# **Guidance**

# Ministers' gifts (given and received), travel, hospitality received and meetings with external organisations and individuals.

Version: 2024-04-02

# General guidance

The <u>Ministerial Code</u> requires government departments to publish details of ministers' gifts, hospitality, overseas travel and meetings on a quarterly basis. This requirement is reflected in the <u>Central Government Corporate Transparency Commitments</u>.

Departments should produce returns in a way that is mindful of the end user - ensuring data is meaningful, accurate and clear. Departments' permanent secretaries are responsible for the quality and timely publication of their transparency data. Meanwhile, ministers retain responsibility for the accuracy of their transparency content, which should be cleared by ministers, or the minister's principal private secretary (where the minister is content to delegate approval) prior to publication.

Detailed guidance is included below on:

**Annex A:** Ministers' gifts (given and received)

Annex B: Ministers' hospitality
Annex C: Ministers' overseas travel

**Annex D:** Ministers' meetings with external organisations and individuals

For details on special advisers' and senior officials' transparency returns, please refer to the respective guidance documents.

# **Ministers**

Departments must complete a declaration for gifts, hospitality, overseas travel, and meetings with external organisations and individuals for each minister. This includes instances where the minister has nothing to declare, in which case Nil Return should be reported. Declarations apply to all those working in a ministerial capacity, including those with duties on an interim basis.

Where a minister has responsibilities in more than one department, the relevant departments should liaise on that minister's transparency returns. These departments should normally aim to avoid duplication between their returns, distinguishing travel, gifts, hospitality and meeting entries based on the duties performed for each department.

# **Preparing data**

The Cabinet Office issues a template to accompany this guidance, which should be used to compile this data. The Cabinet Office will give departments notice if the template is updated and will attach the latest version to each commissioning email.

To support data accuracy, best practice is for private offices to collate ministers' data on an ongoing basis. Collators are encouraged to examine internal approval processes and, where possible streamline any administrative burden.

Departments should submit draft returns to the Cabinet Office Transparency Data team for review in line with this guidance. Departments should obtain initial clearance from the senior principal private secretary for all draft ministerial datasets submitted to the Cabinet Office Transparency Data team. Following feedback from the Cabinet Office, finalised returns must be cleared by the minister or senior principal private Secretary prior to publication.

# **Publishing data**

Departments are responsible for publishing their transparency data on GOV.UK on the specified grid slot set by No 10. Departments should ensure declarations are made in full for each respective reporting period as outlined below (dates inclusive).

Data for the period of:

- 1st January to 31st March should be published by the end of June
- 1st April to 30th June should be published by the end of September
- 1st July to 30th September should be published by the end of December
- 1st October to 31st December should be published by the end of March.

Full draft submissions should be shared with the Cabinet Office's Transparency Data Team for an advisory check within one calendar month of the end of each reporting period. For example, a draft of the department's data for the period of 1st January to 31st March should be shared with the Transparency Data team before the end of April.

**Returns must be published** in accordance with the 'How to publish' guidance on GOV.UK: <a href="https://www.gov.uk/guidance/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings">https://www.gov.uk/guidance/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings</a>. This includes publishing gifts, hospitality, overseas travel, and meetings as separate CSV files, ensuring files are correctly named and tagged in collection pages on GOV.UK. Do <a href="https://notesi.nc/notes/notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings">notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings</a>. This includes publishing gifts, hospitality, overseas travel, and meetings as separate CSV files, ensuring files are correctly named and tagged in collection pages on GOV.UK. Do <a href="https://notes/notes/notes/notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings">notes/notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings</a>. This includes publishing gifts, hospitality, overseas travel, and meetings as separate CSV files, ensuring files are correctly named and tagged in collection pages on GOV.UK. Do <a href="https://notes/notes/notes/notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings">notes/notes/how-to-publish-ministerial-gifts-hospitality-travel-and-meetings</a>.

Returns must be published in CSV format using UTF-8 encoding wherever possible. All leading and trailing whitespace, empty rows and empty columns to the right of the dataset should be removed.

- Google Sheets should use UTF-8 encoding by default when selecting "Download As" -CSV
- Recent versions of Excel provide the option to save individual sheets as "CSV UTF-8 (Comma Delimited) (.csv)".

**Departments must not publish this data in other file formats**, such as PDF, ODS or XSLX. Departments should undertake a final review of their datasets once these have been published on <a href="https://www.gov.uk/search/transparency-and-freedom-of-information-releases">https://www.gov.uk/search/transparency-and-freedom-of-information-releases</a>.

