such as party conferences, non-official meetings) be made transparent?

43. The government’s 2023 guidance on non-corporate communications channels stipulates that ministers and officials should keep records of such communications, which can be

⁶¹ [Cabinet Office, Guidance: Senior Officials’ business expenses, hospitality received and meetings with external organisations and individuals, April 2024, page 14](#)

⁶² [Hawley, Susan., Spotlight on Corruption, Clear as mud: the UK’s lobbying transparency deficit, November 2024](#)

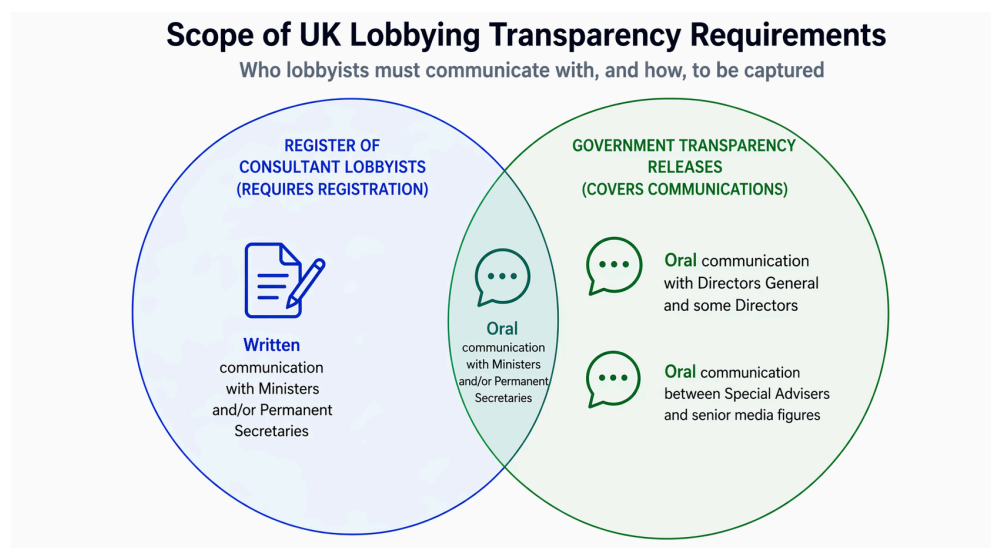
⁶³ For example: [Transparency International, openaccess, meeting between Ian Murray and OpenText, December 2025](#) and [Transparency International, openaccess, meeting between Baroness Lloyd of Effra and BT, December 2025](#) and [Transparency International, openaccess, meeting between Ian Murray and Eutelsat, December 2025](#)

subject to information access requests.⁶⁴ However, it did not go as far as CSPL recommended, that communications which are ‘*serious, premeditated, and credible, or are given substantive consideration by ministers, special advisers or senior civil servants*’ should be included in government transparency releases.⁶⁵

44. In addition, it is important that lobbying meetings that take place in non-official settings such as party conferences where policy, regulations, or legislation are discussed should similarly be included in transparency releases.

12. Have you tried reconciling the Register of Consultant Lobbyists with the Government’s transparency returns on external meetings? If so, how easy or difficult was this to do?

45. Given the mismatch between the two datasets, it is almost impossible to get a coherent comprehensive picture (see diagram below). Additionally, consultant lobbyists just list their clients and it is not always possible to determine which meetings relate to which clients.



13. What are the strengths and weaknesses of the current system for considering applications under the Government’s Business Appointment Rules?

46. The OECD assesses the UK’s business appointment rules as being relatively thorough compared to those of other OECD countries, with the UK being one of just 14% of OECD countries that track post-employment among ministers.⁶⁶

⁶⁴ [Cabinet Office, Using non-corporate communication channels \(e.g. WhatsApp, private email, SMS\) for government business, March 2023, pages 3-4](#) and [Bolton-Jones, James., Spotlight on Corruption, Briefing: ongoing lobbying loopholes despite recent government commitments to reform, October 2023, page 1](#)

⁶⁵ [CSPL, Upholding standards in public life: final report of the Standards Matter 2 review, November 2021, page 12](#)

⁶⁶ [OECD, Anti-Corruption and Integrity Outlook, March 2026, page 66](#)

47. However, the UK falls short of the OECD's best practice⁶⁷ in a number of ways.

- a. The rules are not legally enforceable.⁶⁸ While the government has proposed new financial sanctions for breaches of the rules, many experts have pointed out that there is no way to legally enforce these fines, particularly given a public official or minister will no longer be subject to contractual obligations.⁶⁹ They therefore rely entirely on those breaching the rules to voluntarily comply.
- b. Secondly, the sanctions are too small to provide meaningful deterrence. Having to forgo a severance payment of between £5,594 to £18,860⁷⁰ is nothing compared to the six- or seven-figure sums a minister can make on leaving office.

