

Written evidence submitted by Transparency International UK

Key recommendations:

- Data on APPGs should be published in machine readable formats as soon as possible to enable proper scrutiny and reduce the risk that they are used as a means of buying influence over parliamentarians.
- In order to help protect Parliament from the perception that money can buy access and influence, a statutory register of lobbyists covering both in-house and consultant lobbyists should be introduced as soon as possible. Registers of meetings between lobbyists and key decision-makers, which contain sufficient detail to enable the public to understand the scale and nature of lobbying activities should be published and in a timely manner.
- It is important that there is proper due diligence done by parliamentarians when engaging those connected with corrupt and repressive regimes, particularly where a relationship with an APPG would give the impression of a level of respectability and acceptance to other parliamentarians.
- To reduce the risk of undue interference from foreign governments, parliamentarians should be prohibited from accepting paid foreign travel, whether this is from an APPG or other source, costing over £500 other than from prescribed organisations that are either acting in the UK national interest; which the UK or UK Parliament is a full member, for example, the Inter-Parliamentary Union; or would otherwise be sufficiently regulated to provide this safeguard, for example, UK political parties.
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Introduction

1. Transparency over the interaction between private interests and politics is widely recognised as a key safeguard against potential abuses of power. Openness about the sponsors of APPGs, their members and objectives should form part of a wider integrity infrastructure, including the register of members financial interests and donations, a robust statutory register of lobbyists, and general codes of conduct for parliamentarians. To work effectively, these different sources of data need to be able to be scrutinised in the round. They should provide a comprehensive view of access and potential influence in UK politics. This will only be possible when they are all published in machine readable formats.
2. Transparency International UK works with a number of APPGs, in particular the APPG on Anti-Corruption and Responsible tax. APPGs perform an important role within Parliament. They enable MPs to work on a cross party basis on issues that are of concern to them. They also facilitate engagement between parliamentarians and outside experts – whether researchers or campaigners. This helps increase knowledge within Parliament and helps Parliament to hold the Government to

account. It also helps civil society to build relationships with parliamentarians and to better understand how they can play a part within both Houses.

3. While APPGs can benefit both Parliament and wider society, there are also examples of how the system has been abused and they can open Parliament to risks of corruption.
4. Some of the corruption risks from APPGs have been mitigated by previous reforms such as the withdrawal of parliamentary passes specifically for APPGs. The 2013 Standards Committee report also recommended that APPGs use their own branded Portcullis logos like select committees, instead of the usual Portcullis, so as to better distinguish between APPGs and the formal proceedings within Parliament. Whilst this is a welcome step, it is important to recognise that as APPGs are bodies that hold events within Parliament, involving members of both Houses, the nuance of this distinction will be lost on many outside Westminster.
5. Some important corruption risks remain and are outlined in more detail below.

Data Transparency

6. All APPGs are required to publish information including details of their membership, who the elected officers are, who the public contact is, date of the last meeting, details of any financial interests and whether there is an external secretariat providing support and the monetary value of that support. This information is all published on Parliament's website, so is in the public domain.
7. In order to reduce the risks of corruption it is important not only that data is published but that it is done in a way which aids analysis and scrutiny. Government often fails to meet this standard and sadly Parliament is as well when it comes to APPGs and registers of members financial interests. The registers are only published in HTML and pdf formats. These are not machine readable and makes meaningful scrutiny of the data both difficult and extremely time consuming. This only gets worse when attempting to read across from the different data sources to see where, if at all, there are any links. It is both feasible and highly desirable for APPG data to link seamlessly with other integrity registers, including the register of consultant lobbyists and the register of members' financial interests.
8. It should be easy for a constituent or interested organisation to easily find out how many APPGs and individual MP is a member of, how many APPGs have financial support from outside of Parliament or how many APPGs have not met within the last quarter. In principle this information is all freely available. In practice it is very difficult to access without significant IT skills and the knowledge of the Python programming language.¹

9. As long as this data is not available in machine readable format, we cannot be sure of the full extent of the corruption risks within the work of APPGs. **Machine readable formats, such as csv, json and xml are standard practice in open data. This proposal was made to the previous inquiry in 2013 but regrettably has not been acted on. We recommend that this is introduced as a matter of urgency.**

Lobbying Risks

10. There are no strong safeguards in place to protect either the UK Government or Parliament from the perception that money buys access and influence in our political system. Although there is a register for consultant lobbyists this only catches a tiny proportion of lobbying activity. Transparency International UK research found that only 4 per cent of lobbyists are covered by the register² and even then, only basic information is captured about the lobbyist and their clients, which are also available on the voluntary industry registers.³
11. APPGs are a well-known route for lobbying activity. This is not in and of itself a bad thing, it can benefit Parliament, but there are corruption risks involved. This can be from charities, business groups and trade bodies seeking to influence Parliament as well as foreign governments and organisations.
12. APPGs by their very nature are flexible bodies that work in very different ways. Some are small and informal social clubs, others run campaigns, hold evidence sessions and publish reports. It is common for the more active APPGs to have an external secretariat or research support. These can be provided by a university, supportive charities or campaigning groups as well as PR firms, lobbying agencies, companies and trade bodies. The financial value of the support varies considerably but can involve significant sums. An analysis at the end of 2019 found 198 instances where an external source, be that a company, a charity or some other organisation, gave funding to an APPG and that the total amount received was £1,517,997.⁴ The APPG on the Fourth Industrial Revolution was found to have received the most funding from external sources with £134,812 in that year.⁵

