



Committee on Standards

Oral evidence: All-Party Parliamentary Groups, HC 672

Tuesday 14 September 2021

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Members present: Chris Bryant (Chair); Mrs Tammy Banks (Lay Member); Andy Carter; Alberto Costa; Mrs Rita Dexter (Lay Member); Allan Dorans; Yvonne Fovargue; Sir Bernard Jenkin; Dr Arun Midha (Lay Member); Mr Paul Thorogood (Lay Member); Dr Michael Maguire (Lay Member).

Questions 1-115

Witnesses

I: Harriett Baldwin MP, Chair, British Group Interparliamentary Union; Alex Runswick, Senior Advocacy Manager, Transparency International UK.

II: Harry Rich, Registrar, Registrar of Consultant Lobbyists.

III: Jon Gerlis, Public Relations and Communications Association, and Liam Herbert, Public Relations and Policy Manager, Chartered Institute of Public Relations.

Written evidence from witnesses:

[Harriet Baldwin MP, British Group of the Inter-Parliamentary Union \(BGIPU\)](#)

[Alex Runswick, Transparency International UK](#)

[Harry Rich, Registrar of Consultant Lobbyists](#)

[Jon Gerlis, Public Relations and Communications Association](#)

[Liam Herbert, Public Relations and Policy Manager, Chartered Institute of Public Relations.](#)

Examination of witnesses

Witnesses: Harriett Baldwin and Alex Runswick.

Chair: Welcome to this evidence session of the Standards Committee. We are carrying out an investigation into all-party parliamentary groups and how they can be best managed within the House. We are grateful to have two witnesses before us now, but before we welcome you, I am afraid that Members of Parliament—and others, if applicable—have to declare any interests they might have by virtue of all-party parliamentary group memberships and so on. I will do mine first, and then I will go around the room.

I am chair of the all-party parliamentary group on acquired brain injury, the secretariat for which is provided by the Acquired Brain Injury Forum, which is a British registered charity. I receive no financial benefit from that, obviously. I am also chair of the all-party group on Russia, which has no money from anywhere, even though lots of people keep on offering it to us, and chair of the all-party group on Spain. Those are my active memberships and the groups of which I am an officer.

Sir Bernard Jenkin: I am a trustee of the Parliament choir, which I think, for the purposes of this inquiry, we should treat as an all-party parliamentary group because it used to be an APPG, but now has a special status—it is sponsored by the two Speakers. We raise money from commercial sponsors for concerts. I am personally a quite substantial donor to the Parliament choir, because I think it is a very good workplace choir that helps and supports a lot of people. There are issues that we have wrestled with, as trustees, about conflicts of interest.

I think I am an officer of the all-party group on net zero. I am also an officer of the all-party group on electric vehicles. I am likely to be an officer of other all-party groups, but I can't remember what they are, because I never give them any time—you know what we do; we just help each other out. If I have inadvertently omitted a declaration, it is because it really is not significant and does not impact on my time.

Alberto Costa: Good morning, ladies. I am co-chairman, with Tonia Antoniazzi, of the APPG on medical cannabis, which lobbies the Government on medicinal cannabis—in my case, for children who suffer from severe epilepsy—and we have been working very hard on that. We do have a secretariat, but—forgive me, Chair—I do not recall the name at present. I am co-chair, with the shadow Solicitor General, Ellie Reeves, of the all-party group on Italy. It does have a secretariat: SEC Newgate UK. I am chair of the all-party group on microplastics, which is fighting to minimise the damage that plastics cause to the marine environment. The secretariat is the National Federation of Women's Institutes. I am chairman of the all-party group on Greece, which does not have a secretariat.



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I may be—this is like Sir Bernard—a vice-chairman of the APPG on alternative dispute resolution, whose secretariat is the Chartered Institute of Arbitrators. I might also be an executive officer—non-active—of the APPG for pro bono legal advice. Forgive me if I have inadvertently missed out any others.

Chair: I apologise to the witnesses if it feels like we are giving evidence to you, but this will come to an end eventually.

Allan Dorans: I am vice-chair of the APPG on Scottish sport, with no financial interests.

Yvonne Fovargue: I am chair of the all-party group on consumer protection, which runs from my office. I am chair of the APPG on debt and personal finance—StepChange Debt Charity provides the secretariat. I chair the electrical safety group, whose secretariat is the Electrical Safety Group. I am an officer of the credit union group, but I don't think that has been re-established yet. I am vice-chair of the China consumer affairs group, which is looking into Alibaba and online sales, which links into consumer protection and electrical safety. I think that I am vice-chair of the all-party group on legal aid and have been involved in an inquiry with it recently. Like others, I am probably a vice-chair of some other country groups, but I haven't particularly—

Chair: Fine; thanks very much.

Andy Carter: I am chair of the APPG on media; its secretariat is provided by Whitehouse Communications. I chair the APPG on school exclusions and alternative provision, whose secretariat is provided by the Centre for Social Justice. I chair the APPG on light rail, although I can't remember the secretariat for that, and I also chair the APPG on commercial radio, whose secretariat is provided by Radiocentre.

I am vice-chair of the APPG on rugby league and a variety of others. I am afraid I cannot remember all of them, but none are country groups.

Q1 **Chair:** Sorry, I have one other I left out: I am joint chair, with Iain Duncan Smith, of the all-party group on Magnitsky sanctions. The secretariat is provided by REDRESS, another charity.

Unless any of the lay members of the Committee have anything to add, may I welcome Harriett and Alex? We have several questions, but do you want to say a brief word of hello?

Harriett Baldwin: Absolutely; thank you, Chair.

I am Harriett Baldwin MP. I am chair of the British Group Inter-Parliamentary Union, which I think is why I have been asked to give evidence today, but I should also declare that I chair two all-party parliamentary groups: the APPG on Sudan and South Sudan, because I am a former Minister for Africa, which is funded by Tearfund, Oxfam, CAFOD and Christian Aid—it is all declared on the website—and the all-party parliamentary group on global education, the secretariat for which is



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provided by Results UK. I am also signed up as a member, and possibly an officer, of others, but those are the two that I chair and spend time on.

Alex Runswick: I am Alex Runswick, senior advocacy manager for Transparency International UK. To be equally transparent regarding relationships with APPGs, we work with a number of groups—particularly the APPG on anti-corruption and responsible tax, and hopefully, soon, the APPG on Magnitsky sanctions—but we do not provide secretariats.

Q2 **Sir Bernard Jenkin:** May I give you the opportunity of setting out your stall by asking what are, in your view, the risks of APPGs when it comes to the access or influence of foreign Governments? What sort of access or influence do you think is problematic?

Harriett Baldwin: I will start by talking a little bit about what the Inter-Parliamentary Union, and the British group specifically, do, because it links closely to that question.

We have been going for over 130 years. It is a network of Parliaments. There are currently 179 member countries in the Inter-Parliamentary Union, and about 45,000 parliamentarians are linked up through the Inter-Parliamentary Union. Anyone who is a Member of either of our Chambers is automatically a member of the British group, and we get funding every year from Parliament to do the work of linking parliamentarians throughout the world.

The Inter-Parliamentary Union tends to leave the Commonwealth countries to the Commonwealth Parliamentary Association, and of course IPSA funds travel to European countries, so when we get approached to help APPGs to travel to the country in question, on top of any delegations that we might be organising, we set aside a budget of about £30,000 a year to help parliamentarians to visit those countries. Myself, the staff and the executive, which is made up of other parliamentarians, evaluate the different requests, because we have a strategic schedule of countries with which we want to ensure that we have fresh parliamentary links, and we want to ensure that the bids are complementary to us. In normal circumstances, that funds about 10 visits a year for parliamentarians.

When we have found issues with all-party parliamentary groups, they have tended to arise with the specialist country groups. Sometimes—it is very rare—planned trips are in conflict with one on BGIPU's very transparent schedule or one of the inward delegations. We try to work closely with all the APPGs to make sure that that does not happen, but it is an obvious potential issue. Also, because all our funding comes from the UK Parliament, it is totally clean—it is a very legitimate source of funding for our visits. We can see situations in which country APPGs, or perhaps very interest-aligned groups that then sponsor trips to countries, can give rise to some issues. It is also worth noting that APPGs can cover particular regions or issues within countries, and those can sometimes jar somewhat with what we are doing with our own parliamentary visits.

Q3 **Sir Bernard Jenkin:** Perhaps I should declare that I have been taken to

Israel by a foreign Government, but that was not under the auspices of an all-party parliamentary group. It just adds to the complexity of this.

You do not have any regulatory or oversight role over the country all-party parliamentary groups, do you?

Harriett Baldwin: We do not have any regulatory role over them. We obviously try to work as parliamentarians to parliamentarians when these issues arise.

Q4 **Sir Bernard Jenkin:** When issues arise, do you ring the alarm bell for them and try to get them to sort themselves out—as an informal role?