Please contact the Cabinet Office Transparency Data team <a href="mailto:transparencydatateam@cabinetoffice.gov.uk">transparencydatateam@cabinetoffice.gov.uk</a> should you have any queries on the completion of these ministerial transparency returns.

Propriety and ethics questions should be directed to the departmental permanent secretary's office in the first instance, who may refer queries to the Cabinet Office Propriety and Ethics team <a href="mailto:proprietyandethics@cabinetoffice.gov.uk">proprietyandethics@cabinetoffice.gov.uk</a>.

# Annex A: Ministers' gifts

Guidance on giving and receiving gifts is set out in section 7 of the Ministerial Code.

#### Departments should include:

- 1. Details of gifts given and received in a ministerial capacity valued in excess of £140. Where a family member receives a gift valued in excess of £140 whilst accompanying a minister on an official visit, this should also be declared.
- 2. Where there are sensitivities around disclosing the value of a gift, in excess of the £140 threshold, please use "Above limit" (see table below for data formatting and presentational guidance). This exemption would not normally apply to gifts that are commercially available or gifts purchased by the minister.
- 3. Where a minister receives a selection of gifts from an individual or organisation and the total value exceeds £140, departments should combine and publish these as one entry. Here a collective description should be provided.
- 4. Where a minister receives a gift from an individual on behalf of an organisation, the organisation's name rather than the individual's name should normally be declared.
- 5. Where a gift is given by a representative of an overseas government, their title and the country they represent should be included.
- 6. Where gifts are given by newspaper and other media proprietors, editors or senior executives, departments should record the name of the individual, the media organisation and their role. Where gifts are given by individuals from media organisations below this level, departments should record the name of the organisation only.
- 7. For gifts received, departments need to confirm the 'outcome' in respect of each gift. This will identify whether a gift has been:
  - 7.1. 'Purchased by the minister': where the minister has purchased a gift.
  - 7.2. 'Held by department': Please select this outcome where a gift has been retained by the department. Departments may choose to leave the description as 'held by department', or specify where appropriate whether a gift has been:
    - 7.2.1. 'Used for hospitality': this outcome may apply for example when a gift includes perishable goods or beverages.
    - 7.2.2. 'Donated to charity': where a gift has been deemed appropriate for re-gifting to a nominated charity this outcome should be selected from the drop-down menu in the template.
- 8. If the status of a gift changes at a later date, i.e., if a minister decided to purchase a gift that was initially held by the department, an update should be made on the original declaration, ensuring any changes in the value of the gift are also reflected.

- 9. Gifts valued at £140 or below.
- 10. Invitations to hospitality such as tickets to sporting, theatre or other events and travel upgrades should be considered under the guidance for hospitality.
- 11. Gifts received or given in a Constituency or Party capacity.

<sup>&</sup>lt;sup>1</sup> See page 18 for table of Media Proprietors, Editors and Senior Executives.

- 12. Gifts that were refused.
- 13. Personal gifts, i.e. gifts given and received outside of a minister's capacity as a representative of HM Government.

- Ensure all ministers are declared on a consolidated departmental ministers' gifts return, including ministers' who did not receive any gifts for the period (Nil Return).
- Where a Nil Return applies to one or more ministers, ensure that all subsequent columns are populated with Nil Return.
- Where a minister has multiple gifts to declare, these should be listed chronologically.
- Do not include empty rows or cells between data entries, as this will create errors in the data once published online.
- When collating and editing data in the template, please ensure all internal comments are removed before submitting drafts for consistency checking.
- Please do not use soft returns, i.e., enter the data in each cell, separating text using full stops, semicolons, backslashes or commas only.
- Departments may wish to consult the current <u>GDS style guide</u><sup>2</sup>, for help with style, spelling and grammar conventions.

