

No Rules Britannia?

The UK's lobbying laws
exposed on the global stage

April 2025

Tom Brake, Director, Unlock Democracy

“As the Director of an organisation which lobbies government on democratic reform issues, and the then Minister partly responsible for introducing the Register of Consultant Lobbyists, I understand the need to allow, but also to regulate lobbying. I am also more aware than most of the weaknesses in the existing law and welcome a campaign to strengthen it.”

Susan Coughtrie, Director, The Foreign Policy Centre

“Transparency in politics is essential for preventing potential wrong-doing, ensuring informed decision making and bolstering public trust. In 2025, the importance of knowing who is influencing our decision makers, and why, has probably never been as acute for the democratic health of our societies. When the risk is as high as it clearly is within the UK’s current system - which falls significantly short of our peers on the world stage - there is no excuse for the remedy not to be prioritised.”

Tim Durrant, Programme Director, Institute for Government

“Lobbying is an essential part of democratic policymaking, but the UK’s system for ensuring lobbyists abide by the rules is threadbare compared to other jurisdictions. This report shows some easy steps that the UK could take to improve its lobbying regulation, by learning from other similar countries. If the government are committed to cleaning up politics and rebuilding trust, reforms to lobbying are an important part of the picture.”



**Duncan Hames, Director of Policy and Programmes,
Transparency International (UK)**

“While other democracies have lifted the lid on lobbying, here in the UK only a tiny fraction of all lobbying activity is publicly declared. This report demonstrates how very practical comprehensive registers of lobbying have proven to be elsewhere. It’s time we made it happen here.”

Susan Hawley, Executive Director, Spotlight on Corruption

“It is well past time that Westminster got serious about bringing lobbying out of the shadows. It should be a source of major political embarrassment that Westminster lags all its major democratic allies on lobbying transparency. This important report shows not only why Westminster must clean up lobbying transparency but also how it can.”

Politicians in their own words

Nick Thomas-Symonds, Paymaster General and Minister for the Cabinet Office, Labour Party (04 December 2024):

"The Government are committed to transparency around lobbying. That is why we will have regular transparency updates. The approach that we take will frankly be in stark contrast with that of the Government who preceded us."

Rishi Sunak, former Prime Minister, Conservative Party (09 January 2023):

"I think transparency is really important for the healthy functioning of democracy, it's absolutely right that there's disclosures around donations and outside interests."

Sir Keir Starmer, Prime Minister, Labour Party (14 April 2021):

"What we need is to overhaul the whole broken system. This afternoon, Labour's motion calls for a proper parliamentary inquiry into the [Greensill] scandal. If the Prime Minister is so concerned about this, he should welcome the motion. After all, to quote David Cameron, his old school friend: "Sunlight is the best disinfectant"."

David Cameron, former Prime Minister, Conservative Party (08 February 2010):

"I believe that secret corporate lobbying, like the expenses scandal, goes to the heart of why people are so fed up with politics. It arouses people's worst fears and suspicions about how our political system works."

Foreword by Alastair McCapra, CIPR CEO

When the UK government set up its register of consultant lobbyists more than a decade ago, it didn't spend much time looking at how other countries do it. We've done the work on this now, and the results are alarming. As we set out in this report, tried and tested alternative models for a public register already exist. These registers enable lobbying and policymaking to take place within a more open and accountable framework, a fundamental requirement of any modern democracy.

The continued failure to bring our lobbying laws into line with others creates an information vacuum - one that many will fill with their own narratives, accusations, or conspiracy theories. This is why the CIPR is advocating for lobbying laws that reflect the reality of lobbying activity in Westminster. Rebuilding public trust must be a priority and strengthening our lobbying regulations is a vital step towards achieving that goal.

This is not just about domestic politics, it also speaks to the UK's international reputation. As we navigate an increasingly complex geopolitical landscape and work to establish new relationships with global partners, our credibility is tied to the integrity of our governance. Transparent and robust lobbying laws are essential if we are to champion the virtues of democracy abroad while maintaining our moral authority at home.

Currently, the UK's lobbying laws leave us languishing at the lower end of global governance rankings making it harder to promote our democratic values on the world stage. This report is both a critique and a call to action. We urge parliamentarians to use this paper as a roadmap for reform that creates a level playing field for lobbyists, fosters transparency, and begins the critical task of restoring trust in our political system.

About the CIPR

The Chartered Institute of Public Relations (CIPR) is the world's only Royal Chartered professional body for public relations and public affairs practitioners with over 11,000 members. We play a vital role in fostering ethical practices in lobbying and engagement with government institutions.

