



House of Commons
Committee on Standards

All-Party Parliamentary Groups: improving governance and regulation

Seventh Report of Session 2021–22

*Report, together with formal minutes relating
to the report*

*Ordered by the House of Commons
to be printed 26 April 2022*

Committee on Standards

The Committee on Standards is appointed by the House of Commons to oversee the work of the Parliamentary Commissioner for Standards, except in relation to the conduct of individual cases under the Independent Complaints and Grievance Scheme; to examine the arrangements proposed by the Commissioner for the compilation, maintenance and accessibility of the Register of Members' Financial Interests and any other registers of interest established by the House; to review from time to time the form and content of those registers; to consider any specific complaints made in relation to the registering or declaring of interests referred to it by the Commissioner; to consider any matter relating to the conduct of Members, including specific complaints in relation to alleged breaches in the Code of Conduct which have been drawn to the Committee's attention by the Commissioner; and to recommend any modifications to the Code of Conduct as may from time to time appear to be necessary.

Current membership

[Chris Bryant MP](#) (*Labour, Rhondda*) (Chair)

[Tammy Banks](#) (*Lay member*)

[Jane Burgess](#) (*Lay member*)

[Andy Carter MP](#) (*Conservative, Warrington South*)

[Alberto Costa MP](#) (*Conservative, South Leicestershire*)

[Rita Dexter](#) (*Lay member*)

[Allan Dorans MP](#) (*Scottish National Party, Ayr, Carrick and Cumnock*)

[Laura Farris MP](#) (*Conservative, Newbury*)

[Yvonne Fovargue MP](#) (*Labour, Makerfield*)

[Sir Bernard Jenkin MP](#) (*Conservative, Harwich and North Essex*)

[Dr Michael Maguire](#) (*Lay member*)

[Mehmuda Mian](#) (*Lay member*)

[Dr Arun Midha](#) (*Lay member*)

[Paul Thorogood](#) (*Lay member*)

Powers

The constitution and powers of the Committee are set out in Standing Order No.149. In particular, the Committee has power to order the attendance of any Member of Parliament before the Committee and to require that specific documents or records in the possession of a Member relating to its inquiries, or to the inquiries of the Commissioner, be laid before the Committee. The Committee has power to refuse to allow its public proceedings to be broadcast. The Law Officers, if they are Members of Parliament, may attend and take part in the Committee's proceedings, but may not vote.

Publications

© Parliamentary Copyright House of Commons 2022. This publication may be reproduced under the terms of the Open Parliament Licence, which is published at www.parliament.uk/site-information/copyright-parliament/.

Committee reports are published on the Committee's website at www.parliament.uk/standards and in print by Order of the House.

Committee staff

The current staff of the Committee are Paul Connolly (Media Relations Manager), Arvind Gunnoo (Committee Operations Officer), Dr Robin James (Clerk), and Stuart Ramsay (Second Clerk).

Contacts

All correspondence should be addressed to the Clerk of the Committee at the Committee's email address, standards@parliament.uk. The telephone number for general enquiries is 020 7219 6615.

Contents

1 APPGs and the APPG Rules	3
APPG rules and registration	3
Our inquiry	4
2 Regulating APPGs	7
Benefits of APPGs to Parliament	7
Regulating APPGs	7
What is the current problem?	8
Access by paid lobbyists and commercial entities	8
Access by hostile state actors	11
Conclusion	14
3 Possible reforms	15
Conclusions and recommendations	18
Annex	20
Formal minutes	21
Witnesses	22
Published written evidence	23
List of Reports from the Committee during the current Parliament	25

1 APPGs and the APPG Rules

1. All-Party Parliamentary Groups (APPGs) are a vital part of how Parliament works.
2. They are informal, bicameral, cross-party groups on topics of mutual interest. These topics vary widely. They include individual countries, territories or regions; areas of public policy; industry sectors; individual bodies; medical conditions; arts organisations; specific sports and other recreations. APPG activities also vary enormously. They include organising recreational activities, such as sporting fixtures with parliamentary teams; organising visits, within the UK or overseas; hosting talks by external speakers; making representations to government; running inquiries into topics and inviting written submissions and in-person oral contributions; and publishing papers or reports.
3. APPGs are not official parliamentary bodies. In particular, the rules require that they “must avoid presenting themselves in a way which could lead to confusion with Select Committees”. Any publication by an APPG must have a rubric stating that it is not an official publication of either House, and APPGs may only use the bespoke APPG logo on their website, publications, and other materials, not the crowned Portcullis, to avoid any impression that they are official House bodies.
4. APPGs are often supported by Members’ own office staff. They are, however, sometimes supported by a secretariat provided by an outside body. As things stand, this includes charities, public affairs firms, industry bodies, and some individuals. Outside bodies may also provide financial support or benefits in kind, such as a secretariat, printing reports, or visits and hospitality, to groups. The current rules require that support (either financial or in-kind) over £1,500 a year from a single source must be declared. Groups may include non-parliamentarians as external members, and may charge them a subscription or membership fee, but they must not have voting rights;¹ these fees or subscriptions can be used by the APPG to cover the costs of its activities, including, for example, paying for its own secretariat.