Minister	<ol> <li>List the minister's full name for each entry/row using the format, [Forename][Surname] e.g. Jo Bloggs.</li> <li>Do not include titles or honorifics. For example, please do not include: 'Sir/Lady/Baroness/Lord/Dr', 'The Rt Hon', 'MP/QC'.</li> </ol>
Date	<ol> <li>Report the date the gift was received or given, using hyphens in the format: YYYY-MM-DD i.e., 2023-10-01. This ensures the date is displayed correctly and avoids errors caused by differences between common British and International date formats.</li> <li>Ensure dates correspond to the given reporting period.</li> <li>Where the minister did not receive or give any gifts, please report Nil Return.</li> </ol>
Gift	<ol> <li>Describe the gift in general terms e.g., selection of books.</li> <li>Where the minister did not receive or give any gifts, please report Nil Return.</li> </ol>
Given or Received	<ol> <li>Select 'Given' or 'Received' as applicable from the drop-down menu.</li> <li>Where the minister did not receive or give any gifts, please report Nil Return.</li> </ol>
Who gift was given to or received from	<ol> <li>Only include the names of Individual(s) or organisation(s) in this column. Names of individuals should only be reported where the individuals are representing their own interests, with the exception of senior media figures.</li> <li>For senior media figures,<sup>3</sup> record the name of the individual, the media organisation and their role. For individuals operating below this level, departments should record the name of the organisation only.</li> <li>Do not include contextual information such as 'gift given by' etc.</li> <li>Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g.,</li> </ol>

<sup>&</sup>lt;sup>2</sup> https://www.gov.uk/guidance/style-guide

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<sup>&</sup>lt;sup>3</sup> See page 17 for table of Media Proprietors, Editors and Senior Executives.

	BBC. 5. If a gift is given to, or received from more than one organisation or individual, please name each in turn. 6. Honorifics may be used here. 7. Where the minister did not receive or give any gifts, please report Nil Return.
Value (£)	<ol> <li>Report all gifts valued above £140 only, ensuring all values are reported in GBP.</li> <li>Include numerics only (do not include other characters or text) e.g., 145.</li> <li>Where the value of the gift is not known or deemed sensitive to disclose, report: 'Above Limit'.</li> <li>Where the minister did not receive or give any gifts, please report Nil Return.</li> </ol>
Outcome (Received Gifts only)	1. Select the applicable outcome from the drop-down menu in the template:  a. Purchased by the minister b. Held by department i. Used for hospitality (optional) ii. Donated to charity (optional)  2. Where a gift was given rather than received, please report N/A.  3. Where a minister did not receive or give any gifts, please report Nil Return.

# **Example data: GIFTS GIVEN AND RECEIVED OVER £140**

Minister	Date	Gift	Given or Received	Who gift was given to or received from	Value (£)	Outcome (Received gifts only)
Hilary Bloggs	2023-10-01	Pen	Received	Widget Co.	145.95	Purchased by the Minister
Temitope Alatise	2023-11-01	Hamper	Received	Lord Mustermann, Lady Smith	275.99	Used for hospitality
Phil Anthropy	2023-12-10	Painting	Given	Minister Rew, Ambrossian Government	Above Limit	N/A
Faizan Salah	2023-10-04	Selection of books	Received	Ambassador Lukic, Morrwanian Embassy	Above Limit	Donated to charity
Faizan Salah	2023-10-17	Pair of cufflinks	Received	Kigin Ltd	175	Held by department
Christine Anderson	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return

# **Annex B: Ministers' hospitality**

Guidance on ministers receiving hospitality is set out in section 7 of the Ministerial Code.

## Departments should include:

- 1. Details of all hospitality received by ministers in a ministerial capacity for example, receptions, meals, travel upgrades, tickets for sporting events and concerts etc., including attendance at non-ticketed events, except where set out below.
- 2. The name of the organisation or individual who provided hospitality. Where hospitality is provided by newspaper and other media proprietors, editors or senior executives, departments should record the name of the individual, their role and the media organisation. Where hospitality is provided by individuals from media organisations below this level, departments should only record the name of the organisation.
- 3. There will be instances where hospitality <u>above</u> de minimis levels<sup>5</sup> is provided as part of a meeting, in which case, a corresponding entry should be declared for both meetings and hospitality.
- 4. For hospitality received, departments need to confirm whether the minister was accompanied by a guest. In instances where the ministers' guest received a personal invitation, it is nonetheless recommended departments declare the attendance of the plus one.
- 5. Where a government department has distributed hospitality on behalf of an external organisation or individual among other departments, the external organisation or individual should be named, and the hospitality declared in the usual way.

