

# Easy Wins, Empty Gains

An assessment of the CSPL's 2021 recommendations and why the Ethics and Integrity Commission's review into lobbying rules must go further

# Introduction

In 2021, the Committee on Standards in Public Life (CSPL) set out a series of recommendations on lobbying reform as part of its wider [Upholding Standards in Public Life - Standards Matter 2](#) review. These recommendations (26-34) were never implemented. While the CIPR supported the attempt to improve accountability and transparency in our lobbying laws, taken as a whole, these recommendations fall far short of the measures needed to deliver full transparency.

With the Ethics and Integrity Commission now conducting a formal review into the effectiveness of Westminster's lobbying laws, the CIPR urges it not to treat those 2021 suggestions as a ready-made solution. Below is our assessment of each recommendation and where we believe this review must go further if we are serious about rebuilding trust in our politics. This document assigns a Red, Amber, and Green rating for each recommendation set out by the CSPL for whether it significantly addresses transparency gaps in the UK's lobbying framework.

# Assessment of the CSPL Recommendations

CSPL 2021 Recommendation	RAG	The CIPR's Position
26 — Collate all departmental transparency releases in one searchable, centrally managed database.		<ul style="list-style-type: none"> <li>• In-house lobbyists remain entirely out of scope</li> <li>• Would still leave two incomplete and incompatible data sets</li> <li>• Most comparable democracies use a single register that is updated regularly</li> </ul>
27 — Set stricter minimum standards for meeting descriptions and ensure departmental compliance.		<ul style="list-style-type: none"> <li>• This would place all responsibility on government, not lobbyists</li> <li>• No obligation on the lobbyist to disclose what was discussed</li> <li>• Would still leave two incomplete and incompatible data sets</li> </ul>
28 — Publish transparency returns monthly rather than quarterly.		<ul style="list-style-type: none"> <li>• More frequent publication of incomplete data is still incomplete</li> <li>• Does not address the structural gaps in the system</li> <li>• Meaningful only if the scope of disclosure is also broadened</li> </ul>
29 — Include meetings with director generals and directors in transparency releases.		<ul style="list-style-type: none"> <li>• The CIPR supports this</li> <li>• Reflects the reality of how policy is shaped</li> <li>• Influence is not limited to ministerial level</li> </ul>
30 — Include meetings with special advisers in transparency releases.		<ul style="list-style-type: none"> <li>• The CIPR supports this</li> <li>• Special advisers play a significant, often opaque role in policymaking</li> <li>• Their meetings should be on the public record</li> </ul>
31 — Clarify that informal lobbying via WhatsApp, Zoom and similar channels should be reported.		<ul style="list-style-type: none"> <li>• The CIPR supports this</li> <li>• High-profile cases highlight the risks of unrecorded and informal contact</li> <li>• All lobbying activity should be recorded no matter how it is conducted</li> </ul>
32 — Revise the categories of published information to close the loophole by which informal lobbying goes undisclosed in departmental releases.		<ul style="list-style-type: none"> <li>• The CIPR supports this</li> <li>• The loophole allows significant influence to go unrecorded</li> <li>• A necessary step towards genuine transparency</li> </ul>
33 — Require consultant lobbyists to register communications with special advisers, director generals and directors.		<ul style="list-style-type: none"> <li>• The CIPR supports expanding the scope</li> <li>• But this would still exclude in-house lobbyists</li> <li>• To deliver full transparency the register should be expanded to include all lobbying activity</li> </ul>
34 — Require consultant lobbyists to declare the date, recipient and subject matter of their lobbying.		<ul style="list-style-type: none"> <li>• The CIPR supports this</li> <li>• Current requirement to list clients only is wholly inadequate</li> <li>• But this should form part of a unified register covering all lobbying, not consultants only</li> </ul>

# What the CIPR wants to see in this review

The CSPL recommendations made in 2021 were a missed opportunity and this review must not repeat that mistake. The CIPR is calling for comprehensive and ambitious reforms that bring Westminster in line with comparable democracies and delivers genuine transparency for the public.

The CIPR is calling for:

- A unified register covering all lobbying activity, not just consultant lobbyists
- An expanded scope that, at minimum, covers ministers, special advisers, and senior civil servants
- Removal of the VAT threshold which allows well-connected individuals and foreign interests to lobby with no obligation to register
- Removal of the incidental lobbying exemption, widely regarded as unworkable
- Meaningful disclosure requirements to include the date, who lobbied, on whose behalf, who was lobbied, and the subject matter
- All channels of communication brought into scope, with disappearing messages on official matters prohibited
- A statutory code of conduct with meaningful sanctions
- Stronger enforcement, with fines actually levied and brought closer in line with peer nations
- A free and simple digital registration system to avoid disproportionate burdens on smaller organisations

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