APPG rules and registration

5. Rules relating to the registration of APPGs were first made by Resolution of the House in December 1985.² This provided that:

Commons officers of All Party and Registered Groups be required to register the names of the officers of the Group, and the source and extent of any benefits financial or in kind from outside sources which they may enjoy, together with any other relevant gainful occupation of any staff which they may have. Where a public relations agency provides the assistance, the ultimate client should be named.³

6. Whilst APPGs are bicameral, and members of the House of Lords may therefore be members (or officers, except the chair) of an APPG, the House of Commons has always taken the lead in the regulation and registration of APPGs. The Senior Deputy Speaker in the House of Lords has previously stated in a written answer:

1 [Guide to the APPG rules, para 18\(d\)](#)

2 CJ 17 December 1985, 97

3 CJ 17 December 1985, 97

The regulation and registration of All-Party Groups (APGs) are managed by the House of Commons, and the House of Commons has rules which formally recognise APGs. The House of Lords does not give any such recognition to APGs, and plays no major role in their regulation.⁴

7. The current rules for APPGs were agreed by the House on 13 May 2014. The resolution of 13 May 2014 also gave this Committee the power to “update the Guide to the Rules for All Party Parliamentary Groups from time to time and to make such minor changes to the Rules for All-Party Parliamentary Groups as are necessary to ensure the effective operation of the Register of APPGs and the regulatory regime applying to such groups”.⁵

8. The Registrar of Members’ Financial Interests maintains the register of APPGs. To be a registered APPG, a Group must be open to all Members of both Houses, regardless of party affiliation, and must satisfy the rules agreed by the House. The Registrar has discretion to remove a group from the Register in the case of non-compliance with the rules. This would mean that a Group could no longer use the term “APPG” in its title, or use the APPG Portcullis logo. The Parliamentary Commissioner for Standards may investigate allegations that a group has broken the rules of the House. Such investigations are carried out through correspondence with the chair, who must be a Member of the House of Commons (though a Member of the House of Lords may be a co-chair), and who, as the APPG chair, has responsibility for the compliance of their Group with the rules. No breaches of the APPG rules have ever been referred from the Commissioner (previous breaches, where they have been found, have been subject to rectification rather than referral), but were they to do so, they would fall to be adjudicated by this Committee.

Our inquiry

9. Our predecessor Committee last reported on All-Party Parliamentary Groups in 2013.⁶ That report considered a wide range of aspects of APPG regulation, and proposed a number of changes to the rules on APPGs. It was approved by the House (with the rule changes adopted) on 13 May 2014.

10. Our predecessors’ 2013 inquiry and report followed a report by a Speakers’ Working Group, led by the former Leader of the House, Rt Hon Jack Straw MP, and published in 2012.⁷ The Working Group was set up in response to substantial growth in the number and activity of APPGs, and concerns about confusion between APPGs and select committees, and about APPG finances.⁸ The Committee endorsed many of the Working Group’s recommendations in its report.

11. The main changes implemented at that time were primarily aimed at preventing the confusion between APPGs and select committees. The changes to the rules introduced a requirement to display a rubric on the front of APPG publications making clear they are not official publications, and permitted APPGs only to use a bespoke “APPG” logo which includes the crowned Portcullis, rather than the crowned Portcullis on its own (see Box 1 below).

4 HL Deb, 4 July 2013, col 243WA

5 CJ 13 May 2014

6 Committee on Standards, [All-Party Parliamentary Groups](#), Sixth Report of 2013–14 (HC 357)

7 <https://www.parliament.uk/documents/speaker/Speakers-Working-Group-on-APGs-report.pdf>

8 <https://www.parliament.uk/business/news/2011/november/public-statement-on-the-speakers-working-group/>

Box 1: The APPG logo

Source: <https://www.parliament.uk/globalassets/documents/pcfs/all-party-groups/advice-notes/advice-note-4.pdf>

12. However, our predecessor Committee also noted concerns about lobbying and influence. It concluded:

The fact that APPGs can draw on a variety of funding, including external support, brings significant benefits as well as risks. It enables them to carry out proper research, to network and to conduct public information events. While we agree with the Speakers' Working Group that "APPGs must not be seen as enabling outside interests to 'buy the logo' of Parliament", we do not believe it would be proportionate to ban external support. **We agree that Parliament should not be used as a way for lobbyists to impress their clients. Nonetheless it is important that the response to these fears is proportionate. In the main, our witnesses considered the interplay between parliamentarians and those from wider society to be beneficial. Ultimately, we consider the best safeguard against abuse is a system which ensures that APPGs are controlled by parliamentarians and which requires appropriate financial transparency about both the support APPGs receive, and their use of such support.**⁹

13. The changes to the rules at that time therefore also included revised annual meeting, notice, and quorum requirements; a requirement that groups which receive financial or material support worth a total of £12,500 per year or more should publish annual income and expenditure statements; a requirement to publish lists of active APPG members on their website or on request; and an explicit statement that the Commons Chair of an APPG is responsible for ensuring compliance with the rules.

14. We considered that it was the right time to have a comprehensive review of APPGs and their regulation. We launched our inquiry in October 2020, with wide-ranging terms of reference.¹⁰ We received a range of written evidence from members of both Houses, APPGs themselves, and outside organisations. We heard oral evidence from Harriett Baldwin MP, Chair of the British Group - Interparliamentary Union, Transparency International UK, the Registrar of Consultant Lobbyists, the Public Relations and Communications Association and the Chartered Institute of Public Relations, a number

⁹ Committee on Standards, [All-Party Parliamentary Groups](#), Sixth Report of 2013–14 (HC 357), para 31

¹⁰ Available on the Committee's webpages: <https://committees.parliament.uk/committee/290/committee-on-standards/news/119974/committee-launches-new-inquiry-into-all-party-parliamentary-groups/>

of APPG secretariats, and Alison Giles, Director of Security for Parliament. We are particularly grateful to Mr Speaker and the Lord Speaker who gave oral evidence to us in private. We wish to thank everyone who contributed to our inquiry.

