

Levelling the playing field.

How economic
policy gets captured
and what to do
about it.

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Foreword

“Restoring trust in our political institutions is essential to making our policy-making more effective, delivering on the public’s priorities, and growing the economy. Without trust, governments don’t have a licence to govern. Political leaders are quick to talk up the importance of that trust but, as this vital report highlights, action is required if we want to begin to build it back.

CIPR members and the wider lobbying profession understand that a healthy democracy requires high standards from all parties. That includes equal access to policymakers and a consistent approach to transparency, both notably absent from the UK’s political landscape. If building public trust is genuinely sought, then this research can serve as a blueprint for how we can achieve that.”

Alastair McCapra

Chief Executive Officer
of the Chartered Institute
of Public Relations



Key statistics

68%

Proportion of all events-related hospitality provided to the six departments that went to special advisers

0/6

The number of the departments studied that routinely publish details about secondments

3.8

Number of times per week that senior officials in the Department of Business and Trade accepted hospitality between February 2023 and June 2024 – the highest rate among officials, special advisers and ministers in the six departments

1 in 6

Revolving door decisions for Cabinet Office ministers, senior officials and special advisers that related to joining a registered lobbying firm

2 banks

HSBC and Barclays attended more meetings with Treasury ministers than all civil society, consumer and public interest groups combined

82.6%

Proportion of those meeting ministers and officials that represented businesses, compared to 8.2% for civil society and consumer groups, academics and unions combined

23:1

Ratio of business and commercial stakeholders in meetings compared to charity, consumer and public interest group stakeholders

27 years

How long it has been since the government updated guidance for officials on contact with professional lobbyists

10

Businesses which together submitted at least 176 submissions to Treasury consultations and calls for evidence between 2019 and 2024, and met with Treasury ministers 535 times in the same period

Executive summary

Fair and transparent decision-making in government is critical for addressing historically low levels of public trust in the UK. Recent surveys have shown that 66% of people feel they have little or no opportunities to influence government decisions¹ while 63% believe the very rich have too much influence.²

More participatory and open decision-making wouldn't just help rebuild public trust. It would also help ensure better decision-making, widening the evidence base for policy making and reducing risks of policy capture by vested interests.

But much of decision-making in government is done in the dark. It is still far too hard to find out who is influencing decision-makers in the UK government and there are multiple loopholes and transparency deficits in the UK government's lobbying regime. That is despite numerous expert recommendations to improve lobbying transparency. Meanwhile, recommendations made by ethics experts to level the playing field to ensure fairer access to decision-makers have gone unheeded.

66% of people feel they have little or no opportunities to influence government decisions while 63% believe the very rich have too much influence

Mapping the routes to influence

This report looks at who has been getting access to ministers, senior officials and special advisers in six of the UK's government departments principally responsible for economic decision-making. We reviewed the data on meetings, hospitality and secondments in the five and a half years from January 2019 under the previous government up to the election in June 2024. We also looked at the first three months of the new government.

We looked at who decision-makers are meeting most to see whether certain groups, such as charities and consumer groups, or academics – groups that provide a public interest perspective, and a counterweight to private commercial interests – are getting squeezed out.

We went on to explore whether business groups are getting additional access and influence through other routes like hospitality and secondments and, if so, how.

Given that the main route for the public to feed into policy is through public consultations, we also looked at whether these are actually providing an effective route for participation. In particular, we focused on consultations held by the Treasury between 2019 and 2024, as the lead department on economic decision-making, to see how inclusive they were.

And finally we looked at the other routes through which outside interests can exert influence over policy making, from employing former ministers or officials, to undeclared meetings with party donors.

What we found

The amount of access a firm or sector has does not always equate to direct influence over policy. However, if ministers and senior officials are listening to certain arguments and perspectives more than others, it is likely to shape how they see the problem and the solution. That makes it crucial that public interest perspectives are fairly represented in decision-making.

Who's in the room?

We found that public interest groups such as charities and consumer groups are being marginalised in engagement with ministers and senior officials across the six government departments responsible for economic decision-making.

- Business and commercial stakeholders outnumber charity and consumer group stakeholders in meetings by a factor of 23 to 1.
- Three of the six departments had particularly low engagement with non-business stakeholders – just 1.8% of stakeholders who met with ministers and senior officials in the Department for Business and Trade (DBT) were civil society or consumer groups, 2.3% of the Treasury's stakeholders, and 3.3% for the Department for Energy Security and Net Zero (DESNZ). These departments also had low engagement with academics and unions.
- Under the first three months of the new Labour government, all departments saw an improvement in engagement with public interest groups except the Treasury which saw a reversal. The proportion of charity and consumer group stakeholders meeting with senior officials and ministers in the Treasury dropped from 2.3% to 1.5%.

Who's at the (dining) table?

There are legitimate questions as to whether corporate hospitality can help ensure decision-makers are more well-disposed towards the provider, and thus enables soft influence.

We found considerable crossover between firms that are providing hospitality and those getting meetings, suggesting that these firms may be getting a second bite at the influence cherry:

- In the Treasury, Barclays and HSBC provided the first and second most hospitality to senior officials in the five and a half years running up to the election, and held the third and first most meetings respectively with them.
- This was mirrored in DBT where KPMG, PricewaterhouseCoopers and Oliver Wyman were in the top five hospitality givers to senior officials, and the top six firms getting the most meetings. In DESNZ, EDF was the second highest provider of hospitality to DESNZ ministers and had the most meetings with ministers in the department.

We also found that senior officials in some departments are taking considerable hospitality, while special advisers remain the target for much of it:

- Senior officials in DBT are accepting hospitality on average 3.8 times a week, a rate that went up in the first three months of the Labour government to an average of 5.8 times a week.
- Special advisers, who are subject to minimal transparency in their meetings, received 68% of all events-related hospitality provided in the five and a half years in the run up to the election.

Who's at the desk?

While secondments are a useful way for government to bring in outside expertise, they need to be handled carefully to ensure they don't provide a route for secondees from private interest groups to sway policy-making in their favour.

We found that real transparency gaps make it hard to find out who is being seconded into government. But what we could find through freedom of information requests was that:

- Industry heavily dominates inward secondments compared to academics or charities or consumer groups.
- Some business groups, such as HSBC, Lloyds, UK Finance and Aviva, who get the most meetings and provide significant hospitality to Treasury senior officials and ministers, also have had secondees in the Treasury, suggesting that they may be getting a third bite at the influence cherry.

Who's submitting evidence?

Finally, we looked at public consultations, where we found that over 50% of respondents to Treasury consultations come from industry (where details of respondents are provided).

We found that some of those who submit the most responses to these consultations – such as Aviva, UK Finance and the Confederation of British Industry – are also the same firms that had the most meetings with ministers and senior officials. Given very limited information about what is discussed in meetings being published, it isn't possible to tell whether they were able to influence the shape of government policy under consultation through these meetings.

We also found real transparency gaps, leaving the UK lagging behind other OECD countries in terms of inclusiveness and transparency in public consultations, scoring just 29% compared to 43% for France and the US, 57% for the Netherlands and Portugal and 71% for Poland.

What needs to happen?

Our report makes a series of recommendations for the government to:

1. Strengthen the guardrails against policy capture

As well as adopting best practice to limit hospitality to where there is a public interest for taking it, we recommend **radically enhancing transparency across the board**. That includes creating a central database of up-to-date meetings data which includes special advisers and party political donors, publication of secondment details, and greater transparency about business advisory boards and how conflicts of interest are managed.

2. Foster more inclusive decision-making

Transparency on its own will not be enough to rebuild public trust. **More proactive measures are needed to enhance participation** in government decision-making.

From having fairer public consultations, to requirements for officials to consider steps they should take to ensure inclusive decision-making and establishing departmental participation units, there are concrete steps that can and must be taken. These will ensure that a broad range of stakeholders and the public feel truly listened to, and expand the evidence base on which government policies are made.

Ultimately, these measures are not a luxury, they are essential for delivering on the government's agenda and maintaining faith in democracy.

Key findings

1. Measures to prevent policies being captured by special interests are severely lacking across government.

The Cabinet Office has no specific guidance for ministers and officials on identifying and managing the risk of policy capture, despite its responsibility for effective policy development and implementation.

Guidance for officials on contact with professional lobbyists has not been revisited and updated for 27 years – over a quarter of a century.

Some government departments lack meaningful and specific policies for managing risks of policy capture associated with gifts and hospitality. The Treasury has no gift and hospitality policy of its own at all, relying on general guidance from the Cabinet Office, while the Department for Business and Trade (DBT)'s gift and hospitality policy is largely based on risks facing its predecessor, the Department for International Trade, relating mainly to providing rather than receiving hospitality.

The new government's approach of 'co-governing' with business carries new risks which will require careful management to avoid public policy being captured.

2. Across six major economic-decision making departments, business groups represented 82.6% of those meeting ministers and officials, compared to 8.2% for civil society and consumer groups, academics and unions combined, in the five and a half years up to the 2024 election.

The three organisations that dominated meetings with ministers and senior officials across the six departments were industry trade bodies: the Confederation of British Industry, the Federation of Small Businesses and the British Chambers of Commerce.

Just 1.8% of the stakeholders whom DBT met in the period analysed were civil society, consumer and public interest groups – the lowest of all six departments, followed by the Treasury at 2.3%, and the Department for Energy Security and Net Zero (DESNZ) at 3.3%.³

These same three departments had the lowest proportion of academic stakeholders in meetings: DBT 1.4%, DESNZ 1.8% and the Treasury 2.4%; and the highest with businesses: DESNZ 86.2%, the Treasury 86.5% and DBT 92.4%.

Unions represented just 0.1% of stakeholders in meetings held by DESNZ ministers and senior officials, 0.3% for the Department for Science, Innovation and Technology (DSIT), 0.4% for DBT, 0.4% for the Treasury, 0.8% Cabinet Office and 2% for the now defunct Department for Business, Energy and Industrial Strategy (BEIS).

During the new Labour government's first three months, all departments apart from the Treasury increased the levels of stakeholders from civil society, consumer and public interest groups with whom they had meetings. At DBT the percentage of these stakeholders increased from 1.8% to 3.6%, at DESNZ from 3.3% to 6.6%, at DSIT from 3.9% to 5.5% and at the Cabinet Office from 6.3% to 8%. The Treasury however saw a drop from 2.3% to 1.5%. The Treasury also saw a drop in engagement with academic stakeholders with whom it met from 2.4% to 1.5%.

3. Meetings with Treasury ministers are particularly dominated by certain firms in the financial sector despite the department's wider responsibility for the economy.

Nine of the ten organisations that Treasury ministers met most frequently between January 2019 and June 2024 were financial services firms or lobbyists. Just two banks, HSBC and Barclays, attended more meetings with ministers (271) than all civil society, consumer and public interest groups combined (244) over the five and half years.

Five firms or industry bodies – HSBC, Barclays, Lloyds, UK Finance and Aviva – attended well over double the number of meetings with Treasury ministers between January 2019 and June 2024 (589 in total or 8.9 a month) as all public interest groups together (who had 244 meetings or 3.6 a month).

In the first three months of the new government, Treasury ministers met 22 times with three banks (Barclays, HSBC and Natwest) over three times more often than all civil society, public-interest and consumer groups combined, who had seven meetings.

4. The firms providing the most hospitality to senior officials in departments which oversee policy in their area are also securing the most meetings with them.

Barclays and HSBC provided the first and second most hospitality to senior officials in the Treasury between January 2019 and June 2024, and held the third and first most meetings respectively with those officials. In DBT, KPMG, PricewaterhouseCoopers and Oliver Wyman were in the top five hospitality givers to officials, and the top six firms getting the most meetings with them. In DESNZ, EDF was the second highest provider of hospitality to DESNZ ministers and had the most meetings with ministers in the department.

Senior officials in DBT accepted hospitality on average 3.8 times a week between February 2023 and June 2024 – the highest rate among officials, special advisers and ministers in the six departments. In the first three months of the new Labour government, this increased to 5.8 times a week. Senior officials in the Cabinet Office accepted hospitality 0.4 times a week in the 5.5 years before the 2024 general election, and 1.5 times a week in three months after it.

Some firms received access through multiple routes. The consultancy firm Oliver Wyman provided hospitality between 2020 and 2024 to the Cabinet Office, Treasury, DBT and DSIT, as well as secondees to the Treasury and a shadow Treasury minister, and had multiple meetings with ministers and senior officials in departments under the previous government, including seven with Treasury ministers and six with Treasury senior officials between 2019 and June 2024. The firm has gone on to play a key role in developing Labour's plan for financial services.

5. Special advisers, particularly in the Cabinet Office, are the target for the majority of corporate hospitality, while friends, spouses and other family members also benefit.

68% of all events-related hospitality provided to these departments – in the 5.5 years up to the 2024 general election – went to special advisers, 44% of whom were in the Cabinet Office. Around one in eight instances of hospitality accepted by Cabinet Office spads were from registered lobbyists working for businesses. This is particularly concerning given that special advisers are exempt from most transparency rules about meetings.

Spouses, family members and friends are also benefiting from corporate hospitality, accompanying ministers in the Cabinet Office on 30.4% of the times they attended events, had meals, drinks or other hospitality and ministers in the Treasury taking spouses, family or friends along to hospitality provided in 20.8% of cases. While it is too early to make meaningful comparisons, under the new government only the Chancellor (and no other Treasury ministers) declared hospitality in the first three months of the new government, and on seven out of eight occasions the Chancellor took a guest.

In the first three months of the new Labour government, rates of accepting hospitality under Labour increased for special advisers in: the Cabinet Office (from 0.6 a week to 1.5 a week), DESNZ (from 1 a week to 2.5 a week), DSIT (from 1.6 a week to 2.8 a week) and the Treasury (from 0.7 a week to 1 a week) compared to previous years.

6. Industry groups dominate secondments and, despite real risks of policy capture, departments do not routinely publish details about their secondments.

No departments routinely publish details about secondments and some – the Cabinet Office, Treasury and DBT – refused to provide key information in response to freedom of information (FOI) requests.

From data that was provided, it is clear that some firms with the most meetings with ministers also provide secondees to departments. HSBC, Lloyds, Aviva and UK Finance all had on average 1.5 to two meetings a month with Treasury ministers between January 2019 and June 2024 and each had at least one secondee in HMT.

Since their creation as new departments in February 2023, DBT has had 19 secondees from industry, seven from academia and just one from a charity while DESNZ has had 38 secondees from industry, 16 from university and just one from a charity. Between January 2020 and October 2024, the Treasury had 16 secondees from industry, one secondee from a university and none from charities.

7. Far from providing a route for genuine public engagement, the Treasury's consultations over the past six years have been heavily dominated by industry groups that have multiple meetings with ministers – and lack basic transparency.

Ten businesses, mainly trade bodies and accounting firms, together submitted at least 176 submissions to Treasury consultations and calls for evidence between 2019 and 2024, and met with Treasury ministers 535 times in the same period.

Among the entities that featured most prominently in the submissions to consultations, HSBC, UK Finance, Confederation of British Industry (CBI) and Aviva were in the top 10 for the highest number of submissions. These firms also attended the most meetings with the Treasury during that period with HSBC, UK Finance, and Aviva ranking 1st, 4th, and 5th respectively as top stakeholders in meetings. CBI attended the 7th most meetings with senior Treasury officials. Additionally, UK Finance was ranked 3rd in the list of top providers of hospitality to Treasury ministers, while HSBC, CBI, and Aviva ranked 2nd, 3rd, and 4th respectively providing hospitality to Treasury senior officials.

The Treasury published the names of respondents to just half of its consultations and a quarter of its calls for evidence between 2019-24. It has not published a response to 20 closed consultations from as far back as 2019 and 2020.