- 6. Hospitality received from devolved or foreign governments, HM Government bodies, including other government departments, non-departmental public bodies, non-ministerial departments, members of the Royal Household, executive agencies, government reviews and government advisory groups or representatives of Parliament.
  - a. If, in the course of any exempted hospitality, a minister entered into substantive discussions with a senior media figure, this should be considered under the guidance for meetings.
- 7. Hospitality from government non-executive directors, unless in the capacity of other non-government roles the non-executive director may hold.
- 8. Hospitality received by ministers in their capacity as an MP in a constituency or party-political capacity.
- 9. Offers of hospitality which were declined.
- 10. Hospitality below de minimis levels. This will usually apply to minor refreshments at meetings, receptions, conferences, and seminars e.g., tea or coffee and sandwich lunches.
- 11. Hospitality received from another minister, MP or Peer unless the minister, MP, or Peer was acting in an external capacity.
- 12. The name of any accompanying guests.

<sup>&</sup>lt;sup>4</sup> See page 17 for table of Media Proprietors, Editors and Senior Executives.

<sup>&</sup>lt;sup>5</sup> Hospitality under de minimis levels includes minor refreshments e.g., tea or coffee and sandwich lunches.

- Ensure all ministers are declared on a consolidated departmental ministers' hospitality return, including ministers who did not receive any hospitality for the period (Nil Return).
- Where a Nil Return applies to one or more ministers, ensure that all subsequent columns are populated with Nil Return.
- Where a minister has multiple hospitality entries to declare, these should be listed chronologically.
- Do not include empty rows/cells between data entries, as this will create errors in the data once published online.
- When collating and editing data in the template, please ensure all internal comments are removed before submitting drafts for consistency checking.
- Please do not use soft returns i.e., enter data in each cell, separating text using full stops, semicolons, backslashes or commas only.
- Departments may wish to consult the current <u>GDS style guide</u><sup>6</sup>, for help with style, spelling and grammar conventions.

Minister	<ol> <li>List the minister's full name for each entry/row using the format, [Forename][Surname] e.g., Hilary Bloggs.</li> <li>Do not include titles or honorifics. For example, please do not include: 'Sir/Lady/Baroness/Lord', 'The Rt Hon', 'MP/QC'.</li> </ol>
Date	<ol> <li>Report the date the hospitality took place using hyphens in the format: YYYY-MM-DD i.e., 2023-10-01. This ensures the date is displayed correctly and avoids errors caused by differences between common British and International date formats.</li> <li>Ensure dates correspond to the given reporting period.</li> <li>Where the minister did not receive any hospitality, please report Nil Return.</li> </ol>
Individual or Organisation that offered hospitality	<ol> <li>Include names of individual(s) or organisation(s) in this column.         Names of individuals should only be reported where the individuals are representing their own interests, with the exception of Senior Media Figures.</li> <li>For senior media figures,<sup>7</sup> record the name of the individual, the media organisation and their role. For individuals from media organisations below this level, departments should record the name of the organisation only.</li> <li>Do not include contextual information such as 'drinks reception with' etc.</li> <li>Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g., BBC.</li> <li>Honorifics may be used here.</li> <li>Where the minister did not receive any hospitality, please report Nil Return.</li> </ol>

<sup>&</sup>lt;sup>6</sup> https://www.gov.uk/guidance/style-guide

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<sup>&</sup>lt;sup>7</sup> See page 17 for table of Media Proprietors, Editors and Senior Executives.

Type of Hospitality Received	<ol> <li>Report the nature of the hospitality received e.g., 'Lunch', 'Drinks reception', 'Flight upgrade', 'Tickets to screening'.</li> <li>Where the minister did not receive any hospitality report Nil Return.</li> </ol>
Accompanied by Guest	Specify whether the minister was accompanied to the hospitality event by selecting 'Yes'/ 'No' as applicable from the drop-down menu in the template.     a. Do not name the accompanying guest.     b. In instances where the minister's guest had received a personal invitation to the event, it is recommended departments declare the attendance of the plus one.     c. Where no hospitality was attributed to the minister during the reporting period, please report Nil Return.

# **Example of data: HOSPITALITY RECEIVED**

Minister	Date	Individual or Organisation that offered hospitality	Type of Hospitality Received	Accompanied by Guest
Hilary Bloggs	2023-11-01	Bircaster University	Dinner	Yes
Faizan Salah	2023-12-19	Lord Mustermann	Drinks reception	No
Christine Anderson	2023-12-20	Kroenke Sports and Entertainment	Football tickets	Yes
Temitope Alatise	Nil Return	Nil Return	Nil Return	Nil Return

# **Annex C: Ministers overseas travel**

Guidance on ministers' overseas travel is set out in section 10 of the Ministerial Code.