Harriett Baldwin: We play an informal role, yes.

Alex Runswick: The first thing to say is that we believe that APPGs play a valuable role in the life of Parliament—we are certainly not looking to scrap them. It is important that MPs have the opportunity to learn about other countries, to share knowledge, to develop interests and to build relationships with those outside Parliament. However, APPGs, by their informal and porous nature, do pose particular risks that need to be addressed and mitigated.

APPGs are a well-known route for lobbying activity. That, in itself, is not a bad thing—obviously I am lobbying you now about how to reform APPGs—but it does mean that there can be corruption risks, whether they come from charities, business groups or trade bodies seeking to influence Parliament. As you mentioned before, it could be foreign Governments and organisations. The UK does not have strong safeguards to protect either the Government or Parliament from lobbying, and APPGs are a particularly weak link in the regulatory set-up.

It is common for the more active APPGs to have an external secretariat—many of you have already mentioned them. Secretariats can be provided by universities, charities or campaigning organisations, as well as PR firms, lobbying agencies, companies and trade bodies. The level of financial support varies massively: it could be a few hundred or thousand pounds, but it can be significantly more. Research from 2019 that we cited in our written evidence showed that the total amount provided to APPGs at that point was £1.517 million. The APPG on the fourth industrial revolution was found to have received the most funding from external sources, with £134,812. That is obviously a different level of risk from an organisation that might receive a few hundred pounds from a charity to send a few emails and do some basic admin.

When there are external secretariats, it gives organisations privileged access to the parliamentary Estate in terms of booking rooms and relationships with Members. That introduces a corruption risk and, from a lobbying point of view, it is a benefit that can be offered to clients.

On foreign Governments, APPGs can be used to try to launder the reputation of corrupt and oppressive regimes. One example that I can hopefully elaborate on later is the way in which the Government of



Azerbaijan used the APPG on Azerbaijan to do that. To come back to what Harriett was saying, this is particularly through the use of foreign trips sponsored by Governments or Government-related organisations.

- Q5 **Alberto Costa:** Good morning once again. My question is specifically about the potential influence of foreign Governments on APPGs. You heard in our declarations that some of us chair country-specific groups. We have heard evidence that the groups provide a valuable resource for MPs to foster better links between countries—they are often referred to as friendship groups rather than APPGs. Alex mentioned a weak link, talking about access to Parliament and MPs, and gave the example of Azerbaijan. Given that there are so many country-specific APPGs, can you give further evidence of where we have seen interference by foreign Governments, or to back up the risks that you highlighted?

Alex Runswick: It is important to recognise that APPGs are one way in which foreign Governments try to influence UK politics and parliamentarians, but they are by no means the only way. Just to briefly cover the case study on Azerbaijan, part of that was about the funding of the APPG's secretariat, but it also involved 111 known visits to Azerbaijan between 2007 and 2017 by 71 different parliamentarians and their staff. Over £333,000 was spent on flights and accommodation. The vast majority—84%—of those trips were funded by the Government of Azerbaijan or other institutions connected to the regime. Over a quarter of the visits by parliamentarians were for unspecified purposes, such as a guest of the Azeri state. Following that, two parliamentarians participated in an election observation mission that was boycotted by the international community and paid for by Azeri state bodies, which was a direct conflict of interest.

- Q6 **Chair:** In what year was that?

Alex Runswick: I would need to double-check, but it is in our 2018 report *In Whose Interest?*, so I can check the exact date.

- Q7 **Alberto Costa:** That is a very good example about one country, but there is a large number of country-specific groups. Is there any evidence regarding other country-specific groups of foreign Governments influencing parliamentarians?

Alex Runswick: There have certainly been allegations about members of APPGs—I am thinking specifically about Mike Hancock—being very close to a regime. There is not always a direct funding link, in the sense of the funding of an APPG being how a relationship started. It is often through foreign travel, which may or may not be linked to an APPG.

- Q8 **Alberto Costa:** So you don't have concrete evidence other than on Azerbaijan. You just referred to allegations.

Alex Runswick: In terms of our research, we did three case studies and Azerbaijan was the one in which there was a direct link to the APPG.

Harriett Baldwin: I do have another example—I am now wearing my hat as chair of the all-party parliamentary group on Sudan and South Sudan—



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because there was a situation in which a rival group, the all-party parliamentary group on Sudan, was set up through a Member of the other House. The Bashir regime was keen to invite Members for a nice trip to highlight close business opportunities and things like that—it wasn't a parliamentary trip. It meant that there were effectively two APPGs working with the same country, so it was a bit awkward, but I am glad to say that the other one is no longer constituted.

Q9 Alberto Costa: Finally, in respect of risk, I don't find from the evidence you are giving us that a large number of APPGs are causing you concern; it seems to be a small number that you are able to evidence where there may be a risk of influence by foreign Governments. My experience as chair of the all-party group on Greece and co-chair of the group on Italy is that I have never been invited by either Government to visit their country on any all-expenses trip. My experience is quite the reverse of what has been said; Ms Baldwin, what is your personal experience of the groups in which you have been involved and in your role?

Harriett Baldwin: I agree that we should not, in any way, tar the important group of what I would like to characterise as friendship groups between parliamentarians. They are an incredibly important part of the work that parliamentarians need to do to understand what is going on in the rest of the world. Nevertheless, you have heard evidence of concrete examples, and things could be made more transparent, with more regular reporting, so that we can de-conflict some of the issues. The Committee will be aware that this tends to relate to the most geo-politically sensitive parts of the world. For example, pressure might be brought to bear on Members via membership of the all-party group on Taiwan. I cite that as an example—the country is obviously not recognised by the UN, etc.—of where there are clearly geo-political tensions, and those can be used to inform parliamentarians, but might be used as a way of outside foreign influences putting pressure on them.

Q10 Chair: From memory, in 2012 or 2013, the Russian embassy decided that it wanted to change the chair of the all-party group on Russia. Again, from memory, it set up a Conservative friends of Russia group at the Russian embassy, but I leave that to one side for a moment.

Harriett Baldwin: May I respond to that, Chair, because I think that I was chair of the all-party group on Russia one year, but I was certainly never involved in Conservative friends of Russia?

Q11 Chair: Sorry; I am not making any allegation about you. I was chair. The ambassador said publicly that it was necessary to get rid of the chair, and organised a big dinner and party at the Russian embassy for lots of Conservative MPs to turn up at. We suddenly, at the APPG AGM, had 273 people vote, which was fairly extraordinary. From what you are saying, that kind of direct engagement or involvement is pretty unusual. Most of the all-party country groups proceed in a perfectly open and fair way.

I have been to Israel, as a guest of the state of Israel, as part of Labour friends of Israel. Quite a few Members have done so, whether as part of Conservative or Labour friends of Israel. My experience is that there has



always been an open and transparent relationship. I have been able to talk to people on both sides—or all sides—of the argument. Is that broadly your experience? Is not the key thing transparency?

Harriett Baldwin: Interestingly, I have been a guest of Conservative friends of Israel—I understand money is raised in the UK through that organisation—but I went as parliamentary candidate. That was four years before I was a MP, and there was no requirement to declare that, as I was simply a candidate. That opens up another area. There are definitely groups that see the pipeline of people who might become MPs, and that would not be captured by a normal reporting requirement.

Q12 **Chair:** I suppose this is the point I am making. Qatar is trying to recruit at the moment, and I think that quite a large number of Members are going there in the next few weeks. There are lots of things you could criticise about the Qatari regime—and I have fairly frequently—but most hon. Members are perfectly able, even if a Government invite those people to their country to put their best case for themselves, to make a judgment about the rights and wrongs of an individual country's regime. Surely the key thing is transparency. Is that fair, Alex, or do you think that these visits should be banned?

Alex Runswick: I absolutely think that transparency is essential, and I wouldn't suggest that we should ban foreign trips—it is important that MPs are able to build relationships with other countries and learn about other parts of the world and how things are done there. Our preference would be that foreign travel for parliamentarians is not paid for by foreign Governments, because we are concerned about the perception that that creates. You might well be right that individual hon. Members are able to assess the information, but the perception outside Parliament is that if a foreign Government pay for a trip that results in, for example, a Westminster Hall debate about that trip, there might be something going on. We think that a safer way, which would protect parliamentarians, would be to have bodies such as the IPU, Parliament, IPSA or the UK Government arranging such trips, not foreign Governments.

Q13 **Sir Bernard Jenkin:** My question follows on from that directly. I am reminded that I have been a guest of the Federal Government of the United States and the Chinese People's Congress, under the auspices of the all-party parliamentary groups on the United States and on China.