Where the Treasury published the names or types of respondents to its consultations between 2019-24, 1% were academics, 6% civil society, consumer and public interest groups and 51% industry – more than twice as many as members of the public at 21%.

In 2020, the UK scored just 29% against the OECD's international standards for inclusiveness and transparency of public consultations and has not updated its consultation guidance since 2018. This was much lower than many of the UK's allies, including France and the US (43%), the Netherlands and Portugal (57%) and Poland (71%).

The government is developing an AI tool to summarise submissions to consultations but has not made it clear how this will ensure evidence about the public interest is properly weighted.

8. A large number of senior public officials go on to work for lobbying firms or industries with an interest in their former departments' policy areas, enabling clients and employers to benefit from their specialist knowledge and contacts.

Between January 2019 and September 2024, almost one in six revolving door decisions for Cabinet Office ministers, senior officials and special advisers (41 of 250), was to join a registered lobbying firm.⁴ 30% of special advisers in the Cabinet Office (30 of 101) went to work for a lobbying firm, as did 50% of special advisers in the Treasury (7 of 14) in the same period.

A quarter of revolving door decisions involving Treasury ministers and senior officials between 2019 and September 2024, related to financial services firms. This includes former Chancellor, Philip Hammond, who went to work for OakNorth Bank, and former Permanent Secretary, Tom Scholar, who went to work for Nomura Europe Holdings.

9. There are significant transparency gaps in who is accessing and seeking to influence economic decision-makers.

Departmental data continues to provide inadequate detail about meetings and does not record all meetings held, with no accountability for inadequate reporting. For instance, many senior officials in the Treasury routinely declare having had no external meetings, which is implausible and despite known meetings having been held.

Special advisers, who remain a key route to influencing government, are largely exempted from transparency requirements.

Think tank transparency is poor with some politically affiliated think tanks, which have a large number of meetings with ministers and provide substantial hospitality, publishing no information about who funds their work, providing a backdoor route to influence decision-makers.

Revolving door decisions particularly by some departments are published late, despite the risk that their new employers can take advantage of their networks and inside knowledge. By March 2025, for instance, DBT had only published its decisions up to March 2024 on applications by former senior officials and special advisers to take up new roles, creating a 12-month transparency gap.

Party political donors are able to access and influence policy-making with zero transparency as their meetings with ministers are not published. In 2021, at least 79 donors were eligible to join a Conservative party forum with access to the cabinet, of whom 15 paid enough to regularly meet the prime minister, with no public record taken of these meetings.

It is not mandatory to disclose the names of members of permanent advisory bodies in the UK, unlike in Germany, France, the US and many other countries.

Recommendations

Restoring trust in government and countering widespread views that government decision-making is captured by vested interests is an essential task for this decade. It is also essential for the government to challenge group-think to ensure that its decisions are well-informed and best serve the public interest. In order to do this, the government needs to take proactive measures to level the playing field on access to decision-makers.

We recommend that the government:

A. Strengthens the guardrails to prevent policy capture

This should include increasing transparency and tightening the routes that enable privileged access to decision-makers and policy capture, by:

- 1. Creating a central, public database of departments' monthly meetings data**, expanding the scope and quality of information about meetings, closing the loopholes in the Lobbying Register and establishing an accountability mechanism to ensure departments comply with the rules.
- 2. Adopting international best practice on hospitality** by requiring ministers, special advisers and senior officials to not accept hospitality unless there is a public interest reason to do so, and publishing the value of all hospitality accepted, not just for ministers.
- 3. Requiring departments to publish registers of all inward and outward secondments**, including the organisations, terms of the secondments, job titles, dates and details of conflict of interest declarations and measures taken to prevent conflicts.
- 4. Creating a statutory, independent Committee on Business Appointments** with the powers and resources to investigate and sanction breaches of an enhanced version of the Business Appointment Rules.
- 5. Ensuring more transparent processes for appointments and functioning of advisory boards**, with more balanced representation from independent experts and public interest groups, and publishing in a central database registers of conflict of interest declarations and measures taken to manage conflicts.
- 6. Including meetings with party political donors in transparency data, as part of broader reforms to political finance and donations.** Meetings with individual donors and donor roundtables where policy is discussed should be declared, including the substance of meetings.

B. Fosters more inclusive public policy making

This should include developing a cross-government strategy to prevent policy capture and ensure fairer and more inclusive decision-making processes, with:

- 1. Stronger guidelines to ensure fairer public consultations.** This should involve public interest groups and independent experts participation at an early stage of policy development; publication of all submissions by default unless there are good reasons

not to; and ensuring that new AI tools for assessing submissions properly weigh public interest considerations.

- 2. A requirement for departments to develop more inclusive access policies and guidance on preventing policy capture and ensuring inclusive policy development.** Training for ministers and officials on how to manage external influence over the policy process and make economic policy-making fairer should also be required.
- 3. Mechanisms for more participatory decision-making across government and at all stages of the policy cycle.** This should be done by establishing departmental participation units with lead senior officials, and involving citizens in Mission Boards and the development and scrutiny of legislation.

Introduction

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1. Introduction

1.1. Privileged access to decision-makers and the risks of policy capture

Senior politicians, civil servants and special advisers in key government departments have significant responsibility for economic decision-making. They decide on public spending and the tax system, which businesses to support for investment and growth, energy security, how to regulate areas of the economy and how to spread risks and rewards across society.

They need to take on board a wide range of perspectives in order to make fair decisions that reflect the public interest, support the economy and instill public confidence in government.

But not everyone has the same resources and opportunity to access decision-makers and exert influence. If this is not dealt with proactively, the voices of consumer groups, civil society, smaller businesses, independent experts, unions and the public are excluded from the policy process.

Major reports on standards in government over the past decade have identified that there needs to be a more level playing field when it comes to accessing decision-makers.

- The Committee on Standards in Public Life's (CSPL) 2013 report on lobbying called for guidance to be produced which *“should remind all public office holders of the principle of equality of access and the need proactively to consider, after any meeting, whether a balance of views should be obtained.”*⁵
- CSPL's 2021 report on public standards found *“the perception that preferential access is given to party donors, that ministerial decision-making can be influenced through gifts and hospitality, or that important policy decisions are made in secret consultations with vested interests, all serve to lower impressions of standards in public life.”*
- Sir Nigel Boardman's 2021 review following the Greensill scandal meanwhile recommended that *“an effective lobbying regime ought also to be designed to encourage those who do not have privileged access nonetheless to have a voice.”*⁶

What is policy capture and why does it matter?

The Organisation for Economic Cooperation and Development (OECD) describes 'policy capture' as where *“public decisions over policies are consistently or repeatedly directed away from the public interest towards a specific interest.”*⁷ The International Monetary Fund (IMF) says capture can also affect regulators and lead them to *“act primarily in the interest of the industry they regulate rather than in the public interest.”*⁸

The OECD in its work on policy capture has identified real risks arising from inequitable access to decision-makers, including that it:

1. Exacerbates inequality

Interest groups gain benefits from privileged access to decision-makers which further entrenches their wealth and power. This can lead, as the OECD says, to “*a vicious circle of inequality*.”⁹

2. Fuels a lack of trust in government

Trust in UK politics is at a historic low and people feel excluded from government decisions-making.¹⁰ Polling for the Electoral Reform Society in March 2021 found that 66% of people felt they had little or no opportunities to influence government decisions.¹¹ Polling for the Fairness Foundation in January 2025 found that 63% believe the very rich have too much influence on UK politics.¹²

These findings are echoed in the OECD Survey on Drivers of Trust in Public Institutions, which in 2024 showed that trust in government is well below OECD averages – with one fifth (20%) of people in the UK believing that the political system allows them to have a say in what the government does, compared to 30% on average in OECD countries.

3. Creates structural imbalances within the economy

Policy capture can result from sectors or specific firms that have the most access and influence receiving preferential treatment.¹³

The OECD Product Market Regulation Indicators show that a lack of transparency and accountability in lobbying can also harm market competition. It tilts the playing field towards incumbents and well-resourced firms, enabling them to shape rules in their favour at the expense of smaller businesses and new entrants.¹⁴

4. Distorts the evidence base for decision-making

Where lobbyists and other special interests get privileged access to decision-makers, they are able to raise the visibility of problems and solutions to suit their interests.¹⁵ This can drown out public interest considerations,¹⁶ lead to group-think¹⁷ and reduce the quality of government decision-making.¹⁸

1.2. Routes to influence

This report focuses on ministers, senior civil servants and special advisers in government departments which have particular responsibility for economic decision-making and policies with commercial relevance. These departments were identified by the Independent Adviser on Ministerial Standards (the individual appointed by the prime minister to advise on the

Ministerial Code) as: HM Treasury, the Department for Business and Trade (DBT), Department for Science, Innovation and Technology (DSIT), Department for Energy Security and Net Zero (DESNZ), and the Cabinet Office, which houses the Prime Minister's office.¹⁹

This report also looks at the Department for Business, Energy and Industrial Strategy (BEIS), which existed from 2016 until it was split into DBT, DESNZ and DSIT in February 2023.

The data on these six departments' meetings, hospitality, revolving door decisions and secondments, which was analysed in this report, is published in a separate Appendix.

To ensure that the government does not allow excessive influence by specific interest groups, or create policy echo-chambers, guardrails need to be put in place. This would help restore the public trust in politics

Many of these routes represent legitimate and important ways for giving decision-makers access to external expertise – and engaging with business is an important part of developing effective public policy. However, to ensure that the government does not allow excessive influence by specific interest groups, or create policy echo-chambers where the public interest is side-lined, guardrails need to be put in place. This would help restore the public trust in politics that is so urgently needed.

What are the main routes to influence?

There are many ways for those with power, resources and contacts to get privileged access and opportunities to influence key decision-makers in government. Our research has identified that the greatest risks of policy capture, through direct access and influence, arise in the following areas:

- **Meetings.** Both formal and informal meetings are a key way to secure sustained and coordinated access to decision-makers. Certain groups may get significantly more meetings with government than others, with particular lobby groups, and politically affiliated think tanks getting privileged access to decision-makers.
- **Hospitality.** Hospitality can act as a form of soft influence, enabling privileged access and opportunities for informal lobbying and introducing a sense of reciprocity with decision-makers.
- **Secondments.** Industry representatives seconded into policy roles may play an outsized role in influencing government policy.
- **Revolving door.** Companies can get privileged inside information and access to government by employing former ministers, senior officials or special advisers, particularly in the policy areas where they previously worked.
- **Advisory boards and engagement groups.** Expert advisory boards, taskforces and engagement groups may provide an additional route to influencing policy-making and accessing decision-makers and may reinforce the dominance of particular firms within an industry.

- **Political donations.** Political party donors have been able to get privileged access to very senior decision-makers and the policy-making process. Much of this access is obscured behind transparency rules that exclude meetings held for political purposes.

There are also other forms of indirect influence which may help shape the narrative in favour of specific interest groups. These include funding think tanks – which may obscure the source of the funding – to produce particular pieces of work, giving second jobs to MPs and providing the secretariats for All-Party Parliamentary Groups.

What is sometimes referred to as ‘grassroots lobbying’ involves shaping public debate or policy discourse. This can include funding academic research, conducting communication campaigns, influencing journalistic coverage and using paid influencers on social media.

1.3. A new context: blurring the boundaries between public and private

The new government has spoken about a new “*partnership*” model of governing with business. Prior to being elected, the now prime minister told business executives at the party’s 2023 conference that they would go into government with Labour.²⁰ Labour’s February 2024 paper, Business Partnership for Growth, meanwhile outlined plans to give business a formal voice in making economic policy through advisory councils, and a role in day-to-day departmental consultations.²¹

The now prime minister told business executives that they would go into government with Labour.

Since entering government, this ‘partnership’ model has been developed further. Commitments were made at Labour’s 2024 conference for instance that business and growth policy will be “*co-written with business.*”²²

Treasury ministers have since highlighted that rules governing the UK’s financial services will be “*co-designed*” with the sector. A Treasury minister said that “*a lot*” of the Chancellor’s 2024 speech on the economy at Mansion House came from UK Finance, the City’s main industry body.²³

More recently, the government has said that it will encourage private sector expertise to examine departmental spending plans to be submitted to the UK’s spending review, which is expected to set the budget for departments for the next three to five years.²⁴

This new approach of ‘co-governing’ with business carries new risks that will require careful management, including blurring the boundaries of the public interest with the private interests of the financial sector. Following the 2008 financial crisis, the OECD emphasised that “*the cost of treating the ‘public interest’ and the ‘private interest’ as synonymous in practice has had negative consequences for the financial system.*”²⁵

As an important counterweight to this, the new government has also committed to seek involvement from trade unions and civil society as well as industry in its plans for economic growth.²⁶ In its December 2024 announcement that departments should appoint 'challenge panels' on their departmental spending plans, the government also highlighted that outside bodies, academics, users and producers of public services as well as the private sector should be represented.

These will be steps in the right direction if they are implemented meaningfully. But they risk being tokenistic if they are not accompanied by more fundamental reforms to protect against policy capture and level the playing field in access to decision-makers.

Routes to influence

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2. Routes to influence

2.1. Meetings

Four official, independent reviews over the past five years have concluded that **there is a serious ongoing deficit in lobbying transparency in the UK.**

- In 2021, CSPL concluded that the UK's regime for ensuring transparency in lobbying is "*not fit for purpose.*"²⁷ Its report restated a number of recommendations it had made eight years earlier in 2013 as part of "*a package of measures which is urgently needed*" to "*deliver a culture of openness*" and "*secure maximum transparency.*"²⁸
- In August 2021, Sir Nigel Boardman's report into the Greensill scandal found that significant reforms were required to ensure adequate lobbying transparency.²⁹
- In August 2023, the Council of Europe's Group of States against Corruption (GRECO) found that despite some steps towards improvement undertaken following the CSPL and Boardman reports, the UK was still only partially compliant with key recommendations on lobbying transparency that it had made in 2018.³⁰
- In May 2024, the Public Administration and Constitutional Affairs Committee (PACAC) also found "*significant concerns*" around both the UK's lobbying register and the government's own transparency releases about meetings.³¹

Transparency in lobbying is crucial for accountability of government decision-making, and has the potential to increase inclusive decision-making. Anecdotal evidence from the London Assembly found that when Green Party members started voluntarily publishing their meeting diaries in 2024, as part of a push to rebuild trust, it led them to more actively seek out the views of different groups.³²

Tip of the iceberg: major transparency deficits in lobbying

The key deficits in transparency found by these reviews are as follows:

A. Lack of accessibility to information about meetings

A central, searchable database of departments' meetings records would enable more effective scrutiny of lobbying trends across government and networks of influence.

However, meeting records are currently scattered across multiple files on each department's website. To know who a lobbyist represented in a meeting, those records then need to be cross-referenced with the statutory lobbying register which is located on a separate website.

The previous government agreed to publish all departmental transparency releases in a central, public database, covering meetings, gifts, hospitality and travel.³³ This is a crucial commitment which has yet to happen, and which the new government has not committed to implement.

B. Release of information is too infrequent

Prompt release of information about meetings would enable the public to understand how policy has been influenced and developed, particularly through who public officials and ministers have recently met.

Government transparency releases currently only happen quarterly but are often late, or as has happened as a result of the election, are released months behind schedule. Meetings data is therefore released too long after they take place to allow meaningful accountability.

C. Limited scope: exclusion of special advisers and shadow ministers

CSPL,³⁴ Boardman³⁵ and the Registrar of Consultant Lobbyists³⁶ have all highlighted the key role special advisers play in formulating government policy and influencing ministers. It is therefore essential to have a high level of transparency around lobbying of special advisers.