48. There are also several other weaknesses. While the Civil Service Commission, which considers civil servants' applications under the BAR, is on a statutory footing, the Independent Adviser on Ministerial Standards, who considers ministers' applications, is not.

49. In addition, the Independent Adviser's advice letters are less detailed than ACOBA's used to be. Whereas ACOBA's letters used to set out the minister's associations with the future employer while in government, along with any advice or conditions, the Independent Adviser simply sets out the advice or conditions.⁷¹ Meanwhile, the dispersion of notices across different bodies, means that the 'naming and shaming' or reputational element of sanctions is at risk of being lost.

50. Some comparable jurisdictions have tougher restrictions and sanctions.

Country	Cooling-off period	Maximum fine in local currency	Maximum fine in £	Maximum custodial sentence
Canada	1–2 years ⁷²	-	-	-
USA	1–2 years ⁷³	\$50,000 ⁷⁴	£37,245	5 years ⁷⁵
Ireland	1 year ⁷⁶	-		-

⁶⁷ [OECD, *Post-public employment: good practices for preventing conflict of interest*, 2010](#)

⁶⁸ [ACOBA, *correspondence from ACOBA to Boris Johnson, breach of the rules \(Daily Mail\)*, October 2025](#)

⁶⁹ [UK Parliament, *Written questions, answers, and statements, Government of service*, July 2025](#)

⁷⁰ [House of Commons library, *Ministerial severance pay*, December 2025](#)

⁷¹ See a comparison between [ACOBA, *Advice: Rishi Sunak, Member of the Bloomberg New Economy Forum Advisory Board, Bloomberg*, no date provided](#) and [Independent Adviser on Ministerial Standards, *Advice: Rishi Sunak, columnist, Sunday Times*, no date provided](#)

⁷² [Canada, *Conflict of Interest Act S.C. 2006, c. 9, s. 2, Sections 35–36*](#)

⁷³ [18 US Penal Code § 207](#)

⁷⁴ [18 US Penal Code § 216](#)

⁷⁵ [18 US Penal Code § 216](#)

⁷⁶ [Irish Register of Lobbying, *Guidance note on section 22 of the Regulation of Lobbying Act – The “cooling-off” period*, accessed May 2026](#)

France	3 years ⁷⁷	€200,000 or twice the proceeds derived from the offence ⁷⁸	£148,982	3 years ⁷⁹
Germany	18 months ⁸⁰	-		-
Austria	6 months for civil servants ⁸¹	3x monthly salary due for the last month of their employment ⁸²		-
Ukraine	1 year ⁸³	-		-
Greece	1 year ⁸⁴	2x total remuneration and compensation of any kind received during term of office ⁸⁵		-
Czech Republic	1 year ⁸⁶	CZK 500,000 ⁸⁷	£17,808	-
Poland	1 year ⁸⁸	PLN 5,000 ⁸⁹	£1,018	30 days ⁹⁰

51. The government's upgrade to the Business Appointment Rules does not include a crucial plank of the 2024 OECD Recommendation on Transparency and Integrity in Influence and Lobbying - namely the revolving door as it relates to regulators.