We have a safeguard against your concern: if a Member has been on an all-party trip funded by a foreign Government, they cannot initiate something on the Order Paper to advocate something on behalf of that Government, because that would be paid advocacy. It is dangerous for us to limit things, unless the Government are going to come up with the necessary money so that MPs can be educated about foreign countries, and I very much doubt that they will. The Congress in the United States has very strict rules about accepting hospitality from foreign Governments, and that means that the Americans never come here. They cannot accept hospitality; the British Government cannot pay for them to come here. With global Britain and all that, such a thing would be very damaging. Why



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are you not happy to accept that while, yes, some people will misconstrue what conflicts Members have, as long as things are open and transparent, people can make up their own minds about whether an MP's behaviour reflects some influence by a Government, but we should not restrict Members' ability to find out about foreign countries and then use that knowledge in debate in the House of Commons?

Alex Runswick: I am afraid that I have a lot less confidence than Sir Bernard in the adequacy of the paid advocacy rule. Transparency is absolutely essential, but at the moment we do not have transparency. We have information that is published but not actually very accessible.

Sir Bernard Jenkin: I think you are completely right about that.

Alex Runswick: For example, with the Register of Members' Financial Interests, Members might well be declaring something, but it is very difficult for the public to scrutinise it. Equally, lots of data is published about APPGs, but it is very hard to analyse and scrutinise it. We are not yet at a point where we have genuine transparency.

Chair: Just before you carry on, I think the whole Committee is united in being pretty cross about the state of the website and the availability of information to the public, because it doesn't help. We are banging the table on this matter as much as we can with the House authorities.

Alex Runswick: Thank you. It is important to recognise that foreign trips, gifts and hospitality, and APPGs are small parts of a much bigger framework about access and influence in the UK, and lobbying regulation in the UK. Transparency is essential, as I said, but it is not enough on its own. We need building blocks in place to provide safeguards, such as a comprehensive lobbying register and easily accessible data. We are particularly concerned about foreign Governments paying for parliamentarians' travel and the impact that that can have, and public polling shows that there are concerns around these issues. We feel that it is necessary to look at the bigger picture: not just at whether one MP can make legitimate judgments about the influence of a foreign Government; but the perception of whether, as part of a whole piece, it is possible to buy access and influence within UK politics at the moment—and we believe it is.

Q14 **Chair:** I have one question for Harriett and then we will come to Arun. When the IPU funds a trip, the Members, on their return, are required a report, aren't they—there is an official report of the visit?

Harriett Baldwin: An update for everyone, absolutely.

Q15 **Chair:** And a written report as well, I think. But you do not have to do that if you have been funded by a foreign Government. Maybe a simple answer would be that if you are funded for a trip by a foreign Government, you have to file a report alongside the registration.

Harriett Baldwin: Provided that the report itself is very transparent, that would be a good recommendation. One of the things that worries me more



generally about all-party parliamentary groups sometimes is that when they publish a report, they can be seen to be giving the official endorsement of Parliament to what might be just a niche interest of one particular group, and most of us would never know that the report had been published. If that is going to happen, there has to be transparency about who helped to fund it.

Alberto Costa: May I—

Chair: I am keen to get on to Arun, if that's okay.

Q16 **Dr Midha:** I am Arun Midha, a lay member of the Committee. My two questions are directed at Alex, and my first may follow on from the discussions that we have just had.

In your written submissions, which I found really helpful, you have used the phrase "a culture of impunity within the UK Parliament". Would you expand on your thinking?

Alex Runswick: I have forgotten exactly where that comes in our evidence.

Dr Midha: But do you think there is a culture of impunity?

Alex Runswick: I think there is a culture whereby we believe that we have safeguards in place, but they are not adequate. For example, there is the paid advocacy rule and a statutory register of lobbyists. It is easy to believe that they are providing adequate protections when they are not.

Q17 **Dr Midha:** We have discussed that a lot previously.

As a preface to my second question, the Committee is currently looking at the code of conduct. You have helpfully put in written submissions that "The scope and interpretation of the UK Parliament's Codes of Conduct" is a problem. Why do you think it is a problem, and how do you think we could alter the code to make it not a problem?

Alex Runswick: There are a number of problems. It is too easy to get around the paid advocacy rule—there are too many loopholes. From memory, I believe that something has to be for exclusive benefit, and it is quite easy to say that it might be primarily for the benefit of X, but it also benefits others and therefore does not fall under the exclusive benefit rule. For example, it is very easy for parliamentarians to take jobs with organisations that might need a legislative adviser or consultant. That is not covered by the code of conduct because it is not a direct lobbying role, but the activity could be called lobbying although it is not being called that. I believe there are a number of ways. I should have given evidence on how the code of conduct could be improved.

Q18 **Dr Midha:** Not to put you on the spot, but we are on the cusp of concluding the code of conduct. Do you have any observations on how it might help MPs?



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Alex Runswick: Yes. I certainly think that putting in place some examples of good practice and poor practice is always helpful in ensuring that, as new MPs come into the system, they are aware of past mistakes that colleagues may have inadvertently made.

- Q19 **Alberto Costa:** Alex made a suggestion—if I quote you correctly—that there should be a “prohibition on foreign Governments financing the travel of parliamentarians.”

Do the UK Government fund foreign parliamentarians coming to the United Kingdom?

Harriett Baldwin: As far as I am aware, they certainly do. There was a big global education conference at the end of July. I used to be a Foreign Office Minister, and I think there would have been people they would have been very keen to come to that, and they would have helped with the airfare. With COP26, they are helping by sending out vaccines to those who have not had them. When the UK is holding a big conference and has a specific list of invitees they really want to make sure can come, that will be one of the things that they are prepared to do—of course.

- Q20 **Alberto Costa:** Is that in accordance with the international rule of law? It is transparent to invite, at the expense of the UK, foreign parliamentarians.

Harriett Baldwin: I would have to investigate to find out where in the accounts of the Foreign, Commonwealth & Development Office that is published. Presumably, it is published somewhere.

- Q21 **Alberto Costa:** Alex, would you recommend that the Committee advises the Government to ban UK taxpayers’ money funding foreign parliamentarians coming to this country?

Alex Runswick: I don’t believe Transparency International has taken a view on that, but I am happy to think about it and come back to you.

Harriett Baldwin: You, Alberto, will have come across the Westminster Foundation for Democracy. I know it gets some UK Government money that enables, for example, training trips, including parliamentarians here at Westminster.

- Q22 **Chair:** The US State Department and Congress have a formal system. They actively get British MPs and peers to understand the American political system. When there is a new Congress, a group of MPs is invited to meet the new Congress members, but we do not do that.

Harriett Baldwin: We do. I think we do.

- Q23 **Chair:** Do we?

Harriett Baldwin: I don’t think Parliament is the only organisation that does that. We would do that. The Commonwealth Parliamentary Association, the executive of which I am on, has been doing it with new parliamentarians in Sierra Leone and in the Seychelles. Absolutely, we definitely do that as a country, if not directly through Parliament.



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Chair: I think that the founder of the IPU got the Nobel peace prize, so I'm sure you're lined up for the peace prize as well!

Q24 **Paul Thorogood:** I am a lay member.

APPGs are formed for many reasons, but we have been focusing quite heavily in this session on country APPGs, even though we have established that most of them are operating honourably within the rules and transparently. Nevertheless, do you think that country APPGs should have additional or different rules from other APPGs?

Harriett Baldwin: I certainly think it would be helpful if the rules implied that there should be only one for each country, based on my experience of the conflicting all-party parliamentary group that was set up. I am not sure how you would organise or police that without impinging on the ability of parliamentarians freely to do their job as they see fit and be held accountable to the electorate.

Alex Runswick: I think you need to focus on the activity where you think there is a risk. For example, if it is foreign travel or lobbying activity, focus on that activity and not on the specific label of the group doing that activity.

My concern about having specific restrictions just on country groups is that it would be fairly easy to get around calling it a country group by saying it was the culture of a particular country and a subject area.

You need to focus very much on the activity rather than the type of group. It is important to recognise that there have been concerns about subject groups as well as country groups. The foreign travel issue we have been talking about today is primarily in terms of country groups, but Bath University, for example, published research on pharmaceutical companies' relationships with health APPGs and the access and influence issues around that.

The issue is the lobbying and the associated corruption risk; it is not specifically the type of APPG.

Chair: In addition to one on Spain, there was a Catalunya group. It's a moot point whether it should count as a separate country. I'm not going to enter into a row with Alan on that.

Dr Maguire: Could you send us a copy of the Bath University research?

Alex Runswick: Of course.

Q25 **Andy Carter:** I want to pick up on the point about the challenge of having more than one group per country. We have issues with Kashmir, for example, or Israel and Palestine. Will you talk us through some mechanism you could put in place to try to regulate some of this? I understand the point you made earlier that it is very difficult.

Harriett Baldwin: What we try to do within the BGIPU is, first, to try to limit ourselves to the countries that are members of the IPU, but that will not completely eliminate some of the questions around, for example,



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Taiwan or Kosovo, which have not been recognised by all countries and where parliamentarians will have a legitimate want to be informed about those countries and to have contacts in them.