In a welcome move, in 2023, the government agreed to extend transparency obligations beyond ministers and permanent secretaries to directors general and certain directors.³⁷ The Cabinet Office issued guidance on this for departments which covered releases from January 2024.³⁸

However, the previous government rejected recommendations from a range of independent bodies to include special advisers, beyond their current declarations of meetings with senior media figures. As PACAC put it in May 2024: *“the omission of Spads’ meetings, other than those with senior media figures, from the departmental transparency releases is clearly anomalous. Furthermore, it undermines public confidence in the integrity of the lobbying process.”*³⁹

MPs, including shadow ministers from the main opposition parties, are also not required to declare their meetings. The result is that when a new government comes into power, much of its policy will have been developed where there is no scrutiny or transparency about who is informing its policy. Information may only emerge as a result of press scrutiny, with one press outlet reporting that in the year before the 2024 general election, a member of Labour’s front bench team attended a private client roundtable arranged by a lobbying firm at least once a week, although it is not clear what was discussed.⁴⁰

D. Inadequate descriptions of meetings

Descriptions of meetings should be sufficiently detailed to enable the public to understand clearly what was discussed and any laws, regulations and policy areas that would be affected.

But descriptions remain opaque despite guidance issued in 2018 and 2024.⁴¹ The later guidance states that there should be a *“meaningful and clear description of the ‘purpose of the meeting’”*, topics discussed and areas of government policy or legislation affected.

Between January 2019 to June 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".

Even after the rules were tightened from January 2024, many descriptions still do not meet even the low bar set by guidance on minimum descriptions for meetings, particularly in identifying specific policy areas affected.⁴² Treasury ministers continued to use "introductory meeting" and "to discuss priorities"; and senior officials recorded vague "stakeholder engagement."

The system in the UK falls short of the OECD recommendations on transparency and integrity in lobbying and influence, which call for "comprehensive and detailed information on lobbying and influence activities" including "the policy issue or regulatory act concerned, the objectives, and any supporting documentation received from lobbying and influence actors."⁴³

It also falls significantly short of the transparency regime in the EU Commission. Since December 2024, 1,500 officials with management functions have been required to publish minutes of their meetings with lobbyists – including who they met, the subject matter, the main points raised, and any positions expressed and conclusions – an obligation which previously only applied to Commissioners and the most senior officials.⁴⁴

E. Exclusion of informal lobbying

Messaging platforms are frequently used for informal lobbying but these messages are not subject to the same transparency requirements as meetings.

The previous government rejected calls to close the loopholes around informal lobbying, particularly the use of instant messaging platforms.⁴⁵ It suggested instead that where an informal lobbying approach is granted time or resource, it should be diarised and recorded. But this would only cover pre-planned informal lobbying.

PACAC has called for WhatsApp messages to be included in transparency releases when they are used instead of a direct meeting or if they prompt significant consideration, finding that current arrangements do not command public confidence.⁴⁶

Meanwhile, government definitions of what constitutes "official business" which should be reported back to officials by ministers, are far too discretionary.⁴⁷ Official information is defined with some circularity in the Cabinet Manual as arising "in the course of official government business."⁴⁸

F. No meaningful accountability mechanism

There should be accountability within departments to ensure a high standard and timely reporting of data about meetings. But it is not clear what consequences, if any, departments face for inadequate or late releases or senior officials face for not reporting back on meetings held.

The previous government rejected calls to improve accountability for the quality and timeliness, stating that it did not feel changes were needed.⁴⁹

It is clear that many meetings are not being reported, for instance by senior officials. In the 9-month period between January and September 2024, while ten senior officials in the Treasury reported a total of 106 external meetings, 31 other senior officials in the department reported having no external meetings at all, which is implausible. Some meetings that are known to have taken place in the period were not reported.

G. Major loopholes in the lobbying register

The register of consultant lobbyists, introduced in 2014, has major loopholes that have been highlighted by lobbying trade groups,⁵⁰ the Registrar of Consultant Lobbyists⁵¹ and PACAC.⁵²

Professional lobbyists, who are paid to lobby ministers or permanent secretaries, are required to be on the register and report quarterly on the names of the clients they lobbied for. The Council of Europe has said the register “*gives a very partial view*” of lobbyists seeking to influence government because most large organisations employ in-house lobbyists, who are not required to register.⁵³

The rules also only apply to lobbyists who are registered for VAT, which excludes firms based overseas or who only work for clients based overseas, and do not apply to ‘incidental lobbying’.⁵⁴ Incidental lobbying takes place where a business, which mainly undertakes non-lobbying activities, communicates with a minister or permanent secretary as a minor accompaniment to its main focus.

As a result of the loopholes, the rules are unenforceable in many instances. Analysis by the Chartered Institute of Public Relations (CIPR) in June 2024 found that the Registrar imposed just two civil penalties into suspected unregistered lobbying in the previous five years. Of 53 investigations into suspected unregistered lobbying, there was no requirement to register in 96% of cases, due to the weak rules.⁵⁵

Nothing to see here: lobbying exemptions in practice

In 2021, after investigating the lobbying activities of David Cameron⁵⁶ and Philip Hammond,⁵⁷ the Registrar concluded that both had legitimately used the ‘incidental’ exception. This meant that their lobbying did not have to be noted in the register.

In 2021, the Registrar concluded that David Cameron was not engaged in consultant lobbying on behalf of Greensill Capital because he was an employee, not a consultant.⁵⁸

In 2023, the Registrar reached the same conclusion about Philip Hammond, following concerns raised by Spotlight on Corruption and the Financial Times about his lobbying the Treasury on behalf of his new employer, Copper, a cryptocurrency firm.⁵⁹

In February 2025, following a complaint by Spotlight on Corruption, the Registrar found that Global Counsel’s Qatar office did not need to register as a lobbyist and declare its clients, despite lobbying a UK minister. This is because the company does not need to register for VAT.⁶⁰

Who is meeting economic decision-makers?

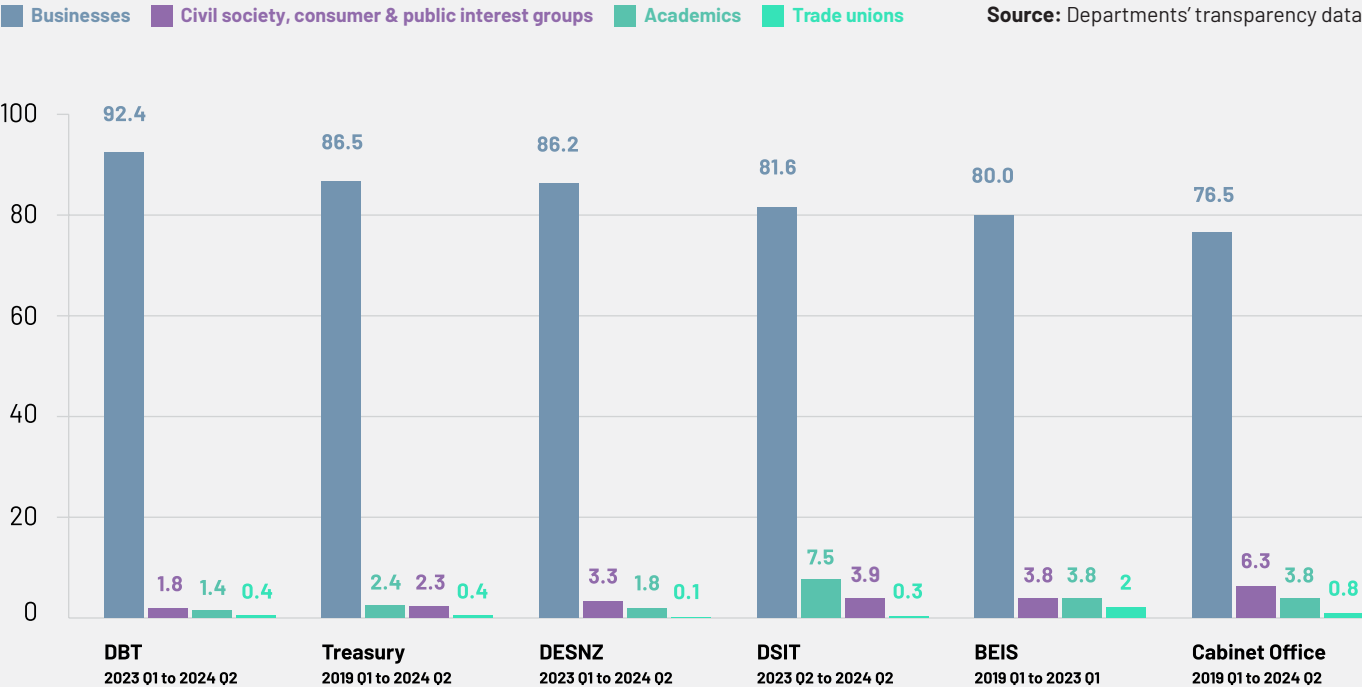
Spotlight on Corruption analysed the data on meetings published between January 2019 and June 2024 by six departments with key economic decision-making responsibilities: the Treasury, Cabinet Office, BEIS, DSIT, DBT and DESNZ.⁶¹

Meetings data published for the first three months of the new Labour government (July to September 2024) were also analysed. While this smaller date range does not provide a direct comparison with the department’s meetings under the five and a half years of the last government, it does give an early indication of stakeholder engagement.

Businesses have significantly more access to ministers and senior officials than organisations with a public interest mandate, like civil society organisations and consumer and public interest groups. Given the extent to which these decision-makers are meeting private sector interests, it is not clear whether public interest considerations are being adequately represented or properly weighted.

We found that DBT, the Treasury and DESNZ had the lowest proportion of meetings with civil society and academics, and the highest proportion of meetings with businesses.

% of stakeholder types attending meetings with ministers and senior officials in the Treasury, Cabinet Office, BEIS, DBT, DESNZ and DSIT

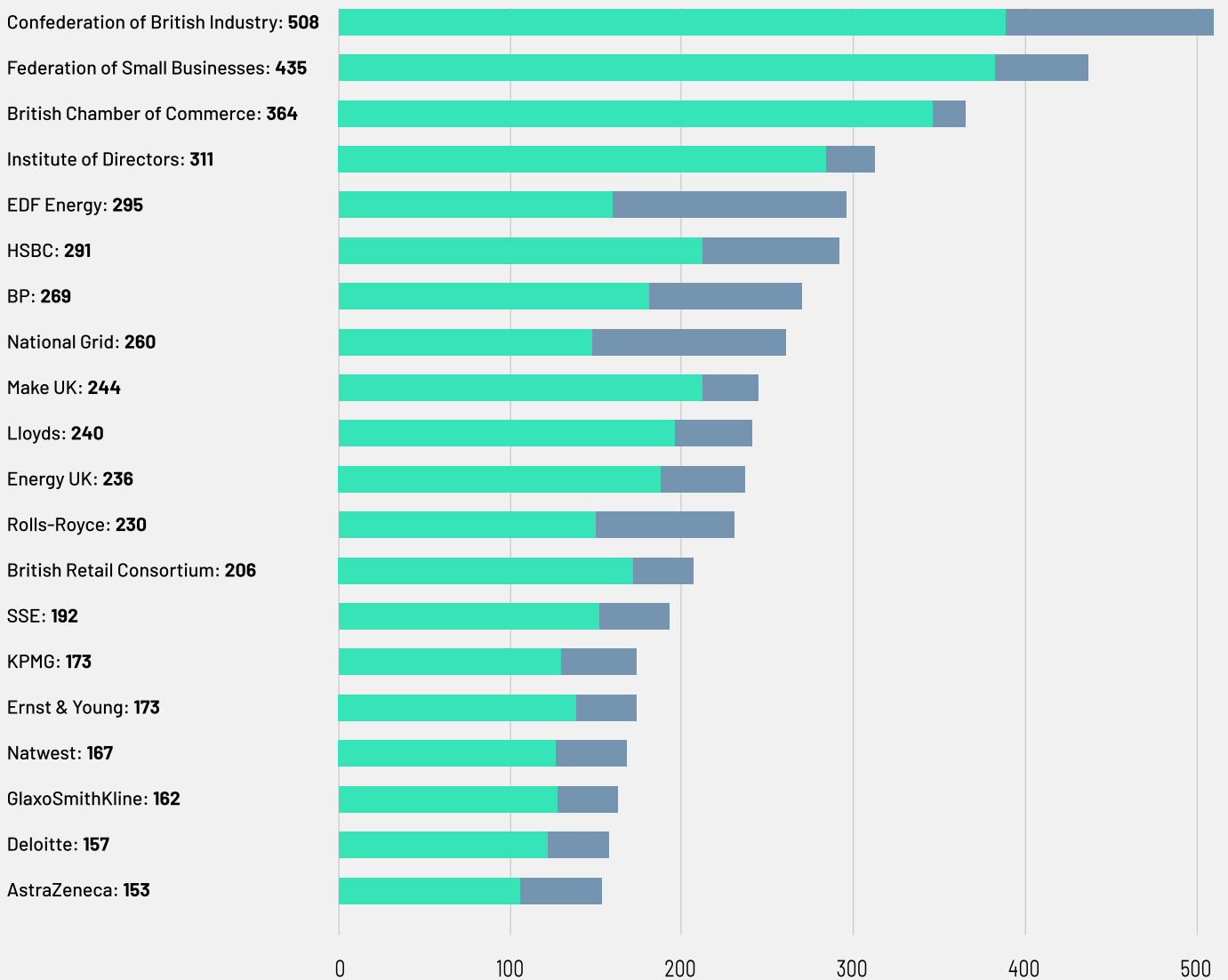


The organisations with most access to the six departments were trade bodies: the Confederation of British Industry (508 meetings with ministers and senior officials), the Federation of Small Businesses (435 meetings) and the British Chambers of Commerce (364 meetings).

Firms with the most access to meetings in these six departments were:

- energy companies (EDF, BP and SSE),
- financial services firms (HSBC, Lloyds and NatWest),
- professional services / accounting firms (KPMG, Ernst & Young and Deloitte), and
- pharmaceutical firms (GlaxoSmithKline and AstraZeneca).

Top 20 meetings with ministers and senior officials between 2019 Q1 and 2024 Q2 in the Treasury, Cabinet Office, BEIS, DBT, DESNZ and DSIT



Source: Departments' transparency data

Department for Business and Trade

February 2023 (when it was established) to June 2024

The top 10 meetings held by both ministers and senior officials in DBT were principally with industry and trade bodies, with officials almost exclusively meeting these firms on a one-on-one basis rather than in groups. The organisations who had the most meetings with senior officials include three large accounting firms, KPMG, PricewaterhouseCoopers and Ernst & Young.

Of the 7,392 stakeholders attending 2,480 meetings with ministers and senior officials, civil society, consumer and public interest groups comprised just 1.8% (136), academics 1.4% (103) and unions only 0.4% (32). By contrast, 92.4% of the organisations (6,828) attending these meetings were businesses.

In the first three months of the new Labour government (July to September 2024), DBT ministers and senior officials recorded meeting 639 individuals and organisations. Civil society, consumer and public interest groups were up at 3.6% (23), academics 1.3% (8) and unions up at 6.7% (43). Businesses represented 80.8% of all stakeholders in meetings.

Department for Energy Security and Net Zero

February 2023 (when it was established) to June 2024

The top 10 meetings were unsurprisingly with energy companies, with EDF having the most access to ministers and senior officials. Other firms in the top 10 for both ministers and senior officials were SSE, BP, the trade association Energy UK, and the utility company National Grid.

Of the 2,797 stakeholders attending 1,409 meetings with ministers and senior officials, civil society, consumer and public interest groups were 3.3% (92), academics 1.8% (50), unions 0.1% (4) and business 86.2% (2,410).