This report forms part of our ongoing Lobbying for Good Lobbying Campaign, which was launched in 2022. The campaign promotes the importance of transparency and accountability in lobbying by educating and informing legislators on what good lobbying looks like with the aim of reforming Westminster's existing lobbying laws. With better regulation, compliance, and more independent oversight, we believe that lobbying will be recognised as a force for good, a way to rebuild trust in our politics and businesses, and an essential part of our democracy.

You can read more about our campaign and our other research here: [Lobbying For Good Lobbying - CIPR](#).

Introduction

The CIPR has been campaigning for improvements to be made to Westminster's current lobbying regime since the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (The Lobbying Act) came into force. In 2022 it launched the Lobbying for Good Lobbying Campaign, a recognition that good lobbying is critical for all policy development and healthy democracies across the world.

Lobbying is a cornerstone of the democratic process. Throughout the course of its long history, lobbying has provided a vital means for lawmakers to solicit expert and popular opinion and has been at the forefront of progressive change.

In the US, for instance, the First Amendment of the United States Constitution protects lobbying as part of the country's free speech rules, reflecting its vital role in the political process and affording it legal protection.

However, where lobbying is opaque or under-regulated it leads to a loss of public trust in political institutions and fuels concern about; corruption, "sleaze", the use of secret and improper communication channels, and the influence of vested interests in policy-making.

British politicians for at least the last generation have recognised the importance of ensuring lobbying is transparent and ethical. Before coming to power in 1997, Tony Blair promised that his Government would be "[whiter than white and purer than pure](#)", when it came to lobbying and ethics. David Cameron promised to change the Conservative party's "[far-too-cosy relationship between politics, government, business and money](#)". Boris Johnson advocated to "[ban MPs from exploiting their positions by acting as paid political consultants or lobbyists](#)". Prior to entering office, the current Prime Minister, Sir Keir Starmer, called for a "[total crackdown on cronyism](#)" and has since committed to establishing an Ethics and Integrity Commission to "clean up politics".

These commitments to improve standards and ethics in lobbying have seen piecemeal changes. Blair made it mandatory for political parties to declare the source of their donations. Cameron passed the Lobbying Act, which remains the central lobbying regulation governing the industry today. Recently, the MP's code of conduct was tightened to stop paid lobbying by sitting Parliamentarians. That is not enough.

This paper compares lobbying transparency and regulatory regimes in Westminster to other comparable countries across the world. The countries were carefully selected to ensure that their democratic make up is similar to the UK, with readily accessible data.

This paper outlines:

1. An overview of the UK System
2. Definitions of regulated lobbyists
3. The number of organisations covered by the lobbying registers
4. Ensuring ease of access and transparency
5. Ensuring integrity and accountability

Summary

A detailed comparison with similar countries lays bare the full extent of the limitations of the UK's Register, with the US registering 10 times more lobbyists per million than Westminster.

Broken down further, the report reveals that:

- The EU has more than 8 times as many registered lobbyists per million people than Westminster.
- Scotland/Holyrood has 69 times more registered lobbyists per million people than Westminster.
- Westminster lobbyists account for 0.5% of lobbyists registered across all jurisdictions analysed (Westminster, USA, EU, IRE, AUS, CAN, FRA, GER, Holyrood).

At the same time, the report also finds that Westminster's lobbying regulations are less transparent than comparator countries about the type of activity that counts as lobbying and that it is the only register that requires payment to join.

Moreover, Westminster's Lobbying Register sanctions are among the least strenuous in terms of barring lobbyists from accessing UK Government agencies, buildings, and staff. Previous research has shown, moreover, that although ORCL has the power to impose civil penalties, exemptions within the Lobbying Act have meant that the overwhelming majority of investigations into suspected unregistered lobbying found no wrongdoing had occurred.

It is clear that Westminster has narrow and ineffective lobbying regulations, making it the international outlier. This regime undermines trust in our political system and leaves it open to scandal.

The need for lobbying reform is recognised cross-party. In order to make the system more effective and transparent, the CIPR is calling for;

- The registering of:
 1. all lobbying activity (oral, written or electronic communications with the objective of influencing, and in relation to Government or Parliamentary functions)
 2. who carries out the lobbying activity
 3. who has been lobbied (Ministers, Senior Civil Servants, and special advisers)
- The Office of the Registrar of Consultant Lobbyists (ORCL) to be expanded into the Office of the Registrar of Lobbying (ORL).
- Technological/digital solutions to be explored to minimise any administrative burden on the registration of lobbying activity or the publication of diaries.