2 Regulating APPGs

Benefits of APPGs to Parliament

15. APPGs are a vital part of how Parliament does its work. They help foster debate on matters of public interest. They keep MPs and Peers informed on a wide range of important topics. They provide access to the political system for many organisations and individuals who might otherwise be excluded. They enable the development of better bilateral relationships with other countries and their parliamentarians. They can be an important campaigning tool for many MPs and peers with specific areas of interest that might not otherwise get considered by Parliament. They enable groups of interested parliamentarians to work together on issues of common interest; and they provide a forum for the development of ideas on matters of public policy that can in turn influence the two Houses or the Government. They often show Parliament and its members working at their best.

16. Members often devote a substantial amount of time and energy to APPG work, and many Members, especially backbench Members, see it as a key part of their role. It would be a mistake to limit the role of APPGs in a way that harmed Members' ability to perform this aspect of their work.

17. APPGs sit alongside other groupings in Parliament, both less and more formal. There are several informal groups of parliamentarians (both intra-party and cross-party) which are not constituted as APPGs. These are not registered, they have no formal constitution, and no specific parliamentary rules apply to them: nor do they have any formal recognition by either House. By contrast, APPGs are formally recognised by dint of being allowed to use the term "All-Party Parliamentary Group" and the APPG crowned Portcullis. This distinction between informal groupings and APPGs is important. The APPG rules and APPG register rightly ensure the minimum level of transparency and propriety that must come with such formal recognition.

18. The House also has formal select committees and general committees. These are regulated and constituted by Standing Orders, are supported by politically impartial House staff, and their proceedings constitute proceedings of the House. They carry the full authority of the House, and it is important that APPGs are not confused with them.

19. The relatively informal nature of APPGs is crucial to their effective operation. They provide a framework for cross-party and bicameral working that is flexible and light-touch enough to be adapted for a huge range of subject matters and circumstances.

20. Our aim is to preserve these benefits, whilst mitigating the risks.

Regulating APPGs

21. Our predecessor Committee previously noted a tension in seeking to regulate APPGs: that the more onerous the requirements imposed by the House, the more closely APPGs are linked with the House. This introduces a greater reputational risk for the House, especially if things go wrong. Our predecessors also noted that increased regulatory burden could create a perverse incentive for groups to de-register:

any change to the regulatory regime needs to balance the rewards of registration with the inconvenience and restrictions that registration will impose. **We do not wish to give APPGs an incentive to de-register which would bring about a reduction rather than an increase in transparency.**¹¹

22. The primary benefit of being a registered group is arguably an association with Parliament, signified by use of the APPG Portcullis and the term “All-Party Parliamentary Group”. There are few other tangible benefits, and APPGs enjoy no special access to parliamentary facilities over and above other individuals or groups, although they enjoy a higher priority than unregistered groups or individual Members for re-allocation when a select committee requires a booked room. The recognisable branding of APPGs also means that Members’ staff whose role is primarily to support an APPG, who will often be passholders, may often present themselves as ‘APPG staff’ within the House. The value to APPGs of this association with Parliament gives the House both a right and a responsibility to put in place proportionate rules and necessary enforcement to ensure this association is not abused.

What is the current problem?

23. At the time of the Speakers’ Working Group report in 2012, and our predecessors’ subsequent report in 2013, the primary risk identified was that of APPGs being confused with select committees. This is still a potential risk. Media reports rarely draw a clear distinction between an APPG and a select committee, thereby incorrectly suggesting that an APPG report carries the full authority of a select committee report—and therefore of Parliament. It is, however, difficult to see how changes to the APPG rules would alter media reporting. We are nonetheless interested in hearing further views on this issue.

24. However, the primary risk today is of improper access and influence by paid lobbyists and commercial entities or by hostile state actors. The first of these risks was identified in 2013, but the increased transparency then introduced has not mitigated the risk in the way that was hoped for at the time. The second of these we take to be a risk which has only developed in recent years. We have been persuaded by the evidence of Mr Speaker and others that this is a very real risk, which needs addressing with some urgency.

Access by paid lobbyists and commercial entities

25. Lobbying is, in general, a public good. It is important that the interests of different sectors, organisations, and communities are brought to the attention of policymakers. As we explain above, APPGs are one way in which wider society can engage with Members and by which representations can be made to Ministers and the wider House. However, it is important that the structures for engaging with wider society do not systematically advantage paid external interests or those with greater financial means. The House has rules on lobbying, for example, which are designed to ensure that a Member does not engage in paid advocacy and that policy cannot be set or influenced by an organisation making payments or providing a reward to a Member. The same reasoning should carry across to APPGs: external interests should not gain an advantage in access or influence by financially supporting APPGs.

26. APPGs receive no staff or financial support from the House, nor do Members receive additional support from IPSA to run APPGs. Taking on the running of an APPG or setting one up can therefore put significant pressure on Members and their staff, especially if the APPG has ambitious plans. Often these ambitions require far greater resources than Members' offices are able to provide, which is why so many APPGs have looked for outside support. The danger is that the need for additional, and therefore external, resources creates a risk of improper influence or access being brought to bear on Parliament.