In the first three months of the new Labour government, DESNZ ministers and senior officials met 819 individuals and organisations. There were relative increases in meetings with civil society (6.6% or 54), academics (4.3% or 35) and unions (6% or 49), with businesses down to 70.2% (575).

Department for Science, Innovation and Technology

April 2023 (when reporting started) to June 2024

DSIT ministers met most frequently with a trade association, Tech UK, followed by a range of mainly technology firms, and one university. This contrasts with the top 10 organisations meeting DSIT senior officials' in the period, eight of which were with charities, universities, academies and research institutes.

Ministers and senior officials had 936 meetings involving 2,716 individuals and organisations. Of those stakeholders, 3.9% (105) were civil society, consumer and public interest groups, 7.5% (204) academics, 0.3% (7) unions and 81.6% (2,216) were businesses.

This was the highest rate of engagement with academics across the six departments. Business engagement in DSIT was higher for ministers (2,071 or 83.2% of the stakeholders they engaged with) than for senior officials (145 or 63.9%).

In the first three months of the new Labour government, DSIT ministers and senior officials met 568 individuals and organisations. Of those, there was again higher relative engagement with civil society (5.5% or 31), academics (13.7% or 38) and unions (0.7% or 4), with businesses down to 69.4% (394).

Department for Business, Energy and Industrial Strategy

January 2019 to February 2023 (when it was closed)

Most of the organisations in the top 10 meetings with BEIS ministers were trade and representative bodies, mainly in group meetings. However, like senior officials in DSIT, one of its successor departments from February 2023, BEIS senior officials' top 10 meetings in the period were mainly with universities and academies.

BEIS ministers and senior officials had 7,618 meetings in the period involving 28,627 stakeholders. Of these, civil society, consumer and public interest groups comprised 3.8% (1,094), academics 3.8% (1,087), unions 2% (575) and businesses 80% (22,909).

HM Treasury

January 2019 to June 2024

Of Treasury ministers' top 10 meetings, nine were with financial services firms or lobby groups and one with a regulator, and seven of the senior officials' top 10 meetings were with representatives from the finance sector. HSBC topped the number of engagements with both ministers and senior officials, with 20 of its 24 meetings with senior officials on a one-on-one basis.

Treasury ministers and senior officials had 3,850 meetings involving 10,715 individuals and organisations. The stakeholders were mainly businesses, at 86.5% (9,273), compared to 2.3% (244) civil society, consumer and public interest groups, 2.4% (257) academics and 0.4% (48) unions.

In the first three months of the new Labour government, Treasury ministers and senior officials met 476 individuals and organisations. Of those, civil society engagement was down to 1.5% (7), academics down to 1.5% (7) and unions 0.8% (4), with businesses broadly unchanged at 86.8% (413).

Cabinet Office (including Number 10)

January 2019 to June 2024

As with DSIT, the organisations that had the most meetings with Cabinet Office ministers in the period were trade and representative bodies, with the Confederation of British Industry, British Chamber of Commerce and Federation of Small Businesses in the top three. Those meeting senior officials most often represented a range of interests, including energy, media and finance.

Of the 7,992 individuals and organisations that attended 2,971 meetings with Cabinet Office ministers and senior officials, civil society, consumer and public interest groups were 6.3% (507), academics 3.8% (301), unions 0.8% (68) and businesses 76.5% (6,115).

Engagement with civil society, consumer and public interest groups was relatively high compared to other departments. The bulk of these meetings were with ministers (497 or 6.7% of stakeholders they met), with senior officials only meeting 10 such organisations.

In the first three months of the new Labour government, Cabinet Office ministers and senior officials met 287 individuals and organisations. Relative engagement with civil society was up to 8% (23), academics 4.9% (14) and unions 8.7% (25), with businesses down to 49.8% (143).

2.2. Hospitality

“Accepting significant gifts or hospitality creates a perception of biased decision-making even if the gift has no bearing on judgement.”⁶²

– National Audit Office

In a 2016 investigation into gifts and hospitality, the National Audit Office (NAO) noted that *“If the risks relating to officials accepting gifts and hospitality are not properly managed, public trust in government may be eroded.”⁶³* Among other things, the NAO found that while it is sometimes justified for officials to accept modest hospitality:

- rules and processes on gifts and hospitality could be more stringent,
- there were weaknesses in departments’ controls over gifts and hospitality, and
- some types of hospitality may not be consistent with Cabinet Office principles, including tickets to sports and cultural events, sometimes accompanied by family members.

When officials receive significant gifts or hospitality, according to the OECD it can *“be interpreted as a signal of obligation or support”* towards the provider.⁶⁴

Rules for politicians and officials fall short of emerging best practice

The Ministerial Code requires that ministers do not accept gifts, hospitality or service *“which would, or might reasonably appear to, compromise their judgement or place them under an obligation to people or organisations that might try inappropriately to influence their work in government.”⁶⁵*

Civil servants and special advisers likewise must not accept gifts, hospitality or other benefits which might be seen to *“compromise [their] personal judgement or integrity”*. It should be: proportionate, in the interests of departments, further government objectives and avoid conflicts of interests.⁶⁶

Following a series of press reports in 2024, the new government committed to publish a Register of Ministers’ Gifts and Hospitality on a monthly basis, with the nature of hospitality and where possible the estimated value.⁶⁷ This is an improvement – before this was only published quarterly – but departments continue to publish details of senior officials’ and special advisers’ gifts and hospitality on a quarterly basis, and without the estimated value.

The Register was published in January 2025.⁶⁸ However, rather than publishing the data in one file or searchable database, there are multiple spreadsheets for different departments and periods, which makes it difficult to identify trends.⁶⁹

The UK rules allow considerable discretion for ministers and officials. By comparison, other international bodies have a presumption against accepting hospitality and gifts:

- The UN prohibits, with no exception, officials from accepting gifts or hospitality from anyone seeking or doing business with the UN.⁷⁰
- The European Commission has a general rule that prohibits staff from accepting gifts or hospitality offered by third parties, but exceptions may be made.⁷¹
- Members of the European Parliament must not accept gifts or similar benefits unless they are worth less than €150 and given in accordance with courtesy usage.⁷²

Some departments do not have robust gift and hospitality policies

The NAO's 2016 review identified that the Cabinet Office expects departments to have their own gifts and hospitality policies to suit their risks and context.⁷³ The NAO found that policies and practices in civil service guidance and a selection of departments did not follow good practice, such as those set out by the Institute of Business Ethics,⁷⁴ which include:

- encouraging the recording of all offers received and the estimated monetary value, and
- better evidencing the review of registers by managers.

Research by Spotlight on Corruption identified serious ongoing problems with some policies:

- In September 2024, DBT told Spotlight that they use a policy in the name of the Department for International Trade (DIT), their predecessor department. The policy which was prepared in 2017 and updated in February 2024, focuses on providing hospitality to visitors, with limited guidance on accepting it.
- In October 2024, the Treasury said they follow the Cabinet Office's general guidance for civil servants and noted that conduct of ministers is governed by the Ministerial Code.

Case study on hospitality – Aviva

The insurance company Aviva has provided hospitality to a range of public officials, including ministers, senior officials, special advisers and shadow ministers, as well as their staff.

The firm provided hospitality to senior officials from the Treasury four times in 2019 and 2021, to a Treasury special adviser in March 2022 and minister in March 2023, and to special advisers in the Cabinet Office in February and November 2023.

Between 2019 and 2024, Aviva also attended 190 meetings with ministers (99 of which were in the Treasury) to discuss a range of issues it had an interest in, including the government's reforms of Solvency II, pension funds and the financial services sector.⁷⁵

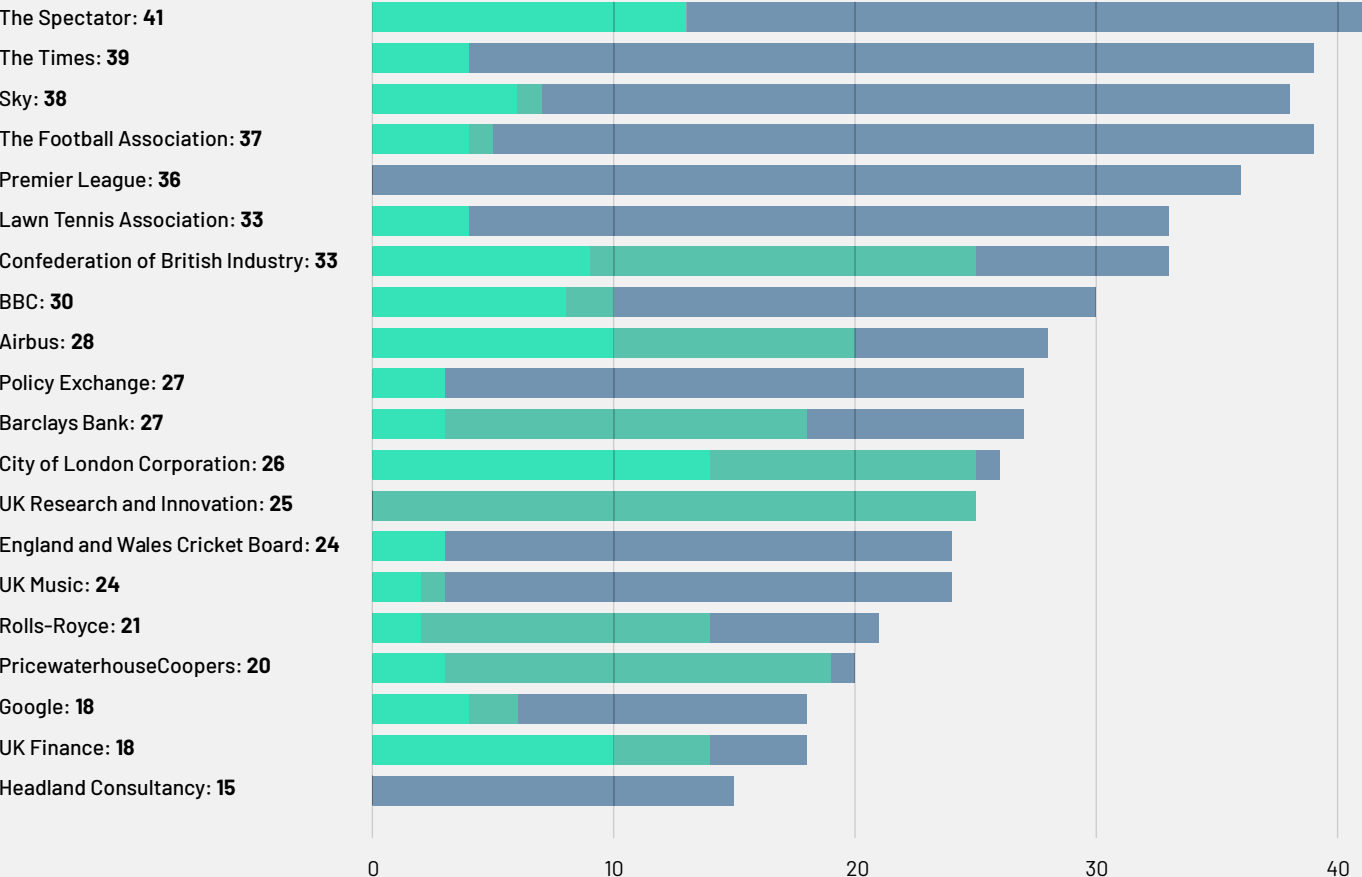
Aviva provided then shadow minister Tulip Siddiq with tickets and hospitality to an event in April 2024. In November 2023, Aviva provided tickets to a music event to Oliver Newton, who oversaw business engagement for Rachel Reeves in opposition.⁷⁶ Mr Newton went on to work as head of business engagement at the Treasury.⁷⁷ In the same month, Aviva provided Keir Starmer’s political director with tickets to a music event.⁷⁸

Who is providing hospitality to economic decision-makers?

Spotlight on Corruption analysed the hospitality data published between January 2019 and June 2024 by the six departments to identify who is providing most hospitality to economic decision-makers.⁷⁹

The top three providers of hospitality across all six departments were media firms (The Spectator, The Times and Sky, who between them gave hospitality on 118 occasions). The fourth, fifth and sixth top providers were sporting bodies (the Football Association, Premier League and Lawn Tennis Association who between them gave hospitality on 106 occasions).

Top 20 providers of hospitality between 2019 Q1 and 2024 Q2 to the Treasury, Cabinet Office, BEIS, DBT, DESNZ and DIT



Source: Departments’ transparency data

The bulk of hospitality from the top six providers went to special advisers, suggesting that these providers see special advisers as key to influence. This makes it even more anomalous that special advisers' meetings with anyone other than senior figures in the media do not have to be declared.

In some departments, we found that firms which are among the top providers of hospitality to departments by which they are either regulated or which have direct policy responsibility over them, are also getting the most meetings with ministers and officials in those departments.

This includes:

- KPMG, PWC and Oliver Wyman who were among the top five providers of hospitality to DBT, and in the top 10 for the most meetings with senior officials, in the department which has responsibility for the professional and business services sector, including accounting and audit consultancy.⁸⁰
- Barclays, HSBC and Aviva were among the top four firms giving hospitality to Treasury officials and in the top three for the most meetings with those officials in a department which oversees financial services.
- EDF was the second highest provider of hospitality to DESNZ ministers and had the most meetings with ministers in the department which oversees energy policy.

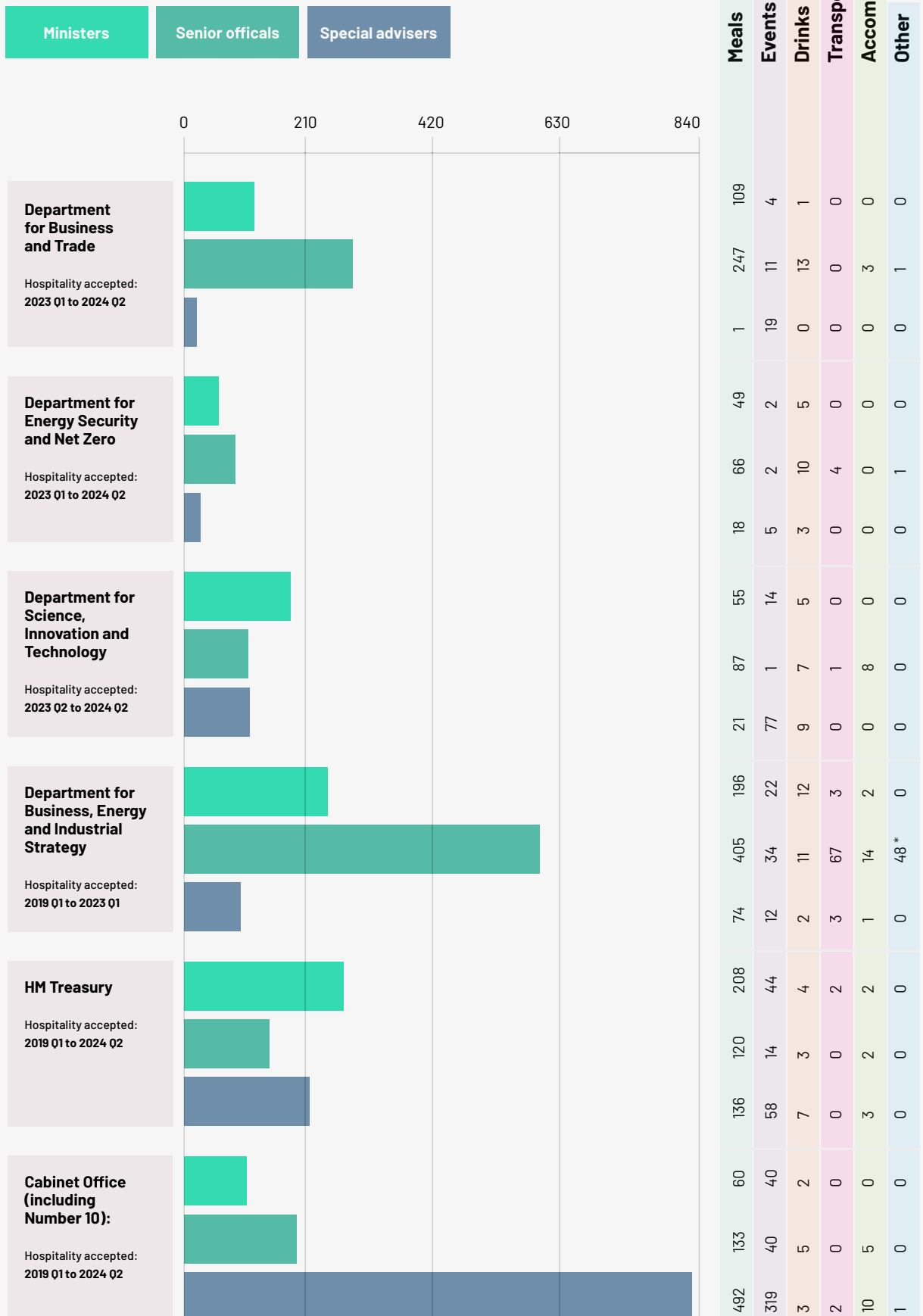
The extent to which spouses, family members or friends of public officials in certain departments are benefiting from hospitality – particularly when compared to the lower levels in other departments – raises questions about the propriety of those arrangements.