¹ Dempsey, N Scraping All-Party Parliamentary Groups in R with parlygroups
<https://medium.com/analytics-vidhya/scraping-all-party-parliamentary-groups-in-r-with-parlygroups-29b05907afda> [Accessed 13 Nov 2020]

² Transparency International UK Accountable Influence, bringing lobbying out of the shadows
https://www.transparency.org.uk/sites/default/files/pdf/publications/Accountable_Influence_Bringing_Lobbying_out_of_the_Shadows.pdf

³ <https://register.prca.org.uk/register/current-register/> <https://www.lobbying-register.uk/>

⁴ Dempsey, N Scraping All-Party Parliamentary Groups in R with parlygroups
<https://medium.com/analytics-vidhya/scraping-all-party-parliamentary-groups-in-r-with-parlygroups-29b05907afda> [Accessed 13 Nov 2020]

13. External organisations providing support for APPGs are a corruption risk. It is possible that organisations are using this privileged access to MPs and the ability to book rooms within the parliamentary estate, as a way of impressing clients and at the very least appearing to influence the views of parliamentarians. In his evidence to the 2013 inquiry on APPGs, Douglas Carswell MP described some APPGs as “front organisations” for trade bodies and companies seeking contracts. He expressed particular concern about defence sector APPGs working in this way.⁶ This perception of commercial lobbying activity, aided by the lack of transparency, that risks damaging the reputation of Parliament.
14. Another concern about the ways APPG work is that parliamentarians can join and hold office in any number of APPGs. A Guardian investigation in 2011 found that Sir Peter Bottomley was a member of 151 different APPGs⁷ although this had decreased to 34 in 2017.⁸ A more recent analysis of the data showed that in 2019 Sir Peter also held the largest number of officer roles – 53.⁹ The top 10 office holders included members from different parties and indeed both Houses. This in no way breaks the rules and parliamentarians must be free to explore their interests. It is of benefit to Parliament and our democracy. However, it does raise questions about the effectiveness of governance requirements of APPGs which are intended to protect their integrity.
15. The register of APPGs is one element of the wider integrity infrastructure. It needs to be seen in conjunction with the other data sources including the register of members financial interests and register of consultant lobbyists. They are addressing different aspects of the same corruption risks. It is therefore not feasible to monitor and regulate APPGs in isolation to capture what may be low levels of lobbying activity. It would be too burdensome on the work of APPGs and would fail to place APPGs in the broader picture of those seeking to influence Parliament. **In order to help protect Parliament from the perception that money can buy access and influence, a statutory register of lobbyists covering both in-house and**

⁵ This was for the period November 2018 to October 2019 as analysed in Dempsey, N Scraping All-Party Parliamentary Groups in R with parlygroups <https://medium.com/analytics-vidhya/scraping-all-party-parliamentary-groups-in-r-with-parlygroups-29b05907afda> [Accessed 13 Nov 2020]

⁶ Standards Committee - Sixth Report All-Party Parliamentary Groups 19 November 2013 <https://publications.parliament.uk/pa/cm201314/cmselect/cmstnprv/357/130702.htm>

⁷ Coalition urged to act over lobbyists who use party groups 'to buy influence' <https://www.theguardian.com/politics/2011/feb/24/coalition-lobbyists-all-party-groups> [Accessed 13 Nov 2020]

⁸ Track the millions of pounds given to all-party parliamentary groups <https://www.theguardian.com/politics/ng-interactive/2017/jan/06/track-the-millions-of-pounds-given-to-all-party-parliamentary-groups> [Accessed 13 November 2020]

⁹ Scraping All-Party Parliamentary Groups in R with parlygroups <https://medium.com/analytics-vidhya/scraping-all-party-parliamentary-groups-in-r-with-parlygroups-29b05907afda> [Accessed 13 Nov 2020]

consultant lobbyists must be introduced as soon as possible. Registers of meetings between lobbyists and key decision-makers, which contain sufficient detail to enable the public to understand the scale and nature of lobbying activities should be published and in a timely manner.