It is clear that Westminster has narrow and ineffective lobbying regulations, making it the international outlier.

An overview: The Westminster system

Lobbying is predominantly regulated by the [Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014](#) (The Lobbying Act). Split into three parts - the first for consultant lobbyists, the second for charities, and the third for trade unions - the bulk of the Act aimed to more stringently regulate activities that could be classified as campaigning by non-party organisations during election periods. However, the Act also aimed to ensure that the practice of lobbying was more transparent to the public.

In Westminster, 'regulated lobbying' only refers to consultant lobbyists. That means only organisations that lobby for and get paid by other organisations are included. If these lobbying organisations are under the VAT threshold, they are also exempt from registering.

- For more information on the Lobbying Act, read the CIPR's ['Failure by Design'](#) report.

Consultant lobbyists must register with the [Office of the Registrar of Consultant Lobbyists](#) (ORCL) and disclose their lobbying activities. ORCL, sponsored by the Cabinet Office, oversees this process and enforces compliance.

The lobbying regulations are further limited by the types of communications that need to be registered. Only consultants who communicate with a Government Minister or a Permanent Secretary on behalf of a third party for payment need to register that communication.

However, the majority of lobbying activity is not undertaken by consultant lobbyists who earn over the VAT thresholds. In-house lobbyists for corporations, NGOs, think tanks, trade associations, trade unions and others all directly lobby the Government and political parties. It is estimated that consultant lobbyists only make up around 20% of lobbyists. Research from Transparency International in 2015 [estimated](#) that just 4% of lobbying activity is covered by the register, highlighting the critical lack of reporting which happens under the current system.

Ultimately, the major flaw of Westminster's lobbying registration is that lobbying is considered a job rather than a type of activity.

The result is a Lobbying Register that ultimately fails to capture the majority of lobbying activity. Westminster's Lobbying Register is far smaller and takes in far fewer interactions than its international counterparts.

Westminster's Lobbying Register is far smaller and takes in far fewer interactions than its international counterparts.

This can lend itself to the absurd. An NGO or an in-house lobbyist can hire a consultant to research a particular policy area. That lobbying organisation can then draft emails to Ministers about that research and prepare all ongoing communications but, so long as the email is sent from the mailbox of an in-house lobbyist, that interaction does not need to be registered with ORCL, even if the lobbyist is CCed or BCCed into the email chain.

CIPR polling, released in February 2024, shows that very few lobbyists consider the current state of affairs to be adequate;

- Almost 90% of UK lobbyists and public relations professionals think that there should be greater transparency around who is lobbying Westminster politicians.
- 23% think the register has had no effect on improving transparency, whilst 33% think it has only improved transparency a little.
- 83% support the idea of a statutory code of conduct for lobbyists.
- 76% support the idea of an independent body enforcing standards.

Very few lobbyists consider the current state of affairs to be adequate.

Chapter One

Definitions and numbers of regulated lobbyists



Who can be considered a regulated lobbyist?

	Consultants	In-House Lobbyists	Think Tanks	NGOs
Westminster	✓	✗	✗	✗
Australia	✓	✗	✗	✗
Canada	✓	✓	✓	✓
EU	✓	✓	✓	✓
France	✓	✓	✓	✓
Germany	✓	✓	✓	✓
Holyrood	✓	✓	✓	✓
Ireland	✓	✓	✓	✓
USA	✓	✓	✗	✗