Between January 2019 and June 2024:

- Ministers in the Cabinet Office were joined by spouses, family members or friends on 30.4% of the times they attended events, had meals, drinks or other hospitality (31 of 102).
- Ministers in the Treasury were joined 20.8% of times (54 of 260).
- Senior officials in the Cabinet Office were joined 15.8% of times (29 of 183)
- Special advisers in the Cabinet Office were joined 12.9% of times (107 of 827).
Given the amount they accepted, this is almost as much as the above three groups combined.

Barclays, HSBC and Aviva were among the top firms giving hospitality to and meeting with officials in a department which oversees financial services

Hospitality accepted in DBT, DESNZ, DSIT, BEIS, the Treasury and the Cabinet Office



Source: Departments' transparency data. * Senior officials categorised hospitality types differently in 2019 Q2.

Special advisers – special treatment

We found that special advisers receive considerable hospitality. Between January 2019 and June 2024:

Special advisers in the Cabinet Office, for instance, had the second highest rates of hospitality across government – these individuals accepted a total of 827 instances of hospitality, an average of 2.8 per week. Only senior officials at DBT accepted hospitality more frequently, with a total of 275 over a shorter period, or 3.8 times a week.

44% of all events-related hospitality across the six departments went to Cabinet Office special advisers; with 80% of all such hospitality within the department going to them.

Cabinet Office special advisers accepted significant hospitality from lobbyists with one in eight (107) instances of hospitality from a registered consultant lobbyist, 104 of which were accepted by special advisers in Number 10. Just two firms, Headland Consultancy and Portland Communications, provided 23% of this hospitality (25 of these 107 instances).

Special advisers at the Cabinet Office were joined by a spouse, family or friend for hospitality 107 times out of 827 (12.9%), with special advisers in Number 10 accounting for 101 of these situations.

2.3. Secondments

Inward secondments risk privileged access and influence

Inward secondments enable individuals to temporarily work for a government department whilst remaining employed by an external organisation; while outward secondments give civil servants a temporary role in a different organisation.⁸¹

Secondments enable departments and commercial organisations to share experience and ideas. But inward secondments are a potential risk area for privileged access to decision-makers or influence over public policy, and must be managed robustly and transparently to avoid policy capture.⁸²

A briefing published by the NAO in 2017 highlighted the risk that *“secondment programmes can create the possibility of conflicts, and procedures should explicitly consider the risk of creating an actual or perceived conflict.”*⁸³

The rules for managing conflicts of interest in secondments

In a 2013 report on lobbying, CSPL recommended that before any secondment is entered into, *“consideration of the possible conflicts of interest that may arise should actively be discussed and managed by public bodies.”* This may require recording possible conflicts, imposing restrictions or conditions to manage that conflict, or ultimately refusing to agree to the secondment.⁸⁴

Guidance on declaring and managing outside interests in the civil service, issued by the Cabinet Office, says departments *“should follow a similar process in advance of agreeing inward secondments”* to the approach for recruiting to civil service roles.⁸⁵ This provides that departments:

- must require successful candidates to declare relevant outside interests as part of the recruitment process, and be clear that potential conflicts will be explored,
- should ensure appropriate mitigations can be put in place,
- should test potential conflicts after an interview if the candidate is successful,
- should identify any actual, potential or perceived conflicts in relation to the particular role being applied for, and the
- appointment should be subject to resolution of any conflicts.

Cabinet Office guidance on secondments across government, produced in October 2024 and provided to Spotlight on Corruption in January 2025, states that to mitigate conflicts of interests, roles should not involve:

- opportunities to communicate with the government where there is scope to influence a decision or policy in relation to the interests of the department,
- working on bidding processes for commercial opportunities which relate to the secondee's home organisation or its competitors, or
- access to sensitive or confidential information about commercial competitors of the secondee's home organisation.

The guidance does not address the fact that those with the most resources and existing contacts are more able to provide staff on secondment. The risks are compounded by the weaknesses in conflict of interest management across government. A report published by the NAO in 2024 found that:⁸⁶

- Approaches to tackling conflicts of interest between departments are inconsistent, with no agreed definition of what conflicts of interest are.
- 71% of public bodies surveyed had no management information about how civil servants are complying with conflict of interest rules.
- Only one public body of the 35 surveyed could show that they took steps to verify whether measures to mitigate conflicts of interest were being implemented.
- Only one public body surveyed had imposed any sanctions in the last 12 months, while the NAO saw no sanctions imposed despite breaches of the rules in six case studies.

Case study on multiple routes to influence – Oliver Wyman

The consultancy firm Oliver Wyman has significant access to decision-makers through different routes. The firm attended seven meetings with Treasury ministers between January 2019 and June 2024 and six with the second Permanent Secretary. The firm provided hospitality to a senior official and a minister in the Treasury between January 2020 and March 2024.

The Treasury was not the only department where Oliver Wyman had access. It held seven meetings with senior officials in DBT between January 2023 and June 2024, including six with the Permanent Secretary.

The firm was also the fourth highest provider of hospitality to senior officials in DBT, with hospitality four times in that period. Between January 2020 and March 2024, Oliver Wyman also provided hospitality to a senior official and minister in the Treasury, a senior official and special adviser in the Cabinet Office, and a senior official in DSIT. An individual from Oliver Wyman was also on secondment to the Treasury between 2020-22.

The firm provided a member of staff to support Tulip Siddiq in her front bench role between August 2023 and February 2024. The member of staff led a review into financial services policy, which resulted in Labour's pre-election plan for growth in the financial

services sector,⁸⁷ and which itself took forward themes from a previous report by the City of London Corporation into economic growth done in partnership with Oliver Wyman.⁸⁸ The firm also advised the new government on the creation of a National Wealth Fund.⁸⁹

Days after the 2024 general election, on 9 July 2024, Oliver Wyman attended a roundtable, hosted by the Chancellor, to discuss the National Wealth Fund. The firm also had three meetings with senior officials in DBT in July and August 2024. It has had a secondee in the Treasury since September 2024.

Departments do not publish details about secondments

CSPL noted in 2013 that information about the number of secondments was not publicly available and could only be illustrated by FOI requests. These showed:

- 209 secondments into the Treasury between January 2007 and August 2011, mainly from major accountancy firms, and
- over 50 secondments into the then Department of Energy & Climate Change between October 2008 and September 2011.

CSPL recommended that departments and their agencies should be required to publish annually the number of inward and outward secondments. However, in their 2023/24 annual reports, DSIT, DESNZ and the Treasury only reported costs in respect of outward secondments, while the Cabinet Office additionally recorded £9.6 million of expenditure on inward secondments.⁹⁰

FOI requests submitted in 2024 to the five current departments, by Spotlight on Corruption and journalist Lucas Amin, revealed troubling transparency gaps and inconsistent approaches.

Some departments refused to provide key details, like job titles or when a secondment started. The Cabinet Office refused to provide any information, saying it was not held centrally but at Business Unit level, and that it would take too long to locate, retrieve and extract the information.

Secondments to political parties as a route to influence

Analysis by the Autonomy Institute in 2023 found that there were 1,250 donations of staff to political parties between 2001-22, together worth £15,560,393.⁹¹ Of this, £3,853,382 went to individual politicians and £11,147,513 to political parties, including: Labour (£5,075,759), Conservatives (£3,990,875) and Liberal Democrats (£1,548,713).

Autonomy identified that the professional services and scientific sector was donating the most staff to work for political parties (£5,572,667 or 35.8% of the total). The bulk of

this was from two accounting firms (PricewaterhouseCoopers: £2,292,500 and KPMG: £1,868,619) and the rest from other accounting and law firms, including Christine Lee & Co Solicitors (£567,457).

The Security Service, MI5, issued an ‘interference alert’ in January 2022 about Christine Lee, accusing her of having “*knowingly engaged in political interference activities*” on behalf of China.⁹²

Opposition parties rely on consultants and think tanks because they do not have the civil service to work up policy for them. Labour reportedly sent an appeal for companies to provide staff to help with policy ahead of the 2024 election, raising concerns that its policies would be influenced by interest groups.⁹³ The party made significant use of secondees from the private sector and think tanks, receiving over £1.8 million worth of support between 2022 and the general election.⁹⁴

At least 25 secondees were in shadow cabinet teams between 2022 and 2024. Consultancy firms Global Counsel and Oliver Wyman seconded staff to shadow economic secretary Tulip Siddiq; NatWest and HSBC to shadow business secretary Jonathan Reynolds;⁹⁵ while shadow Chancellor Rachel Reeves was assisted by a secondee from consultancy firm FGS Global.^{96 97}

Who is providing secondees to departments?

The FOI responses revealed the large number of inward secondments from industries, including those with an interest in departments’ policy objectives, as well as from universities.

Charities are under-represented in secondments compared to industry. In response to a parliamentary question in 2017, a Treasury minister confirmed that the department then had six full-time staff seconded inward from private businesses and none from charities.⁹⁸ Between January 2020 and October 2024, there were no secondees from charities in the Treasury. This is likely in part to be due to capacity and resource constraints from charities’ perspective, making the question of how secondments are paid for and their terms very important.

Since they were established in February 2023, to October 2024, DBT had one secondee from a charity and 19 from industry; DESNZ one secondee from a charity and 38 from industry; DSIT six from charities and 10 from industry. Universities were more represented, with seven in DBT, 16 in DESNZ and 29 in DSIT. However, between 2020 and October 2024, the Treasury only had two from universities.

Some of the companies and trade associations that provide secondees to departments also secure a significant number of meetings with them. This includes HSBC, Lloyds, Aviva and UK Finance (top 10 meetings with Treasury ministers) and Rolls-Royce (top 10 meetings with DBT ministers).

2.4. Public consultations

Public consultations (usually where a draft policy is in place) and calls for evidence (to inform the general direction of a policy) are crucial for informing decision-making and strengthening the legitimacy of public decisions.

They must be actively managed to ensure that they are inclusive and that private interests do not unfairly influence the process and outcomes.

However, the UK scores poorly against the OECD's international standards for inclusiveness and transparency of public consultations, with just 29%.⁹⁹ This was lower than the UK's allies, including France and the US (43%), the Netherlands and Portugal (57%) and Poland (71%).

The OECD has recommended that countries introduce a decision-making process footprint *“that details the stakeholders who sought to influence the decision or were consulted in its development, and shows what inputs into the particular public decision-making process were submitted and what steps were taken to ensure inclusiveness of stakeholders in the development of the regulation.”*¹⁰⁰ It has also called for governments to look beyond traditional consultation processes, targeting the *“willing but unable”* and the *“able but unwilling”* in order to support inclusive growth.¹⁰¹

The UK government's Consultation Principles, introduced in 2012 and updated in 2018, require departments to consider *“the full range of people, business and voluntary bodies affected”* by a policy being consulted on, and to consider *“targeting specific groups if appropriate”* by ensuring *“they are aware of the consultation and can access it.”*¹⁰²

We surveyed public consultations and calls for evidence held by the Treasury – as the department which leads economic policy for the UK – to see how inclusive and transparent its public consultations are.

Treasury consultations are dominated by industry

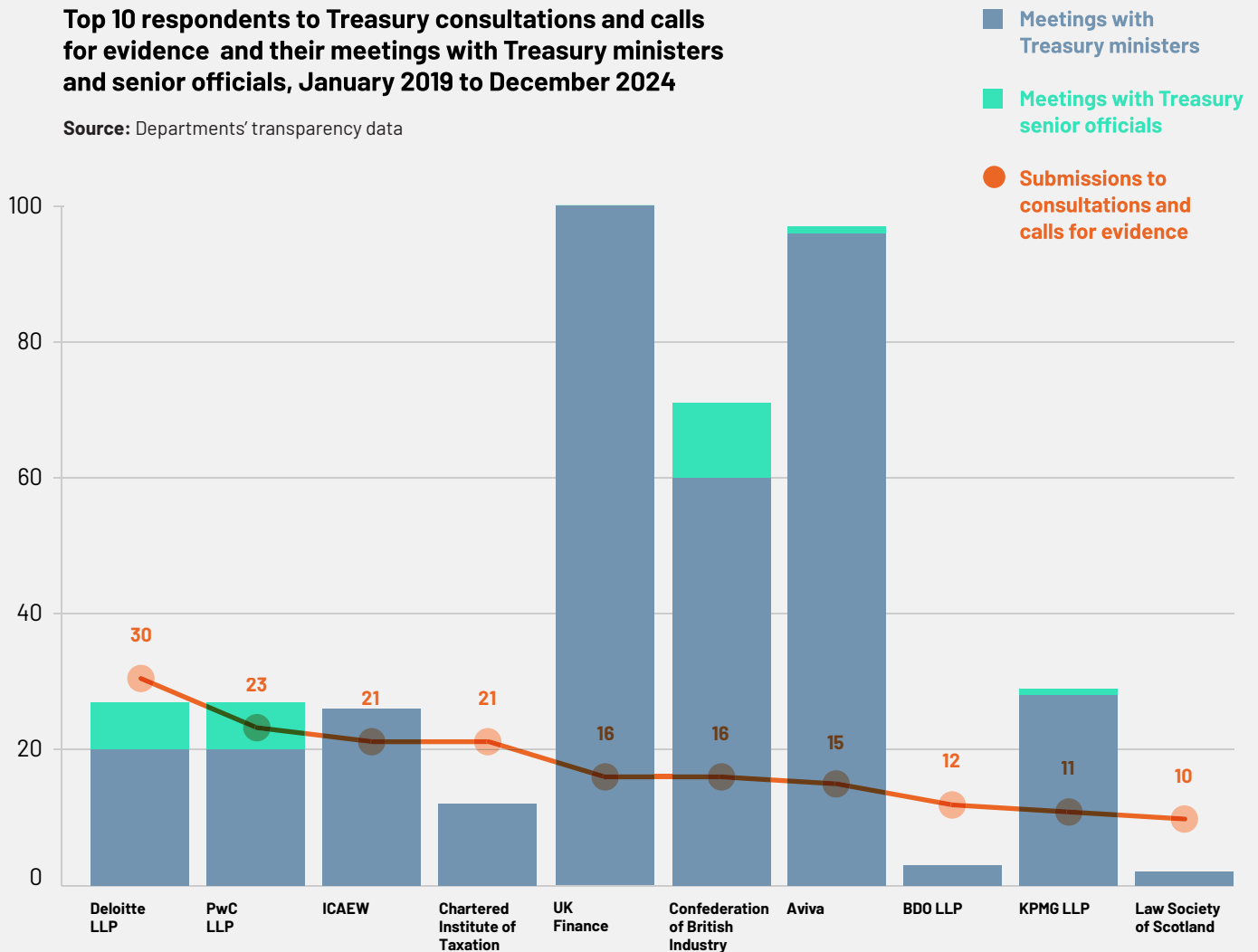
Treasury consultations between 2019 and 2024 were dominated by accountancy firms and trade bodies – organisations with the resources and capacity to respond to multiple consultations and potentially complex issues. Many of these groups also had frequent meetings with Treasury ministers in the period.

