



Improving ethical standards in government

Tim Durrant, Catherine Haddon,
Alex Thomas and Jack Pannell

Introduction

The role of former prime minister David Cameron in lobbying on behalf of failed finance company Greensill Capital has sparked controversy. The episode has shown the need to change some of the rules that regulate relations between business and government, and enforce existing ones far better.

There are many benefits to allowing people, both ministers and officials, to move between the public and private sectors and to ensuring the views of business are heard at the heart of government. Such exchange makes for better policy and enhances the skills available to the civil service. But the benefit of this exchange must always be balanced with the principle that people doing public sector work should not be motivated by the possibility of using their position for personal or private sector gain. There are rules in place to mitigate the risk that any appointment might provide an improper advantage to a business or individual. But the current rules on lobbying, transparency and post-government jobs are not working well.

Cameron's work for Greensill – including lobbying the health secretary to investigate the possibility of using the company's products in the NHS, and the chancellor to ensure it had access to the financial schemes set up during the pandemic – was within the letter of the current rules. He was employed by Greensill two years after he left office, the period during which former ministers' appointments to the private sector are regulated. And as an employee, not a consultant lobbyist, he did not have to declare his work to the official Register of Consultant Lobbyists (a public body established when he was prime minister).¹ However, his actions show that the protections to ensure a clear line between the public interest and private benefit are not functioning as intended.

Cameron himself has acknowledged he should have acted differently,² and there are growing calls for changes to the rules to ensure that the same thing cannot happen again. Alongside Cameron, there have been revelations about former civil servants – including the government’s chief commercial officer, Bill Crothers – who also had links with Greensill, even while still in post. There have also been other recent examples of individuals outside government being in close contact with high-profile ministers – including the prime minister himself, when Sir James Dyson spoke to him via text message about a tax issue.³

But more fundamentally the affair has raised questions about the role of lobbying and the robustness of rules around ethics and propriety in how former and current ministers and officials move from government to the private sector.

The plethora of reviews and inquiries now launched into the Greensill and lobbying questions highlight just how big a problem this has become. The prime minister has asked Nigel Boardman, a non-executive director of the Department for Business, Energy and Industrial Strategy, to review the government’s links with Greensill.⁴ Labour criticised the Boardman review as a “cover-up”, and argued for the creation of a temporary parliamentary select committee to investigate Greensill.⁵ The government opposed this move and has said that Boardman will have “access to all necessary government information required to conduct the review and will engage with those involved at the time decisions were made”.⁶

Meanwhile, three select committees – Treasury, Public Accounts, and Public Administration and Constitutional Affairs – have also launched inquiries into the links between the company and government, and the wider questions of lobbyists’ access to ministers. The Committee on Standards in Public Life, guardian of the Nolan principles,* was already conducting a review into the landscape of standards rules in the UK and has now said it will consider problems raised by lobbying. And the National Audit Office (NAO) has also launched an investigation into Greensill’s involvement in Covid-19 support schemes.

These reviews are welcome. But the bigger question is whether the government will act in response. Many of the problems with the rules are already clear. The current arrangements are a patchwork of different rules and enforcement bodies that have grown up over time. It is right that there are separate sets of rules for ministers, officials, special advisers and others, but the government needs to reform these to make them work better together.

The government should also enforce the existing arrangements, patchwork or not, far better than it currently does. In addition it should put in place new rules to avoid real or potential conflicts of interest, including on shareholdings, directorships, relations with unions and political funders. Some balance will always be required: these rules should not make joining the public sector, in any capacity, so onerous that it is unattractive to people with valuable private sector expertise or preclude the possibility of people leaving the public sector to have successful private sector careers.

