

# Guidance

## Special advisers' gifts and hospitality received, and meetings with Senior Media Figures.

Version: 2024-04-02

### General guidance

The [Special Advisers' Code of Conduct](#)<sup>1</sup> requires government departments to publish details of special advisers' gifts and hospitality received alongside details of special advisers' meetings with newspaper and other media proprietors, editors and senior executives on a quarterly basis. This requirement is reflected in the [Central Government Corporate Transparency Commitments](#)..

Departments should produce returns in a way that is mindful of the end user - ensuring data is meaningful, accurate and clear. Departments are responsible for the quality and timely publication of their transparency data, which must be cleared by the Permanent Secretary or the Principal Private Secretary before publication. Meanwhile, special advisers retain responsibility for the accuracy of their transparency content.

Detailed guidance is included below on:

**Annex A:** Special advisers' gifts received

**Annex B:** Special advisers' hospitality

**Annex C:** Special advisers' meetings with senior media figures.

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

### Special Advisers

Departments must complete a declaration for gifts, hospitality and meetings with senior media figures for each special adviser with data in period. Declarations apply to all those working in a special adviser capacity, including those with duties on an interim basis. Where a special adviser has responsibilities in more than one department, the relevant departments should liaise on that special adviser's transparency returns. These departments should normally aim to avoid duplication between their returns, distinguishing data entries based on the duties performed for each department.

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<sup>1</sup> <https://www.gov.uk/government/publications/special-advisers-code-of-conduct>

All special advisers' content should be cleared by the special adviser prior to publication.

## 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 special advisers' data on an ongoing basis, or for special advisers to collate data themselves. 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, obtaining initial clearance from the senior principal private secretary or special advisers themselves. Following feedback from the Cabinet Office, finalised returns must be cleared by the special adviser prior to publication.

## Publishing data

Departments are responsible for publishing their transparency data on GOV.UK on the specified grid slot set by No10. 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: <https://www.gov.uk/guidance/how-to-publish-special-advisers-gifts-hospitality-and-meetings>. This includes publishing gifts, hospitality and meetings as separate CSV files, ensuring files are correctly named and tagged in collection pages on GOV.UK. Do not include the 'Notes' sheet of the template file in your publications.

**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 to: <https://www.gov.uk/search/transparency-and-freedom-of-information-releases>.

Please contact the Cabinet Office Transparency Data Team [transparencydatateam@cabinetoffice.gov.uk](mailto:transparencydatateam@cabinetoffice.gov.uk) should you have any queries on the completion of these special adviser 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 [proprietyandethics@cabinetoffice.gov.uk](mailto:proprietyandethics@cabinetoffice.gov.uk).

# Annex A: Special advisers gifts received

Guidance on declaring gifts is set out in the [Special Advisers' Code of Conduct](#)<sup>2</sup>.

## Departments should include:

1. Details of all individual gifts received by special advisers in an official capacity valued in excess of £25, in accordance with the following value thresholds:
  - 1.1. £25 for individual gifts
  - 1.2. £50 for group gifts
  - 1.3. £75 for gifts from overseas governments or international organisations.
2. Where there are sensitivities around disclosing the value of a gift in excess of the thresholds outlined above, please use "Above limit" (see table below for data formatting and presentational guidance). This exemption does not apply to gifts that are commercially available or gifts purchased by the special adviser.
3. Where a special adviser receives a selection of gifts from an individual or organisation and the total value exceeds the thresholds outlined above, departments should combine and publish these as one entry. Here, a collective description should be provided.
4. Where a special adviser 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. Departments must confirm the 'outcome' in respect of each gift received. This will identify whether a gift has been:
  - 5.1. 'Purchased by special adviser': where the special adviser has purchased the gift.
  - 5.2. '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
    - 5.2.1. 'Used for hospitality': this outcome may apply for example when a gift includes perishable goods or beverages.
    - 5.2.2. '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.
6. If the status of a gift changes at a later date, i.e., if a special adviser decided to purchase a gift that was initially held by the department, this change should also be declared, ensuring the value of the gift reflects its most recent valuation.

## Departments should not include:

7. Gifts valued below £25.
8. Invitations to hospitality such as tickets to sporting, theatre or other events and travel upgrades should be considered under the guidance for hospitality.
9. Gifts received in a Party capacity.