Business, industry and trade groups provided over half of all submissions to both consultations and calls for evidence (where names were published). Civil society, consumer, campaign and public interest groups provided 6% of submissions to both, with academics and universities between 1% and 3%. Responses from members of the public were between 20 and 30% of responses, and other public sector bodies around 20% for consultations.

The UK scores poorly against the OECD's standards for inclusiveness and transparency of public consultations

Top 10 respondents to Treasury consultations and calls for evidence and their meetings with Treasury ministers and senior officials, January 2019 to December 2024

Source: Departments' transparency data



Number of submissions by different respondents to Treasury consultations and calls for evidence between 2019-2024 (where breakdown of respondent types or list of respondents provided)

Respondent type	Consultation (% of total)	Call for evidence (% of total)
Civil society, consumer, campaign and public interest groups	427 (6%)	74 (6%)
Academics and universities	65 (1%)	32 (3%)
Members of the public	1,599 (21%)	390 (33%)
Business, industry and trade groups	3,874 (51%)	614 (53%)
Other including: public sector; government bodies; regulators; public sector officials	1,587 (21%)	55 (5%)

Source: Treasury responses to consultations and calls for evidence 2019-24

Meaningful engagement is needed for consultations to be inclusive

Lack of meaningful engagement may make stakeholders feel excluded from the process and less inclined to engage in the future.¹⁰³ The OECD has identified that “*typical engagement on regulatory proposals takes place at the final stage of the process ... This timing is often too late to influence the process, and may indicate the use of the tools of stakeholder engagement as a mere formality.*”¹⁰⁴

It is not clear to what extent the Treasury is making efforts to engage wider audiences beyond those it normally engages with, or to explain what evidence it is looking for. In a 2023 report, the Institute for Government (IfG), a think tank, recommended that the Treasury advertise calls for evidence directly to academics and other external researchers, and be clearer about the evidence they need and how it will feed into policy development, to help researchers understand what would be most helpful.¹⁰⁵

IfG also called for more consultations to take place at an earlier stage, to bring those with relevant expertise into the process more effectively and enhance public debate. Consulting at the right point in the policy-making process will ensure a wider range of views are fed in, including on the principle of whether or not to take forward a reform. Too often a consultation takes place about the precise details of a policy where well resourced business groups most impacted by it tend to be those who dominate.¹⁰⁶

In January 2025, the government set out details of an AI tool, Consult, which is being tested on past consultations and is intended to analyse and summarise responses for policymakers, by identifying themes and mapping them on to responses. The government has not explained how this will ensure public interest considerations are not drowned out by shared views of industry.¹⁰⁷

Transparency is critical but lacking

The Consultation Principles are particularly weak on transparency. They require departments to “*explain the responses that have been received from consultees and how these have informed the policy*” and how many responses were received. Departments are not required to publish submissions and have discretion over how much detail to provide about how they were influenced.¹⁰⁸

Between 2019 and 2024, the Treasury ran 31 calls for evidence and 128 consultations. By January 2025, the Treasury had responded to 21 calls for evidence and 104 consultations. It published the names of respondents in half of these consultations (53), and in just a quarter of calls for evidence (5).

Strikingly, the Treasury has published no response at all to one in six (20) completed consultations, from as far back as 2019 and 2020.

Consulting at the right point in the process will ensure a wider range of views are fed in, including on the principle of whether or not to take forward a reform

Measurement	Number of consultation responses where provided	Total consultation responses 2019-24	Number of call for evidence responses where provided	Total call for evidence responses 2019-24
Names of respondents provided by Treasury	53 (50.96%)	104	5 (23.80%)	21
Respondent types provided by Treasury (with figures)	28 (26.92%)	104	10 (47.61%)	21
Respondent types provided by Treasury (without figures)	47 (45.19%)	104	10 (47.61%)	21

Source: Treasury responses to consultations and calls for evidence 2019-24

2.5. Other routes to influence

There are various other ways in which those with power, resources and contacts can obtain privileged access and opportunities to influence decision-makers. These include:

- Appointing former public officials with contacts and networks in government.
- Being appointed to advisory boards and securing an insider role in policy-making.
- Meeting senior politicians through access channels provided to party donors.
- Having access facilitated by think tanks which have relations with decision-makers.

Revolving door

The interchange of people between the private and public sectors can be beneficial to both, but needs to be managed carefully to prevent former public officials exploiting privileged access to government or information, to benefit themselves or their new employers.

In his post-Greensill review, Sir Nigel Boardman identified that the significant increase and political drive for much more interchange between the public and private sectors following a decade of civil service reform provided the backdrop to the scandal. While this was not in itself wrong, he noted, it required “*careful management*” not least to ensure the integrity of the civil service.

In a 2009 report, about revolving doors in relation to the financial crisis, the OECD found:¹⁰⁹

- “*The revolving door is an issue that is part of a wider concern about transparency in policy making and privileged access to policy making and regulation*”,
- problems arising from the revolving door, like conflicts of interest “*could significantly undermine public trust in government*”,

- the revolving door could result in unfair advantages and lead to corrupt practices, and
- *“Tackling the revolving door is an indispensable part of the process of restoring confidence in both the government system and the financial markets more generally.”*

The Business Appointment Rules are too weak

The Business Appointment Rules require former ministers and the most senior officials and special advisers to seek advice from the Advisory Committee on Business Appointments (ACOBA) for any new roles within two years of leaving public office.¹¹⁰ Officials up to and including director level ask ACOBA for advice in some circumstances but otherwise are advised by their department.¹¹¹

The Rules impose a two-year ban on lobbying the government. But as a parliamentary committee identified in 2008, there has been confusion about what this means in practice.¹¹² There have also been questions about whether two years is long enough.

Former Prime Minister David Cameron lobbied ministers and officials in the Treasury on behalf of Greensill Capital, a company in which he had a significant financial interest, after the two-year prohibition expired. This reignited debate about whether to extend the ban.

Participants at a 2023 lobbying seminar hosted by CSPL, which included standards regulators, suggested that *“the influence of an ex-Prime Minister or ex-minister of one of the high offices of state, arguably extends beyond two years”* and suggested implementing a lobbying ban on a case-by-case basis.¹¹³ However both the previous and current governments rejected calls to extend the lobbying ban to five years.¹¹⁴

Inadequate oversight of the Rules

ACOBA is merely an advisory body. Neither ACOBA nor the Rules have any statutory basis and exist at the discretion of the government. This is despite CSPL recommending, in a landmark report in 2021, that ACOBA and the Rules should be put into legislation, along with other standards watchdogs.¹¹⁵

ACOBA meanwhile has limited resources, no enforcement powers, and no system for monitoring compliance. There are no sanctions for failing to seek or follow its advice, beyond a public letter setting out concerns.

The outgoing chair, Lord Eric Pickles, described ACOBA as a *“toothless regulator”*¹¹⁶ and said the system had no credibility.¹¹⁷ In January 2025, Lord Pickles called the system a *“ticking bomb”* and said that despite offering to train and audit departments, *“they’ve done the square root of nothing.”*¹¹⁸

David Cameron lobbied ministers and officials in the Treasury on behalf of Greensill Capital, a company in which he had a significant financial interest

The previous government committed in July 2023 to a ministerial deed that would make the Rules binding on ministers, but this has not been implemented. Meanwhile, Labour's 2024 manifesto commitment to "review and update post-government employment rules" including "enforcing restrictions on ministers lobbying for the companies they used to regulate, with meaningful sanctions for breaching the rules" remains to be seen.¹¹⁹

The previous government committed to a ministerial deed that would make the rules bindings, but this has not been implemented

While ACOBA deals mainly with former ministers and officials at the senior grades of permanent secretary and director general, government departments are responsible for overseeing the revolving door for officials at director level and below. Both Lord Pickles¹²⁰ and CSPL¹²¹ have raised concerns that oversight at department level is a serious risk area and lacks transparency – no details are published, for instance, of business appointments for civil servants below senior grades.

This lack of transparency is particularly concerning given the significant increase in the number of applications processed by departments. In response to an FOI request from Spotlight on Corruption, the Cabinet Office confirmed that applications from civil servants below senior grades doubled each year, increasing from 7 in 2020-21, 14 in 2021-22 to 28 in 2022-23.

Revolving door decisions for economic decision-makers

Spotlight on Corruption analysed decisions under the Business Appointment Rules relating to the six departments by ACOBA between January 2019 and September 2024 (for ministers and the most senior officials and special advisers); and by the departments from January 2019 to the latest available releases (for directors and directors general).

This analysis is complicated by the fact that different departments publish decisions at different rates leading to uneven transparency about departmental decisions. At the end of January 2025, the Cabinet Office published its decisions covering the period July to September 2024. However, DBT had only published decisions up to March 2024, which means the public do not know where senior officials and advisers have gone to work over the past 10 months.

Whilst former public officials from the same department are going into a range of different industries, there are concentrations of some industries:

- Of 101 decisions relating to BEIS, 20 involved consultancy firms and 11 energy firms.
- Of 52 relating to the Treasury, nine were for lobbying firms and 13 in financial services.
- Of 250 relating to the Cabinet Office, 16 were for financial services, 20 for strategy, comms or advisory firms, 22 think tanks, 41 lobbying and 44 consulting firms.

Almost one in six revolving door decisions for Cabinet Office ministers, senior officials and special advisers (41 of 250), and Treasury senior officials and special advisers (eight of 52) was to join a registered lobbying firm. Three quarters of these decisions (37) were for special advisers.

These individuals will be able to put their specialist department knowledge and contact books to work for a range of clients. Given the weaknesses in the UK's regime for lobbying transparency and inadequate regulation of the revolving door, as set out above, this gives businesses significant scope to have privileged access to and potential influence over senior decision-makers.

ACOPA has highlighted the growing number of applications for work with consulting or advisory firms, from 12% of applications in 2020/21 to 21-24% in the following three years.¹²²

In 2023, academics at the University of Exeter published an analysis of the post-government careers of 521 former special advisers, who served between 1997-2017.¹²³ They mainly went on to corporate lobbying and advocacy roles for special interest organisations that seek to influence government.

Advisory boards

Power without accountability

The government and political parties establish advisory boards and other groups of external experts and stakeholders. Some are set up to provide ad hoc advice on a specific issue, others provide ongoing support. There is often little transparency over how the individuals are selected, how these bodies operate in practice and how departments and parties manage the risks of conflicts of interest.

The OECD found that it is not mandatory to disclose the names of members of permanent advisory bodies in the UK, unlike in Germany, France, the US and many other countries.¹²⁴

The OECD recommends that countries implement transparency and integrity measures for all those providing advice to the government, including publicly disclosing details about their funding, functioning and members; and providing rules to promote transparency, integrity and inclusiveness, such as procedural rules, standards of conduct and rules on conflict of interest.¹²⁵

Unlike lobbyists and other external influences, advisory boards and groups become part of governance structures and policy-making processes, with established points of access to decision-makers.¹²⁶

Key economic advisory boards under the previous government include:

- In October 2022, then Chancellor Jeremy Hunt announced an Economic Advisory Council to advise the government on growth, economics, markets and industry. The members were representatives from BlackRock, Element Capital, PGIM Wadhvani and JP Morgan.¹²⁷

- In November 2020, Rishi Sunak initiated the UK Listings Review, to propose reforms to the UK's rules for companies listed on the stock exchange. The Chair of the Review, Lord Hill, was assisted by an advisory panel which included representatives from BlackRock and Goldman Sachs.¹²⁸ The government later announced that it would take forward each of the Review's recommendations, including the growth and competitiveness objective for the Financial Conduct Authority (FCA).¹²⁹
- In April 2023, the previous government established a Technology Working Group to examine the impact of new technology on asset management. The Working Group included the FCA, Treasury and 20 companies and trade bodies with a vested interest in this area.

Many of the advisory boards set up by the new Labour government, and the party in opposition, include representatives from the same firms involved in the previous government's boards, many of whom regularly meet senior economic decision-makers and provide them with hospitality.

- In December 2023, Labour in opposition announced an advisory panel to help it review financial services.¹³⁰ The panel – mainly comprising heads of large financial institutions like Schroders, Abrdn (now Aberdeen), Barclays and Prudential – included some of the key players behind Labour's light-touch approach to regulation prior to the 2008 financial crisis.¹³¹
- Labour, when it was in opposition, set up a British Infrastructure Council to advise on private sector investment. Members include HSBC, Santander, BlackRock and Lloyds. Labour said the aim is to deliver infrastructure delivery challenges by partnering with the private sector to unlock capital.¹³²
- Labour, again when it was in opposition, set up a taskforce of City bosses to advise on a National Wealth Fund, with representatives from firms with an interest, like Aviva, NatWest, Equitix and Barclays and with support from Oliver Wyman.¹³³

Lack of accountability and transparency for non-executive directors

Non-executive directors (NEDs) are appointed to bring commercial expertise into departments and provide external scrutiny.¹³⁴ This gives them influence within the civil service and potential access to decision-makers.¹³⁵ NEDs are subject to a Code of Conduct issued by the Cabinet Office.¹³⁶

In June 2023, PACAC found the way boards and NEDs are used depends on the minister responsible for their department *“and often NEDs wield significantly more responsibilities within their department outside the board than is publicly documented or defined”* which limits transparency and accountability for their positions.¹³⁷

PACAC expressed concern about the lack of consistency and transparency in how departments manage any real or perceived conflicts of interests.

Cabinet Office guidance, issued in November 2024, requires Board Secretariats to maintain a register of interests for NEDs – including any measures to mitigate actual, potential or perceived conflicts of interest – but only requires publication of NEDs' relevant interests. Measures to mitigate conflicts are not published unless agreed with the Accounting Officer.¹³⁸

This means the public can see relevant interests but have no understanding of the measures taken to manage potential conflicts. Examples of some key NEDs' outside interests include:

- Michael Jary, the government's former lead NED, had a range of other roles, including as non-executive director of Barclays, and a senior adviser to consulting firm, OC&C Strategy Consultants.¹³⁹
- Lord Hill, the Treasury's lead NED, has declared other roles, including as board member of a think tank, the Centre for Policy Studies, and as an adviser to Santander.¹⁴⁰
- The Cabinet Office's lead NED, Anand Aithal, was also on the board of an investment management company, Polar Capital.¹⁴¹

The 2024 Labour government dismissed a number of NEDs after taking office, including Mr Jary and all of the NEDs in DBT and the Cabinet Office.¹⁴² Concerns about privileged access were raised when, in December 2024, the new government appointed the head of a lobbying firm as a NED in DBT.¹⁴³

Donations

Political donations are a significant risk area for privileged access to decision-makers, with donors providing staff to politicians and according to public reports, involved often extensively in setting or lobbying for changes to government policy.