Secondly, we will see whether there is a legitimate Parliament with which we can have a friendship group and delegations can meet. Again, that is not a perfect mechanism, because there will be all sorts of examples of IPU members such as Tunisia, where the Parliament has been suspended, and Afghanistan—a really good example where the IPU is playing a very important role keeping in touch with the Afghan parliamentarians and making sure we have a comprehensive list of those seeking support and help. It relies on the good judgment of the staff team and on the executive that reviews that forward programme.

We have to rely to a great extent on the good judgment of MPs being aware when they are being approached for reasons that are not necessarily aligned with their role as a representative of their constituency.

Q26 **Andy Carter:** I know we are talking about countries, but MPs are contacted by all kinds of lobbying bodies from all sides and issues. They face that every day.

You raise in your submission the difficulties of defining a fit and proper country, and I very much agree with you. Will you explain how the BGIPU chooses which country groups it is appropriate to fund? Do they have to have a formed Government? Is that the rule you try to follow? Would it be feasible for the House to seek to regulate the setting up of a country APPG along those lines?

Harriett Baldwin: I don't think it would be ideal for the House to feel it has constrained parliamentarians who might have a particular interest in Catalunya, as a good example. The BGIPU would avoid funding a delegation to Catalunya. We try to stick to the national Government level and to countries that are members of the IPU, but at the fringes there are still some grey areas and matters of judgment that ultimately the staff team and executive have to take a view on.

Q27 **Chair:** At the moment we do not have normalised relations between the British and Russian Governments and there are questions about the state of democracy in Russia. My understanding is that the IPU has decided it will not fund any visits to Russia.

Harriett Baldwin: The BGIPU would not at the moment, but there has been an IPU-sponsored event this week in Vienna and Russian politicians were obviously at that. We sent a delegation as well.

Q28 **Chair:** Iain Duncan Smith raised a point of order on the Floor of the House not long ago about the China group inviting the Chinese ambassador here to Parliament and about his concern that several British MPs are under sanction from China. Does that come into the equation in your considerations?



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Harriett Baldwin: That is a very interesting question—hypothetical, of course. As you say, there is an all-party parliamentary group on China. We have not, for the record, been approached by them to fund a visit there. I'm not sure whether—I'm looking behind me at Rick—in the recent past that has been the case. We haven't been approached by them. I imagine that any country all-party parliamentary group will have a working relationship if there is an ambassador or high commissioner in post in this country.

Q29 **Andy Carter:** I want to change tack slightly. You mentioned in your written evidence concerns about conflicts of interest created by the funding of APPGs from Government sources or bodies in receipt of UK aid. Will you explain what those conflicts might be? Do you think that APPGs should be barred from accepting funding from those sources?

Harriett Baldwin: I definitely don't, because there will be so many organisations that are directly or indirectly funded by UK Government sources. My colleague was giving me the example before we came in here of a group that is an all-party parliamentary group effectively for an arm of UK soft power, which is the British Council all-party parliamentary group. Many of us have a lot of interest in what the British Council is doing, and we all think it is fine that there is an all-party parliamentary group for the British Council, but the reality is that the British Council is quite extensively funded by the UK Government from the aid budget. Lots of all-party parliamentary groups will be supported by organisations that receive a lot of UK Government funding—in the health sector, in the international development sector. It will be enormous. It would almost close down all all-party parliamentary groups if we applied that test.

Q30 **Chair:** Alex, do you want to add to that?

Alex Runswick: Not specifically. Harriett has covered the points I would make.

Q31 **Dr Maguire:** This is a question for Alex. You said that APPGs are a well-known route for lobbying. Will you give some direct examples of where they have been problematic—both country and subject matter APPGs? What might be done about it?

Alex Runswick: I'm trying to think of specific examples. I will need to go back to look at the evidence I gave in 2013, because I don't think it has changed since I gave evidence to the Committee then. There are many examples that I will look up and send—for example, public affairs companies being secretariats to APPGs. There is nothing inherently wrong about that, but it is a bonus you can offer clients. It is important that there is transparency about that and it is a risk that we believe needs to be mitigated.

There have been examples in the past of defence companies working with defence APPGs and concerns have been raised about that. There was the University of Bath research on health APPGs.



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This issue has been going on for many years. I am happy to go back and look up specific examples, but I cannot remember them off the top of my head now.

Q32 **Dr Maguire:** That would be very helpful. There have been a lot of assertions that there is a risk, but I would like to see some direct evidence of it being problematic and the consequences of that.

The second part of the question was that other than transparency, which we have talked about, was there anything else that should be done to address the issue.

Alex Runswick: From our point of view, we want, as I have already said, a comprehensive lobbying register and more transparency on the register of interests and APPG data. We would also want to restrict foreign travel to that organised by specific bodies rather than foreign Governments.

Q33 **Chair:** You have come up with the one case and you could argue that mine was another, but it's a bit thin for us to introduce major changes if the risk seems to be relatively moderate. But if you could show us more evidence, that would be very helpful. Feel free to write to us.

Alex Runswick: Sure.

Chair: Thank you both very much for your time this morning. I am sorry that we spoke at great length at the beginning telling you all the things we are involved in, but we are enormously grateful to you. From my personal experience, I know that the IPU is a really important part of the way that we do our business here. I know people can get very wound up by MPs going on visits, but if we do not speak to the rest of the world, we don't get to understand some of the things that we end up debating in Parliament. Thank you very much for your time.

Examination of witness

Witness: Harry Rich.

Chair: Thank you, Mr Rich. We are not going to make our declarations of interest all over again. We don't have to do that.

Sir Bernard Jenkin: May I just declare that I was the Chairman of a Committee that had a pre-appointment hearing with Mr Rich?

Q34 **Chair:** There you are. Thank you very much, Sir Bernard.

In a sense, my first question is: can you just explain what you do, Mr Rich? You are part of a statutory body, but can you briefly explain when an all-party parliamentary group's secretariat would need to register as a consultant lobbyist?

Harry Rich: Let me first take half a step back to explain the scope of the work that I do. That sets the context for all the rest of the conversation. As you say, it is a statutory organisation set up by legislation in 2014 with a narrow and very clearly defined remit. If an organisation is communicating on behalf of paying clients with Government Ministers,



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permanent secretaries or with a very tiny number of other senior people, that activity has to be registered. The lobbyist, in those terms, has to register the fact that they are conducting that activity and then, each quarter, they declare who they have lobbied on behalf of in that quarter. Those are the parameters. There is another narrowing factor. Organisations that are not VAT-registered are excluded from the remit of my office. That may become relevant in our later conversation.

On APPGs and their secretariats, there is a theoretical possibility that an all-party parliamentary group could qualify as a consultant lobbyist and need to register, but I have not come across any all-party parliamentary groups that are VAT-registered. Therefore, even if they fulfil the other criteria, they would not have to register. Having said that, if there are any that are VAT-registered, they would need potentially to register.

The area that is probably more relevant for my office is the secretariats for APPGs. In those terms, we are talking about external secretariats. If, for example, the secretariat is provided from a Member of Parliament's office, or somehow the APPG itself is paying a member of staff, that would not come within the remit of the 2014 legislation. That would not be an external lobbyist. We are talking very specifically about third party secretariats. The guidance that I use uses the rather peculiar term of "support provider". The reason for saying that is to distinguish them from the secretariats that are internal to the APPG. Under those circumstances, most APPG support provider secretariats would need to register as consultant lobbyists because, in the vast majority of cases, they would be paid to communicate with Government Ministers on behalf of that third party. There would be narrow situations where they did not have to do that if they fell outside the definitions I have described.

The clients that would be declared in those cases by the external secretariat would in pretty much all cases be the APPG itself, but in many cases it is likely to be the members and funders. I do not mean members as in Members of Parliament who are members of the group, but external members, pressure groups, interest groups and lobby groups that are funding the APPG. The legislation is designed to ensure transparency of who a lobbyist is speaking on behalf of, and that transparency would be aided by that.

- Q35 **Chair:** Just so that I have got it right—it's perfectly possible that I've got it all wrong—let us say that I am an MP who wants to set up an APPG on the manufacture of widgets, although I should say I don't know what a widget is. I have been encouraged to do so by the widget manufacturers of Britain group, which has paid a consultancy to help it lobby Parliament, MPs and so on. I set the group up and the secretariat is provided by the trade body, but the trade body has actually paid a public affairs consultancy to do this work for it. Who is the person that is registered and where are they registered?

Harry Rich: This can get a little bit arcane, but if the trade body is providing the secretariat, it will be the trade body that would be registered as the consultant lobbyist in that case.



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Q36 **Chair:** Is it likely to be registered anyway? Are most trade bodies registered?

Harry Rich: No—by no means. There is a whole separate set of other rules to do with representative bodies that would not really apply in this case. We are only talking here narrowly about trade bodies that are not providing a secretariat. To follow through on your example, if it is not the trade body but the consultancy that is providing the secretariat, it is the consultancy that would have to register. If the trade body is funding this, the trade body that sits behind that consultancy would also be deemed to be a client to be declared in the quarterly returns.