The use of APPGs by foreign governments

16. There are two forms of APPGs, country groups and subject groups. There are currently in the region of 120 country group APPGs. The role of country group APPGs is primarily to foster knowledge within Parliament of the different countries. They may also support development goals and/or build links among Parliamentarians from the respective countries. This is consistent with APPGs being used to bring outside expertise into Parliament. However as with subject groups this can be open to abuse.
17. This Committee last examined the issue of APPGs after a lobbying scandal in 2013 involving Patrick Mercer MP. Mr Mercer was found to have set up an APPG and offered a Westminster security pass after signing a deal with a lobbying firm that paid him £4,000 seeking the readmission of Fiji to the Commonwealth.¹⁰ At the time, Fiji was facing fierce criticism over its human rights record and a lack of democracy.
18. Unfortunately, the Patrick Mercer scandal is not an isolated case. In 2018, Transparency International UK published research showing how corrupt and repressive regimes seek influence and legitimacy through engagement with UK Parliamentarians.¹¹ APPGs were one of the ways they did this. For example, country group APPGs can be used as a way of foreign governments funding parliamentary trips to their country.
19. There is a clear risk that overseas trips sponsored either directly or indirectly by corrupt and repressive regimes may present the perception or reality that parliamentarians' judgements and actions are influenced by the malign intent of their hosts. Visits by UK parliamentarians may also give undue legitimacy to the regime in-country. And in extreme cases where substantial gifts and hospitality are given in exchange for favours or services, this could also constitute a bribery offence. There are controls on the sources of donations and loans to political parties and politicians to prevent such foreign interference in our democracy. A similar approach should be applied to those funding overseas visits. **We recommend parliamentarians be prohibited from accepting paid foreign travel costing over £500 other than from prescribed organisations that are either acting in the UK national interest; which the UK or UK Parliament is a full member, for example, the**

¹⁰ Committee on Standards - Eleventh Report Patrick Mercer 29 April 2014

<https://publications.parliament.uk/pa/cm201314/cmselect/cmstandards/1225/122502.htm> [accessed 13 November 2020]

¹¹ Transparency International UK In whose interest? Analysing how corrupt and repressive regimes seek influence and legitimacy through engagement with UK Parliamentarians 2018

https://www.transparency.org.uk/sites/default/files/pdf/publications/In_Whose_Interest_WEB3.pdf

Inter-Parliamentary Union; or would otherwise be sufficiently regulated to provide this safeguard, for example, UK political parties.

20. One of the case studies in the report is Azerbaijan, a petrostate and former Soviet Republic in the South Caucasus that has been ruled by the same family dynasty since 1993. The regime used a wide range of activities including organising Parliamentary trips to Azerbaijan supporting, the APPG on Azerbaijan, and producing promotional material for the country featuring UK parliamentarians. This was arranged through the European Azerbaijan Society (TEAS) – Azerbaijan’s lobbying organisation for Europe, including the UK, with support from a number of UK public relations firms.¹²
21. The recent Intelligence and Security Committee of Parliament report on Russia¹³ highlighted the urgent need to address the UK’s role as a money and reputation laundering hub for wealthy individuals linked to the Russian President. Transparency International UK has highlighted efforts by the Russian state to legitimise itself through interaction with UK Parliamentarians. This has primarily involved inviting and paying UK politicians to appear on Russian state media outlets, courting of MPs and political figures by suspected Russian spies and securing access to senior politicians with the help of lobbyists.¹⁴
22. APPGs are one element of a much bigger problem but they can act as entry point for foreign governments to build relationships with parliamentarians. **It is important that there is proper due diligence done by parliamentarians when engaging those connected with corrupt and repressive regimes, particularly where a relationship with an APPG would give the impression of a level of respectability and acceptance to other parliamentarians.**
23. This review of the ways that APPGs operate and the value they bring to Parliament is very timely. It is important that the ways APPGs are regulated keep in step with current insights on the ways in which external manipulation of our democratic institutions.

¹²Transparency International UK In whose interest? Analysing how corrupt and repressive regimes seek influence and legitimacy through engagement with UK Parliamentarians 2018 p8

https://www.transparency.org.uk/sites/default/files/pdf/publications/In_Whose_Interest_WEB3.pdf

¹³ Intelligence and Security Committee of Parliament Russia HC632 July 2020 https://b1cba9b3-a-5e6631fd-sites.googlegroups.com/a/independent.gov.uk/isc/files/20200721_HC632_CCS001_CCS1019402408-001_ISC_Russia_Report_Web_Accessible.pdf?attachauth=ANoY7crNzWx2cMnXsugazixKWKpaTTI4DYnA6M_-eakdzsZ42br-rOvJuRTS26MgEpKF9CovUcJAXTVfkKDzylDhyq-Y6K0ZkhlCRloeV_ib6yBbBY9t5ZugPQt84oqORI53QRqT3Wj4JU0VDZm8MGJqrkrZeKxta3GNldldwWvJVNRBTCLCrZhVno_TtAHXTIvNJXST-Rmo5C751snwq1BUL4RAFD8HZ7_3byNtflVnO4fCKXhKwVBRUuIU-ypYS9-VE56Lq6Khsoma-722EhRVvgYlpMIPMMtnBYoyZpMqUaljyzwKFA%3D&attredirects=0

¹⁴ Transparency International UK In whose interest? Analysing how corrupt and repressive regimes seek influence and legitimacy through engagement with UK Parliamentarians 2018

https://www.transparency.org.uk/sites/default/files/pdf/publications/In_Whose_Interest_WEB3.pdf

ABOUT TRANSPARENCY INTERNATIONAL UK

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

Transparency International UK (TI-UK) is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK.

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