27. The Committee on Standards in Public Life explained the risk of APPGs 'institutionalising' paid lobbying within Parliament, with the effect that better resourced APPGs would dominate policy debate:

The use of third-party organisations to fund and staff APPGs also raises issues about equality of access. Lobbying, in general, is beneficial to a democracy. MPs should be able to draw on the expertise and advice of representative groups and third sector organisations with specialisms in certain policy areas. However, problems arise when access to parliamentarians is determined by financial resources, privileging some interest groups at the expense of others. The concern regarding third party involvement in the running of APPGs is that better funded and better staffed APPGs will be able to dominate policy debate, excluding others who may not have the luxury of private sector resources. Involvement in APPGs must not operate on a 'pay to play' basis, where those who provide financial and/or secretarial support gain privileged access at the exclusion of others.¹²

28. The Speaker told us in private oral evidence about his concerns that APPGs are being abused by lobbyists by gaining sponsors for a Group and then arranging for those sponsorship funds to be used to pay them to act as the secretariat.¹³

29. OpenDemocracy estimated that that APPGs have received around £25 million worth of benefits from outside bodies since 2018, of which more than half is provided by private sector organisations.¹⁴ Transparency International also drew our attention to statements on APPGs' websites that appear to offer access to benefits for sponsors of APPGs, such as networking events and opportunities to brief members of the APPG.¹⁵

30. During this inquiry, we have also received a number of complaints from members of the public, alleging conflicts of interest on the part of funders of or secretariats to an APPG. The Parliamentary Commissioner for Standards is unable to accept such complaints for investigation because there is no rule against conflicts of interest for APPGs. For the most part we have not accepted these complaints as formal evidence or published them, as we are not empowered to conduct investigations into individual APPGs and our inquiry has dealt with general issues rather than arbitrating on alleged misconduct by specified APPGs. However, such complaints indicate to us a level of public concern that APPGs are being used as a route of access by lobbyists.

12 APG0024 (Committee on Standards in Public Life)

13 Unpublished oral evidence

14 <https://www.opendemocracy.net/en/dark-money-investigations/appgs-all-party-parliamentary-groups-lobbying-mps-private-firms-millions/>

15 APG0041 (Transparency International)

31. The use of, and reliance upon, external secretariats by a number of APPGs also gives rise to the risk of “secretariat-led” APPGs, that is, Groups which are driven primarily by the secretariat rather than the Group Officers.

32. Mr Speaker gave us an example he had come across where the initiative in setting up the APPG had clearly come from outside the House, and added:

MPs should be setting the agenda rather than some private company or some lobbying company that is representing an industry. That is what we have created: lobbyists actually setting up APPGs rather than MPs.¹⁶

33. Mr Speaker and the Lord Speaker suggested that outside bodies should be prohibited from providing, directly or indirectly, secretariat services and that consideration should be given to a ban on APPG funding from specific sources, including state actors.

34. APPGs can be used as part of a lobbying or campaign strategy to amplify the message of an external organisation. Representatives of the Public Relations and Communications Association (PRCA) and the Chartered Institute of Public Relations (CIPR) told us in oral evidence that they did not believe that APPGs were widely used in this way by public affairs firms. Jon Gerlis told us:

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.¹⁷

Liam Herbert said, however, that:

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.¹⁸

35. We also note that there is a small but significant number of ‘single body’ APPGs, where the subject of the APPG also provides the secretariat. Channel 4, who provide the secretariat for the APPG on Channel 4, told us in written evidence:

Channel 4 work in close collaboration with the office of the Chair of our APPG [...]. What we use APPG meetings for is also decided through a collaborative process with our Chair, Vice Chairs, wider membership and Channel 4. So, whilst Channel 4 facilitate the secretariat for the APPG it is “led” by Parliamentarians.¹⁹

16 Q13 (unpublished oral evidence)

17 Q60

18 Q59

19 APG0043 (Channel 4)

It is hard, however, to see how there could not be a conflict of interest for the secretariat in such cases. In any event, there are no structures in place to ensure that such groups are genuinely led by Members rather than by the secretariat and the body in question.

36. We recognise that it is difficult to frame enforceable rules to ensure that Members, not external interests, are setting the agenda and determining the output of an APPG. A clearer statement of chairs' responsibilities may go some way to reminding Members that they bear ultimate responsibility for the activities of an APPG and its compliance with the rules. In practice, however, we cannot see a viable alternative to placing some limits on secretariats and their activities in order to ensure that Groups are run by Members, rather than externally. We outline possible options to do so in chapter 3.

37. Lobbying is an important part of a healthy democracy. It is crucial that the interests of different sectors, organisations, and communities can be brought to the attention of Members and Ministers. All-Party Parliamentary Groups provide a significant benefit to the House by providing a forum where matters of policy can be discussed and a vehicle for making representations to Ministers and the wider House.

38. It should not be the case, however, that those with greater financial means should enjoy a greater advantage in lobbying Members and Ministers, or that those without financial means should be excluded. All-Party Parliamentary Groups must not be a vehicle by which paid external interests can achieve a level of access and influence not available to others. There are few, if any, safeguards in place to ensure that APPGs are genuinely Member-led and are not simply used by external bodies as way to amplify their own message with the added advantage of an informal parliamentary imprimatur. The danger is that an APPG could all too easily become a parliamentary front for an external commercial entity. That would be wholly inappropriate. We therefore believe some limits must now be placed on secretariat services to APPGs.

39. We also advise that Members who set up, chair or play a role in an APPG should be extremely vigilant that the APPG's agenda, funding and activities do not bring the House into disrepute; are genuinely led by Members rather than any external organisation or individual; and do not provide an inappropriate or unequal degree of influence to any one organisation, individual or set of organisations.