Q37 **Chair:** Right. And how easy is it to find out who is doing what in all this?

Harry Rich: It is very easy to find out who is registered and what their declarations are. It is on our website. I think it is pretty transparent. Obviously, as with all these things, if there are those that are not registered, that is much harder. Perhaps we might come on to that.

Q38 **Chair:** Is there a means of linking your register with our register?

Harry Rich: Not in a technological way—no.

Chair: There's a surprise.

Q39 **Dr Maguire:** For the sake of argument, if a widget manufacturer, to take Chris's example, was funding the trade body substantially, the widget manufacturer would not have to register; it would be the trade body that registers.

Harry Rich: That's right, because the trade body is seen as being a body that is representative of a class of people.

Q40 **Dr Maguire:** But on the register we would have no idea that the widget manufacturer could actually be funding substantially the organisation to lobby Parliament.

Harry Rich: Correct—if the funding was passing via the trade body.

Q41 **Yvonne Fovargue:** A lot of APPGs do not actually pay the secretariat. The secretariat gives lots of benefits in kind that they do put a cash value on. Is that counted as lobbying? For example, a charity that gives its time might have to put a cash value on that.

Harry Rich: If the secretariat is being paid for in any way—whether that is in cash or in other ways—that would count as paid lobbying. If the time is given free, even if a value is put on that, that would not be paid lobbying.

Q42 **Yvonne Fovargue:** I am not quite sure how I would distinguish between the time being given and the putting of a cash value on it.

Harry Rich: That unfortunately or fortunately is how the law is cast. Let us take this out of the realm of APPGs. If a public affairs business that is registered as a lobbyist chose to provide free services to a client for good reason—it could be a charity client—the fact that it is doing it for nothing



means that it would not be considered to be registrable lobbying activity. The same would apply in an analogous example with APPGs.

- Q43 **Yvonne Fovargue:** In your written evidence, you talk about the communications, events and possibly even the documents that are produced and that it is “unclear whether communications and events originate from the APPG or their support provider”. What do you think we should do about that?

Harry Rich: Again, I suppose I should have said at the very beginning that APPGs and APPG support providers are not under the legislation different categories of lobbyists or potential lobbyists. They fall under exactly the same rules. What I am about to say applies to these as well as to anybody else. The law, because it is looking for transparency, is comfortable with a letter going from, in this case, an APPG or from a commercial business to a Government Minister on their own headed notepaper, metaphorically. It is completely clear that the letter is coming from the widget manufacturers, for example. The distinction is that if the consultant lobbyist—in this case, the secretariat—has nothing to do with the sending of the letter in a public sense and if, for example, the chair of an APPG writes under their own steam to a Government Minister, that would not be an act of registrable lobbying, even if the secretariat had drafted the letter. On the other hand, if the secretariat sends the letter to the Government Minister saying, “Dear Minister, Here is a letter from our Chair”, that would become a registrable activity because of the intervention at that point of the lobbyist.

- Q44 **Yvonne Fovargue:** I am not sure. I have been the chair of the same APPG for 11 years and I was still not aware of some of the lobbying rules. How should they be promoted given that a lot of areas appear to be quite grey?

Harry Rich: Obviously, as with all these things, there are complex areas particularly at the fringes. The fundamentals of it should be straightforward. It is worth saying that it is my sense that most APPG support providers and secretariats that ought to be registered are registered. I will expand on what I mean by that. The reason is that the secretariats are, in most cases, provided either by public affairs businesses or by a couple of not-for-profit organisations that have set themselves up to do this kind of work. All of them know the rules very well and apply them very well as far as we can tell. As we heard when you declared your interests around the table, a number of charities also provide those services. In most cases, they are probably not registered for VAT and therefore are not going fall within the rules.

We are about to start a piece of work in the next three months to engage with the APPG chairs and officers. That is complex because the obligations under the legislation are on the support providers, so I cannot compel APPG chairs to do anything. I believe that the APPG officers are the key route to answering the questions and they are the people who should be saying to their secretariats, “Are you aware of these requirements and are you complying with them?” In the end, if the secretariats don’t comply



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with those requirements, it is embarrassing for the APPG, but the secretariats are not committing an offence.

- Q45 **Yvonne Fovargue:** Obviously an awful lot of APPGs have arisen over the pandemic with a lot of newer members and it is a lot easier to form an APPG in the era of Zoom.

Harry Rich: Yes, and there are challenges. Again the declarations around the table demonstrated this. Quite a lot of officers of APPGs are not particularly engaged with the APPG. That is not my issue, but I am sure it makes it harder for me to get responses from APPGs.

- Q46 **Chair:** I cannot remember what the title is, but we now have a system where someone is formally the key person. It is normally either the secretary or the chair, and I am looking towards our registrar.

Some Members and journalists have suggested to me that it is inappropriate for any secretariat to be provided by a public affairs consultancy. I don't know what your view is about that.

Harry Rich: I cannot see any objections to that. If I think about my role in enforcing the legislation, my interest, and therefore the public interest in relation to this, is that the public know on whose behalf communications are being made to Ministers and permanent secretaries. If that is being done via a public affairs business, that is in a category no different from what it would be if it was being done by anybody else.

- Q47 **Sir Bernard Jenkin:** In summary, there are two things. One is whether you could briefly list the measures that you think we need to recommend in our report, to secure public confidence.

Harry Rich: It would be very helpful if, to the extent that you are able, you encouraged APPGs, and particularly the responsible officers that the Chair mentioned, to ask the right questions of their secretariats. That is something that they should engage with. I cannot shift, and I don't think the Committee would be able to shift, the responsibility to the APPG officers, but you could at least ask them to support the process. That would be the key thing, I would suggest.

- Q48 **Sir Bernard Jenkin:** There is a balance to be struck, isn't there? The regulation itself can cast suspicion over everything if it is too draconian, and that would inhibit what MPs do. Do we have the balance about right? Apart from the measure that you suggest, are you broadly happy with the balance?

Harry Rich: As long as we can be confident that that transparency exists and that it is possible for members of the public and other interested parties to know on whose behalf a communication is being made, that fulfils the purpose of the legislation and supports the public interest.

Sir Bernard Jenkin: Thank you.

- Q49 **Andy Carter:** I want to pick up on some of the questions that Yvonne asked. I am a relatively new Member of the House. I have to confess that I did not really know anything about you, and I am the chair of a number



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of APPGs. Have you written to Members of Parliament since the last election? I suspect that there are a lot of new Members who will have come into this world and, frankly, do not know that you exist.

Harry Rich: I am quite sure that is true. I don't mean this glibly but, actually, it would not matter for most Members of Parliament that they did not know we existed. The people on whom we focus our communication arm will be public affairs businesses and the like, such as PR people, who will be the vast volume of people with whom we need to communicate.

But as I said earlier, one thing that we will be doing in the next three months is communication to all APPG chairs. We are doing that with the registrar and communicating with your colleague around that. That is the focus. If I simply wrote to every MP and said, "Are you aware of this?", it is not going to fall on very interested ears. But if we focus it on APPGs, that will be most useful.

Q50 **Chair:** Which means that some of us will be getting three letters from you.

Harry Rich: Or more.

Chair: Or four, five or six. Thank you very much, Mr Rich. We are very grateful to you.

Examination of witnesses

Witnesses: Jon Gerlis and Liam Herbert.

Q51 **Chair:** We do not have nameplates for you, Mr Gerlis and Mr Herbert, so you will have to tell us who is who, I'm afraid.

Liam Herbert: I am Mr Herbert.

Jon Gerlis: And I am Mr Gerlis.

Chair: It sounds a bit like "The Two Ronnies" somehow, doesn't it? Anyway, we are very grateful to you for coming along today. Thank you very much. We will kick off with Alberto.

Q52 **Alberto Costa:** Good morning, gentlemen. A number of your members provide secretarial services to APPGs. What would you say are the benefits of APPG secretarial services to the House and to the wider public interest? I will start with Mr Herbert.

Liam Herbert: I am chair of the PRCA's public affairs group. We represent 124 public affairs companies with about 2,000 staff, so a lot of our members are engaged in APPG activity. We strongly support the idea of APPGs and their role in parliamentary democracy, because MPs cannot know everything they need to know about all subjects. We also suggest that providing services through the secretariat system, either commercially or pro bono, saves public funds. We strongly support all the transparency that goes with that, and our public affairs code is perhaps



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more stringent than the big lobbying Act, in terms of declarations of activity in the APPG system. We think that it is a valuable service to democracy and therefore a valuable service to the public interest.

Jon Gerlis: I certainly agree with Mr Herbert's points. I will add that the confidence that it can give to Parliament is based on our members' expertise and knowledge of the parliamentary process; they act as a buffer between the supporters of APPGs and parliamentarians. The benefit to the public, of course, is that all our members are searchable, on the online public relations register. That is next to a code of conduct that all members actively sign up to, and there is a publicly available complaints process, which anyone who has any concerns about the activities or behaviour of any of our members can go through. I think there is confidence on both sides.