⁷⁷ [France, Penal Code, Article 432-13, January 2017](#)

⁷⁸ [France, Penal Code, Article 432-13, January 2017](#)

⁷⁹ [France, Penal Code, Article 432-13, January 2017](#)

⁸⁰ [Germany, Federal Ministers Act, §6](#)

⁸¹ [Austria, Civil Service Law 1979 \(Beamten-Dienstrechtsgesetz 1979\) § 20 \(3a\)](#)

⁸² [Austria, Civil Service Law 1979 \(Beamten-Dienstrechtsgesetz 1979\) § 20 \(3a\)](#)

⁸³ [LAW OF UKRAINE On Prevention of Corruption, Article 26\(1\)](#)

⁸⁴ [Greece, Law 4622/2019, Article 73](#)

⁸⁵ [Greece, Law 4622/2019, Article 75](#)

⁸⁶ [Czech Republic, Act No. 159/2006 Coll., on Conflict of Interest § 6](#)

⁸⁷ [Czech Republic, Act No. 159/2006 Coll., on Conflict of Interest § 23\(3\)\(c\)](#)

⁸⁸ [Poland, Act on limitation of business activity by persons performing public functions, Article 7\(1\)](#)

⁸⁹ [Poland, Petty Offences Code, Article 24](#)

⁹⁰ [Poland, Petty Offences Code, Article 19](#)

52. Additionally, the UK should look at ways to ensure that the private sector also bears the burden of upholding the business appointment rules and can face sanctions for failure to do so. This could be supplemented by requiring government suppliers to declare whether they have employed former ministers or public officials in conflict of interest declarations in procurement tenders.

14. What principles should guide the Government when reviewing the Business Appointment Rules?

53. Alongside the Nolan principles, the government should focus on preventing improper commercial advantage and privileged access, mitigating conflicts of interest and perceived conflicts of interest,⁹¹ ensuring ethical public-decision-making in the public interest as well as consistency and transparency of decision-making, and ensuring there is independent and impartial oversight which ensures meaningful deterrence.

15. What principles should guide the bodies charged with implementing the Government's Business Appointment Rules when considering applications within their cohort?

54. In implementing the government's business appointment rules, the Independent Adviser on Ministerial Standards, the Civil Service Commission and other public bodies should be guided by the principles of:

- a. Ensuring deterrence by having appropriate sanctions and enforcement policies
- b. Facilitating ethical public decision-making in the public interest
- c. Preventing conflicts of interest, and ensuring that holders of public office are not influenced in their responsibilities by future job offers, and that their future employers do not benefit from privileged information or access
- d. Committing to full transparency by publishing detailed decisions

16. What are the strengths and weaknesses of the current arrangements for the declaration and publication of financial interests for Ministers and senior government officials?

55. While overall, publication of financial interests is fairly well developed, with the declarations policed by the Independent Advisor on Ministerial standards, there are some ongoing weaknesses.

56. These include that:

- a. There is a very serious lack of consistency between the declarations on shareholdings between the House of Commons, House of Lords, devolved administrations and ministers. Peers only have to declare shareholdings above

⁹¹ [Hawley, Sue., Spotlight on Corruption. NAO reveals woeful conflicts of interest management undermining government objectivity. November 2024](#)

£100,000 or those that amount to a controlling interest.⁹² For MPs, the declaration threshold is shareholdings worth over £70,000, where they exceed 15% of a company's share capital, or where the interests might reasonably be thought to influence them.⁹³ Ministers shareholdings below the threshold set by their Parliamentary status are only declared if they are relevant to their portfolio.

By comparison the respective devolved assemblies in Scotland⁹⁴, Wales⁹⁵ and Northern Ireland⁹⁶ have a much lower threshold where members must declare shareholdings if they exceed the value 50% of their salary as set at the start of a parliamentary session. Following recent changes to these salaries, during the next parliamentary sessions of these assemblies, the threshold will be set at £38,855 for Scotland⁹⁷, £39,908 for Wales⁹⁸ and £33,600 for Northern Ireland.⁹⁹

- b. The ministerial code doesn't specify the sorts of financial interests to be declared so it is not clear, for example, that cryptoassets should be included.
- c. Ministerial interests are published quarterly, which is at odds with MPs, whose interests are updated fortnightly.
- d. The ministerial code is not statutory, so could be abolished by a future government – putting it at odds with other public bodies who will be required by statute to have an ethical code.
- e. There is an over-reliance on blind trusts to tackle potential conflicts of interest.
- f. Senior civil servants' financial interests aren't publicly available.
- g. Mitigation plans for conflicts of interest are not made public.