Ministers must ensure that they always make efficient and cost-effective travel arrangements, mindful of the government's commitment to sustainability. To reflect this requirement, ministers must declare details of all overseas travel.

#### Departments should include:

- 1. Details of all overseas travel undertaken by ministers in an official capacity.
- 2. The cost to the department for official travel undertaken by the minister, and their spouse/partner where authorisation to accompany the minister has been given. Costs should include the cost of flights, accommodation, meals, cars and visas etc.
- 3. If the visit required the use of hired aircraft, whether a non-scheduled or RAF flight, departments should include the number of people accompanying the minister e.g., officials, special advisers etc. For these trips, departments should provide the total cost of the flight, minus any income from paying passengers external to HM Government.
- 4. Where ministers travel on official business, their travel expenses should normally be borne by the department. Where junior ministers accompany senior ministers, all non-scheduled / RAF flight costs should be attributed to the senior minister to avoid duplication.
- 5. Where ministers from multiple departments (and their accompanying staff) travel on a single non-scheduled / RAF flight, each senior minister should declare the share of cost as borne by each department.
- 6. Departments cross charging expenses should report all expenditure to the relevant ministers' private office at the point of spend to ensure costs are accurate and complete.

- 7. Accommodation and travel costs for accompanying staff, unless the flight was a non-scheduled / RAF flight.
- 8. Details of trips that have been cancelled.
- 9. Details of any travel undertaken in a party political or social capacity.

- Ensure all ministers are declared on a consolidated departmental ministers' travel return, including ministers who have no travel to declare over the period (Nil Return).
- Where a Nil Return applies to one or more ministers, ensure that all subsequent columns are populated with Nil Return.
- Where a minister has undertaken multiple trips, these should be listed chronologically.
- Do not include empty rows/ cells between data entries as this will create errors in the data once published online.
- When collating and editing data in the template, please ensure all internal comments are removed before submitting drafts for consistency checking.
- Please do not use soft returns i.e., enter the data in each cell separating text using full stops, semicolons, backslashes or commas only.
- Departments may wish to consult the current <u>GDS style guide</u><sup>8</sup>, for help with style, spelling and grammar conventions.

Minister	<ol> <li>List the minister's full name for each entry/row using the format, [Forename][Surname] e.g., Jo Bloggs.</li> <li>Do not include titles or honorifics. For example, please do not include: 'Sir/Lady/Baroness/Lord/Dr', 'The Rt Hon', 'MP/QC'.</li> </ol>
Start date	List the start and end date of travel using hyphens in the format:     YYYY-MM-DD i.e., 2022-10-01. This ensures the date is displayed correctly, and avoids errors caused by differences between common British and International date formats.
End date	<ol> <li>Ensure dates correspond to the given reporting period.</li> <li>Where a visit overlaps two reporting periods, the declaration should be attributed to the period in which the majority of the visit took place.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Destination	<ol> <li>List all destinations in the format City; Country.</li> <li>Where the minister completed a multi-destination visit, all destinations should be listed within the same entry using semicolons i.e., City; Country, City; Country.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Purpose of Trip	<ol> <li>Provide a clear, informative description of the main aim of the trip, avoiding generic descriptions e.g., "Bilateral visit' wherever possible.</li> <li>Any important contextual information, such as 'to attend the New Tech summit' should be reflected here only.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Mode(s) of Transport	1. Report the main mode(s) of transport used from the list below;  Train  Eurostar  Scheduled flight  Non-scheduled flight  RAF flight  G-GBNI Aircraft  Ferry