Q53 **Alberto Costa:** Do you think that these external secretariats, many of which are members of your respective organisations, should be subject to any restrictions in the work they do on behalf of APPGs?

Jon Gerlis: We have 15 members as named contacts for 18 APPGs. I don't think that having restrictions would be the right way to go. I think the regulations and rules that are in place are adequate and provide a good degree of transparency. Our key concern is that there are some big differences between how APPGs operate. We have talked already about the number of APPGs, and particularly the number seen in the last few months, and they do operate rather differently. Although the rules apply to all of them, they do not necessarily seem to be adhered to as strictly by some.

Our members take their responsibilities towards their professional conduct in this area very seriously, and they will go above and beyond in listing the sponsors of APPGs, which is encouraged by the rules but not required.

Q54 **Chair:** Can I just check that? You are saying that that is not required. I would have thought that it was.

Jon Gerlis: No. Secretariats are obviously required to declare themselves, but sponsors are encouraged to do so.

Q55 **Chair:** Who are you counting as a sponsor?

Jon Gerlis: Someone who provides financial benefits or benefits in kind to a secretariat to provide services to the APPG. I can read out the rule, if you like, as I have it somewhere here.

Q56 **Dr Maguire:** To use the earlier example, if a widget manufacturer provides support to an APPG secretariat, it is the secretariat that has to be registered, not the individual widget manufacturer. Is that right?

Jon Gerlis: Yes.

Q57 **Chair:** Whereas if somebody gives £10,000 directly to the all-party parliamentary group on Spain, we do have to register that.

Jon Gerlis: If it is direct, absolutely.



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Chair: That is what I thought you meant by sponsors, whereas you mean the people who are behind the secretariat. Okay. Sorry to interrupt.

Jon Gerlis: That is quite all right. I have lost my train of thought.

Q58 **Alberto Costa:** I was asking specifically whether you think there should be any further restrictions, from what you already know, on what external secretariats can do on behalf of APPGs.

Jon Gerlis: No, I don't think so, and I think the key here is that what we are looking for is greater scrutiny and greater enforcement in how APPGs are regulated. The rules are appropriate, but we want to see greater scrutiny and enforcement of them.

Liam Herbert: We agree with the principle. If we take the widget analogy, under the code of conduct and the rules that my members follow, we would be declaring who runs the APPGs, whether it is one of our members who funds it, and who funds the APPG, and that is published quarterly on our register, which is easily searchable. Anything that facilitates the work of the APPG, in terms of its purpose, would seem perfectly reasonable, so long as it is transparent and open, and it can be easily discovered who is saying what about what, and who is paying for it.

Q59 **Chair:** Let me play devil's advocate for a moment. You're a public affairs consultancy, and one of your clients comes to you and says, "Well, we really want to get the law changed on x. How can we get this discussed in Parliament?" and you go, "Well, the best way would obviously be to set up an APPG. Let's try and find an MP who will launch an APPG. They might not be able to get the numbers of people interested in it, but you only really need one. Theoretically, you've got to have a few people who will add their name to it." And then you would advise your client, "One of the best things an APPG could do now is publish a report, and it will look like a parliamentary report, because it is a report of the all-party parliamentary group on x." That is rather cynical and sceptical way of how this might work, but it does feel sometimes as if that's what is actually happening. Is that fair or manifestly unfair? Or do you not recognise that any public affairs consultancy would ever advise anybody to set up an APPG?

Liam Herbert: Public affairs companies always advise the setting up of an APPG. To take your legislative example, if the purpose is to inform and educate about the positives and negatives of legislation and the impacts and unintended consequences of legislation, then communicating that through an APPG might be a perfectly legitimate way of lobbying. But it is very clear who is saying what about that. If an organisation comes forward and says, "We want to change the law on this," everyone can see that that is who is behind it and who is helping to sponsor the report that then says whatever it says.

Jon Gerlis: I think the 2013-14 report from the previous Committee made the point that APPGs aren't a particularly good route for "improper lobbying", which is what they called it. I don't work for a public relations

consultancy. I think it is one way of having a lobbying campaign, but it certainly wouldn't be the only tactic I would advise.

I agree completely with Mr Herbert's point about the increasing transparency required. I think the point was made earlier by Transparency International, which I know you agree with, Chair, about information on the Parliament being all there. The accessibility, the story that it tells, and the ability to access what it means is a very different situation. I think it is really about making sure that we can be as transparent as possible.

We heard from the registrar earlier, and key to this is the expansion of the lobbying register. As the registrar himself said, what is defined by the law as lobbying is rather narrow. It is consultants lobbying Ministers or permanent secretaries—both groups who have been calling for a long time for this to be expanded to cover all lobbying activities, so that we have a good register of lobbying activity, whoever is doing it. That could be officers of APPGs as well, of course.

Q60 Chair: Why has the number gone up so dramatically in the last two years?

Jon Gerlis: I don't know. However, I don't think public affairs consultancy support has gone up. Again, previously, about 15% of APPGs were provided with external support from public affairs companies. While the number of groups has gone up, I don't think the number for consultancy support has necessarily gone up. I guess that there are just a lot of interesting issues to discuss in Parliament, and maybe they are seen as an interesting way to do that. They are certainly a very valuable way of doing that, and we certainly see value in them, so hopefully parliamentarians also recognise that value.

Q61 Dr Maguire: I want to pick up on what Mr Herbert said about transparency. I have not had the benefit of looking at the APPG report yet, but I will have a look. You say that the sponsor will be published. Is that published in the report, or published in the register?

Liam Herbert: The Public Affairs Board register, which we publish on a quarterly basis.

Q62 Dr Maguire: But if you publish a report, it wouldn't necessary be in the report.

Liam Herbert: The register is published online on a quarterly basis, and all our members make a return on a quarterly basis, declaring APPG activity, and every member of the organisation that is involved in lobbying is named.

Q63 Dr Maguire: I accept that. My point is that you talked about a report. Coming back to Chris's example of an APPG being a way to influence, a way to inform would be the publication of a report; that is fine. Would the sponsors of that report be published in the report, or would it be published as an all-party parliamentary group report?



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Liam Herbert: That would be a matter for the APPG to decide themselves.

Q64 **Dr Maguire:** So the transparency isn't really there then, if you have to look in the Member register.

Liam Herbert: Yes, you would have to go through the Member register to see who was supporting that APPG, but that is a matter for the APPG themselves, given that it is on that side. We would suggest that, as an ethical and transparent lobbyist and ethical and transparent public-facing practitioners, you should be declaring either in the reports or on the register who is involved on every production.

Q65 **Dr Maguire:** So if we did a trial of APPG reports in general, given that your members are involved in them, do you think we would find open publication of who is sponsoring them?

Liam Herbert: I don't know exactly. I am not familiar with all the reports. There are at least 600 APPGs.

Q66 **Sir Bernard Jenkin:** This is going to sound rather an aggressive question, but I really mean it in a kind way. How concerned are you about the public reputation of your industry?

Liam Herbert: Very concerned. We take it very seriously. We take the ethics and transparency of what we do very seriously.

Q67 **Sir Bernard Jenkin:** So if a report produced by an APPG is being confused with a report produced by a proper parliamentary Committee, how concerned are you about that?

Liam Herbert: I am not sure I understand the question.

Q68 **Sir Bernard Jenkin:** What basically happens is that all-party groups produce reports, and they are confused, very often by political commentators, with being some kind of official utterance of Parliament, like a Select Committee report. The BBC has the habit of introducing Select Committee reports by saying, "A group of MPs has reported that". Later in the bulletin, they might actually tell you which Select Committee it is, but they will report an APPG in the same way—"a group of MPs" or "an all-party group of MPs". If a lobbying company or public affairs consultancy is behind that, how much do you think the reputation of your industry is compromised by what looks like covert lobbying? I am amazed that you are confused by it.

Liam Herbert: My response would be that the way the activities of Parliament and of the lobbying industry are reported often leaves a lot to be desired. Our engagement with journalism on that side helps, we hope, to promote a better understanding of lobbying. I understand the shorthand of how journalists write. I consider that any confusion or potential confusion is something we need to address. I am not quite sure how an organisation or the APPGs would attempt to achieve that.

Q69 **Sir Bernard Jenkin:** That is fine. What measures do you think Parliament should take to enhance the reputation of your industry and protect it



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from being misconstrued in the way that it sometimes is? What should we do about it?

Liam Herbert: The way that APPGs are presented on parliamentary places is perhaps an area to consider.

Q70 **Sir Bernard Jenkin:** We could, for example, require that any APPG that produces a report says in very large letters on the front—

Chair: We do. It does not have to say it in very large letters, but it does have to be on the front of the report.

