

## LOBBYING, DISCLOSURE AND ACCESS TO GOVERNMENT

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

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

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

The government should revise the categories of published information to close the loophole by which informal lobbying is not disclosed in departmental releases.		
The government should update guidance to make clear that informal lobbying, and lobbying via alternative forms of communication such as WhatsApp or Zoom, should be reported to officials.		Guidance issued in December in 2023 states that “Remote formal meetings using video or audio-conferencing technology should be included. Audio calls should also be reported where these replace or take the format of an official meeting.” But no mention of WhatsApp or other social media messaging platforms.
Consultant lobbyists should also have to register on the basis of any communications with special advisers, directors general, and directors.		
Consultant lobbyists should have to declare the date, recipient, and subject matter of their lobbying.		

ANNEX 2: LOBBYING REGISTERS INTERNATIONAL COMPARISON

	Nearest to best practice
	In-between
	Furthest from best practice

Country	Scope: Lobbyists		Scope: Public officials			Form of communication			Reporting		
	In-house	Consultant	Ministers	Special advisors	Legislators	Face-to-face	Written	Oral (remote)	Purpose of lobbying	Spending	Reporting period
<a href="#">Canada</a> (statutory register) Est. 1989	<a href="#">Section 7</a>	<a href="#">Section 5</a>	<a href="#">Section 2(1)</a>	<a href="#">Section 2(1)</a>	<a href="#">Section 2(1)</a>	<a href="#">SOR/2008-116 (Sections 6 and 9)</a> <a href="#">Section 5(1)(a)</a>	<a href="#">Section 5(1)(a)</a> NB. is included in registration details	<a href="#">Section 5(1)(a)</a> NB. is included in registration details	<a href="#">Section 5(2)</a> Example		Monthly SOR/2008-116 ( <a href="#">Sections 6 and 9</a> )
<a href="#">Germany</a> (statutory register) Est. 2021	<a href="#">Section 1(4)</a> <a href="#">Section 2</a>	<a href="#">Section 2</a>	<a href="#">Section 1(1)</a>	<a href="#">Section 1 (2)</a> Includes contact with employees	<a href="#">Section 1</a>	<a href="#">Section 1(3)</a> Any contact	<a href="#">Section 1(3)</a>	<a href="#">Section 1(3)</a>	<a href="#">Section 3 (1)(4)</a>	<a href="#">Section 3 (1)(8)</a>	Without delay and by the end of the quarter at the latest <a href="#">Section 3 (3)</a>
<a href="#">Ireland</a> (statutory register) Est. 2015	<a href="#">Section 5(2)</a>	<a href="#">Section 5(1)</a>	<a href="#">Section 6(1)(a)</a>	<a href="#">Section 6(1)(e)</a>	<a href="#">Section 6(1)(b)</a>	<a href="#">Section 5(4)</a>	<a href="#">Section 5(4)</a>	<a href="#">Section 5(4)</a>	<a href="#">Section 12</a> Example		Every four months ( <a href="#">Sections 7 and 12</a> )
<a href="#">Scotland</a> (statutory register) Est. 2016	<a href="#">Section 1</a>	<a href="#">Section 1</a>	<a href="#">Section 1(1)(a)(1)</a>	<a href="#">Section 1(1)(a)(1)</a>	<a href="#">Section 1(1)(a)(1)</a>	<a href="#">Section 1</a> incl. video conferencing			<a href="#">Section 6</a> Example		Biannually ( <a href="#">Section 1</a> )
<a href="#">US</a> (statutory register) Est. 1946	<a href="#">SEC 3(7)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(9)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(3)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(3)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(4)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(8)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(8)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 3(8)</a> <a href="#">2 USC 1602</a>	<a href="#">SEC 5</a> <a href="#">2 USC 1604</a> Example		Quarterly
<a href="#">Westminster</a> (statutory register) Est. 2014		<a href="#">Section 2</a>	<a href="#">Section 2(3)</a>	Can be introduced via S.I.		<a href="#">Section 2(3)</a>	<a href="#">Section 2(3)</a>	<a href="#">Section 2(3)</a>	<a href="#">Section 5</a> Example		Quarterly ( <a href="#">Section 5</a> )
<a href="#">Westminster</a> (ministerial code)									Example		Quarterly ( <a href="#">Para 8.14</a> ) NB subject to the grid