57. The UK fulfills around 55% of the OECD's criteria on regulation for managing conflicts of interest involving ministers and senior government officials, but just 22% of the criteria on practice managing these conflicts.¹⁰⁰ Among the criteria it fails to achieve are that at least 60% of declarations in the last two years should be verified by the responsible authority and that all declarations are made electronically.¹⁰¹

⁹² [House of Lords, Code of Conduct for Members of the House of Lords and Guide to the Code of Conduct, April 2025, page 22](#)

⁹³ [National Audit Office, Managing conflicts of interest, November 2024, page 21](#)

⁹⁴ [Scottish Parliament, Code of Conduct for MSPs, May 2021](#)

⁹⁵ [Senedd Cymru, Guidance for Members of the Senedd on the registration, declaration and recording of financial and other interests, March 2026](#)

⁹⁶ [Northern Ireland Assembly, The Code of Conduct together with the Guide to the Rules Relating to the Conduct of Members](#)

⁹⁷ [Scottish Parliament, MSP salaries](#)

⁹⁸ [Independent Remuneration Board of the Senedd, Determination on Members' Pay, Staffing and Business Costs, March 2026, page 68](#)

⁹⁹ [Northern Ireland Assembly, Salaries and Expenditure Rates 2022 - 2027](#)

¹⁰⁰ [OECD, Anti-Corruption and Integrity Outlook 2026, March 2026, page 61](#)

¹⁰¹ [OECD Public Integrity Indicators, Use of conflict-of-interest prevention mechanisms for senior officials, accessed April 2026](#)

58. To avoid conflicts of interest, some ministers make use of blind trusts. However, the lack of oversight mechanism to enforce the barrier between beneficiary and trustee means that these can't be relied upon as infallible.

17. What improvements can be made to the current system for the declaration and publication of financial interests for Ministers and senior government officials?

59. The government should look at whether a consolidated register bringing together MPs, Peers and Ministers financial disclosures, as well as those of senior government officials, would enhance transparency and make public scrutiny more effective. The government should also lower the threshold for registering interests, in line with the recommendation made to the UK by the Council of Europe's Group of States Against Corruption, but which was left unimplemented.¹⁰² For ministers, consideration should be given to have no threshold as happens in other jurisdictions (see question 18).

60. The register should indicate where financial interests are over a certain amount, even if, for the sake of financial privacy, it doesn't specify exactly what amount they are. The code should also be more specific about the types of financial interests to be declared, explicitly including cryptoassets. It should also include public information about where mitigations have been put in place to avoid conflicts of interest, and what those mitigations are. To accompany this, the Independent Adviser should publish clearer guidance on the use of blind trusts and divestment should be more routinely considered when conflicts of interest arise.¹⁰³

61. Senior civil servants' financial interests should also be made public.

18. Are there different arrangements in place in other countries for the declaration and publication of financial interests for Ministers and senior government officials that should be considered for implementation in the UK?

62. There are several approaches the UK can learn from in improving financial declaration rules for ministers and senior government officials.

- a. Canada makes the declaration of a Minister's conflicts of interest to the Conflicts of Interest and Ethics Commissioner a statutory duty under the Conflict of Interest Act,¹⁰⁴ though only some of what they report is made public.
- b. Canada also goes further than the UK and mandates that '*no minister of the Crown, minister of state, or parliamentary secretary shall have an interest in a partnership or private corporation that is a party to a contract with a public sector entity under which the partnership or corporation receives a benefit.*'¹⁰⁵

¹⁰² [GRECO, Fourth Evaluation Round of the UK, January 2015](#)

¹⁰³ [Beizsley, Daniel., Spotlight on Corruption, Blind trusts: integrity silver bullet or transparency black hole?, May 2023](#)

¹⁰⁴ [Government of Canada, Conflicts of interest act 2006, 22\(1\)](#)

¹⁰⁵ [Government of Canada, Conflicts of interest act 2006, 13\(1\)](#)

63. The lack of threshold below which ministers and senior government officials do not have to declare interests is not in line with other governments, such as Canada¹⁰⁶ and Australia¹⁰⁷, where ministers have to declare all financial interests.

19. What arrangements in place for the declaration and publication of financial interests of directors of large corporations could be adopted for use within government?