* Named after Lord Nolan, who first set out the principles in 1995, they are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

On a fundamental level, the rules are only as good as the people enforcing them. The biggest problem the Greensill story has exposed is what can happen when standards in government are able to be enforced only through powerful people effectively marking their own homework. The prime minister enforces the Ministerial Code, senior civil servants oversee the Civil Service Code and assess conflicts of interest in their own departments, and former ministers must report themselves to the committee that advises on post-government jobs. If these events have revealed anything, it is that enforcement of all these rules should not be solely reliant on the goodwill of those to whom they apply.

In this paper we look in detail at the different rules in place and how they need to be reformed. Our key recommendations are:

Current ministers

The government should give the newly appointed independent adviser on ministerial interests – Lord Geidt, a former private secretary to the Queen – the power to both initiate his own investigations into possible breaches of the Ministerial Code and to publish the findings. To do so, the government should put the code on a statutory basis, and ensure the independent adviser is subject to a pre-appointment hearing with the Public Administration and Constitutional Affairs Committee (PACAC). The code should also be updated to make clear that ministers are expected to be transparent about all their meetings, including with lobbyists, and clarify expectations around informal means of communication – such as text messages.

Current civil servants, special advisers, non-executive directors and other appointees

Civil servants should have to declare all their interests in private sector companies to their departments, and the interests of those in the senior civil service should be published. All civil servants, including those entering from the private sector, should have to seek and follow the advice of their permanent secretary to avoid any real or perceived conflicts of interest. Special advisers, departmental non-executive directors and ad-hoc appointees should seek and follow the advice of the permanent secretary of the department they are joining on any potential conflicts of interest, which may include putting any shares they hold into a blind management arrangement.

Former prime ministers, ministers and civil servants

The ban on lobbying government, where an organisation stands to benefit financially, should be extended from two to five years for all former cabinet ministers, including prime ministers. The body that oversees former ministers' post-government jobs, the Advisory Committee on Business Appointments (ACOBA), should be put on a statutory basis, and should report to PACAC (including annually on revisions required to the rules). ACOBA should be given powers to sanction former ministers who do not comply with the business appointment rules, or with its advice.

Current ministers

What are the current rules?

The Ministerial Code, a document issued by the prime minister, states that ministers must not allow any conflict of interest to arise or even “appear to arise” with their public role. They may not accept any sort of gift or hospitality that might compromise their role. Any meetings with external organisations must be disclosed, and ministers must try to ensure that a private secretary or official is present. If, in an informal meeting, the topic turns to government business, the minister must inform their department of the discussion straight away.

When appointed, ministers must provide the permanent secretary with a list of all interests for themselves and close family members that might present a potential conflict. If the minister’s department deals with any issues that might conflict with their private interests, they are required to remove themselves from any decision making. While permanent secretaries may guide ministers on what might cause a conflict of interest, the final decision is the minister’s, as is what course of action should be taken to remedy any issues.

Are there gaps in these rules?

The Ministerial Code is relatively straightforward in setting out how ministers are expected to behave generally but it lacks detail on how they should respond specifically to lobbying. The code says that ministers should publish information on meetings on official business and any gifts or hospitality they receive, but it is silent on other conversations with external groups, including phone calls and text messages. The current rules are also not always properly followed – although Matt Hancock said he notified officials of his meeting with Lex Greensill in October 2019, there is no official record in his department’s publication of his meetings that he did so. This is not acceptable.⁷

There are also gaps in how the code is enforced. The code is issued in the name of the prime minister; its existence and current form is based on the convention of Boris Johnson’s predecessors having issued one. It is also the prime minister who is responsible both for deciding whether ministers are in breach of it, and for assigning any sanctions in the case of a breach: he is both judge and jury.

The prime minister had an opportunity on appointing his new independent adviser on ministerial interests to improve how the rules are enforced, but he chose not to take it. The former adviser, Sir Alex Allan, resigned in November 2020 after Johnson disagreed with his findings that the home secretary, Priti Patel, had broken the Ministerial Code by bullying her officials. Johnson appointed Lord Geidt as his new adviser on 28 April 2021, but did not give Geidt any new powers to start his own investigations into potential breaches of the code or publish his findings when he does investigate.⁸

What needs to change?