<sup>8</sup> https://www.gov.uk/guidance/style-guide

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	<ul> <li>Taxi</li> <li>Car</li> <li>Nil Return</li> <li>Where multiple transport options were used, please report the main modes of travel in turn using commas e.g., Scheduled flight, Train.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ul>
Number of officials who accompanied the minister if non-scheduled flight was taken	<ol> <li>List the number of officials and special advisers who accompanied the minister. Where the minister was not accompanied, please report 0.</li> <li>Where the minister did not take any non-scheduled or RAF flights, please report N/A.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Accompanied by spouse / partner at public expense	<ol> <li>Please select Yes or No from the drop-down menu.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Subtotal of all travel costs including any non-scheduled / RAF flights (£)	<ol> <li>Provide details of all travel expenditure incurred during the trip.</li> <li>Where non-scheduled/ RAF flights were taken, declare the total cost of the flight in GBP, minus any income from paying passengers external to HM Government.</li> <li>Where a minister shared a non-scheduled/RAF flight with a ministerial colleague from another department, including any associated staff, the cost to the department should be declared.</li> <li>Include numerics only- do not include other characters, commas or text e.g., £.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>
Subtotal of associated costs (for minister only) including all visas, accommodation, meals etc. (£)	<ol> <li>Report all associated costs incurred by the minister only to the taxpayer in GBP.</li> <li>Include numerics only- do not include other characters, commas or text e.g., £.</li> <li>Where the minister did not incur any associated costs, please report Nil Return.</li> </ol>
Total Cost (£)	<ol> <li>Report the total cost of the trip to the taxpayer in GBP.</li> <li>Include numerics only- do not include other characters / commas or text e.g., £.</li> <li>Where the minister has no travel to declare, please report Nil Return.</li> </ol>

# **Example of data: MINISTERS' OVERSEAS TRAVEL**

Minister	Start Date	End Date	Destination	Purpose of Trip	Mode(s) of transport	Number of officials who accompanie d the minister, if non-schedul ed flight was taken	Accompanie d by spouse/part ner at public expense	Subtotal of all travel costs including any non-schedul ed / RAF flights (£)	Subtotal of associated costs (for minister only), including all visas, accommoda tion, meals etc. (£)	Total Cost (£)
Faizan Salah	2023-11-09	2023-11-13	Madrid; Spain	To attend the New Tech Summit	Flight, Train	N/A	No	600.46	2200	2800.46
Temitope Alatise	2023-12-01	2023-12-02	Dublin; Ireland	Visit to Generic Company	Flight	N/A	No	285.82	100	385.82
Sean Smith	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return
Victoria Kaplan	2023-11-26	2023-11-28	Paris; France	Attendance at EU Summit	Eurostar, Taxi	N/A	No	150.60	250	400.60
Hilary Bloggs	2023-10-01	2023-10-12	New York; USA, Washington D.C.; USA	Attendance at the Global 24 Assembly	Non-scheduled flight	26	Yes	143000	165000	380000
Alex Bailey	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return	Nil Return

# Annex D: Ministers' meetings with external individuals and organisations (including meetings with newspaper and other media proprietors, editors and senior executives)

Guidance on ministers' meetings with external organisations is set out in paragraph 8.14 of the Ministerial Code9.

All meetings with newspaper and other media proprietors, editors and senior executives ("senior media figures") will be published regardless of the purpose of the meeting.

#### What is an external organisation, individual or senior media figure?

- 1. An external organisation means any group, company or organisation external to government. An external individual means any individual representing their own interests, rather than those of an external organisation. Where a minister meets an external organisation or individual in an official capacity, details of these meetings must be declared. This applies to meetings with lobbyists registered on the Register of Consultant Lobbyists.
  - a. Meetings with government and legislative bodies, such as other government departments, NDPBs, non-ministerial departments, members of the Royal Household, executive agencies, government reviews, government advisory groups, representatives of Parliament (unless meeting outside their parliamentary capacity), and devolved or foreign governments would not normally be declared. If, however, any of the above attend a meeting where an external organisation or individual is also present, the meeting must be declared.
- 2. Senior media figures i.e., newspaper, broadcast, and other media proprietors, editors and senior executives are outlined in the table below. Meetings with media figures of equivalent seniority should also be declared in accordance with these guidelines.
  - a. Where ministers meet with senior media figures, the names of the attendees, their job title, and the organisation they represent should be included regardless of the purpose of the meeting.
  - b. Official meetings with representatives of media organisations operating below the level of senior media figures must also be declared

#### Senior media figures including Media proprietors, Editors and Senior Executives

	Proprietors	Editors	Senior Executives
Newspapers (Including regional publications and online editions)	Chair/Owner	The Editor, all Senior Editorial Staff including Political, Business, Economic Editors and Deputy Editors.	CEOs
Broadcasters  (Including regional broadcasters)	Chair/Owner	All Senior Editorial Staff including Political, Business, Economic and Deputy Editors, Channel Controllers, Directors of Programming and Radio Controllers	Director Generals CEOs