No response

¹⁰⁶ [Government of Canada. *Conflicts of interest act 2006*. 22\(1\)](#)

¹⁰⁷ [Australian Government. *Code of conduct for ministers*. June 2022. page 6](#)

Annex A: other countries' lobbying codes of conduct

Provisions in the code	<u>Scotland</u>	<u>Canada</u>	<u>France</u>	<u>EU</u>	<u>Ireland</u>	<u>Germany</u>
Identify themselves and their client	✓	✓	✓	✓	✓	✓
Respect government institutions and do not cause them harm	X	✓	X	✓	✓	X
Do not exploit relationships	X	X	X	X	✓	X
Treat confidential information properly	X	✓	✓	X	✓	✓
Do not induce officials to contravene rules	✓	X	✓	✓	✓	X
Do not mislead or be dishonest	✓	✓	✓	✓	✓	X
Do not offer financial incentives	✓	X	✓	X	✓	✓
Abide by conflict of interest rules	X	✓	X	✓	✓	X
Abide by gifts/hospitality rules	X	✓	✓	X	✓	X
Do not create a sense of obligation	X	✓	X	X	✓	X

Annex B: a comparison of lobbying registers of comparator countries and those ahead of the UK in implementing their regulatory frameworks on lobbying¹⁰⁸

	<u>UK</u>	<u>Scotland</u>	<u>EU</u>	<u>Canada</u>	<u>Ireland</u>
Who has to register?	Only consultant lobbyists	Consultant and in-house lobbyists ¹⁰⁹	Consult and in-house lobbyists engaged in influencing EU institutions, with a few exceptions including public authorities, parties, and churches. ¹¹⁰	Consultant and in-house lobbyists. ¹¹¹	Consultant lobbyists, in-house lobbyists with over 10 employees, advocacy organisations, and representative bodies. ¹¹²
What amount of lobbying triggers the need to register?	Lobbyists do not have to register if lobbying is 'incidental' to their business	There is no threshold under which a lobbyist does not have to register, though the lobby must be done orally and face-to-face (written communication and phone calls do not count). ¹¹³	There is no threshold under which a lobbyist does not have to register. ¹¹⁴	In-house lobbyists have to register if they spend more than 8 hours in a 4-week consecutive period engaged in lobbying activity. ¹¹⁵	There is no threshold under which a lobbyist does not have to register. ¹¹⁶
The targeting of which public officials	Lobbyists only have to register if targeting ministers of permanent secretaries.	Lobbyists have to register if they target MSPs, members of the Scottish Government, special advisers, and	Lobbyists have to register if they seek to influence formulation of policy or legislation or	Lobbyists have to register if they lobby ministers, MPs, parliamentary staff, members of the armed	Lobbyists have to register if they lobby ministers, members of parliament and local authorities,

¹⁰⁸ Canada, France, Germany, Ireland, Ukraine, Estonia (which doesn't have a lobbying register), Finland, and Chile: [OECD, Anti-Corruption and Integrity Outlook, 2026 figure 3.1, page 44](#)

¹⁰⁹ [The Scottish Parliament, The lobbying register: guidance, accessed April 2026, page 5](#)

¹¹⁰ [European Union, Transparency Register, Who should register?, accessed April 2026](#) and [European Union, Interinstitutional Agreement, May 2021, Articles 3 and 4](#)

¹¹¹ [Canada, Lobbying Act, 1985, sections 5 and 7](#)

¹¹² [Citizens Information Ireland, Regulation of lobbying, Who needs to register to lobby, October 2021](#)

¹¹³ [The Scottish Parliament, The lobbying register: guidance, accessed April 2026, page 5](#)

¹¹⁴ [European Union, Transparency Register, Who should register?, accessed April 2026](#)

¹¹⁵ [Office of the Commissioner of Lobbying in Canada, Significant part of duties registration thresholds for organisations and corporations, January 2026](#)

¹¹⁶ [Lobbying Ireland, Are you affected by the legislation?, accessed April 2026](#)

triggers the need to register?		permanent secretaries. ¹¹⁷	decision-making process of EU institutions including the European Parliament. ¹¹⁸	forces, and federal government employees. ¹¹⁹	special advisers, and senior civil servants. ¹²⁰
Does the country have a statutory code of conduct for lobbyists?	There is no statutory code of conduct.	It has a statutory Code of Conduct published in 2017. ¹²¹	It has a statutory Code of Conduct published in 2021. ¹²²	It has a statutory Code of Conduct published in 2023. ¹²³	It has a statutory Code of Conduct published in 2018. ¹²⁴