Access by hostile state actors

40. APPGs also pose a risk of access and improper influence by hostile state actors. The recent case of Christine Lee, who was the subject of a Security Service Interference Alert as a covert actor promoting the interests of the Chinese Communist Party, and her involvement with the Chinese in Britain APPG, has brought these issues to the fore.²⁰

41. Alison Giles, Director of Security for Parliament, told us that Ms Lee's close involvement with an APPG and its Chair created the conditions for improper influence in Parliament:

As far as the Chinese in Britain APPG is concerned, Lee was instrumental in setting it up. She attended meetings of that group and would have

20 The Alert itself was not published externally by the House or the Security Services, but was widely reported in the media, for example: <https://www.bbc.co.uk/news/uk-politics-59984380>

participated in discussions. As you are aware from news coverage, she funded the parliamentary staff of the chair of that group, to the tune of approximately half a million pounds over a period of years. The conditions for influence certainly existed [Redacted]. In 2013, there was the one occasion when she directly funded the APPG, and she paid for the then chair to go on an all-expenses-paid trip to China for four days.²¹

42. We heard that it is difficult to address the risk of improper access or influence of hostile state actors purely through straightforward transparency measures alone, since the state actor will tend to be at arms-length. Alison Giles told us:

My impression is that current disclosure obligations are relatively superficial. Perhaps comparable to the disclosure of Members' interests, it does not really get beyond the top layer. Given how I described how foreign entities tend to operate now, that does not get to the risk, which is at one or two removes from the front person operating. Given how easy it is to set up shell companies and to obfuscate funding sources, I do not think that that goes far enough.²²

43. As we identified above, an APPG which has ambitious aims and wishes to run a substantial programme of activity will often seek funding and support from outside Parliament. Alison Giles told us that this makes APPGs an attractive avenue for access or influence by foreign governments:

APPGs are particularly attractive routes of access to parliamentarians. I do not think that their lack of official standing actually detracts from their attractiveness. The fact that they are relatively unregulated and, crucially, dependent on outside interests for funding and support makes them very easy to engage with. Many APPGs will be actively looking for the kind of support that foreign entities and Governments would be only too pleased to provide—a secretariat that might influence the agenda, funding for foreign visits, guest speakers and so on. That [Redacted] is what an intelligence officer would view as both an attractive and accessible target.²³

44. Transparency International told us that the majority of country groups supported by an external secretariat explicitly undertake lobbying or provide 'networking opportunities', although we appreciate that civil society groups or think tanks will not necessarily be promoting the interests of the country in question:

There are 36 APPG country groups which have an external 'Public Enquiry Point', 'Secretariat' or funder of which 23 are a civil society/campaign group or think tank, six are a country group funded by private business, five are unknown and two are sponsored by a foreign government. Of the 36 APPG groups, 21 either explicitly state they undertake lobbying of parliamentarians on their registered website or they state they provide

21 Q1
22 Q2
23 Q1

networking opportunities with ‘decision makers’. There are also four APPGs which have a registered lobbyist or a public affairs consultant as their registered secretariat or public enquiry point.²⁴

45. We appreciate that Members wish, rightly, to engage with governments, regions, and indeed other parliaments, across the world. However, Mr Speaker told us in private oral evidence that indiscriminate engagement with state actors who were hostile to UK interests did not take adequate account of the potential security risks to Parliament:

I worry that we are not joining up our security and the threats that we have. These people are not our friends. Some are our friends, but they have intentions and objectives, which worries me. If we are not careful, the security implication for the opening up of Parliament is very, very worrying.²⁵

46. Alison Giles warned us that no system of regulation could, or should, replace the responsibility of Members to undertake their own due diligence about who is offering a benefit and whether it is right to accept it:

I think who regulates is really difficult, because if we are not careful, we will devise a system that absolves the individual Member of accountability. If I go back to the recent interference alert, certainly the message that Mr Speaker put in his covering note was a reminder to Members of their own responsibility for due diligence in accepting funding.²⁶

47. Some APPGs have had visits, including flights, accommodation, meals and entertainment provided by foreign governments. Members are required to register such visits and declare them if they participate in any relevant debate. Such visits also preclude them from initiating proceedings that would bring a benefit to the foreign government. However, it is difficult to avoid the imputation that foreign governments are attempting thereby to buy a good opinion, or at least a better understanding, of their country or their government. Some international legislatures expressly forbid their elected representatives from accepting such hospitality.

48. In our view, there is no substitute for Members undertaking their own due diligence as to the source of a benefit, assessing why they are being offered it, and carefully judging if it is right to accept it. This is particularly true of benefits which are offered, or appear to be offered, by foreign governments. The House authorities should, however, provide more significant support to enable Members to exercise that responsibility. This should, at the very least, include a single point of contact to whom Members can turn, and whose advice Members can rely on when in doubt.

49. Alison Giles acknowledged to us the historic reluctance to undertake closer regulation of APPGs, but suggested that the risks involved in doing so needed to be weighed against the security and reputational risks to the House:

24 APG0041 (Transparency International)

25 Q15 (unpublished oral evidence)

26 Q10

I understand from reading previous reports of this Committee and its predecessors that there has long been a concern that the very act of regulating and providing support to APPGs risks conferring on them some kind of formal or quasi-formal status as a parliamentary body.

That is clearly a risk, but it might be time to weigh that one risk against that of the vulnerability to foreign influence [...] [I]s Parliament prepared to accept the reputational risk, or is it satisfied that it can maintain sufficient distance from the activities of APPGs to be able to manage that risk.²⁷

50. The expert evidence we have received to our inquiry shows that the risk of improper access and influence by hostile foreign actors through APPGs is real, though difficult to measure. There is also evidence that this risk has already materialised.