Despite the heavy influence they can exert, meetings between ministers and special advisers with party donors are exempt from transparency releases on the grounds that they are 'political' meetings.

Some political parties give donors access to senior politicians

Political parties have systematically given donors access to senior politicians with little to no transparency about those arrangements and the access they provide. The Conservative party operated a tiered system in government:

- £50,000 a year to join the Leader's Group, which met with the entire cabinet;¹⁴⁴ and
- £250,000 a year for the Advisory Board, whose advice was sought on policy.¹⁴⁵

In 2021, 79 individuals (not including donations through companies and other entities) donated enough to make them eligible to join the Leader's Group; 15 gave £250,000 or more. The numbers had decreased by 2024, to 66 eligible for the Leader's Group and 10 for the Advisory Board.¹⁴⁶

Members of the Advisory Board have reportedly included the financier Lord Spencer of Alresford, Lubov Chernukhin, a former banker and wife of President Putin's former deputy finance minister, property tycoons Tony Gallagher and Leo Noé, and the businessman Javad Marandi.¹⁴⁷

Some Advisory Board members reportedly lobbied ministers to change policy, including against taxes for wealthy individuals, but the group is not subject to transparency rules.

These sorts of opaque access arrangements are a potential risk to the quality and fairness of government decision-making, because they could be skewing decisions towards those with privileged access and the deepest pockets.¹⁴⁸

Ministers' meetings with donors – a transparency black hole

The Cabinet Office refused to provide Spotlight on Corruption with details of Boris Johnson's meetings with Advisory Board members, in response to an FOI request, on the basis that the information is political. The Information Commissioner upheld the Cabinet Office's refusal based on confidential submissions.¹⁴⁹

The Treasury also refused to provide details of Rishi Sunak's meetings with the Advisory Board.¹⁵⁰ It is unlikely that people would pay such large sums of money to meet a politician in their capacity as an MP or party representative, detached from their role in government and public decision-making powers.

Financial sector influence through donations

Politicians rely on the donors and sectors that support their party and help get them elected. This can lead to dependence on particular individuals, companies and sectors, and may lead to a reciprocal relationship and decision-making that favours those interests.

The finance sector has played a dominant role in party funding. The Conservative party received £11 million from the sector between the 2019 general election and September 2021; just 140 individuals from the finance sector gave 40% of all donations. This period marked a shift from bankers towards managers of hedge funds, private equity and asset management firms.¹⁵¹

Financial institutions and individuals closely tied to the sector donated a total of £15.3 million to political parties throughout 2020 and 2021.¹⁵² And of the top 500 largest donations from individuals in 2020-21, 46% came from those with a financial background.¹⁵³

Analysis by the Autonomy Institute in 2023 found that the finance sector donated at least £37.4 million between 2001-2022, including half a million pounds in staffing; surpassed only by the construction and real estate sector, which donated over £40 million.¹⁵⁴

Donors have in some instances been found to receive significant public contracts

Organisations with public contracts in the UK, and their owners, are not prohibited from donating to political parties. 46% of countries ban political donations from public contractors or from companies partially owned by the government.¹⁵⁵ Within the EU, over half of countries¹⁵⁶ (14 out of 27 members) have bans on companies with public contracts making donations, as does the US.¹⁵⁷

A study in December 2021, based on data from Czechia, identified that donations can skew public contracts towards politically connected firms and undermine government efficiency.¹⁵⁸

Analysis by the Guardian in June 2024 found that companies linked to Conservative party donors collectively received £8.4 billion in public money since 2016. Donors included Frank Hester, who donated £15.3 million to the Conservative party, and whose company The Phoenix Partnership received £427.7 million from the NHS and Department of Health and Social Care since 2016.¹⁵⁹

Preventing major conflicts of interest in procurement is essential to ensuring value for money and maintaining public trust in public spending and electoral laws. One way of achieving this is by prohibiting companies and directors of companies that receive or are bidding for public contracts from making political donations. It is also important to require those bidding for public contracts to declare whether they have made political donations on pre-qualification forms so that conflicts of interest that arise as a result can be robustly assessed and proactively managed.

Think tanks

By publishing research and engaging with decision-makers, think tanks shape the environment in which the government makes decisions and the narratives of policy-making.¹⁶⁰

They also provide direct support to political parties. The bosses of three influential think tanks – the Institute of Economic Affairs, the Centre for Policy Studies and Policy Exchange – collectively gave over £35 million to the Conservative party between 2004-24.¹⁶¹

Labour Together raised over £4 million between January 2023 and August 2024.¹⁶² This enabled it to channel money and staff to Labour, providing 12 members of staff to nine senior Labour politicians before the 2024 election, worth around £565,000.¹⁶³ Labour Together was fined by the Electoral Commission in 2021 for failing to fully and promptly declare over £700,000 in donations.¹⁶⁴

Alongside being a conduit for political donations, many influential think tanks publish little to no information about their sources of funding, making it impossible to scrutinise the drivers of their activities and on whose behalf they are accessing and making representations to the government.

Online media outlet openDemocracy rates think tanks' transparency from A to E. Those rated A publish their annual income and name all funders who gave £5,000 or more in the last year and declare the exact amount from each. Those rated E publish no or negligible information.¹⁶⁵

The main ‘Tufton Street’ think tanks, noted in the table below, attended 156 meetings with ministers between 2020 and 2023.¹⁶⁶

Think tank transparency and meetings with ministers across government		
Organisation	Funding transparency	Meetings 2020-23
Centre for Policy Studies	D	64
Policy Exchange	E	45
Institute of Economic Affairs	D	37
Adam Smith institute	E	9
Legatum	E	6
Taxpayers’ alliance	E	3
LGB Alliance	Not rated	3
Civitas	E	2
Institute for Free Trade	Not rated	1

Source: meeting figures prepared by Peter Geoghegan based on departments’ transparency data

Think tanks that have closer alignment with the Labour party have a high transparency rating, including: the Resolution Foundation (A), the Institute for Public Policy Research (A), the Fabian Society (A) and Demos (B).

Inclusive policy processes

3

3. Inclusive policy processes

The routes to influence set out in this report need to be tightened to prevent privileged access to decision-makers and policy capture. These guardrails should be strengthened in a coordinated way to prevent influence shifting to less regulated areas: from more transparency in meetings, through to tougher rules on hospitality and more robust enforcement of the revolving door.

But strengthening the guardrails and increasing transparency will not on their own achieve fairer access. This needs to be accompanied by a more inclusive approach to the policy process, to make decision-making more resilient to capture by narrow interests – and to help ensure that economic policy is based on a wide range of options and serves the public interest.¹⁶⁷

Strengthening the guardrails and increasing transparency will not on their own achieve fairer access

3.1. More inclusive economic decision-making

The OECD has highlighted the need for complementary and mutually reinforcing strategies to prevent policy capture and safeguard public decision-making, including:¹⁶⁸

- levelling the playing field with more inclusive decision-making processes;
- ensuring transparency and access to information for effective stakeholder engagement;
- shielding competition authorities, audit institutions and regulators from capture; and
- identifying and mitigating the risks of capture through integrity policies.

Successive governments – including Labour’s 1999 Modernising Government white paper¹⁶⁹ and the Conservative government’s 2012 Civil Service Reform Plan¹⁷⁰ – have identified the need for inclusive policy-making, widening access to policy debates and involving people who are impacted by decisions. This has yet to be translated to the realm of economic decision-making.

In September 2024, a Cabinet Minister said the new government recognised the potential value of participatory methods as part of a broader toolkit for policy development and public engagement; and said the government was assessing their effectiveness.¹⁷¹

The Citizens’ White Paper, published in 2024 by civil society groups Involve and Demos,¹⁷² recommended ways to embed public participation in policy-making, including:

- panels of randomly selected citizens to feed into the government’s Mission Boards,
- develop departmental participation units and senior civil service champions,
- require public bill teams to involve the public before introducing legislation,
- involve citizens in select committee inquiries and post-legislative scrutiny, and
- create an independent body to ensure processes meaningfully involve citizens.

A project by King's College in 2023, which explored more deliberative public input into economic policy, identified the UK Research and Innovation Sciencewise programme as a potential template, which embeds deliberation and public dialogue into science and technology.¹⁷³ An example of this is the citizens' panel which informed the 7th Carbon Budget report published in February 2025, by the Climate Change Committee.¹⁷⁴

OECD and inclusivity

The OECD has repeatedly called for more inclusive policy-making processes:

- The OECD found that a more inclusive and informed policy-making process “*will result in policies that are fairer and closer to citizens’ needs, and may help prevent policy capture.*”¹⁷⁵
- The OECD’s 2010 *Lobbying Principles*, developed in response to the 2008 financial crisis, and updated in 2024,¹⁷⁶ state that “*countries should provide a level playing field by granting all stakeholders fair and equitable access to the development and implementation of public policies.*”
- OECD Guidelines on Open and Inclusive Policy Making provide that all citizens should have equal opportunities and multiple channels to access information, be consulted and participate, and reasonable efforts should be made to engage broadly.¹⁷⁷
- The OECD’s 2017 Recommendation on Public Integrity called for governments to enable stakeholder engagement at all stages of the policy cycle, to promote accountability and the public interest, and to grant all stakeholders the opportunity to develop policies.¹⁷⁸

3.2. Towards an equitable access policy

The OECD has identified the need for principles, rules, standards and procedures that give public officials directions on engaging with lobbyists, to tackle policy capture.¹⁷⁹ But independent reviews in the UK have identified the lack of a clear framework to help public officials understand and manage the risks of vested interests trying to influence decision-making.

- In a 2008 report, a parliamentary committee noted that managing relations with those outside of departments had a very low profile on the government’s agenda, comprising only guidance from 1998 for civil servants on contact with lobbyists.¹⁸⁰
- In a 2013 report, CSPL identified that there is no specific guidance for special advisers on contact with lobbyists, that guidance is required given their proximity to decision-makers, and that the 1998 guidelines was not widely known about in the civil service.¹⁸¹

The Cabinet Office 1998 guidance says officials can meet lobbyists when it is justified by the needs of government, and they should consider whether meeting one group on a particular issue should be balanced by offering other groups the opportunity to make representations.¹⁸² This focuses on “*professional lobbyists*”, those paid to lobby, not the wider spectrum of influencing activity.

In response to an FOI request from Spotlight on Corruption, in August 2024, for any guidance for ministers and officials on lobbying or policy capture, the Cabinet Office referred only to its April 2024 guidance on transparency returns,¹⁸³ the 1998 guidance for civil servants dealing specifically with professional lobbyists¹⁸⁴ and references to lobbying in the Business Appointment Rules.¹⁸⁵

This principles-based approach to managing public officials’ relations with lobbying, with general codes of conduct, does not adequately safeguard against policy capture. Experience and evidence from OECD member countries has shown that voluntary methods are insufficient to deal with the challenges posed by lobbying.

Voluntary schemes without the right compliance and enforcement processes have been shown to have limited impact, because they provide few incentives for companies to abide by the rules. Meanwhile, while some companies have used voluntary commitments to display a public image of corporate responsibility while continuing to lobby behind closed doors for the status quo, many others who are heavily involved in influencing public policies – including law firms and think tanks with corporate funding – opt out of participating at all in voluntary schemes.

The Cabinet Office should issue guidance for departments to develop an equitable access policy to ensure fairer access to decision-makers and mitigate policy capture, and departments should develop policies that are proportionate to their risks and context. These might include:

- An explicit recognition that the public interest is paramount in policy-making and must not be mistaken for, or assumed to coincide with, private interests.¹⁸⁶
- Defining standards of conduct and expectations in relation to external influence over policy-making, including engaging with lobbyists and other influence actors.¹⁸⁷
- Requiring officials to identify in their policy submissions those who materially lobbied them in relation to that policy, to disclose influence that decision-makers should be aware of.¹⁸⁸
- Explaining the need for wide stakeholder engagement and for public officials to proactively consider, after any external meeting, how an equitable balance of views could be obtained.
- Outlining how departments can identify those adversely affected by a policy decision, and those who are under-represented in policy-making, and how to increase their involvement.¹⁸⁹
- Setting out the need for departments to lead policy debate in their areas and to promote participation and deliberation with a wide range of experts and stakeholders.¹⁹⁰
- Requiring departments to develop ways to level the playing field, and identify in their annual reports steps they have taken to ensure broad consultations and equitable access.

A principles-based approach to managing officials’ relations with lobbying, with general codes of conduct, does not adequately safeguard against policy capture

The Cabinet Office should work with departments to help implement the policies, monitor for emerging risks, and continually assess the impact and effectiveness of policies through ongoing engagement with public officials, public interest groups and independent experts.

Finally to embed this guidance, it is essential that there is ongoing training and awareness raising. In a 2015 report, CSPL highlighted the importance of training so that public officials are aware of the standards expected of them.¹⁹¹ In 2023, CSPL identified that there is no single ethics programme in government.¹⁹² Ministers, special advisers and officials should receive guidance and training on the equitable access policy framework, how to identify and manage the risk of policy capture and make policy-making fairer and more inclusive, as part of the government's plan to restore public trust in politics.

