

LOBBYING, DISCLOSURE AND ACCESS TO GOVERNMENT

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

1. INTRODUCTION

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

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

2. SUMMARY

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

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

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

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

2.4 We recommend both the introduction of a statutory lobbying register (a register of lobbying interactions provided by all lobbyists, not just consultant lobbyists) and the retention of a

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

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

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

ministerial meetings register provided by the Government. Both should be centralised and easily searchable. Transparency International UK's position paper lays out the current arrangements in more detail and the case for change.⁴

2.5 Meanwhile, the current rules covering lobbying in the House of Lords are too permissive, allowing peers to work for firms selling political access to paying clients. This is a clear conflict of interest. We recommend that the Lords' Code of Conduct is strengthened, and that peers should be required to dispense of these interests or leave the House of Lords.

2.6 It is also notable that the Business Appointment rules, notwithstanding the structural change in 2025, have not seen an overhaul since their introduction in 2012. They are well overdue an update. The current rules governing the revolving door do not sufficiently address the risks of ministers benefiting from privileged access and misusing confidential information. We recommend that the Business Appointment rules should be extended, and their enforcement strengthened.

3. LOBBYING TRANSPARENCY

3.1 Transparency of access to and influence over decision-makers is essential for the public to understand how decisions are made, to be able to trust they are being made in the public interest, and to maintain the social contract. Providing transparency over lobbying is also crucial for preventing and identifying potential misconduct by ministers and those seeking to influence them.

3.2 Too little of this activity is currently captured on the public record at Westminster. That the revelations over Greensill,⁵ Westferry⁶ and the COVID-19 'VIP lane'⁷ for public contracts all came from the work of journalists instead of the statutory lobbying register or departmental disclosures, illustrates the ramifications of this transparency gap.

3.3 Annex 2 provides a short summary of international examples and how they compare to Westminster's approach. While all have their pros and cons, we would suggest that the Canadian approach⁸ to regulating lobbying provides a model to build from that would deliver more meaningful openness over attempts to influence key decision makers through a proportionate and more comprehensive statutory register.

3.4 In relation to the specific questions in the call for evidence, we would suggest that communications made to special advisers, non-executive directors and other senior civil servants should be included in the definition of lobbying activity.

3.5 We consider the VAT registration requirement presents a problematic loophole, and would note that similar registers of consultant lobbyists do not provide exemptions.⁹ If a minimum threshold is deemed appropriate we would suggest alternative methodologies be considered

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

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

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

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

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

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

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

3.6 RECOMMENDATIONS

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

4. MINISTERIAL MEETINGS

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

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

- 4.4. Our analysis shows that the average number of words used in the ‘purpose’ field of the disclosures in the last two quarters of 2025 (July – December) is just 11. This is a decline from the average of 13 words in the comparable meetings data for 2024. Whilst word count is a crude measure, we would compare this with the lengthier descriptions provided by the Scottish lobbying register which gives the public a much better insight into why the meeting was held, what was discussed, and any agreed outcomes. The average number of words for submissions to the Scottish lobbying register in the same period was 118.¹¹
- 4.5. The previous government committed to introducing a central register of ministerial meetings with outside interests that would have been a key piece in improving lobbying transparency. Disappointingly, the current government is yet to have allocated funding to make progress in delivering this commitment.¹²
- 4.6. The Call for Evidence specifically asks about non-corporate communication channels. Evidence provided to the Covid-19 inquiry suggests that use of informal messaging was prevalent across government, and there is little external evidence of any change in behaviour. We have previously recommended personal phones be prohibited for use in official government business. If this is considered unfeasible, we recommend the Scottish Government-commissioned Martins Review¹³ as a starting point for considering how best to handle non-corporate communication channels.
- 4.7. We also note the specific question on whether the data provided by the register of consultant lobbyists can be reconciled with the ministerial meetings data. Using official records from 2020, our analysis suggested that at most only 4 per cent of lobbyists who appear in the external meetings data are registered with the Registrar of Consultant Lobbyists.¹⁴ This data is however inconclusive due to the difficulty of undertaking the analysis. To do this at scale one would need to:
- download, clean and consolidate departmental disclosures
 - split out the attendee field so you have one row per attendee
 - download, clean and consolidate the register of consultant lobbyist entries
 - fuzzy match the two datasets
 - go back through and manually search each consultant lobbyist

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

- on whose behalf they were lobbying
- about lobbying activity that was not a meeting
- the objective of that lobbying
- how much the lobbyist has been paid to pursue that objective

¹¹ Data available on request due to size of file.