- The government should put the Ministerial Code on to a statutory footing, like the Civil Service Code and the Special Advisers' Code, to give it the same status and enforceability as other, similar, sets of rules. This does not mean legislating for the specific rules, as each iteration of the code should be issued in the name of the prime minister, but legislation should emphasise that the code be based on the principles of public life.
- The legislation should also clarify the remit of the independent adviser on ministerial interests, who should be subject to a pre-appointment hearing with PACAC (this did not happen with Lord Geidt's recent appointment). The adviser should have a permanent staff, rather than relying on Cabinet Office civil servants to support specific investigations on an ad-hoc basis as happens now.
- The prime minister should reconsider his decision on not giving Lord Geidt the power to initiate his own investigations, or to publish the findings. This would be in the prime minister's interests as well as the public's: it would stop accusations that ministers are marking their own homework. This would be in line with recommendations from Lord Evans, chair of the Committee on Standards in Public Life.⁹
- The prime minister has committed to updating the Ministerial Code.¹⁰ The new version should include changes to make reference to dealing with lobbying. The new code should set out that departments should publish information on all their ministers' meetings with outside groups – including phone calls, emails and text messages – quarterly.

How should these rules be enforced?

- Once a new independent adviser is appointed, they should be able to investigate all aspects of the Ministerial Code except for the sanctions that will follow a breach, which should remain with the prime minister.
- Any minister whose department does not publish the relevant information on their meetings in time should have to explain why to their departmental select committee, as well as to the independent adviser.

Current civil servants

What are the current rules?

The Civil Service Code sets out the standards of behaviour required of civil servants, including that they “must not misuse [their] official position, for example by using information acquired in the course of [their] official duties to further [their] private interests or those of others”, that they “must not be influenced by improper pressures from others or the prospect of personal gain”, and that they “must provide information and advice, including advice to ministers, on the basis of evidence, and accurately present the options and facts”.

The separate Civil Service Management Code gives more detail on additional jobs. Departments must “require staff to seek permission before accepting any outside employment which might affect their work either directly or indirectly”.¹¹ Civil servants are also required to declare any business interests they, or their immediate family, hold that they might be able to benefit using their official position.

That means that there is no blanket prohibition on civil servants taking on roles or responsibilities in addition to their civil service employment. Once somebody has asked whether they can accept an additional role it is for individual managers to determine whether that is appropriate and can be managed without creating a conflict of interest. Ultimately, it is the responsibility of a departmental permanent secretary to make those calls.

Senior civil servants also must publish a list each quarter of gifts received, hospitality and expenses; permanent secretaries must declare their external meetings.

Are there gaps in these rules?

If the rules above are followed then they should adequately ensure that civil servants are not unduly influenced by personal or private interests. However, again much relies on individual judgments – of managers and ultimately of permanent secretaries. Bill Crothers’ acceptance of his role at Greensill was approved, despite it being a clear conflict with his job as head of government procurement.¹²

There is a certain subset of civil servants, the ‘crown representatives’ recruited from business, who will – by design – have close links to the private sector. Crothers was a crown representative before becoming the government’s chief procurement officer and then chief commercial officer.¹³ Crown representatives are appointed to “help the government act as a single customer”, based on their understanding of the private sector and procurement processes.¹⁴ Given their private sector backgrounds, many maintain links with business during their time in the government. The Cabinet Office has said that all crown representatives “go through regular propriety checks”,¹⁵ but the nature of these checks is not clear, as the Cabinet Office does not publish their findings anywhere.

The transparency declarations made by senior civil servants who are required to publish information on their meetings, gifts and hospitality are often late and sometimes incomplete. For example, the currently available register of meetings of the permanent secretary at the Department for Education covers meetings only up to March 2020.¹⁶ Clearly, part of the delay will be due to the pandemic, and the fact that a new permanent secretary was appointed in September 2020 – but it is not acceptable that this register has not been updated for more than a year.