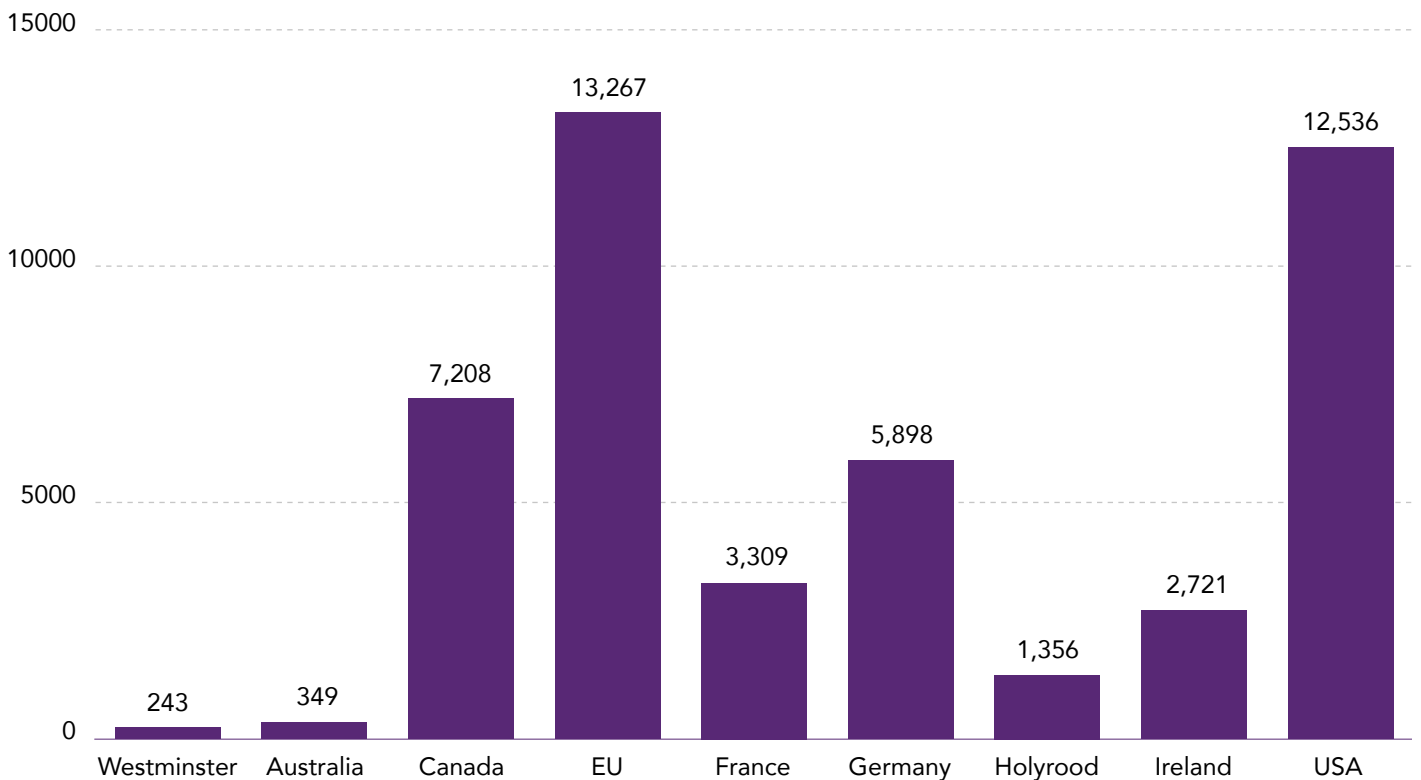
In only capturing consultant lobbyists, Westminster's lobbying regulations are almost unique. Scotland, Canada, the European Parliament, and Ireland all have much more comprehensive definitions that include in-house lobbyists, think tanks, and NGOs. Only Australia has a similarly loose definition that only includes consultant lobbyists.

This light-touch system is designed to avoid misunderstandings about the interests of those engaged in lobbying. Ministers and government officials should know in whose interest a lobbyist is speaking. This is easier to ascertain for in-house lobbyists, for example, and the notional editorial control of think tanks is similarly supposed to provide a firewall against undisclosed vested interests.

However, this does nothing to provide the public with any understanding about who is seeking to influence our politics and it is clear that the majority of comparable countries do not make this distinction.

In only capturing consultant lobbyists, Westminster's lobbying regulations are almost unique.

How many organisations are covered by the lobbying registers?



When compared to other countries, Westminster regulates far fewer lobbying organisations than other countries:

- The US has 10 times more registered lobbyists per million people than Westminster.
- The EU has more than 8 times as many registered lobbyists per million people than Westminster.
- Scotland/Holyrood has 69 times more registered lobbyists per million people than Westminster.
- Westminster lobbyists account for 0.5% of lobbyists registered across all jurisdictions analysed (Westminster, USA, EU, IRE, AUS, CAN, FRA, GER, Holyrood).

Once again, only Australia has a comparable number of regulated and registered organisations on its lobbying register. However, even in this case, there are more than double the number of registered lobbyists than England has, with a population less than half that of England. Australia has no [equivalent](#) small business or VAT exemption for registration.

A view from Canada

“Canada’s federal lobbying registry has done something remarkable: it has made lobbying - often viewed with suspicion - transparent, predictable, and even somewhat boring. And that’s a good thing. Every lobbyist, from the greenest rookie to the most grizzled veteran, knows the drill: disclose meetings, follow the rules, keep everything above board. Compliance isn’t just encouraged; it’s now the norm. The result? A system that enhances trust, not just in government, but in professionals who as recently as the early nineties in Canada were referred to as “zebra mussels”.