Sir Bernard Jenkin: It should not be coloured green, and it is not allowed to carry the portcullis—or is it? I can't remember. How concerned are you about taking other measures to make clear this separation between what all-party groups do and what Select Committees do? Shouldn't you be concerned? Would you give it some thought?

Liam Herbert: We will give it some thought. It is not something we had considered before, but we will respond to you on that.

Q71 **Sir Bernard Jenkin:** Many of your members have considered it to be in their interest to sponsor all-party parliamentary groups. As the industry body, you might want to reflect on how this looks—to protect the reputation of your members.

Jon Gerlis: The public understanding of APPGs as informal groups certainly is an issue for this side, rather than for us. We commissioned a survey last week, and of 2,000 members of the public, only one in 10 said they had any idea what an APPG is, let alone its role or purpose. We also have to understand that APPGs, in their informality, which is obviously very valuable in separating them from the Executive, are part of the fabric of this institution, and therefore have a degree of authority and reputation. In terms of your specific question about what Parliament can do to help to increase, if you like, the accusation that public affairs—

Q72 **Sir Bernard Jenkin:** To strengthen public confidence in what is going on.

Jon Gerlis: Very simply, I would suggest that there are a few areas of transparency, and particular areas within APPGs specifically, but overall it goes back to the lobbying register. As I say, the lobbying register is an incredibly narrowly defined register of a particular number of lobbyists. It is up to us, as industry bodies, to provide our members with the opportunity to be transparent. I would say that it is quite damning that Parliament does not legislate for that, so we want to see a widening of the lobbying register. We need a lobbying register that captures activity, rather than just a small number of lobbyists.

Sir Bernard Jenkin: We all know what the problem is: we all know what lobbying, is but trying to define lobbying in law is extraordinarily difficult without catching a whole lot of other perfectly legitimate activities.

Q73 **Chair:** It has been put to me by some quite senior members of the House that we should be saying that no secretariat can be provided by a commercial organisation, or that all secretariats have to be done in-house



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by Members' offices.

Jon Gerlis: I think bringing rules like that in compromises the informality of the groups, for a start. It has been very difficult to make that, and to get the level of support for a number of APPGs that they are currently getting. As I explained at the very beginning, the benefit to the public and to Parliament of having consultancies provide secretarial support is there because of our code of conduct, and because of the clear independent complaints process that we operate. We would love to see all lobbyists and public affairs consultancies sign up to a code of conduct and be held to the same level of scrutiny that our respective members are.

Q74 **Chair:** Other countries have friendship groups that are appointed by the respective House; it is not just anybody who feels like turning up.

Liam Herbert: I am not sure how removing commercial interests helps transparency or visibility on this, because as we said earlier, it potentially leads to much more pro bono activity and benefit-in-kind activity, which is harder to notice and harder to follow through a transparency process. The focus on public affairs agencies providing secretarial services seems obtuse in an area where we are looking at broader transparency from an industry that is actually more transparent, in some cases, than Parliament itself in this respect.

Chair: The thing that is rattling in my head is that sometimes it feels as if the driving force for these things is not the Member, and the Member's interest; it is a commercial interest from outside. When it gets the imprimatur of "parliamentary" on it, that is the bit that seems awry. I was a lobbyist for the BBC. I am in favour of lobbying. I think it is a perfectly legitimate, honourable career, but I still worry about where we are at.

Q75 **Sir Bernard Jenkin:** How practical would it be for the public affairs consultancy involved to make it clear on behalf of which clients they are acting in respect of that all-party group? Presumably the public affairs consultancy would not be doing it out of altruism; it would be doing it because it was being encouraged to do it by a client or a number of clients.

Liam Herbert: We already do that. We already declare that on our register.

Q76 **Sir Bernard Jenkin:** You declare it on your register, but would it help if the all-party parliamentary group were required to make that declaration more explicit?

Liam Herbert: That would be a reasonable connection, I would have thought.

Q77 **Sir Bernard Jenkin:** Could you set out what the potential is for conflicts of interest between the public interest and the private interest of a secretariat, or the client funding a secretariat, as you see it? What are the potential conflicts of interest?



Jon Gerlis: I think it is really important that parliamentarians remain connected to the outside world through their interests and experiences. The CIPR contributed to a 2018 report from the Committee on Standards in Public Life on MPs' outside interests where we made that point. There were 12 recommendations in that report, including to the Committee, that a review of the rules on register of interests is looked at, which we would certainly welcome.

Again, I think it ultimately comes down to the issue of transparency. I think the point that you made earlier about sponsors not having to be declared is a very good point. Some consultancies proactively do that on the APPG register, but it's not consistent enough, and the level of detail that is provided across the board is not consistent enough. There has to be some balance between an MP's outside interest and where the public interest is; and if there is a conflict, there need to be stronger rules around that, certainly.

There are very few—the point I made earlier about the 15% or so of secretarial support being provided by consultancies suggests that it's not a significant commercial opportunity for too many agencies. If it were, we would see that number be significantly higher. But we have had members raise concerns about the fact that some have used this as business development opportunities. That is not, however, limited just to public affairs consultancies. I was sent a proposal that a member had received from a secretariat of an APPG, which didn't involve a consultancy. There were different bands of sponsorship, and the top band was £100,000 for two years. The concern we have with that isn't necessarily about the figure itself or what the APPG gets for that, although that wasn't clear. What was very clear was the level of access that the sponsor would receive. But actually there are two points. The first is that the sponsor isn't required to be declared, as I mentioned earlier. Secondly, there is no indication that offices would have any idea about this level of sponsorship being provided, or any level of sponsorship being provided at all. So there are certainly some areas that need to be tightened up—

Q78 **Sir Bernard Jenkin:** That is a very, very full answer, but could I just play back to you what I think you said in answer to my question? When I said, "What are the potential conflicts of interest?", you mentioned two things. One is that it actually is a vehicle for advancing the commercial interests of the secretariat or the person sponsoring the secretariat.

Jon Gerlis: That is the case in very few examples.

Q79 **Sir Bernard Jenkin:** Well, I would be surprised. I can't think of any reason why a commercial organisation, a charity or a trade union would want to do it unless they were advancing the interests of their organisation. I can't think of why they would do it.

Jon Gerlis: To advance the interests—

Sir Bernard Jenkin: Otherwise, they are misusing, misappropriating, the funds of their organisation for some personal interest of the directors or something. Let's be realistic.



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Jon Gerlis: It is to advance the interests—

Sir Bernard Jenkin: You say that's very rare. Okay, but the other item you mentioned—what was it? It is that—sorry.

Chair: While you are thinking about that, can I just ask about the £100,000 instance that you gave, because I didn't understand that?

Q80 **Sir Bernard Jenkin:** Oh, cash for access—that's what it was. You said cash for access, so let's just look at that for a minute. How much access does a public affairs consultancy or a commercial organisation get by sponsoring an all-party secretariat? In your experience, how serious is that?

Jon Gerlis: It differs between different groups.

Q81 **Sir Bernard Jenkin:** But it is cash for access, isn't it?

Jon Gerlis: Well, I don't think it is in the large number of—

Q82 **Sir Bernard Jenkin:** No, you just said £100,000 gets much more access.

Jon Gerlis: Yeah, and it wasn't a consultancy, actually, that was supplying that, but what we don't want to see—this is why the rules need to be tightened up and enforced and there needs to be greater scrutiny—is actually having that, having a pay-to-play system around. We need to see and there does need to be a level of responsibility from the officers themselves to make sure that the right voices and competing voices are taking part in that conversation and not just those that can afford to.

Q83 **Sir Bernard Jenkin:** Okay, we have identified two areas of conflict. How should that be addressed?

Jon Gerlis: There need to be tougher rules from the registrar's office to basically scrutinise these points. I don't think the number of groups that have arisen in the last few years, certainly since the 2013-14 report, has been reflected in the office's infrastructure or resources. There certainly needs to be greater scrutiny on that.

Q84 **Sir Bernard Jenkin:** Thank you very much. The same question to Mr Herbert—what exactly are the conflicts, and how should they be addressed?

Liam Herbert: I disagree entirely with the cash-for-access comment. Anyone who is running a secretariat has the same access, whether they are a commercial organisation, whether they are a charity or whether they are providing their services free of charge. I think the dissonance is between the activities, the reasons and the purpose of the APPG—potentially—and how that is communicated, and how that is funded and the requirement for the funding on that basis.

Q85 **Sir Bernard Jenkin:** You are making a very important point here; I think it is really important. Very often, the members of an APPG already have a deep interest in a particular topic, which they want to advance. Therefore—I can attest to this—you see it as an opportunity to advance



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something that you believe in, and you find some sympathetic organisation to help you advance that.

Chair: When the driving force is that way around.

Sir Bernard Jenkin: Yes, when the driving force is that way around—and we wouldn't want to frustrate that.

Liam Herbert: Not at all. That is a positive aspect.