	<u>Germany</u>	<u>Ukraine</u>	<u>France</u>	<u>Finland</u>	<u>Chile</u> ¹²⁵
Who has to register?	Consultant and in-house lobbyists. ¹²⁶	Consultant and in-house lobbyists where lobbying is in their commercial	Consultant and in-house lobbyists ¹²⁸	Consultant and in-house lobbyists. ¹²⁹	The target of lobbying must register anyone engaged in lobbying into

¹¹⁷ [Lobbying \(Scotland\) Act 2016, Section 1](#)

¹¹⁸ [European Union, Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, May 2021, Article 3](#)

¹¹⁹ [Government of Canada, Lobbying Act 2\(1\), 1985](#)

¹²⁰ [Lobbying Ireland, Are you affected by the legislation?, accessed April 2026](#) and [The Regulation of Lobbying Act 2015 \(Designated Public Officials\) Regulations 2015](#)

¹²¹ [The Scottish Parliament, Lobbying, Code of Conduct, December 2017](#)

¹²² [European Union, Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register, May 2021, Annex I](#)

¹²³ [Office of the Commissioner of Lobbying of Canada, Lobbyists' Code of Conduct, 2023](#) and [Government of Canada, Lobbying Act 10.2\(1\), 1985](#)

¹²⁴ [Lobbying Ireland, Code of Conduct, 2018](#)

¹²⁵ Under Chilean law, targets of lobbying are the ones responsible for entering the lobbyist's details in the lobbying register.

¹²⁶ [German Parliament, Lobby register, FAQs, accessed April 2026](#)

¹²⁸ [High Authority for Transparency in Public Life, Register of interest representatives, July 2022, page 3](#)

¹²⁹ [Government of Finland, Finnish Transparency Register, Who should submit disclosures?, accessed April 2026](#)

		interests. ¹²⁷			the lobbying register, including consultant and in-house lobbyists. ¹³⁰
What amount of lobbying triggers the need to register?	In-house lobbyists must register if their lobbying is regular or permanent, or if they have more than 30 contacts with members of the Bundestag or the federal government within a three-month period. Consultant lobbyists must register when their activity falls within the statutory definition of lobbying activity. ¹³¹	There is no minimum threshold of lobbying below which a lobbyist does not need to register. ¹³²	Lobbyists have to register if lobbying is their main activity over six months or if they issue at least 10 communications in the preceding 12 months ¹³³	Lobbyists must register when they make more than five separate contacts with lobbying targets in a year. ¹³⁴	Any request for a meeting by a lobbyist requires a public official to enter them into the register. ¹³⁵
The targeting of which public officials triggers the need to register?	Lobbyists have to register if they lobby government ministers, members of parliament, and senior civil servants. ¹³⁶	Lobbyists have to register if they lobby any 'subject of law-making activity'. ¹³⁷	Lobbyists have to register if they lobby ministers, members of Parliament, presidential staff, and some senior civil servants. ¹³⁸	Lobbyists have to register if they lobby MPs, their assistants, ministers, special advisers, and civil servants. ¹³⁹	Lobbyists have to register if they lobby members of parliament, ministers, regional governors, senior members of the armed forces, ambassadors, some senior civil

¹²⁷ [Ukraine Government. National Agency on Corruption Prevention. Transparency Register launched: features, functions and registration requirements, September 2025](#) and [Government of Ukraine. Law of Ukraine about lobbying, 2024, Article 1\(6\)](#)

¹³⁰ [OECD. The regulation of lobbying and influence in Chile, 2024, page 29](#)

¹³¹ [German Justice Ministry. Law on the introduction of a lobby register for the representation of interests vis-à-vis the German Bundestag and the Federal Government, 2021, Section 2](#)

¹³² [Government of Ukraine. Law of Ukraine about lobbying, 2024](#)

¹³³ [High Authority for Transparency in Public Life. Register of interest representatives, July 2022, page 3](#)

¹³⁴ [The Finnish Government, the Finnish Transparency Register. Questions and answers, accessed April 2026](#)

¹³⁵ [Chilean Congress, Law 20730: regulates lobbying and actions that represent private interests before authorities and officials, 2014](#)