What needs to change?

- Departments should record details of all civil servants who have accepted paid additional employment, and publish this information for all members of the senior civil service. The plan set out by the cabinet secretary to PACAC in April 2021 goes some way to dealing with this, but more transparency is needed.
- Civil servants should have to declare all their interests in private sector companies to their departments, and the interests of those in the senior civil service should be published. All civil servants, including those entering from the private sector, should have to seek and follow the advice of their permanent secretary to avoid any real or perceived conflicts of interest.
- Permanent secretaries must ensure that all civil servants get sufficient guidance on managing conflicts of interest. They should ensure that those joining their department from the private sector are aware of the importance of avoiding potential conflicts of interest.
- Permanent secretaries should make sure that where information is expected to be published, their departments publish it in a timely and comprehensive way.

Who should enforce this?

- Departmental boards should assess any possible conflicts of interest among civil servants in their departments.
- The Civil Service Commission, which safeguards an impartial civil service and oversees standards in civil service recruitment, should ensure that permanent secretaries oversee the collection and publication of all relevant data, and the provision of advice to all appointees from the private sector. The commission should inform PACAC if it disagrees with a permanent secretary's advice on how to manage any conflicts of interest.
- Any permanent secretary whose department does not publish the relevant information on their meetings in time should have to explain why to their departmental select committee.

Special advisers, non-executive directors and ad-hoc appointees

What are the current rules?

Like ministers and civil servants, special advisers already have a code of conduct that regulates what they should and should not do in office.¹⁷ Though special advisers are ‘temporary’ civil servants, much of their code is the same as the one that applies to permanent officials.* However, as they are appointed to provide political advice to their minister(s), they are exempt from the requirement on the permanent civil service to be impartial. They also cannot be responsible for public expenditure, manage civil servants, use official resources for political party activity or view sensitive information unless they have the required security clearance.

But special advisers are subject to the same requirements as civil servants for integrity and honesty, must not use their position for private gain, and must declare any gifts or hospitality they receive as part of their duties to their department.

Non-executive directors (NEDs), who sit on departmental boards, are not employed by the government in the same way as ministers, officials or special advisers. However, as members of the departmental board, they can be very influential over a department’s work and have access to privileged information. NEDs also have a code of conduct and are subject to many of the same rules as ministers and special advisers, including a ban on using official resources or information for personal or political gain, and on accepting gifts or hospitality that may compromise their role.¹⁸ They must also, like ministers, declare all their, and their family members’, private financial interests.

Other ad-hoc appointees – often referred to as government ‘tsars’ – like Baroness Harding, head of NHS Test and Trace, and Kate Bingham, former head of the UK vaccine taskforce, do not face any transparency requirements in their government roles at all. (If they are members of the House of Lords, they have to declare their financial and other interests in that capacity).

Are there gaps in these rules?

Unlike ministers and NEDs, special advisers are not required to publish all their financial interests; they are published only if the departmental permanent secretary judges them to be “relevant”.¹⁹ This has led to criticisms of conflicts of interest, most recently regarding No.10 deputy chief of staff Baroness Finn.²⁰ Before joining the prime minister’s team, Baroness Finn was an NED at the Cabinet Office, where her declaration of interests stated that she was a partner at Francis Maude Associates, a consultancy founded by Lord Maude that provides services to governments around the world.²¹ (Lord Maude is himself now reviewing the work of the Cabinet Office for the prime minister). As a special adviser, Baroness Finn’s declaration of interests no longer has to be made public.

* “Temporary” refers to the fact that special advisers are employed to serve a particular government minister, as opposed to the permanent civil service, which serves governments of all parties.