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

¹³ <https://www.gov.scot/publications/independent-review-scottish-governments-use-mobile-messaging-apps-non-corporate-technology/> [accessed 15 April 2026]

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

- whether the lobbyist employs former public officials e.g. someone who used to work with or for the advocacy target

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

4.9 RECOMMENDATIONS

- 4.9.1 **The Cabinet Office should collate all departmental disclosures and publish them in one centrally managed database**, as recommended by the CSPL.
- 4.9.2 **These datasets should include unique identities for individuals and organisations meeting with government** to provide a clearer cross-departmental view of Government's relationships with key stakeholders, and improved data matching with relevant datasets, including the register of consultant lobbyists.
- 4.9.3 **The description of meetings should be improved** to provide more meaningful information about what was discussed and, if possible, why.
- 4.9.4 The timeliness of **publication of the meetings should move to monthly**.

5. LOBBYING AND THE HOUSE OF LORDS

- 5.1. Under current rules, members of the House of Lords are allowed to retain interests in lobbying firms so long as they do not directly or indirectly offer clients parliamentary services and may also seek to influence ministers or parliamentary debates so long as this does not exclusively benefit their employers. We argue these rules are too permissive: being a peer and working for a firm that sells political access to paying clients is a clear conflict of interest.
- 5.2. We are currently undertaking an analysis of Lords' financial interests in organisations engaged in lobbying and political advisory services, and have found peers enjoying paid employment relating to the provision of political advice, strategic advice, public policy and similar— some of which may be proxy terms for activities such as paid lobbying that are prohibited by the Lords Code of Conduct. We are currently drafting our analysis for publication which we will share with the Ethics and Integrity Commission.
- 5.3. We consider that peers should not sit in the House of Lords while holding registerable interests in firms lobbying on behalf of private clients, or while they engage in paid work for foreign governments.

5.4. RECOMMENDATIONS

- 5.4.1. **The Lords' Code of Conduct should be tightened, with its lobbying rules brought in line with the Commons'.**
- 5.4.2. **Peers should be required either to dispense of their interests in lobbying firms or leave the House of Lords.**
- 5.4.3. **The Lords' Commissioner should impose harsher sanctions for serious breaches of the code of conduct.**
- 5.4.4. **The House of Lords Appointment Commission (HOLAC) should have a role in re-assessing peerages where Lords have committed serious wrongdoing** that would have triggered a recall petition were they an MP.

6. BUSINESS APPOINTMENT RULES (BARS)

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

Our research found that between January 2017 and June 2022:

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

6.4. RECOMMENDATIONS

- 6.4.1. **The Government should further extend the scope of the Business Appointment Rules** so that they prohibit appointments for two years where the applicant has had significant and direct responsibility for policy, regulation or the awarding of contracts relevant to the hiring company.

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

¹⁶ <https://www.transparency.org.uk/news/new-ethics-commission-welcome-stronger-rules-backed-law-are-needed> [accessed 7 April 2026]

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

- 6.2.2. **The lobbying restriction should be extended to at least five years**, with consideration of an extension for the most senior roles such as Prime Minister and Chancellor of the Exchequer.
- 6.2.3. **The lobbying ban should include a prohibition on any work for lobbying firms within a set time limit.**
- 6.2.4. **The Government should introduce more meaningful sanctions**, including binding monetary penalties, for those who breach the Business Appointment Rules.