- 3. Official meetings held in a ministerial capacity with external organisations or individuals, including:
  - a. meetings with external organisations held by ministers in the course of visits, including visits overseas, (generally visits on their own are not included).
  - b. Meetings held in-person. Remote formal meetings using video or audio-conferencing technology should be included. Audio calls should also be reported where these replace or take the format of an official meeting.
  - c. In instances of doubt, departments may consider whether the minister and one or more persons external to government discussed official government business or policy, subject to the exemptions listed below, and whether government resources were used.
- 4. All meetings with senior media figures, regardless of whether the meeting was official, social or political. Meetings with media figures of equivalent seniority should also be declared in line with these guidelines. Official meetings with media representatives below this level must also be declared.
- 5. The name of the external organisation meeting the minister rather than the individual(s) representing the organisation, with the exception of meetings with senior media figures, <sup>10</sup> in which case the individual, their job title and organisation must be named. Where a meeting was with an individual not connected with an organisation, the name of the individual should be provided, unless they do not have a prominent public profile. Here a generic description should be used instead e.g., 'Widow of veteran'.
- 6. Ministers' meetings with external organisations at party conferences will generally be in a political capacity so there is no need to normally declare these, unless a senior media figure was also present. However, if ministers exceptionally hold meetings in the margins of Party

<sup>&</sup>lt;sup>10</sup> See page 17 for table of Media Proprietors, Editors and Senior Executives.

conferences in an official ministerial capacity, then these should be recorded and published in the normal way.

- 7. Departments should make every effort to provide a meaningful and clear description of the 'purpose of the meeting', succinctly capturing
  - a. the key topic(s) discussed and:
  - b. state any specific area(s) of government policy/ legislation etc., affected.
  - c. Broad descriptions such as 'general discussion', 'introductory meeting', 'informal catch-up', 'bilateral meeting' etc. should not normally be used.
  - d. An example of a good description would be 'Discussion during visit to the National Space Centre, on the National Space Strategy and UK investment in the space sector'.
- 8. There will be instances where hospitality <u>above</u> de minimis levels<sup>11</sup> is provided as part of a meeting. Here a corresponding entry should be declared for both meetings and hospitality in accordance with the principles set out in this guidance.
- 9. Where a minister met with multiple organisations (e.g., as part of a roundtable), departments should list each organisation or individual in turn. Where it is impracticable to list attendees individually, a descriptive collective name may be used instead e.g., 'roundtable with UK broadband providers'.
- 10. If a minister attended the same meeting as a ministerial colleague from another department, the relevant private offices should liaise to ensure the purpose of the meeting and list of attendees is consistent between departments. There is no need to list the other minister as an attendee.
- 11. Meetings with the wider public sector, including local government authorities, schools, emergency services and NHS service providers, unless there is a risk of disclosing classified information or personal data.
- 12. Meetings with members of the judiciary.

- 13. Information relating to meetings in cases where disclosure would engage exemptions under the Freedom of Information Act 2000 ("the Act"). This would most commonly apply to Sections; 23-24, 26, 35-36 and 43 of "the Act". Departments should give due consideration as to whether a careful account of these meetings would allow these to be declared, particularly in instances where there is already a record of the meeting in the public domain.
- 14. Where an individual represents an organisation, their name should not be included, with the exception of senior media figures. Private individuals without a public profile should also not be named. Here a generic description should be used instead e.g., 'Widow of veteran'.
- 15. Minister's own constituency meetings held in their capacity as an MP, unless a meeting has an impact on the ministerial role, or ministerial decisions are made. The Cabinet Office Propriety and Ethics team can provide advice in cases of doubt.
- 16. Whether external engagement would be considered to be a meeting should be decided by departments on a case-by-case basis and in accordance with the principle set out in point 3. Visits (e.g., tours), speeches, attendance at seminars, conferences, receptions, media interviews/ etc., would <u>not</u> automatically be classed as meetings, except where a minister took away views and discussion points from attendees on matters of government business

<sup>&</sup>lt;sup>11</sup> Hospitality under de minimis levels includes minor refreshments e.g., tea or coffee

through active engagement (e.g., substantive Q&A or in-depth discussions).

- 17. Meetings with government bodies such as other government departments, non-departmental public bodies, non-ministerial departments, members of the Royal Household, executive agencies, government reviews and government advisory groups, representatives of Parliament (unless meeting outside their parliamentary capacity), devolved or foreign governments. If any of the above attend a meeting alongside external organisations or individuals not covered by this exemption, the meeting should be declared including the names of these organisations or individuals only.
- 18. Meetings regarding contracted services being provided to departments (e.g., head-hunters, IT providers or facilities contractors). However, meetings with contracted organisations outside of the terms of their contract(s), for example to discuss broad industry trends, should be included.
- 19. Meetings with departmental Non-Executive Directors, unless operating in the capacity of other, non-government roles they may hold.