The vast majority of special advisers abide by the rules. Those who do not are formally accountable to the minister they work for. However, past Institute research has found that few ministers have the time to focus on management of their advisers.²² The Cabinet Office's propriety and ethics team also has a role in overseeing the work and conduct of special advisers, but given that much of an adviser's work is political in nature, the ability of the Cabinet Office to change their behaviour is limited. The problems in how rules regarding special advisers are enforced risks future controversies.

Unlike special advisers, NEDs must declare any financial interests, but there is little consistency to how this information is published. Each government department takes a different approach and the data is not always easy to find. This is not acceptable.

The appointment of special advisers, NEDs and ad-hoc appointees is not regulated by the Public Appointments Commissioner, and there is currently no requirement for government tsars to declare their private financial interests. This is a problem because it creates a potential for undeclared conflicts of interest.

What needs to change?

- Special advisers and other non-regulated appointees, like Baroness Harding and Kate Bingham, should have to register all their financial interests with their departments, and these should be published quarterly.
- Special advisers, NEDs and other ministerial appointees should have to seek advice from the permanent secretary of the department they are joining as to whether their private financial interests present any potential conflict of interest with their government role. Potential NEDs should discuss this with the government lead NED (currently Lord Nash). If there is a risk of a conflict of interest, they should have to take the same action as ministers, including possibly giving up the interests.
- At other points, it may be appropriate for NEDs to recuse themselves from board decisions; if this is the case, this should be noted in the board minutes.
- Ministers who appoint tsars should write to their departmental select committee, explaining the remit and terms of their appointment.²³
- Departments should publish registers of interest of their special advisers, NEDs and any ad-hoc appointees in a consistent, easily accessed format.

How should these rules be enforced?

- The lead NED of each department and the Civil Service Commission should ensure that permanent secretaries are correctly fulfilling their responsibility to advise special advisers, other NEDs and ad-hoc appointees.
- The role of ministers in ensuring that their special advisers' conduct meets expected standards is already part of the Ministerial Code. It should be subject to proper scrutiny by the independent adviser.

Former ministers and civil servants

What are the current rules?

On leaving office, ministers and civil servants are subject to 'business appointment rules', which are intended to ensure that there is no suspicion that an appointment is a reward for past favours, or that an appointment would help an employer gain improper advantage. The rules include a ban on lobbying the government for a certain period (from six months for junior officials to two years for ministers and the most senior officials). Ministers and the most senior civil servants can seek advice from the Advisory Committee on Business Appointments (ACOBA), which oversees the rules.²⁴ ACOBA can recommend that a former public servant does not take up a certain position, or delays starting a job for a certain period.

Are there gaps in these rules?

The rules apply only to those who have left government within the last two years; after that period, there is no restriction on what a former minister or official can do. As a result, David Cameron did not have to seek advice from ACOBA on his employment with Greensill.

But even when individuals leaving government are within the ACOBA timeframe, there is no enforcement of the requirement to seek ACOBA's advice, to adhere to it – or, more fundamentally, of the ban on lobbying itself. ACOBA's only lever for ensuring compliance is to write to individuals who are publicly seen to have taken on an appointment that they should have sought advice for. The chair of ACOBA, Lord Pickles, made the point that embarrassment can "seriously affect an ex-minister's, and indeed an ex-civil servant's, prospects" of post-government employment.²⁵ But embarrassment is not the same as real sanctions.

What needs to change?

- The ban on lobbying government should be extended from two to five years for all former cabinet ministers, where the organisation could gain financially.
- The government should legislate to give the business appointment rules and ACOBA a statutory basis. ACOBA should be recreated as a parliamentary body that reports to PACAC, in the way that the NAO reports to the Public Accounts Committee.

How should these rules be enforced?

- ACOBA should be given the power and resources to investigate individuals who have not abided by the rules and to impose sanctions, including fines, on those who do not comply. The government has argued recently that the current "moral and reputational pressure" resulting from the rules means that no legal powers for enforcement are necessary.²⁶ The Greensill case has shown that this is clearly not the case.