None of this works without the dedicated staff who keep the wheels turning. They train newcomers, troubleshoot complexities, and ensure we don’t get lost in the fine print. Their work makes life simpler for lobbyists and more transparent for Canadians. In a profession where clarity is currency, the registry delivers. The rules are clear, the expectations are set. And seventeen-years in, we’ve seen our profession move from apprehension for the tool, to a willing participation in its optimization.”

Nic Ruskowski

Partner, TACTIX Government Relations and Public Affairs

“The majority of lobbyists in Canada appreciate the lobbying register’s presence and public recording aspect - it promotes transparency and provides valuable insight into which offices engage more frequently with lobbyists. The registration process is straightforward and user-friendly. While the rules require some training for new hires, the Commissioner’s Office provides really informative webinars that clearly explain the procedures. Overall, I wouldn’t say the training requirements are burdensome.

In my view, the public register has substantially improved the credibility and understanding of the public affairs sector, particularly within government and the wider industry. That said, I think the public may not be fully aware of all the obligations and regulations that lobbying firms must adhere to.”

Kate Harrison

Vice Chair, Summa Strategies



A view from Scotland

“The Scottish system offers a more detailed framework than Westminster’s, which helps improve transparency. That means organisations need to take extra care to ensure they understand the requirements and their role in adhering to them. The system is relatively intuitive once you get used to it and although it’s not hugely burdensome there are definitely some aspects that could be refined to make the standards and process more proportionate. There are also gaps, particularly in the types of communication covered. An approach that combines the best elements of both systems could make compliance more straightforward while also strengthening accountability. That’s an option that should be considered. So, there’s still work to be done to ensure the system is as clear and effective as possible although one positive is that the guidance and support from the lobbying register team is very good. Overall, as an agency, we find it works well and it’s an important measure of accountability that the sector works to a rigorous lobbying register.”

Stewart Argo

Director, BIG Partnership and Chair CIPR Scotland



Chapter Two

Who counts as a regulated target of lobbying?



Who counts as a regulated target of lobbying?

Westminster's lobbying regime is not only less regulated because of who it counts as a lobbyist but also because it exempts a much larger number of politicians as regulated targets of lobbying.

The Westminster and Australian federal register are the only two not to include Members of Parliament, or equivalent, as part of their regulation. Compared with the UK, most registers include a greater number of Civil Servants too. This acknowledges that influence occurs at all levels of government, rather than just at the level of those directly crafting legislation.

Westminster	Ministers, and Permanent Secretaries
Australia	Ministers, parliamentary secretaries, ministerial staff, civil servants, members of the armed forces, heads of agencies and persons engaged as entrepreneurs or consultants by an Australian Government Agency
Canada	Ministers and all their employees, the Leader of the Opposition Office (LOTO) and senior staff in LOTO, MPs and staff, Senators and staff, Senior Civil Servants, Chiefs of staff within defence related fields
EU	Members of the European Parliament and their assistants, civil servants and other officials in European Union institutions
France	A member of Government, or a member of a ministerial cabinet; a member of the National Assembly, a senator, a member of the President of the National Assembly's staff or that of the President of the Senate, of a member of Parliament, of a senator or of a parliamentary group, as well as with staff from offices of the parliamentary assemblies; A member of the President of the Republic's staff; general director, the secretary-general, or their deputy, or a member of the board or of commissions endowed with powers to impose penalties within independent administrative authorities or within independent public authorities
Germany	Federal Chancellor and the Federal Ministers, Parliamentary State Secretaries, State Secretaries, Heads of Directorates-General, Heads of Directorates, and Heads of Division; all members and groups associated with the Bundestag
Holyrood	First Minister, Cabinet Secretaries and Scottish Law Officers, Junior Ministers, Special Advisers, Permanent Secretaries, MSPs
Ireland	Ministers, members of the two Houses of Parliament, members of the European Parliament, local executive bodies, special advisers, secretaries-general, CEOs and directors of departments in local authorities
USA	The Executive Branch: The President, the Vice-President, any civil servant with a position in the President's Executive Office, White House staff, cabinet secretaries and their deputies, and senior employees in government bodies (administrators and assistants) The Legislature: Members of Congress, elected officers of the House of Representatives and Senate, Congress staff (including both office and committee staff)

