

## Written evidence submitted by UK Anti-Corruption Coalition

**Introduction**

1. The UK Anti-Corruption Coalition (UKACC) is a non-partisan alliance of anti-corruption organisations dedicated to reducing corruption in the UK and its role in facilitating it abroad. Our vision is for the UK to become a leader in integrity, reducing domestic corruption, and curbing its role in facilitating corruption internationally. Our coalition consists of experts in various sectors across this policy space, including on procurement, illicit finance, sanctions, political integrity, the environment, the courts, and the press. We regularly input to policy processes through letters, briefings, joint statements, and submissions to inquiries and consultations.

**Standards**

2. Recently, the integrity of politicians has been called into question. Parliamentary Questions have been tabled on behalf of corrupt and oppressive regimes and MPs have promoted themselves to fictitious companies in exchange for payment.<sup>1</sup> These events have contributed to worryingly low levels of public trust in politics.<sup>2</sup> Our Coalition would like to emphasise the importance of the Committee's strategic aim to drive up standards, and why this presents a crucial opportunity to reform the rules on parliamentary standards and behaviour.

**Second Jobs**

3. The Government has recently removed some exemptions, including the exemption that allowed MPs to provide advice on current affairs and the exemption which permitted general advice about how parliament works. This is welcome, but the rules still allow room for inadvertent or deliberate poor behaviour from parliamentarians.
4. Allowing MPs to take up second jobs outside the boundaries of simply maintaining their professional qualifications leaves them open to corruption-risk. Consultancy roles or non-executive director roles are still permitted. In a recent case where a former MP was found in breach of lobbying rules, he was undertaking consultancy roles for private companies.<sup>3</sup> As was the case at the time of the investigation – and is the case now - his

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<sup>1</sup> <https://www.opendemocracy.net/en/opendemocracyuk/bob-blackman-azerbaijan-lobbying-javanshir-feyziyev/>

<sup>2</sup> <https://natcen.ac.uk/news/trust-and-confidence-britains-system-government-record-low>

<sup>3</sup> <https://committees.parliament.uk/committee/290/committee-on-standards/news/158246/committee-on-standards-publish-report-on-the-conduct-of-rt-hon-owen-paterson-mp/>

activities advocating on behalf of the private companies are banned, but roles like these leave MPs vulnerable to performing lobbying tasks.

5. A simple solution could be to ban 'consultancy' roles, but the rules cannot specify every job title that an MP can and cannot take and it would be impractical and likely become unworkable. **To protect MPs from slipping into - or knowingly undertaking - lobbying activities, all second jobs should be prohibited except those that maintain a professional qualification, are political activities, or provide an essential public service, such as army reservists.**

### Gifts and Hospitality

6. Events since the election have highlighted the public's concern over gift-giving in Westminster. It is welcome that in response to media attention, reforms were introduced in this area. However, they only focused on the rules for ministers, not MPs.
7. The Ministerial Code of Conduct states that ministers should not accept gifts and hospitality that would place the minister 'under any obligation' or 'might reasonably be seen to compromise their judgement'. We believe these are reasonable rules. On the other hand, parliamentarians are required to follow the general principle of 'integrity', included in the code, but there is no explicit rule or guideline on the acceptance of gifts and hospitality except that they must be declared if above £300.
8. The rules for parliamentarians should be updated. **A clause should be added to the Commons' code of conduct reminding parliamentarians to treat offers of generous gifts and hospitality with caution. The Committee should consider aligning the Commons rules with the ethical rules for ministers, and members of the Senedd and Holyrood, which prohibit accepting benefits that appear to influence or potentially influence their activities.**
9. Further, recent media stories have demonstrated that there is a case to **reduce the reporting threshold for gifts**. MPs have boasted about accepting tickets and other hospitality just below the reporting threshold thereby allowing them to avoid the transparency requirements.<sup>4</sup> The reporting threshold for ministers is already the lower amount of £140.

### Overseas Trips

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<sup>4</sup> <https://www.independent.co.uk/news/uk/mps-labour-tory-party-rishi-sunak-lucy-powell-b2315664.html>

10. There should be tighter controls on who can fund parliamentarians' overseas visits, as is the case for political donations. Trips sponsored either directly or indirectly by corrupt and repressive regimes presents the perception – or reality - that parliamentarians' judgement and actions are influenced by the intent of their hosts. New research from Transparency International UK found that MPs have accepted over £4.5 million worth of visits abroad funded by foreign governments, parliaments and regime-linked groups since 2001.<sup>5</sup> This includes:

- over £460,000 worth of visits to Qatar funded by its government and embassy
- over £400,000 worth of trips to Saudi Arabia, paid for by the country's government and embassy
- over £200,000 worth of visits to Bahrain, funded by the country's' government and embassy
- over £140,000 worth of visits to Azerbaijan funded by its government, parliament, and regime-linked groups.

11. Other comparable democracies have explicit rules in this space. The United States does not allow foreign governments to fund US federal employees, including Members of Congress, to travel outside the country unless there is a Mutual Educational and Cultural Exchange Act agreement with the foreign government in place. The US Department of State approves these agreements upon application by the foreign government.<sup>6</sup>

**12. To address the loophole that allows foreign governments to donate to political parties through gifts of foreign travel, the Committee should reform the rules on overseas trips. As the current threshold for permissibility checks of donations is £500, checks which identify foreign influence, we propose following a similar logic and prohibiting foreign paid travel above £500.**

#### Updating sanctions for breaches

13. There should be clear and credible deterrents for serious breaches of the code of conduct but the sanctioning process should also be proportionate and fair. Under the current system, to predict how a breach of the parliamentary code of conduct might be investigated and sanctioned, a member of the public or an MP would have to examine every case the Standards Commissioner has investigated and make assumptions based on the findings in these cases. This is impractical and imprecise.

