



**LORD PRESIDENT OF THE COUNCIL
LEADER OF THE HOUSE OF COMMONS
THE RT HON MARK SPENCER MP**



Chris Bryant MP
Chair, Committee on Standards
House of Commons
London
SW1A 2HQ

Our Ref: MS/NMP2658
5 September 2022

Dear Chris,

I am writing to thank you and the Committee for the important report you have recently produced - All-Party Parliamentary Groups: improving governance and regulation.

The Government welcomes this timely and thoughtful initial report. APPGs are valuable conduits for widening the voices heard in Parliament but the Government agrees that their informal structures make them potentially vulnerable to improper influence and access. It is welcome that the Committee is reviewing their functioning and regulation, and that the House will consider proposals to ensure that APPGs are protected from improper influence, including that of hostile state actors.

While it is a matter for the House how APPGs are regulated, the Government particularly welcomes proposals that would enhance transparency around external funding and increase clarity of whose interests are being represented.

To address the concerns around the number of APPGs and monitoring compliance with the rules, the Government thinks that the priority should be those reforms which would ensure greater compliance with the rules rather than those concerned with quorum requirements or the number of APPGs one member can chair. The Government is not opposed to these recommendations but instead recognises that this is a question for the House to consider to ensure the right balance is struck between ensuring APPGs command cross-party interest and also cover a range of issues.

In particular, the Government would welcome the Committee further considering Mr Speaker's suggestion that a "gatekeeper" be introduced to approve the setting up of

APPGs. This reform could have the potential to prompt members to reflect on whether an APPG commands cross-party support and interest and also greater member-led involvement and accountability. As to Mr Speaker's suggestion there could be a role for Members of the Panel of Chairs in chairing all APPG AGMs, we think that this would need careful thought given the burden it could place on Members given the number of APPGs.

In relation to the proposed restrictions on APPG funding from foreign governments, the Government thinks that this is a welcome proposal which warrants further consideration. This change would serve to bring the rules on APPG funding more in line with comparable provisions in electoral law that preclude foreign companies and individuals making party political donations. The proposed reform would serve to remove the possibility of direct foreign government funding and influence in the work of these informal parliamentary groups but would not preclude foreign companies from funding and providing secretariat services to APPGs so long as they were properly registered. The Government thinks that the 'permissible donor' criteria (as set out in the Political Parties, Elections and Referendums Act 2000) should be applied to both foreign governments and organisations. This reform would be compatible with the Committee's recommendation that APPGs must declare their ultimate funder. Declaration of the ultimate funder would ensure that APPGs are not a backdoor to indirect foreign influence by closing the loophole that funding could be provided via an organisation that is a 'permissible donor'.

In relation to the proposed bar on 'overseas trips paid for by a foreign government', we are not persuaded of the necessity of this proposal which would go beyond the relevant comparable provisions in electoral law. It is already the case that there are clear transparency requirements set out in the MPs Code of Conduct that 'Gifts and benefits from sources outside the UK' received by an APPG or an individual MP must be declared in the Register of Interests. The Government believes that these provisions ensure transparency and the introduction of further limits would serve to impede Members' abilities to perform their parliamentary role and form links outside of the UK.

The Government also agrees with the Committee that there is value in seeking an approach that mitigates the risks but also preserves the benefits of informal APPGs which allow parliamentarians to collaborate and engage with external members. Therefore, the Government is concerned that measures to remove regular external

interaction - such as banning all external secretariats and removing the provision for external members - would deprive many APPGs of valuable external insight and even hinder their capacity to function. As the Committee itself observed, the introduction of a disproportionate regulatory regime which fundamentally changed the nature of APPGs could offer an incentive for some APPGs to de-register. It is important to consider carefully whether enhanced transparency measures might adequately mitigate the risks identified by the Committee and the practical impact of these specific recommendations on the diversity and particular value of APPGs.

I concur wholeheartedly with the emphasis placed on Members exercising their own judgement and agree entirely that “there is no substitute for Members undertaking their own due diligence” and “carefully judging if it is right to accept it”. It is the responsibility of all Members of APPGs to ensure that they uphold the highest standards. The Government would welcome the Committee considering whether, as it has recommended in the context of the MPs Code of Conduct, a “safe harbour” provision could be introduced to provide additional support to APPG Chairs and formalise the nature of advice that Members can receive in relation to their responsibilities under the Rules.

Let me conclude by offering my thanks for this valuable and necessary report. The Government shares your interest in protecting the transparency and processes of Parliament and safeguarding its reputation. I stand ready to support your work and would welcome the opportunity to discuss further your proposals as you develop them.

A handwritten signature in black ink that reads "Mark Spencer". The signature is written in a cursive, slightly slanted style. There is a small dot at the end of the signature, possibly indicating the end of a sentence or a flourish.