

Spotlight on Corruption response to the EIC's lobbying review

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

14. As Annex B shows, the UK is increasingly lagging behind other OECD countries when it comes to lobbying transparency (including Finland, Germany, Canada, Ukraine, Chile, Ireland and France), as well as lagging behind Scotland and the EU. Of those countries or bodies shown in the table in Annex B who score higher for lobbying transparency than the UK:
 - a. All of them include both consultant and in-house lobbyists in their register.
 - b. All of them cover members of parliament as well as ministers and senior officials
 - c. Five of them have no minimum threshold of lobbying below which a lobbyist does not need to register, while four have a threshold based on the amount of lobbying conducted.
 - d. Seven have a statutory code of conduct for lobbying while two of them have a voluntary code.
15. The OECD has itself assessed that the UK's lobbying register falls short of best practice in three areas:²²
 - a. In not having a code of conduct
 - b. In not including the piece of legislation or regulation being targeted or the budget of the lobbying involved
 - c. In not being searchable by the legislation or regulation being targeted.
16. Given how far behind the UK is in the scope and detail of its lobbying register, it is important that the government invests in its improvement. As the OECD has found, transparency is one of the key drivers of trust, particularly where trust is low to start with.²³ Specifically, it has found that 51% of OECD citizens who find information about administrative processes easily available trust their government, whereas among citizens who find that information is not easily available, trust in government is only 22%.²⁴
17. As the OECD's graph below shows, the UK is among the worst performers when it comes to trust in government – with just 27% of the population showing trust in national government, compared to 49% in Canada and 62% in Switzerland.²⁵ Greater lobbying

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

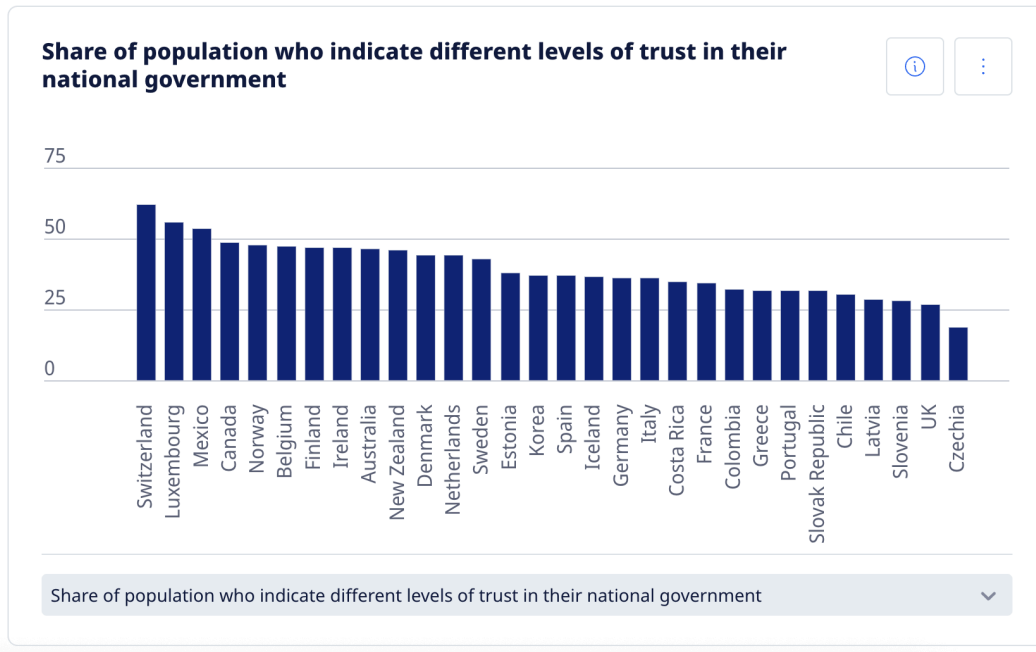
²² [OECD. Transparency of lobbying activities and prevention of undue influence. accessed April 2026](#)

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

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

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

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



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

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

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

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

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

²⁸ [2 US Penal Code § 1606](#)

²⁹ [2 US Penal Code § 1606](#)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

28. One way to help fund a consolidated register would be to ensure that there is a suitable fee for all lobbyists (currently well over half of ORCL's income – £235,771 – comes from fees and with an expanded register this would rise).⁵² However, registration for lobbying registers in comparator OECD jurisdictions – including Australia, Canada, the EU, France, Germany, Scotland, USA, and Ireland⁵³ – is free, so if the UK continues to charge it will be an outlier.
29. If the UK decides to continue to charge for registration, it should ensure this is a proportionate fee that does not disincentive registration. To do this it could look at either a sliding scale, or a low flat rate fee to help subsidise the administration of the register. It should continue however to receive significant financial and staffing support from the Cabinet Office.

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

30. Government transparency releases are split across approximately 250 spreadsheets and 100 webpages per release, making it extremely difficult to search or cross-check.
31. As we have called for above, these releases should be made in a comprehensive consolidated transparency register, or at the very least in a **single, accessible, online portal**, modelled on Transparency International's open access tracker.
32. However, there are also important changes that should be made alongside this:
 - a. **Frequency:** Meeting logs should be **released at least monthly** rather than quarterly to enable timely scrutiny. In some jurisdictions, this is done in almost real-time with meeting logs updated daily in Spain,⁵⁴ Lithuania,⁵⁵ Luxembourg,⁵⁶ and Norway.⁵⁷
 - b. **Scope:** government transparency releases must include meetings with all **special advisers' external meetings**, not just those with senior media executives - given the critical role they play in forming government policy. They should also include meetings with **party donors**, whose influence over policy is likely to be significantly greater than the average lobbyist.