- Ensure all ministers are declared on a consolidated departmental ministers' meetings return, including ministers who are not declaring any meetings for this period (Nil Return).
- Where a Nil Return applies to one or more ministers, ensure that all subsequent columns are populated with Nil Return.
- Where a minister has multiple meetings to declare, these should be listed chronologically.
- Do not include empty rows/cells between data entries, as this will create errors in the data once published online.
- When collating and editing data in the template, please ensure all internal comments are removed before submitting drafts for consistency checking.
- Please do not use soft returns i.e., enter the data in each cell, separating text using full stops, semicolons, backslashes or commas only.
- Departments may wish to consult the current <u>GDS style guide</u><sup>12</sup>, for help with style, spelling and grammar conventions.

Minister	<ol> <li>List the minister's full name for each entry/row using the format, [Forename][Surname] e.g., Jo Bloggs.</li> <li>Do not include titles or honorifics. For example, please do not include: 'Sir/Lady/Baroness/Lord/Dr', 'The Rt Hon', 'MP/QC'.</li> </ol>
Date	<ol> <li>List the date the meeting took place using hyphens in the format: YYYY-MM-DD i.e., 2023-10-01. This ensures the date is displayed correctly, and avoids errors caused by differences between common British and International date formats.</li> <li>Ensure dates correspond to the given reporting period.</li> <li>Where a minister did not meet with external organisations or individuals, please report Nil Return.</li> </ol>
Name of Individual or Organisation	<ol> <li>Include names of Individual(s) <u>or</u> organisation(s) in this column, with the exception of senior media figures, where the job title should also be included using the format, First name, Surname, Role, Organisation. E.g., Hilary Bloggs, Political Editor, UK TV News.</li> <li>Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g., BBC.</li> <li>Honorifics may be used here.</li> <li><u>Do not</u> include contextual information e.g., 'meeting with' / 'telephone call to discuss' etc.</li> <li>Where a minister did not meet with external organisations or individuals, please report Nil Return.</li> </ol>
Purpose of Meeting	<ol> <li>Provide a clear, informative description of the main topic(s) of discussion or meeting objective(s) and any area of policy implicated.</li> <li>Broad descriptions e.g., 'general discussion', 'introductory meeting', and 'general catch-up' should not be used.</li> <li>Contextual information e.g., 'meeting / 'telephone call to discuss' etc., should be included here only.</li> </ol>

<sup>12</sup> https://www.gov.uk/guidance/style-guide

4.	Where a minister did not meet with external organisations or
	individuals, please report Nil Return.

# Example of data: MINISTERS' MEETINGS WITH EXTERNAL INDIVIDUALS AND ORGANISATIONS (INCLUDING MEETINGS WITH NEWSPAPER AND OTHER MEDIA PROPRIETORS, EDITORS AND SENIOR EXECUTIVES)

Minister	Date	Name of Individual or Organisation	Purpose of Meeting
Alex Bailey	2023-11-30	123 Charity	Discussion of the impact of COVID-19 on youth employment in the retail sector.
Hilary Bloggs	2023-12-02	George Cartwright, Political Editor, Bright News Network	To discuss the findings of the Green Tech Emissions Review.
Faizan Salah	2023-12-03	International Monetary Body	To discuss the impact of COVID-19 on apprenticeships in the UK manufacturing sector.
Julia Trawley	2023-12-04	Member of the public	Discussion of the benefits of improvements in transport accessibility in their son's access to work.
Christine Anderson	Nil Return	Nil Return	Nil Return
Temitope Alatise	Nil Return	Nil Return	Nil Return

# **Change log:**

#### 2024-04-02

- Page 17, point 13 Meetings content of which Information relating to meetings in cases where disclosure would engage exemptions under the Freedom of Information Act 2000 ("the Act"). This would most commonly apply to Sections; 23-24, 26, 35-36 and 43 of "the Act". Departments should give due consideration as to whether a careful account of these meetings would allow these to be declared, particularly in instances where there is a record of the meeting already in the public domain.
  - Rephrase as above.
  - Continuation of good practice of working to the Freedom of Information Act 2000.