¹³⁶ [German Parliament, Lobby register, FAQs, accessed April 2026](#)

¹³⁷ [Government of Ukraine. Law of Ukraine about lobbying, 2024, Article 1\(7\)](#)

¹³⁸ [High Authority for Transparency in Public Life. Regulation of lobbying, public officials and public decisions, accessed April 2026](#)

¹³⁹ [The Finnish Government, the Finnish Transparency Register. How to disclose targets of lobbying?, accessed April 2026](#)

					servants, and other posts. ¹⁴⁰
Does the country have a statutory code of conduct for lobbyists?	It has a statutory Code of Conduct published in 2021. ¹⁴¹	It has a statutory Code of Conduct published in 2024. ¹⁴²	It has a statutory Code of Conduct published in 2013. ¹⁴³	The recommendations for good lobbying practice are optional for lobbyists to sign up to. ¹⁴⁴	There is a voluntary code of best practice, ¹⁴⁵ which is not legally binding ¹⁴⁶

¹⁴⁰ [Chilean Congress, Law 20730: regulates lobbying and actions that represent private interests before authorities and officials, 2014, Articles 3 and 4](#)

¹⁴¹ [German government, Code of Conduct for representatives of special interests in the framework of the Lobbying Register Act, 2021](#)

¹⁴² [Legislation of Ukraine, Cabinet of Ministers of Ukraine Resolution: on approval of the rules of ethical conduct of lobbying entities, October 2024](#) and [Government of Ukraine, Law of Ukraine about lobbying, 2024, Article 6](#)

¹⁴³ [LOI n° 2013-907 relative à la transparence de la vie publique, Article 18-5, October 2013](#)

¹⁴⁴ [The Finnish Government, The Transparency Register, Good lobbying practice, accessed April 2026](#)

¹⁴⁵ [Chilean Commission for Public Integrity and Transparency, Code of ethics and best practices on lobbying and private interest management, November 2023](#)

¹⁴⁶ [OECD, The regulation of lobbying and influence in Chile, 2024, page 79](#)

Annex C: How effectively the UK is implementing some of the OECD's recommendations on transparency and integrity in lobbying and influence¹⁴⁷

Recommendation	Implemented	Notes
Make publicly available online and easily accessible...timely, comprehensive and detailed information on lobbying and influence activities	~	While the UK government publishes transparency releases, they are very limited in scope and detail.
Establish and maintain a mandatory public decision-making process footprint ...with timely, comprehensive and detailed information on lobbying and influence activities	X	Transparency releases rarely specify which laws or regulations the meetings were related to, so it is not possible to construct a footprint.
Disclose online...information about donations and contributions , within a reasonable threshold	✓	The Electoral Commission publishes quarterly reports on donations to political parties.
Apply disclosure regulations to the sources of financing ...of lobbying and influence actors [such as companies...non-governmental organisations, think tanks...trade unions]	~	Think tanks do not have to declare the source of their funding, creating the risk of foreign interference.
Take measures to ensure that companies, business and trade associations, consultancies and law firms, non-governmental organisations, think tanks, research bodies and other organisations adhere to integrity standards and engage responsibly in their lobbying and influence activities.	X	The UK has no statutory Code of Conduct for lobbyists.
Provide clear standards and guidelines for public officials ...on: (i) engaging with lobbying and influence actors ...(ii) how to seek and assess information and evidence...(iii) receiving gifts , invitations and hospitalities;	~	The guidance for civil servants when interacting with lobbyists was written in 1998. There is clear guidance on gifts and hospitality. ¹⁴⁸
Design effective rules and procedures such as cooling-off periods, subject-matter limits, time limits, disclosure of post-term engagements by holders of at-risk positions.	~	There are rules in place but they are not always effective as they have no legal standing.
Provide for fair, objective, proportionate, timely and dissuasive sanctions for non-compliance with policies and regulations concerning lobbying.	~	The sanction for non-compliance (forfeiting severance pay) is insignificant compared to the vast sums a former public-office-holder can earn in a post-government appointment.

¹⁴⁷ [OECD legal instruments. Recommendation of the Council on Transparency and Integrity in Lobbying and Influence, 2010, amended in 2024](#)

¹⁴⁸ [UK Government. Acceptance of gifts, benefits, and hospitality. November 2024](#)