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

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

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

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

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

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

33. Separately, the government should publish details of all inward and outward secondments, any conflicts of interests they pose, and mitigation plans in place for the highest risk secondments. While some departments have released this information as a result of Freedom of Information requests, none do so in a systematic or centralised way, and some departments refuse to release meaningful data in relation to FOI requests.⁵⁸
34. However, even if all the data was fully transparent and accessible, it would not be enough to ensure some individuals or firms having privileged access, and an outsized influence on government thinking and policy making. In line with the 2024 OECD recommendation on transparency and integrity in lobbying, the government needs to ensure that there are mechanisms in place to ensure **fair and equitable access to decision-makers for all stakeholders**. This is crucial to ensure that policy is made in the public interest, and to ensure value for money on public decisions.

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

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

a. The recipient(s) of the lobbying.

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

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

36. The transparency releases do not include enough detail about the content of the meetings. Between 2019 and 2024, 183 of Treasury ministers' 3,326 meetings were simply described as "*to discuss financial services*". 59 were an "*introductory meeting*" and 29 a "*general discussion*".⁵⁹
37. In comparison, the Scottish Government's transparency releases offer significantly more detail.⁶⁰

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

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

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

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

c. The forms of communications that should be included.

39. See our answer to question 11.

d. When and how the transparency data is published.

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

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

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

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

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

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

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

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

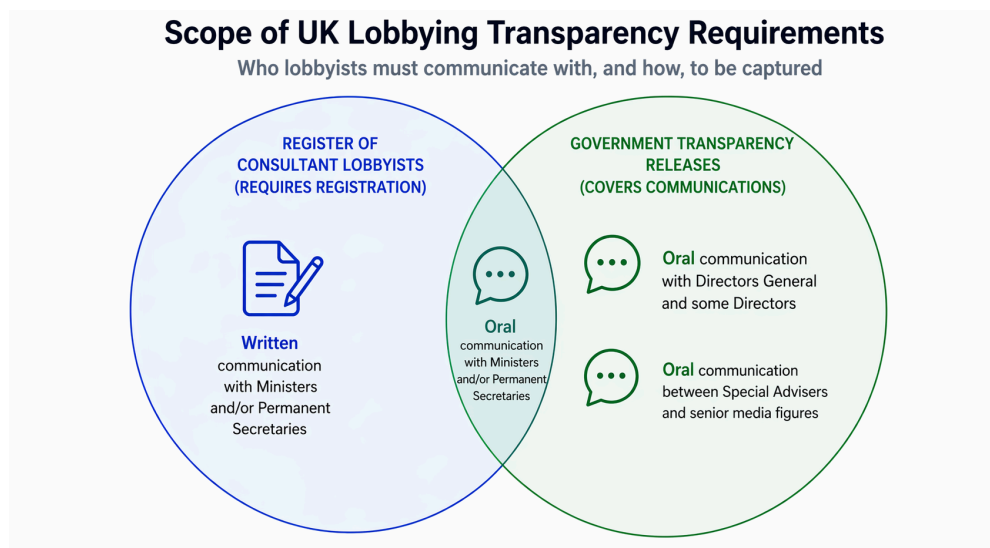
⁶³ For example: [Transparency International, *openaccess, meeting between Ian Murray and OpenText, December 2025*](#) and [Transparency International, *openaccess, meeting between Baroness Lloyd of Effra and BT, December 2025*](#) and [Transparency International, *openaccess, meeting between Ian Murray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

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

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

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

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



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

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

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

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

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

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

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

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

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

50. Some comparable jurisdictions have tougher restrictions and sanctions.

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

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

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

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

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

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

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

⁷³ [18 US Penal Code § 207](#)

⁷⁴ [18 US Penal Code § 216](#)

⁷⁵ [18 US Penal Code § 216](#)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

56. These include that:

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

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

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

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

- b. The ministerial code doesn't specify the sorts of financial interests to be declared so it is not clear, for example, that cryptoassets should be included.
 - c. Ministerial interests are published quarterly, which is at odds with MPs, whose interests are updated fortnightly.
 - d. The ministerial code is not statutory, so could be abolished by a future government – putting it at odds with other public bodies who will be required by statute to have an ethical code.
 - e. There is an over-reliance on blind trusts to tackle potential conflicts of interest.
 - f. Senior civil servants' financial interests aren't publicly available.
 - g. Mitigation plans for conflicts of interest are not made public.
57. The UK fulfills around 55% of the OECD's criteria on regulation for managing conflicts of interest involving ministers and senior government officials, but just 22% of the criteria on practice managing these conflicts.¹⁰⁰ Among the criteria it fails to achieve are that at least 60% of declarations in the last two years should be verified by the responsible authority and that all declarations are made electronically.¹⁰¹

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

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

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

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

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

⁹⁷ [Scottish Parliament. MSP salaries](#)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

No response

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

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

Annex A: other countries' lobbying codes of conduct

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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