Q86 **Sir Bernard Jenkin:** But how do we make the distinction between the two?

Liam Herbert: I guess it is a governance issue. We, as an industry, can do as much as we can in being open and transparent, and declaring who is involved in what. However, there is an element for Members to then take control and say, "In terms of how this works and how we engage with outside organisations, whoever they may be, who help us provide the secretariat and the facilities to do the work to pursue this interest—"

Q87 **Sir Bernard Jenkin:** Let us take an example. There was an all-party group—I cannot remember what it was called—that was very keen on the destruction of personal data and confidential information. They thought that MPs and organisations should be encouraged to destroy data that they did not need to hold, to comply with the data protection regulation. The all-party group was sponsored by a manufacturer of paper shredders. How does that sit? How does that feel? Is that okay?

Liam Herbert: Provided that everybody knows that it is sponsored by a member that makes paper shredders, then that seems perfectly reasonable. There is nothing wrong with a commercial organisation putting forward a point of view to Parliament and parliamentarians.

Q88 **Chair:** I go back to the driving forces—where is the driving force for all of this coming from? Being transparent about that is quite difficult. I am aware, in a way, Arun, we have asked some of your questions, but I want to ask one quick question. Parliamentary email accounts are apparently provided to quite a number of secretariats. Do you know how many?

Liam Herbert: I do not.

Chair: It would be good if we could find that out—I am looking to the registrar. Secondly, I know that parliamentary passes are quite often provided to secretariats. Do you know how many?

Liam Herbert: We recently went through a trawl of who holds parliamentary passes, in association with Transparency International. A number of APPGs did come up in that. Similarly to my colleague here, we take a very strong line on parliamentary passes for anybody who is not actively involved in the function of Parliament. We do not allow members to have parliamentary passes. There is no requirement for them to have them.

Q89 **Chair:** But it does happen, doesn't it?



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Liam Herbert: It does, and that is, again, a matter that we have raised with the parliamentary authorities.

Q90 **Chair:** You can imagine that if the driving force for setting up the APPG is from outside—from a commercial interest—and they then end up with a pass for Parliament, then that is bingo, isn't it?

Liam Herbert: Again, let's be very clear. Anyone who is doing that through an APPG would not be doing that through either a CIPR or a PRCA membership. Neither our code of professional conduct nor our public affairs code would allow such activity.

Chair: There are bad apples everywhere. Arun?

Dr Midha: My questions have been covered. We have talked about transparency funding, and I can glean the rest from other discussions.

Sir Bernard Jenkin: Apologies, Arun.

Dr Midha: No, it is fine.

Chair: He is a very naughty boy. Michael has his hand up, then we will come to Tammy.

Q91 **Dr Maguire:** In your submissions, you both made a great play about the ethical standards of membership—you talked about the code of conduct and the self-regulatory mechanisms. How many of your members have been subject to discipline, within the last two years, for failure to adhere to those codes? Are there any particular examples regarding activities related to APPGs?

Jon Gerlis: None in relation to APPGs. The exact figure, of those that have been stripped of their membership in the last two years, is one. We have obviously received complaints, and, in many examples, they been dealt with amicably, but one has been stripped of membership. There have been zero complaints about any APPG activity.

Liam Herbert: I am unaware of any complaints regarding our members and APPG activity.

Q92 **Dr Maguire:** Is that because all your members adhere to the highest ethical standards, or because the levels of enquiry into their behaviour is weak?

Liam Herbert: We take our reporting and recording and responses to our register extremely seriously. As an organisation, we will challenge into where we think or perceive there may be some problems. The opportunity to complain or raise issues about any of our members is open to anyone at any time. The PRCA has a very strong record of dealing robustly with membership infractions of its code of conduct.

Q93 **Dr Maguire:** Just to be clear, how many members are in your organisation?

Liam Herbert: Throughout the world, there are over 35,000.



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Dr Maguire: In the UK?

Liam Herbert: In the UK, there are 124 organisations.

Jon Gerlis: We are different. We have individual members rather than organisations. We have around 10,000 individual members.

Q94 **Dr Maguire:** Out of all of that number, one person has been disciplined.

Liam Herbert: Collectively, we have about 2,500 to 3,000 members involved in public affairs activities.

Q95 **Dr Michael Maguire:** That makes it worse. One has been found guilty of inappropriate behaviour.

Jon Gerlis: On your earlier question about whether it is our members' reputable behaviour, our members do take their professional conduct very seriously. They sign up to the code of conduct, both on joining and upon renewing membership. We write to all new MPs. We have produced a guide to professional lobbying, which we send to members, but we have also written to all new MPs over the last two, maybe three, elections. That includes specific behaviours and activities that you should expect from a professional lobbyist, whether they are a member or not, and how to make a complaint.

Q96 **Dr Maguire:** I have no doubt about that, but the problem is that saying that there is a policy does not make it so. Simply because policies are in place does not mean that they are going to be implemented in practice. We are getting concerns about inappropriate activity in relation to lobbying, yet only one member has been disciplined for inappropriate activity. I just wonder whether there is a dissonance in relation to that. I am not suggesting that there is a problem, but I wonder whether there is a dissonance.

Liam Herbert: From our perspective, we run professional training for all our members, not just broadly on the public affairs code but on the ethics of the public relations and public affairs industry per se. One of the issues is, obviously, new entrants into companies and new members, and building the ethical view at the start of that. We champion that by taking a very firm line, as we have done throughout recent months, on any perceived lobbying scandals that have taken place. The activities of former Ministers and former Prime Ministers have featured quite significantly in that list—the activities of those we would consider to be professional public affairs practitioners.

Q97 **Chair:** Sorry, Mr Gerlis. I did ask you to repeat this thing about the £100,000 case, because I think that it is something that Mr Speaker has mentioned to me as well. I do not quite understand it, and I do not know which person this refers to.

Jon Gerlis: Sure, I will clarify. A member of ours received a proposal from a secretariat to sponsor an APPG. That proposal has three tiers of sponsorship, all for two years. The platinum tier, as it is called, which is

the top tier, started at £100,000. It went down, I think, to £15,000, possibly £20,000—I have it on email. Each tier included what—

Q98 **Chair:** When was this?

Jon Gerlis: This was over the last few months—over the last couple of months, I think.¹

Q99 **Chair:** What APPG is this?

Jon Gerlis: It was the APPG on longevity. As I say, we have no particular concern about that individual APPG. The concern is about what level of reporting needs to happen.

Q100 **Chair:** I am feeling stupid. Does everybody else understand this, and I don't? No, everybody else is shaking their heads as well. Does this APPG already exist?

Jon Gerlis: It exists, and there is a secretariat.

Chair: Right.

Jon Gerlis: And the secretariat is looking for financial sponsors to give money to essentially attend meetings and be part of—

Q101 **Chair:** To attend meetings? You have to pay to attend meetings?

Jon Gerlis: Well, you don't have to pay to attend, but the sponsorship included access to meetings.

Q102 **Chair:** That's quite high up there on the badness register, isn't it?

Jon Gerlis: And the different tiers included the number of meetings you could attend, as well.

Q103 **Chair:** Can you provide us with the chapter and verse on this? I think we might want to ask the individuals concerned to come and explain their position. Is that all right?

Jon Gerlis: Yes. I've got it to send, and I'll send it to the office.

Chair: Thanks very much.

Q104 **Andy Carter:** I would be very interested to see the proposal. This money would effectively be used to pay the secretariat. Is that what the sponsorship is for?

Jon Gerlis: It appears that way, yes. In answer to the question about the commercial interests of consultancies, this is a clear reason why there needs to be some greater level of transparency in terms of the sponsors I talked about earlier on. But yes, it looks like the secretariat would then allow that money to be used for different levels of access to the APPG.

Chair: It is an awful lot of money to spend on a secretariat for an APPG,

¹ Following the oral evidence session, Mr Gerlis informed the Committee that he had should have said a "couple of years" rather than a "couple of months".



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but thanks very much.

Q105 **Tammy Banks:** Most of what I was going to ask has been covered apart from specifics around the secretariat and the APPG chair. I just wondered if you think the current rules make it clear what is the responsibility of the secretariat and what is the responsibility of the chair.

Liam Herbert: I do not think we have any particular issues with that, but again we are back to the same conversation we had earlier. There are APPGs of varying quality, and the definition and purpose and drive behind some of them is a little more specific than others.

Jon Gerlis: Some members have raised concerns about the line where the role of an officer stops and where the role of the secretariat begins being blurred, and that there isn't a consistent approach. The guidance that exists appears to be written towards officers of APPGs rather than secretariat support. It has been suggested by some members that clear guidance specifically for secretariat support would be beneficial. CIPR would be very happy to work with the office to produce something like that. There is some concern that there is some confusion that exists.

Chair: Thank you very much. We are grateful to both of you. If you have anything you want to add, please send that in writing to us, particularly on this case, because we would like to dig into that a bit more to see whether it reveals anything we need to work on.