Lobbyists

What are the current rules?

The Register of Consultant Lobbyists was created in 2014 and requires lobbying companies to submit to it company details and names of their clients and directors. Companies are then required to keep their information on the register up to date, and to inform the registrar every three months whether lobbying of ministers or permanent secretaries has occurred.²⁷ The registrar has powers to require the provision of information and can issue civil penalty notices.

These rules apply only to consultant lobbyists – that is, those individuals and businesses who are lobbying on behalf of somebody else.

When the coalition government introduced the register it argued that it was necessary to complement the meeting transparency declarations for ministers and permanent secretaries. The rationale is that if a minister meets with an individual or company representing themselves, that will be recorded and published. If a minister met with a consultant lobbyist, it would not previously have been clear who that consultant lobbyist was representing.

Are there gaps in these rules?

The difficulty with these rules is that they are very narrow, and address only a small gap in government transparency arrangements. They require only formal meetings to be declared, not all contact between lobbyists and government. Lobbyists directly employed by companies are excluded, as are other organisations that interact with the government. Special advisers and senior civil servants other than permanent secretaries are excluded.

It is also straightforward to evade the requirement to register and declare contacts; for example, if a consultant lobbyist arranged a meeting, but did not attend with their client.

What needs to change?

- As the Public Relations and Communications Association, the industry body for professional lobbyists, has argued, the lobbying register should be expanded to cover all lobbying of government, including that by in-house business lobbyists.²⁸
- Meetings with special advisers and civil servants should be within the scope of the rules, and the register should cover all contacts, including phone calls and text messages.

How should these rules be enforced?

- The lobbying registrar should ensure that the work of in-house lobbyists, as well as consultant lobbyists, is logged.
- Ministers and their teams need to take responsibility for ensuring all contacts are logged. If they do not, this should count as a breach of the Ministerial Code.

Conclusion

The stories published about Greensill have showed that the rules governing the relationship between the public and private sectors are not working well. The investigations currently under way will uncover the details of that case, but the need for reform is already clear.

Those reforms should not undermine the ability of government to engage with the private sector, nor stop the valuable interchange between the private and public sectors for those working as civil servants, advisers or non-executive directors. But there must be clearer distinctions between public service and private interests, more effective rules – and stronger powers for enforcement to back these up.

This paper has set out some clear recommendations for change, but the government could go further. In Northern Ireland the recently passed Functioning of Government Act 2021, which began as a private member's bill, put new legal requirements on ministers and their offices. These include an obligation to record all meetings that cover government business, including any lobbying. It also created a new criminal offence, punishable by up to two years in prison, of communicating official information for the "improper benefit" of any individual.

There are various reviews currently under way but these cannot guarantee changes in the rules, their enforcement or, most importantly, the behaviour of those in public life. If these are not forthcoming, the UK parliament should follow the example of the Northern Ireland assembly and investigate further ways to ensure that those currently in government, as well as those who used to be, adhere to the high standards the public expect of them.