Chapter Three

Ensuring integrity and accountability

Possible fines and penalties for breaking the rules of the lobbying register

	Maximum fine	GBP conversion	Other civil or criminal penalties and measures
Westminster	£7,500	£7,500	Referral for criminal prosecution is theoretically possible but has never been used
Australia	NA*	NA*	Possible permanent loss of access to the register
Canada	CA\$200,000	£113,000	Up to 2 years in prison, 2-year lobbying ban
EU	€60,000	£50,000	Removal from the register Prohibition of reregistration for a period of up to 2 years and publication of the measure on the website
France	€15,000	£12,500	Up to 1 year in prison
Germany	€60,000	£51,000	Ban on access to the Bundestag
Holyrood	£5,000	£5,000	Reports can be issued to Scottish Parliament
Ireland	€2,500	£2,100	Automatic penalty (EUR 200) for sending late declarations Up to 2 years in prison
USA	\$200,000	£154,000	Up to 5 years in prison

*Australia can impose fines on lobbyists, however, this happens at the state level rather than at the federal level. In South Australia for example, punishments range up to AUS\$30,000 or c. £15,000 and lobbyists can face up to 2 years in prison.

While clearer and more transparent regulations would be good in and of themselves, it is clear that there will still be infractions that occur. In these instances, it is essential that there is an effective and clear way to punish lobbying infractions.

In principle, Westminster has similar powers to many comparable countries. However, the [CIPR's Failure by Design report](#) raises questions about whether ORCL has the penalties available to punish those guilty of breaching the Lobbying Act.

Is there a statutory lobbying Code of Conduct?

Westminster	✗
Australia	✓
Canada	✓
EU	✓
France	✓
Germany	✓
Holyrood	✓
Ireland	✓
USA	✗

Those that do sign the Westminster register are not required to sign up to a code of conduct, let alone a statutory code. Many other countries have statutory codes of conduct.

The EU and Australia are able to reduce access to Government buildings for those lobbyists who breach the code of conduct for lobbyists. This essentially works as a reputational deterrent for firms acting against the principles of lobbying regulations and removes their ability to freely operate in the halls of power. Currently, Members of either house can be banned from Parliament for misconduct, or for breaking lobbying rules, but similar deterrents have not been applied (or, at least not in the public record) to lobbyists.

Is it free to register as a lobbyist?

Westminster	✗
Australia	✓
Canada	✓
EU	✓
France	✓
Germany	✓
Holyrood	✓
Ireland	✓
USA	✓

The Westminster register is also unlike other countries in [charging](#) consultant lobbyists £1,000 per year for their entry onto the register. Of the countries analysed, the UK is the only country to do so and charges a flat-fee regardless of the size or turnover of an organisation.

Those that do sign the Westminster register are not required to sign up to a code of conduct, let alone a statutory code.

Conclusion

While lobbying is an essential feature of a healthy democracy, this paper has demonstrated that Westminster is an outlier in how it regulates lobbying. The current legislation introduced in 2014 does not go far enough to ensure that the process of lobbying is transparent and, indeed, inherently fails to encapsulate the majority of lobbying activities.

This legislation, in the narrow way it categorises those who lobby and those who can be lobbied, means that Westminster regulates far less when compared to other similar democracies around the world. As well as this, the legislation does not come equipped with the powers to ensure that where rules are broken, perpetrators are punished. The result is a system which is opaque and this opacity can lead to scandal and corruption.

Comparisons with international registers show that regulation can be introduced to make the system fairer and transparent to the public, as well as agreeable for those that would be required to register.

A Survation poll [revealed](#) that 63% of people believe UK politics is corrupt. Additionally, a 2021 poll for Transparency International [found](#) that 76% of people think wealthy individuals frequently use their influence on the government for personal gain and that stricter rules are needed to prevent this.

While it is clear that lobbying and the regulation of lobbying is not the sole, or even the primary, cause of this decline in trust, our opaque system is also a contributing factor to why voters are increasingly turning away from the political process and refusing to trust elected officials, who in most instances only have good intentions.

Failure to address this simply adds fuel to the perception that our government is not only corrupt but is deliberately so. And it creates the impression, on the world stage at least, of a no rules Britannia.

This legislation, in the narrow way it categorises those who lobby and those who can be lobbied, means that Westminster regulates far less when compared to other similar democracies around the world.

Chartered Institute of Public Relations

+44 (0)20 7631 6900

[@CIPR_Global](#)

[cipr.co.uk](#)