14. We support a recommendation from the Standards Committee to introduce greater consistency in imposing sanctions.<sup>7</sup> In particular, the publication and standardisation of

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<sup>5</sup> <https://www.transparency.org.uk/publications/cheques-and-balances-countering-influence-big-money-uk-politics>

<sup>6</sup> [https://ethics.house.gov/house-ethics-manual/travel#\\_Travel\\_Paid\\_for\\_1](https://ethics.house.gov/house-ethics-manual/travel#_Travel_Paid_for_1)

<sup>7</sup> [https://publications.parliament.uk/pa/cm5801/cmselect/cmstandards/241/24103.htm#\\_idTextAnchor000](https://publications.parliament.uk/pa/cm5801/cmselect/cmstandards/241/24103.htm#_idTextAnchor000)

what constitutes a ‘mitigating’ or ‘aggravating’ factor. This is essential to maintain fairness and equity of treatment as well as public understanding of the process, both essential ingredients to support accountability for wrongdoing.

### **Transparency and Parliamentary Procedures**

15. When submitting written questions, MPs are asked if they have a registered interest that would be relevant to the content of the question - a useful step in managing conflicts of interest. However, when the written question is published, the details of the interest are lost. Only the simple fact of whether or not the MP has an interest is noted. This seems counter-productive if the information is already being collected and obscures transparency, something that *My Society* has recently highlighted.<sup>8</sup> **The Committee should look to integrate MPs’ interests in their written questions**
  
16. Similarly, when a member speaks in Parliament and declares an interest in proceedings, they often do this by stating ‘refer to my register of interests’. Unless versed in the transparency of parliament, it seems unlikely that individuals would know how to cross-check these declarations of interest with the register. This short-hand measure was introduced so that debates wouldn’t be bogged down in long explanations of MPs’ interests, but it seems that by avoiding this extreme, another extreme of ambiguity was introduced. **Short additional details as to what this interest is would help to mitigate conflicts of interest and improve transparency.**
  
17. Former MPs are allowed to keep their parliamentary passes to Westminster. As with any career, these former MPs go on to work for new employers, often private companies or consultant lobbying companies.<sup>9</sup> Maintaining their pass gives them VIP access to legislators, a highly priced commodity for their new employer. **Given the inherent risks of awarding these passes to past parliamentarians, many of whom go on to work in the PR industry, this practice should end now.**

### **Open Parliament**

18. An open parliament – one that encourages transparency, accountability and participation, both within the parliamentary institution and throughout government – is an essential part of an open government.<sup>10</sup> Many of the key aspirations of the Open Government movement – pursuing rights-based approaches, institutionalising reforms, promoting and protecting civic space, defending democratic processes – require the

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<sup>8</sup> <https://www.mysociety.org/2024/10/31/better-declarations-of-interest-for-parliamentary-questions/>

<sup>9</sup> <https://www.theguardian.com/politics/2020/sep/13/revealed-ex-mps-use-parliament-access-passes-over-2500-times-year>

<sup>10</sup> <https://www.opengovpartnership.org/members/united-kingdom/>

support and buy-in of parliaments. There is also a growing demand from citizens for parliaments to be more open, inclusive, and effective in representing the interests of all.

19. Open Government Partnership (OGP), of which the UK is a founding member, highlights four specific roles parliaments can play within the wider open government context:

- **Taking legislative action:** Championing open government values by introducing, reviewing and ratifying legislation relevant to open government or approving budgets for open government reform.
- **Ensuring parliamentary oversight:** Holding governments accountable for open government reforms and opening up their own oversight processes to public scrutiny.
- **Opening up parliamentary processes:** Adopting open government principles – transparency, accountability, participation and inclusion – in the parliamentary institution and processes.
- **Creating space for dialogue:** Fostering cross-party dialogue and support needed to advance and institutionalize open government reforms.

20. OGP's Global Strategy includes a recommendation that members aim to *"Make open government central to how all levels and branches of government function and deliver on their priorities"*. **With UK national government as well as devolved and local governments also taking part, UK parliamentary action on open government reform would be a logical further development on the pathway to an 'open state' approach.**

#### Proactive Publication of Parliamentary Data

21. Parliament should adopt a Parliamentary Transparency Framework to standardise and institutionalise transparency practices, combining elements such as legislative tracking, ethical oversight, and public accountability mechanisms. Estonia offers a model, publishing all parliamentary data in formats that allow easy analysis by civil society, academics, and citizens.<sup>11</sup> Parliamentary records, including plenary debates, committee sessions, legislative drafts, and voting records, are published in machine-readable formats. Citizens and civil society can easily analyse and visualise this data using digital tools.

22. Introducing a legislative footprint system is essential for tracking the progress of bills through Parliament. This system should document all stages of a bill's development, including consultations, amendments, and decisions, enabling citizens to follow the legislative process transparently.

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<sup>11</sup> <https://www.opengovpartnership.org/stories/estonias-journey-of-open-government-reforms/>

23. The OECD's recommendation of the Council on Transparency and Integrity in Lobbying and Influence states adherents introduce a regulatory footprint in public decision-making processes - a tool that details lobbying and influence actors and stakeholders consulted in the decision-making process, and which represents a step towards transparency and enforcement.<sup>12</sup> Canada has an approach to procedural tracking (ensuring transparency in legislative progression) whereas Iceland, Latvia, Luxembourg and Poland focus on post disclosure (enhancing accountability and understanding of decision-making) to create a robust and balanced legislative footprint system.

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<sup>12</sup> [https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0379?\\_ga=2.170292834.315675275.1629908852-250816919.1627058184](https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0379?_ga=2.170292834.315675275.1629908852-250816919.1627058184)