Conclusion

51. There has been a dramatic increase in the number of APPGs in recent years. This has made it more difficult to monitor groups' adherence to the House's rules, and created the conditions for inappropriate influence and access. There appears to be the real possibility of APPGs having been set up at the suggestion of, and as a result of lobbying by, a commercial interest. We are concerned that if left unchecked, APPGs could represent the next great parliamentary scandal, with commercial entities effectively buying access to and influence of parliamentarians and decision-makers.

52. Registered APPGs gain the primary benefit of an association with Parliament. Whilst APPGs remain informal bodies, the use of the APPG title and the APPG Portcullis are highly valued and signal a clear link to the House. This gives the House both a right and responsibility to ensure that APPGs continue to enhance, rather than undermine, the reputation of Parliament. In the light of the risks we have identified, we believe significant steps are now required to protect the integrity and reputation of Parliament.

3 Possible reforms

53. What follows in this chapter are not firm recommendations but possible options for reform intended for consultation.

54. We propose that four broad approaches are needed to address the current risks posed by APPGs.

55. First, there is a need to reduce the number of APPGs. There is currently a very large number of Groups: 744. That is more than the number of MPs—and the number has grown significantly in the last few years. The sheer quantity of Groups makes it more likely that an individual APPG may be subject to improper access and influence, and makes it more difficult to monitor compliance in any meaningful way. Our predecessor Committee considered it was not appropriate directly to aim at reducing the number of APPGs.²⁸ We no longer believe this to be the case. Mr Speaker told us that, whilst he could not wish to comment on which APPGs should exist, he considered there was a risk of duplication and that the current numbers of APPGs were too high.²⁹

Alison Giles also told us that reducing the number of APPGs would be a significant step in addressing the security risks posed:

I think you can reduce the surface area and reduce your vulnerability, which is the first thing you always try and do.³⁰

56. Second, there is a need further to enhance transparency, particularly over the eventual funding sources of APPGs and the provision of external secretariats. Third, we believe that limits should now be placed on secretariats, for example, setting conditions on who is permitted to provide a secretariat, to reduce the risk of improper access. Lastly, steps should be taken to increase regulatory enforcement.

57. We consider that measures within each of these four broad approaches are required. We are not formally proposing to the House to introduce all the measures listed below—indeed, some proposals are mutually exclusive—but we have set out an extensive list to give the House an indication of the breadth and significance of the measures we believe are required.

58. Possible measures to reduce the numbers of APPGs include:

- a) Increased quorum requirements at AGMs. This is currently set at just five members of either House, but it could be increased to twelve or fifteen members of either House to ensure that all groups have and retain a broad base of Member support from year to year and are not just the personal hobbyhorse of an individual Member;
- b) Measures to ensure that AGMs are compliant with the rules. Mr Speaker has suggested that members of the Panel of Chairs should chair all APPG AGMs.
- c) Limiting the number of APPGs one Member can chair, for instance to six or ten.

28 Committee on Standards, [All-Party Parliamentary Groups](#), Sixth Report of 2013–14 (HC 357), para 38

29 Unpublished oral evidence

30 Q19

- d) Increased cross-party officer requirements (currently, APPGs require at least four officers, but only one officer from the Government and one officer from the Opposition);
- e) Introducing a “gatekeeper” to approve the setting up of new APPGs. Mr Speaker has suggested that this could be the Chairman of Ways and Means, or a committee similar to the Committee on Standards. The gatekeeper would apply set criteria including avoidance of overlap, cross-party support, a statement of purpose, and a statement of how it will be member led and avoiding undue influence by an external organisation; and
- f) A phased re-application process. This would involve existing APPGs reapplying to the gatekeeper, perhaps every second or third year and being assessed according to the same criteria.

59. Possible measures to enhance transparency include:

- a) Requiring all external secretariat support, regardless of value, to be registered;
- b) Reducing or abolishing the £1,500 threshold for registration of benefits or benefits in kind;
- c) The ultimate funder of an APPG secretariat should be registered: for example, whether this is paid for from the APPG’s own funds; and where an organisation providing or funding a secretariat receives outside support itself, where this comes from (rather than this information being provided on request, as currently required);³¹
- d) All APPGs should produce a centrally-published annual income and expenditure statement, regardless of income level, and even if this is a nil return;
- e) APPGs should be required to register whether a foreign government or organisation closely associated with it is the eventual funder of any benefit or benefit in kind (and if so which government or organisation), and conduct due diligence to this effect; and
- f) Making clear in the Guide to the Rules on APPGs that Members should declare any relevant interests when taking part in a formal meeting of an APPG.

60. Possible limitations on secretariat activities and funding might include:

- a) Banning all external secretariats, whether they are provided by commercial entities, charities or NGOs;
- b) Banning public affairs firms (ie multi-client lobbyists) from providing a secretariat;
- c) Banning secretariats funded or provided by foreign governments;
- d) Barring MPs from accepting, whether through an APPG or otherwise, any overseas trips paid for by a foreign government;

- e) Providing that external secretariats may only be supplied by registered charities;
 - f) Requiring external secretariats to have a contract with the APPG;
 - g) Placing a cap on benefits, or benefits in kind, that an APPG may accept;
 - h) Providing support for country groups by the House or by the CPA/IPU;
 - i) Removing the provision for APPGs to have external “members”; and
 - j) Prohibiting external secretariats from holding funds on behalf of the APPG.
61. Lastly, we suggest possible reforms to improve regulatory enforcement:
- a) Creating different categories of groups which have different levels of transparency requirements and oversight, depending upon whether groups receive external support or benefits;
 - b) Creating a more extensive and rigorous statement of an APPG chair’s responsibilities, with the introduction of an annual return confirming that the chair has acted in line with these; and
 - c) Joint and several liability for chairs and vice chairs for compliance with the rules, to encourage more careful governance shared between Members.