Endnotes

1. Electoral Reform Society (9 April 2021), [New polling reveals just how powerless people feel over Westminster](#)
2. Fairness Foundation (26 January 2025), [Inequality Knocks](#)
3. 'Civil society, consumer and public interest groups' includes charities registered with the Charity Commission (except think tanks) and organisations that operate in the interests of consumers or the public that are not registered charities, including consumer councils, commissions and advocacy groups, campaign groups and grassroots organisations.
4. The Advisory Committee on Business Appointments oversees the revolving door for ministers and the most senior officials; departments oversee the revolving door for officials at director level and below.
5. CSPL (November 2013), [Strengthening Transparency Around Lobbying](#), p.8
6. Nigel Boardman (5 August 2021), [Review into the development and use of supply chain finance: recommendations and suggestions](#)
7. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#), p.85
8. IMF (9 August 2019), [Bank Lobbying: Regulatory Capture and Beyond](#)
9. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
10. Ipsos (14 December 2023), [Trust in politicians reaches its lowest score in 40 years](#)
11. Electoral Reform Society (9 April 2021), [New polling reveals just how powerless people feel over Westminster](#)
12. Fairness Foundation (26 January 2025), [Inequality Knocks](#)
13. Bochel H., Bochel C. (27 October 2017), [Making and Implementing Public Policy](#), p.79
14. OECD (January 2025), [Product Market Regulation Indicators](#)
15. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
16. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
17. Kwak, J., Cultural Capture and the Financial Crisis (2014), [Preventing Regulatory Capture: Special Interest Influence and How to Limit it](#), p.80
18. Spotlight on Corruption (11 February 2022), [Half of VIP lane companies supplied PPE worth £1 billion that was not fit for purpose](#); Quentin Grafton R., Williams J. (24 October 2019), [Rent-seeking behaviour and regulatory capture in the Murray-Darling Basin, Australia](#)
19. Independent Adviser on Ministerial Standards (November 2024), [List of Ministers' Interests](#)
20. The Times (18 August 2024), [Labour risks storing up trouble with its business lobby love-in](#)
21. Labour (1 February 2024), [Labour's Business Partnership for Growth](#)
22. Reuters (23 September 2024), [UK ministers seek to reassure business over workers' rights plans](#)
23. Politico (28 November 2024), [Tell us what you want: Labour gets cozy with the City as 2008 crash fades](#)
24. FT (10 December 2024), [Review of £1.2tn in UK public spending will 'be tight', minister warns](#)
25. OECD (21 September 2009), [Revolving doors: emerging regulatory concerns and policy solutions in the financial crisis](#)
26. Labour (13 June 2024), [Manifesto - kickstart economic growth](#)
27. CSPL (November 2021), [Upholding standards in public life: final report of the standards matter 2 review](#), p.11
28. CSPL (November 2013) [Strengthening Transparency Around Lobbying](#), p.3
29. Nigel Boardman (5 August 2021), [Review into the development and use of supply chain finance: recommendations and suggestions](#)
30. Group of States Against Corruption (25 August 2023), [UK Fifth evaluation round - second compliance report](#)
31. PACAC (2 May 2024), [Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters](#)
32. Politico (1 August 2024), [Lean Green transparency machine](#)
33. Cabinet Office (July 2023), [Strengthening Ethics and Integrity in Central Government](#)
34. CSPL (November 2021), [Upholding standards in public life: final report of the standards matter 2 review](#), p.86
35. Nigel Boardman (5 August 2021), [Review into the development and use of supply chain finance: recommendations and suggestions](#)
36. Civil Service World (16 November 2022), [Consultants should be made to declare lobbying of spads, MPs told](#)
37. Cabinet Office (July 2023), [Strengthening Ethics and Integrity in Central Government](#)
38. Cabinet Office (2 April 2024), [Senior Officials' business expenses, hospitality received and meetings with external organisations and individuals](#)
39. PACAC (2 May 2024), [Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters](#), p.11
40. OpenDemocracy (9 July 2024), [Lovebombed by lobbyists: How Labour became the party of Big Business](#)
41. Cabinet Office, Guidance (2 April 2024), Guidance for [ministers](#), [senior officials](#) and [special advisers](#)
42. Spotlight on Corruption (29 November 2024), [Clear as mud: The UK's lobbying transparency deficit](#); Spotlight on Corruption (11 December 2024), [Lobbying scorecard: what has happened to lobbying transparency under the new government?](#)
43. OECD (3 May 2024), Recommendation of the Council on Transparency and Integrity in Lobbying and Influence
44. The Good Lobby (6 December 2024), [The European Commission increases transparency](#)
45. Cabinet Office (July 2023), [Strengthening Ethics and Integrity in Central Government](#)
46. PACAC (2 May 2024), [Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters](#)
47. Reuters (3 September 2020), [UK trade minister reverses decision to remove think tank meetings from public register](#)
48. Cabinet Office (October 2021), [The Cabinet Manual](#)
49. Cabinet Office (July 2023), [Strengthening Ethics and Integrity in Central Government](#)
50. CIPR (June 2024), [Failure by Design](#)
51. Harry Rich (September 2022), [written evidence to PACAC inquiry on the Lobbying Act](#)
52. PACAC (2 May 2024), [Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters](#), p.3
53. Group of States Against Corruption (25 August 2023), [UK - Fifth Evaluation Round Second Compliance Report](#), p.5
54. Harry Rich (September 2022), [written evidence to PACAC inquiry on the Lobbying Act](#)
55. CIPR (June 2024), [Failure by Design](#), p.3
56. ORCL (19 October 2021), [Summary of Investigation – Rt Hon David Cameron](#)
57. ORCL (10 September 2021), [Summary of Investigation – Lord Hammond of Runnymede and Matrix Partners Limited](#)
58. ORCL (26 March 2021), [Summary of investigation – Rt Hon David Cameron](#)
59. ORCL (7 November 2023), [Summary of investigation – The Rt Hon the Lord Hammond of Runnymede](#)
60. Spotlight on Corruption (26 February 2025), [The VAT exemption: a key weakness in the system for lobbying transparency](#)
61. This is based on meetings data from January 2019 to September 2024 for the Treasury and Cabinet Office; from January 2019 to February 2023 for BEIS, when it was dissolved and split into three departments: DBT, DESNZ and DSIT; and from the meetings data published by those three successor departments to September 2024.
62. NAO (27 January 2015), [Conflicts of interest](#)
63. NAO (9 February 2016), [Investigation into the acceptance of gifts and hospitality](#)
64. OECD (2009), [Lobbyists, governments and public trust: increasing transparency through legislation](#)
65. Transparency International UK (February 2015), [Lifting the Lid on Lobbying: The Hidden Exercise of Power and Influence in the UK](#)

66. Cabinet Office (21 September 2010), [Guidance on civil servants receiving hospitality](#)
67. Hansard (14 October 2024), [Reporting Ministerial Gifts and Hospitality](#)
68. Cabinet Office (30 January 2025), [Register of Ministers' Gifts and Hospitality: December 2024](#)
69. Transparency International UK (February 2025), [Promise vs practice: Why Britain's new ministerial gift register misses the mark](#)
70. UN Ethics Office (October 2017), [Putting ethics to work: a guide for UN staff](#)
71. European Commission (7 March 2012), [Communication to the Commission on guidelines on gifts and hospitality for the staff members](#)
72. European Parliament, [Code of conduct for members of the European Parliament regarding integrity and transparency](#)
73. Cabinet Office (21 September 2010), [Guidance on civil servants receiving hospitality](#)
74. Institute of Business Ethics (10 November 2012), [The Ethics of Gifts and Hospitality](#)
75. Transparency International UK, [Open Access UK](#)
76. Parliament (30 May 2024), [Register of interests of members' secretaries and research assistants](#)
77. Politico (14 August 2024), [UK Treasury failed to tell watchdog about senior official's Labour donation](#)
78. Parliament (30 May 2024), [Register of interests of members' secretaries and research assistants](#)
79. This is based on hospitality data from January 2019 to June 2024 for the Treasury and Cabinet Office; from January 2019 to February 2023 for BEIS, when it was dissolved and split into three departments: DBT, DESNZ and DSIT; and from the data published by those three successor departments to June 2024.
80. Department for Business and Trade, [DBT Professional and Business Services sector team](#)
81. Civil Service Careers, [Civil Service Secondments](#)
82. Transparency International UK (February 2015), [Lifting the Lid on Lobbying: The Hidden Exercise of Power and Influence in the UK](#)
83. NAO (18 August 2017), [Managing conflicts of interest and keeping public trust](#)
84. CSPL (November 2013), [Strengthening Transparency Around Lobbying](#)
85. Cabinet Office (6 November 2024), [Declaration and management of outside interests in the Civil Service](#)
86. Spotlight on Corruption (22 November 2024), [NAO reveals woeful conflicts of interest management undermining government objectivity](#)
87. Reuters (8 December 2023), [Britain's Labour Party reviews financial services to 'unleash' City for growth](#)
88. City of London and Oliver Wyman (24 July 2024), [Vision for Economic Growth – a roadmap to prosperity](#)
89. Oliver Wyman (15 July 2024), [Oliver Wyman advises on setup of National Wealth Fund](#)
90. Cabinet Office (12 December 2024), [Annual report and accounts 2023 to 2024](#)
91. Autonomy Institute (May 2024), [Politics for sale: analysing 21 years of UK political donations](#)
92. The Guardian (17 December 2024), [Lawyer accused of being Chinese spy in UK loses legal challenge](#)
93. The Guardian (2 July 2024), [Private sector lobbyists embedded into Labour's shadow cabinet teams](#)
94. OpenDemocracy (22 July 2024), [The army of private sector secondees who helped Labour win](#)
95. OpenDemocracy (7 February 2024), [Watchdog urged to probe Labour's failure to declare value of HSBC donation](#)
96. OpenDemocracy (9 July 2024), [Lovebombed by lobbyists: How Labour became the party of Big Business](#)
97. OpenDemocracy (7 February 2024), [Watchdog urged to probe Labour's failure to declare value of HSBC donation](#)
98. Hansard (9 March 2017), [Treasury: Secondment](#)
99. OECD, [Public integrity indicators](#)
100. OECD (3 May 2024), [Recommendation of the Council on Transparency and Integrity in Lobbying and Influence](#)
101. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making, p.62](#)
102. Cabinet Office (19 March 2018), [Consultation principles: guidance](#)
103. OECD (20 May 2021), [Lobbying in the 21st Century](#)
104. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
105. Institute for Government (August 2023), [How is evidence used in tax policy making?](#)
106. Institute for Government (April 2020), [Overcoming the barriers to tax reform p.56](#)
107. AI.gov.uk, [Consult](#)
108. Hansard (14 July 2021), [Government Departments: Public Consultation](#)
109. OECD (21 September 2009), [Revolving doors: emerging regulatory concerns and policy solutions in the financial crisis](#)
110. Cabinet Office (2 May 2012), [Business appointment rules](#)
111. Institute for Government (31 March 2021), [Jobs after government: rules for ex-ministers and civil servants](#)
112. Public Administration Select Committee (9 December 2008), [Lobbying: Access and influence in Whitehall](#)
113. CSPL (21 September 2023), [Lobbying seminar: summary note](#)
114. FT (3 January 2024), [Labour wavers on pledge to ban former UK ministers from lobbying for 5 years](#)
115. CSPL (November 2021), [Upholding standards in public life: final report of the standards matter 2 review](#)
116. PACAC (24 April 2017), [Report shows gaps in ACoBA's monitoring process](#)
117. ACOBA (18 July 2024), [21st Report - April 2020 to March 2024](#)
118. Politico (23 January 2025), [UK ethics watchdog warns next big government scandal is coming](#)
119. Labour (13 June 2024), [Manifesto - serving the country](#)
120. CSPL (November 2021), [Upholding standards in public life: final report of the standards matter 2 review](#)
121. CSPL (November 2021), [Upholding standards in public life: final report of the standards matter 2 review](#)
122. The Times (29 July 2024), [Labour urged to fix revolving door for former ministers](#)
123. University of Exeter (6 January 2023), [Most former SpAds become "shadow lobbyists" when they leave Whitehall, major new analysis shows](#)
124. OECD (20 May 2021), [Lobbying in the 21st Century, p.57](#)
125. OECD (3 May 2024), [Recommendation of the Council on Transparency and Integrity in Lobbying and Influence](#)
126. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
127. HM Treasury (17 October 2022), [Government to establish expert Economic Advisory Council](#)
128. HM Treasury (21 April 2021), [Call for Evidence – UK Listings Review](#)
129. Positive Money (June 2022), [The Power of Big Finance](#)
130. FT (8 December 2023), [Labour appoints 10 City advisers as part of financial services review](#)
131. Private Eye (June 2024), [Slicker](#)
132. City AM (20 November 2023), [HSBC, Santander and Blackrock among firms advising Labour on private investment](#)
133. Policy Mogul (10 March 2024), [Rachel Reeves appoints independent Taskforce on National Wealth Fund](#)
134. PACAC (14 June 2023), [The Role of Non-Executive Directors in Government](#)
135. High Pay Centre (September 2020), [Revolving Door and the Corporate Colonisation of UK Politics](#)
136. Cabinet Office (June 2019), [Code of conduct for board members of public bodies](#)

137. PACAC (14 June 2023), [The Role of Non-Executive Directors in Government](#)
138. Cabinet Office (28 November 2024), [Non-Executive Board Member declaration of interests process](#)
139. Cabinet Office (6 November 2024), [Cabinet Office register of board members' interests 2023 to 2024](#)
140. House of Lords, [Lord Hill of Oareford - registered interests](#)
141. Cabinet Office, [Biography: Anand Aithal](#)
142. The Times (13 August 2024), [Labour kicks out non-execs given Whitehall jobs by the Tories](#)
143. The Times (19 December 2024), [Keir Starmer faces backlash over lobbyist's government role](#)
144. OpenDemocracy (22 November 2019), [Revealed: The elite dining club behind £130m+ donations to the Tories](#)
145. The Times (19 February 2022), [The Tory donors with access to Boris Johnson's top team](#)
146. Electoral Commission, [donations database](#)
147. The Times (19 February 2022), [The Tory donors with access to Boris Johnson's top team](#)
148. Spotlight on Corruption (October 2022), [submission to PACAC inquiry on the Lobbying Act 2014](#)
149. ICO (17 August 2023), [Decision notice](#)
150. OpenDemocracy (6 July 2022), [Boris Johnson refuses to publish his official pandemic diaries](#)
151. OpenDemocracy (27 September 2021), [Tories rake in £11m from hedge funds and finance tycoons](#)
152. Positive Money (June 2022), [The Power of Big Finance](#)
153. Positive Money (June 2022), [The Power of Big Finance](#)
154. Autonomy Institute (May 2024), [Politics for sale: analysing 21 years of UK political donations](#)
155. International IDEA (2012), [Political Finance Regulations Around the World](#)
156. European Parliament (June 2021), [Financing of political structures in EU Member States](#)
157. 52 US Code § 30119, [Contributions by government contractors](#)
158. World Development (December 2021), [Political donations, public procurement and government efficiency](#)
159. The Guardian (27 June 2024), [Companies linked to Tory donors given £8.4bn in public contracts since 2016](#)
160. Transparency International UK (February 2015), [Lifting the Lid on Lobbying: The Hidden Exercise of Power and Influence in the UK](#)
161. Democracy for Sale (12 June 2024), [Revealed: Money men behind disastrous Truss mini budget now pumping millions into Sunak](#)
162. The Times (18 August 2024), [Labour risks storing up trouble with its business lobby love-in](#)
163. OpenDemocracy (22 July 2024), [The army of private sector secondees who helped Labour win](#)
164. The Times (12 November 2023), [The secretive guru who plotted Keir Starmer's path to power with undeclared cash](#)
165. OpenDemocracy, [Methodology for Who Funds You](#)
166. Democracy for Sale (12 June 2024), [Revealed: Money men behind disastrous Truss mini budget now pumping millions into Sunak](#)
167. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making](#)
168. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making, pg. 10](#)
169. HM Government (March 1999), [Modernising Government - white paper](#)
170. HM Government (June 2012), [The Civil Service Reform Plan](#)
171. Hansard (30 July 2024), [Citizens' Assemblies](#)
172. Demos (July 2024), [Citizens' White Paper](#)
173. King's College (October 2023), [The Citizens' Economic Council on the Cost of Living](#)
174. Climate Change Committee (26 February 2025), [Citizens' Panel for an accessible and affordable household vision of Net Zero](#)
175. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making, p.60](#)
176. OECD (3 May 2024), [Recommendation of the Council on Transparency and Integrity in Lobbying and Influence](#)
177. OECD (2023), [Government at a Glance](#)
178. OECD (26 January 2017), [Recommendation of the Council on Public Integrity](#)
179. OECD (1 February 2017), [Preventing Policy Capture: integrity in public decision making, p.57](#)
180. Public Administration Select Committee(9 December 2008), [Lobbying: Access and influence in Whitehall](#)
181. CSPL (November 2013), [Strengthening Transparency Around Lobbying](#)
182. Cabinet Office (27 July 1998), [Guidance for civil servants: contact with lobbyists](#)
183. Cabinet Office (14 December 2017), [How to publish central government transparency data](#)
184. Cabinet Office (21 September 2010), [Directory of civil service guidance](#)
185. Cabinet Office (2 May 2012), [Business appointment rules](#)
186. OECD (21 September 2009), [Revolving doors: emerging regulatory concerns and policy solutions in the financial crisis](#)
187. OECD (3 May 2024), [Recommendation of the Council on Transparency and Integrity in Lobbying and Influence](#)
188. Nigel Boardman (5 August 2021), [Review into the development and use of supply chain finance: recommendations and suggestions](#)
189. CSPL (November 2013), [Strengthening Transparency Around Lobbying](#)
190. Nigel Boardman (5 August 2021), [Review into the development and use of supply chain finance: recommendations and suggestions](#)
191. Transparency International UK (February 2015), [Lifting the Lid on Lobbying: The Hidden Exercise of Power and Influence in the UK](#)
192. CSPL (January 2023), [Leading in Practice](#)

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