References

- 1 ORCL, 'Investigation into the Rt Hon David Cameron', (no date), retrieved 28 April 2021, <https://registrarofconsultantlobbyists.org.uk/investigation-into-the-rt-hon-david-cameron>
- 2 'In full: David Cameron's statement on Greensill row', BBC News, 12 April 2021, retrieved 27 April 2021, www.bbc.co.uk/news/uk-politics-56716031
- 3 'Boris Johnson told Sir James Dyson by text he would "fix" tax issue', BBC News, 21 April 2021, retrieved 18 April 2021, www.bbc.co.uk/news/uk-politics-56819137
- 4 Cabinet Office, 'Review into the Development and Use of Supply Chain Finance in Government – Terms of Reference', press release, 16 April 2021, www.gov.uk/government/news/review-into-the-development-and-use-of-supply-chain-finance-in-government-terms-of-reference
- 5 'Greensill: Labour urges 'full' probe into Cameron lobbying', BBC News, 13 April 2021, retrieved 27 April 2021, www.bbc.co.uk/news/uk-politics-56730447
- 6 Cabinet Office, 'Review into the Development and Use of Supply Chain Finance in Government – Terms of Reference', press release, 16 April 2021, www.gov.uk/government/news/review-into-the-development-and-use-of-supply-chain-finance-in-government-terms-of-reference
- 7 Gov.uk, DHSC: ministerial gifts, hospitality, travel and meetings, October to December 2020, 22 April 2021, retrieved 28 April 2021, www.gov.uk/government/publications/dhsc-ministerial-gifts-hospitality-travel-and-meetings-october-to-december-2020
- 8 Gov.uk, 'The prime minister's letter to Lord Evans', 28 April 2021, retrieved 28 April 2021, www.gov.uk/government/publications/correspondence-between-the-prime-minister-and-lord-evans-on-the-independent-adviser-on-ministers-interests
- 9 Evans J, Letter from Lord Evans, Chair of the Committee, to the Prime Minister about the Independent Adviser on Ministers' Interests, Committee on Standards in Public Life, 2021, www.gov.uk/government/publications/letter-from-lord-evans-chair-of-the-committee-to-the-prime-minister-about-independent-adviser-on-ministers-interests
- 10 Gov.uk, 'The prime minister's letter to Lord Evans', 28 April 2021, retrieved 28 April 2021, www.gov.uk/government/publications/correspondence-between-the-prime-minister-and-lord-evans-on-the-independent-adviser-on-ministers-interests
- 11 Civil Service, Civil Service Code of Conduct, November 2016, www.gov.uk/government/publications/civil-servants-terms-and-conditions
- 12 Chisholm A, 'Letter to Lord Pickles, Chair, Advisory Committee on Business Appointments', 12 April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/977744/Letter_from_Alex_Chisholm_to_Lord_Pickles_re_Bill_Crothers__2_.pdf
- 13 'Bill Crothers', Gov.uk, (no date), retrieved 27 April 2021, www.gov.uk/government/people/bill-crothers
- 14 Cabinet Office, 'Crown Representatives and strategic suppliers', Gov.uk, 25 January 2021, retrieved 27 April 2021, www.gov.uk/government/publications/strategic-suppliers
- 15 Murphy J, 'Official announced Greensill in key role before joining firm', *Evening Standard*, 16 April 2021, retrieved 27 April 2021, www.standard.co.uk/news/politics/lex-greensill-official-announced-key-role-before-joining-firm-b930056.html
- 16 Department for Education, 'DfE: Permanent Secretary's meeting with external organisations' Gov.uk, 20 July 2020, retrieved 27 April 2021, www.gov.uk/government/collections/dfе-permanent-secretarys-meetings-with-external-organisations
- 17 Cabinet Office, Code of Conduct for Special Advisers, December 2016, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832599/201612_Code_of_Conduct_for_Special_Advisers.pdf
- 18 Cabinet Office, Code of Conduct for Board Members of Public Bodies June 2019, November 2019, www.gov.uk/government/publications/code-of-conduct-for-board-members-of-public-bodies/code-of-conduct-for-board-members-of-public-bodies-june-2019
- 19 Cabinet Office, Government Submission to Committee on Standards and Public Life Standards Matter 2 Review, April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980366/Government_Submission_to_Standards_Matter_2.pdf