Contact: Rose Zussman, Senior Policy Manager – rose.zussman@transparency.org.uk

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

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

advisers, and set out what the consequences for a breach of contract may be.		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 st July 2025 announcement. States that “in the event of a serious breach of the Business Appointment Rules, ministers will in future be asked to repay any severance payment they have received.” Which would imply an investigation to determine a breach - presumably by the Independent Adviser on Ministerial Standards with the PM deciding the sanction under current arrangements - more clarity needed.
Government departments should publish anonymised and aggregated data on how many applications under the Business Appointment Rules are submitted, approved, or rejected each year.		Many departments now publishing figures in their annual accounts (see Cabinet Office, Defra , DCMS) but not all (see DSIT).
The Cabinet Office should ensure the Business Appointment Rules are applied consistently across all government departments, and work with ACOPA to promote best practice and awareness of the rules.		21 st July 2025 announcement stated that: “To improve the consistency of the application of the Rules in departments, the Civil Service Commission, which already audits departments for compliance with the Civil Service Recruitment Principles, will in the future undertake regular audits of departmental decisions of Business Appointment applications for grades below the level currently administered by ACOPA” Due to the splitting of responsibilities between Independent Adviser and the Civil Service Commission there will now need to also be consistency of the rules between these two bodies.
The Cabinet Office should collate all departmental transparency releases and publish them in an accessible, centrally managed and searchable database.		Gifts and hospitality are now collated but not searchable. Meetings’ accessibility and centrality not improved.
The Cabinet Office should provide stricter guidelines on minimum standards for the descriptions of meetings and ensure compliance by government departments.		New guidelines first published in December 2023 provide more detailed guidelines on minimum standards.
The government should publish transparency returns monthly, rather than quarterly, in line with the MPs’ and peers’ registers of interests.		Gifts and hospitality published monthly but meetings still quarterly.
The government should include meetings held between external organisations, directors general, and directors in transparency releases.		
The government should include meetings held between external organisations and special advisers in transparency releases.		

<p>The government should revise the categories of published information to close the loophole by which informal lobbying is not disclosed in departmental releases.</p>		
<p>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.</p>		<p>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.</p>
<p>Consultant lobbyists should also have to register on the basis of any communications with special advisers, directors general, and directors.</p>		
<p>Consultant lobbyists should have to declare the date, recipient, and subject matter of their lobbying.</p>		

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
Canada (statutory register) Est. 1989	Section 7	Section 5	Section 2(1)	Section 2(1)	Section 2(1)	SOR/2008-116 (Sections 6 and 9) Section 5(1)(a)	Section 5(1)(a) NB. is included in registration details	Section 5(1)(a) NB. is included in registration details	Section 5(2) Example		Monthly SOR/2008-116 (Sections 6 and 9)
Germany (statutory register) Est. 2021	Section 1(4) Section 2	Section 2	Section 1(1)	Section 1 (2) Includes contact with employees	Section 1	Section 1(3) Any contact	Section 1(3)	Section 1(3)	Section 3 (1)(4)	Section 3 (1)(8)	Without delay and by the end of the quarter at the latest Section 3 (3)
Ireland (statutory register) Est. 2015	Section 5(2)	Section 5(1)	Section 6(1)(a)	Section 6(1)(e)	Section 6(1)(b)	Section 5(4)	Section 5(4)	Section 5(4)	Section 12 Example		Every four months (Sections 7 and 12)
Scotland (statutory register) Est. 2016	Section 1	Section 1	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1 incl. video conferencing			Section 6 Example		Biannually (Section 1)
US (statutory register) Est. 1946	SEC 3(7) 2 USC 1602	SEC 3(9) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(4) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 5 2 USC 1604 Example		Quarterly
Westminster (statutory register) Est. 2014		Section 2	Section 2(3)	Can be introduced via S.I.		Section 2(3)	Section 2(3)	Section 2(3)	Section 5 Example		Quarterly (Section 5)
Westminster (ministerial code)									Example		Quarterly (Para 8.14) NB subject to the grid