62. We are not recommending to the House that all the measures listed above should be introduced. We intend them as a set of options for consultation. We believe, however, that significant changes should be made in response to the risks that have been identified during our inquiry. We now invite comments from across the House and the House of Lords, and particularly from Members closely involved in APPGs, on the possible measures and the desirability or otherwise and practical implications of their implementation.

Conclusions and recommendations

Regulating APPGs

1. Lobbying is an important part of a healthy democracy. It is crucial that the interests of different sectors, organisations, and communities can be brought to the attention of Members and Ministers. All-Party Parliamentary Groups provide a significant benefit to the House by providing a forum where matters of policy can be discussed and a vehicle for making representations to Ministers and the wider House. (Paragraph 37)
2. It should not be the case, however, that those with greater financial means should enjoy a greater advantage in lobbying Members and Ministers, or that those without financial means should be excluded. All-Party Parliamentary Groups must not be a vehicle by which paid external interests can achieve a level of access and influence not available to others. There are few, if any, safeguards in place to ensure that APPGs are genuinely Member-led and are not simply used by external bodies as way to amplify their own message with the added advantage of an informal parliamentary imprimatur. The danger is that an APPG could all too easily become a parliamentary front for an external commercial entity. That would be wholly inappropriate. We therefore believe some limits must now be placed on secretariat services to APPGs. (Paragraph 38)
3. We also advise that Members who set up, chair or play a role in an APPG should be extremely vigilant that the APPG's agenda, funding and activities do not bring the House into disrepute; are genuinely led by Members rather than any external organisation or individual; and do not provide an inappropriate or unequal degree of influence to any one organisation, individual or set of organisations. (Paragraph 39)
4. In our view, there is no substitute for Members undertaking their own due diligence as to the source of a benefit, assessing why they are being offered it, and carefully judging if it is right to accept it. This is particularly true of benefits which are offered, or appear to be offered, by foreign governments. The House authorities should, however, provide more significant support to enable Members to exercise that responsibility. This should, at the very least, include a single point of contact to whom Members can turn, and whose advice Members can rely on when in doubt. (Paragraph 48)
5. The expert evidence we have received to our inquiry shows that the risk of improper access and influence by hostile foreign actors through APPGs is real, though difficult to measure. There is also evidence that this risk has already materialised. (Paragraph 50)
6. There has been a dramatic increase in the number of APPGs in recent years. This has made it more difficult to monitor groups' adherence to the House's rules, and created the conditions for inappropriate influence and access. There appears to be the real possibility of APPGs having been set up at the suggestion of, and as a result of lobbying by, a commercial interest. We are concerned that if left unchecked,

APPGs could represent the next great parliamentary scandal, with commercial entities effectively buying access to and influence of parliamentarians and decision-makers. (Paragraph 51)

7. Registered APPGs gain the primary benefit of an association with Parliament. Whilst APPGs remain informal bodies, the use of the APPG title and the APPG Portcullis are highly valued and signal a clear link to the House. This gives the House both a right and responsibility to ensure that APPGs continue to enhance, rather than undermine, the reputation of Parliament. In the light of the risks we have identified, we believe significant steps are now required to protect the integrity and reputation of Parliament. (Paragraph 52)

Possible reforms

8. We are not recommending to the House that all the measures listed above should be introduced. We intend them as a set of options for consultation. We believe, however, that significant changes should be made in response to the risks that have been identified during our inquiry. We now invite comments from across the House and the House of Lords, and particularly from Members closely involved in APPGs, on the possible measures and the desirability or otherwise and practical implications of their implementation. (Paragraph 62)

Annex: APPG statistics

Table 1: Number of APPGs

Year	Publication Date	Groups
2022	9 February	755
2021	27 February	696
2020	24 February	355 ³²
2019	19 January	692
2018	31 January	614
2017	6 January	601
2016	3 February	555
2015	30 July	580

Source: <Source>

Table 2: Number of APPGs chaired by individual Members (as at March 2022)³³

Number of members	Number of APPGs chaired by an individual Member
137	1
92	2
40	3
27	4
16	5
6	6
4	7
1	8
1	9
1	10
1	11
1	12
1	13
1 [24 groups]	14+

³² The 2019 General Election meant that Groups needed to re-register, and not all had re-registered by February 2020.

³³ Figures will not necessarily match published editions of the Register because APPGs are added to and removed from the Register between published editions.

Formal minutes

Tuesday 26 April 2022

Members present:

Chris Bryant, in the Chair

Tammy Banks

Andy Carter

Alberto Costa

Rita Dexter

Yvonne Fovargue

Sir Bernard Jenkin

Dr Michael Maguire

Mehmuda Mian

Dr Arun Midha

Paul Thorogood

Draft report (All-Party Parliamentary Groups: improving governance and regulation), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 62 read and agreed to.

Annex agreed to.

Resolved, That the Report be the Seventh Report of the Committee to the House.

None of the lay members present wished to submit an opinion on the Report (Standing Order No. 149(8)).