-
- 20 Swinford S, 'Concern over Baroness Finn's stake in advisory firm FMAP limited', *The Times*, 14 April 2021, retrieved 27 April 2021, www.thetimes.co.uk/article/concern-over-baroness-finns-stake-in-advisory-firm-fmap-limited-7226k22jg
 - 21 Cabinet Office, 'Cabinet Office register of non-executive board members' interests August 2020', Gov.uk, 24 September 2020, retrieved 27 April 2021, www.gov.uk/government/publications/cabinet-office-register-of-non-executive-board-members-interests-august-2020
 - 22 Durrant T, Blacklaws N and Zodgekar K, *Special advisers and the Johnson government: How the prime minister and his team are changing the role*, Institute for Government, 2020, www.instituteforgovernment.org.uk/publications/special-advisers
 - 23 Thomas A, 'Government reaches for the tsars in its coronavirus response', blog, Institute for Government, 22 May 2020, retrieved 27 April 2021, www.instituteforgovernment.org.uk/blog/government-reaches-tsars-its-coronavirus-response
 - 24 Advisory Committee on Business Appointments, Gov.uk, (no date), retrieved 27 April 2021, www.gov.uk/government/organisations/advisory-committee-on-business-appointments
 - 25 House of Commons Public Administration and Constitutional Affairs Committee, 'Oral Evidence: The Advisory Committee on Business Appointments' (HC 1350), House of Commons, 15 April 2021, <https://committees.parliament.uk/oralevidence/2012/default>
 - 26 Cabinet Office, Government Submission to Committee on Standards and Public Life Standards Matter 2 Review, April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980366/Government_Submission_to_Standards_Matter_2.pdf
 - 27 Office of the Registrar of Consultant Lobbyists, 'Office of the Registrar of Consultant Lobbyists', (no date), retrieved 27 April 2021, <https://registrarofconsultantlobbyists.org.uk>
 - 28 Public Relations and Communications Association, 'Lobbying Industry publishes 6-point Public Confidence Plan for Reform in response to Cameron Inquiry', 13 April 2021, retrieved 27 April 2021, <https://news.prca.org.uk/lobbying-industry-publishes-6-point-public-confidence-plan-for-reform-in-response-to-cameron-inquiry>

About the authors

Tim Durrant

Tim is an associate director leading the ministers programme, which includes the Institute for Government's work with current and past ministers and ministerial offices. He joined the Institute in 2017 to work on the Brexit programme. Prior to this, Tim was a civil servant, working on a number of international and domestic policy areas at HM Treasury and the Department for International Development.

Dr Catherine Haddon

Catherine is the Institute's resident historian and leads our work on changes of government, ministers and the workings of the constitution. Before joining the Institute in November 2008, Catherine was a lecturer on security and intelligence history, taught contemporary British history, and worked as a historian and researcher.

Alex Thomas

Alex is a programme director at the Institute for Government. He was a civil servant from 2003–2019 and has worked in the Department for Environment, Food and Rural Affairs, the Cabinet Office and the Department of Health.

Jack Pannell

Jack Pannell is a research assistant who joined the Institute for Government in 2021, working on the ministers and constitution teams.

Acknowledgements

The authors wish to thank Bronwen Maddox, Hannah White and Jill Rutter for their input into earlier drafts. Further thanks go to Will Driscoll and Sam Macrory, and to all those around the IfG who provided their thoughts and comments on this important topic.

The Institute for Government is the leading think tank working to make government more effective.

We provide rigorous research and analysis, topical commentary and public events to explore the key challenges facing government.

We offer a space for discussion and fresh thinking, to help senior politicians and civil servants think differently and bring about change.

Copies of this IfG Insight are available alongside our other research work at:

 instituteforgovernment.org.uk

 enquiries@instituteforgovernment.org.uk

 +44 (0) 20 7747 0400  +44 (0) 20 7766 0700

 [@instituteforgov](https://twitter.com/instituteforgov)

**Institute for Government, 2 Carlton Gardens
London SW1Y 5AA, United Kingdom**

April 2021

© Institute for Government 2021

The Institute for Government is a registered charity in England and Wales (No.1123926) with cross-party governance. Our main funder is the Gatsby Charitable Foundation, one of the Sainsbury Family Charitable Trusts.