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

Adjournment

The Committee adjourned.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

Tuesday 14 September 2021

Ms Alex Runswick, Senior Advocacy Manager, Transparency International UK; **Harriett Baldwin MP**, Chair, British Group Interparliamentary Union [Q1–33](#)

Harry Rich, Registrar, Registrar of Consultant Lobbyists [Q34–50](#)

Liam Herbert, Chair (Public Affairs), Public Relations and Communications Association; **Mr Jon Gerlis**, Public Relations and Policy Manager, Chartered Institute of Public Relations [Q51–115](#)

Tuesday 11 January 2022

Suzie Tucker, Head of Strategy and Communications, National Museum Directors' Council; **Miss Marisa Heath**, Secretariat, APPG on Animal Welfare; **Danny Stone MBE**, Chief Executive, Antisemitism Policy Trust; **Natascha Engel**, Chief Executive, Policy Connect [Q106–174](#)

Monday 7 March 2022

Rt Hon Sir Lindsay Hoyle MP, Speaker of the House of Commons; **Rt Hon Lord McFall of Alcluith**, Lord Speaker

Published written evidence

The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

APG numbers are generated by the evidence processing system and so may not be complete.

- 1 All-Party Parliamentary Group on Heritage Rail ([APG0013](#))
- 2 Antisemitism Policy Trust ([APG0037](#))
- 3 Baroness Goudie ([APG0003](#))
- 4 Baroness Hodgson of Abinger ([APG0028](#))
- 5 Best for Britain ([APG0009](#))
- 6 Brake, Mr Tom (Director, Unlock Democracy) ([APG0036](#))
- 7 Brehany, Mr Frank (Independent Consumer Campaigner & Media Commentator ([APG0011](#)))
- 8 British Group Inter-Parliamentary Union ([APG0019](#))
- 9 CO-Gas Safety, The Carbon Monoxide & Gas Safety Society ([APG0029](#))
- 10 Chartered Institute of Public Relations (CIPR) (supplementary written evidence) ([APG0038](#))
- 11 Chartered Institute of Public Relations (CIPR) ([APG0022](#))
- 12 Chartered Institute of Public Relations (CIPR) (supplementary written evidence) ([APG0039](#))
- 13 Committee on Standards in Public Life ([APG0024](#))
- 14 Dalit Solidarity International and a range of other Dalit support organisations; and APPG for Dalits ([APG0027](#))
- 15 Damian Green ([APG0040](#))
- 16 Earl Attlee ([APG0004](#))
- 17 Heath, Miss Marisa (Secretariat, APPG Animal Welfare); and Officers of the Group ([APG0015](#))
- 18 Darren Jones MP, Baroness Neville-Rolfe and Rt Hon Lord McNally ([APG0025](#))
- 19 King, Ronnie ([APG0034](#))
- 20 Kirkpatrick, Stewart (Head Of Impact, openDemocracy) ([APG0044](#))
- 21 Lord Berkeley ([APG0020](#))
- 22 Lord Cormack ([APG0030](#))
- 23 Lord Griffiths ([APG0001](#))
- 24 Lord Hannay and Sir Peter Bottomley MP ([APG0007](#))
- 25 Lord Haselhurst ([APG0008](#))
- 26 Lord Hodgson ([APG0002](#))
- 27 Lord Lipsey ([APG0005](#))
- 28 Lord Tebbit ([APG0006](#))
- 29 Lynch, Stephen (Public Affairs Manager and secretariat for Channel 4 All Party Parliamentary Group, Channel 4) ([APG0043](#))

- 30 Mr Kevin Hollinrake MP ([APG0018](#))
- 31 Name withheld ([APG0042](#))
- 32 Policy Connect ([APG0014](#))
- 33 Public Relations and Communications Association ([APG0017](#))
- 34 RSPCA ([APG0012](#))
- 35 Registrar of Consultant Lobbyists ([APG0033](#))
- 36 Reynard, Miss Bethany (Public Affairs Officer, National Museum Directors' Council) ([APG0031](#))
- 37 Rickard, Miss Emily (PhD Researcher, University of Bath) ([APG0026](#))
- 38 Sir David Amess ([APG0035](#))
- 39 Transparency International UK ([APG0041](#))
- 40 Transparency International UK ([APG0023](#))

List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the publications page of the Committee's website.

Session 2021–22

Number	Title	Reference
1st	Boris Johnson	HC 549
2nd	Mrs Natalie Elphicke, Sir Roger Gale, Adam Holloway, Bob Stewart, Theresa Villiers	HC 582
3rd	Mr Owen Paterson	HC 797
4th	Review of the Code of Conduct: proposals for consultation	HC 270
5th	Daniel Kawczynski	HC 1036
6th	Review of fairness and natural justice in the House's standards system	HC 1183

Session 2019–21

Number	Title	Reference
1st	Kate Osamor	HC 210
2nd	Stephen Pound	HC 209
3rd	Greg Hands	HC 211
4th	Conor Burns	HC 212
5th	Mr Marcus Fysh	HC 213
6th	Confidentiality in the House's standards system	HC 474
7th	Sanctions in respect of the conduct of Members	HC 241
8th	David Morris	HC 771
9th	Dr Rosena Allin-Khan	HC 904
10th	The House of Commons and the criminal law: protocols between the police and the Parliamentary Commissioner for Standards and the Committee on Standards	HC 883
11th	ICGS investigations: Commons-Lords agreement	HC 988
12th	Sanctions and confidentiality in the House's standards system: revised proposals	HC 1340