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<sup>2</sup> <https://www.gov.uk/government/publications/special-advisers-code-of-conduct>

10. Gifts refused.
11. Personal gifts, i.e., gifts given and received outside of a special adviser's capacity as a representative of HM Government.

## How to format and present the data

- Ensure all special advisers are declared on a consolidated departmental special advisers' gifts return.
- Where a special adviser 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 [GDS style guide](#)<sup>3</sup>, for help with style, spelling and grammar conventions.

|                                   |   |
|-----------------------------------|---|
| <b>Special Adviser</b>            | <ol style="list-style-type: none"> <li>1. List the special adviser's full name for each entry/row using the format, [Forename][Surname] e.g., Jo Bloggs.</li> <li>2. Do not include titles or honorifics. For example, please do not include: 'Mr/Sir/Lady' etc.</li> </ol>   |
| <b>Date</b>                       | <ol style="list-style-type: none"> <li>1. Report the date the gift was received, 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>2. Ensure dates correspond to the given reporting period.</li> </ol>  |
| <b>Gift</b>                       | <ol style="list-style-type: none"> <li>1. Describe the gift in general terms e.g., selection of books.</li> </ol>   |
| <b>Who gift was received from</b> | <ol style="list-style-type: none"> <li>1. 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>2. Do not include contextual information such as 'meeting with' etc.</li> <li>3. Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g., BBC.</li> <li>4. If a gift is given to, or received from more than one organisation or individual, please name each in turn.</li> <li>5. Honorifics may be used here.</li> </ol> |
| <b>Value (£)</b>                  | <ol style="list-style-type: none"> <li>1. Report all gifts valued above £25 only, ensuring all values are reported in GBP.</li> <li>2. Include numerics only (<u>do not</u> include other characters or text) e.g., 145.99</li> <li>3. Where the value of the gift is not known or deemed sensitive to disclose, report: 'Above Limit'.</li> </ol>  |
| <b>Outcome</b>                    | <ol style="list-style-type: none"> <li>1. Select the applicable outcome from the drop-down menu in the template:</li> </ol>   |

<sup>3</sup> <https://www.gov.uk/guidance/style-guide>

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>a. Purchased by the special adviser</li> <li>b. Held by department <ul style="list-style-type: none"> <li>i. Used for hospitality (optional)</li> <li>ii. Donated to charity (optional)</li> </ul> </li> </ul> |
|--|---|

**Example data: GIFTS RECEIVED OVER £25**

| Special adviser      | Date       | Gift               | Who gift was received from           | Value (£)   | Outcome                      |
|----------------------|------------|--------------------|--------------------------------------|-------------|------------------------------|
| Hilary Bloggs        | 2023-10-01 | Pen                | Widget Co.                           | 40.95       | Purchased by special adviser |
| Temitope Alatise     | 2023-11-01 | Hamper             | Lord Mustermann, Lady Smith          | 65.99       | Used for hospitality         |
| John Smith           | 2023-12-10 | Painting           | Minister Rew, Ambrossian Government  | Above Limit | Held by department           |
| Faizan Bannister     | 2023-10-04 | Selection of books | Ambassador Lukic, Morrwanian Embassy | Above Limit | Donated to charity           |
| Faizan Bannister     | 2023-10-17 | Pair of cufflinks  | Kigin Ltd.                           | 125         | Held by department           |
| Christopher Anderson | Nil Return | Nil Return         | Nil Return                           | Nil Return  | Nil Return                   |
| Philijp Anthropy     | Nil Return | Nil Return         | Nil Return                           | Nil Return  | Nil Return                   |

## Annex B: Special advisers' hospitality received

Guidance on special advisers receiving hospitality is set out in the [Code of Conduct for Special Advisers](#)<sup>4</sup>.

### Departments should include:

1. Details of hospitality received by special advisers in their special adviser capacity for example, meals, travel upgrades, tickets for sporting events and concerts etc., including non-ticketed events except where set out below.
2. The name of the organisation or individual who provided hospitality. Where hospitality is provided by media proprietors, editors or senior executives<sup>5</sup> 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. Details of hospitality received when accompanying ministers.
4. There will be instances where hospitality above de minimis levels<sup>6</sup> is provided as part of a social or political meeting with Senior Media Figures. Please declare such instances under hospitality only.
5. For hospitality received, departments need to confirm if the special adviser was accompanied by a guest. In instances where the special adviser's guest received a personal invitation, it is nonetheless recommended departments declare the attendance of the plus one.
6. 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.

### Departments should not include:

7. 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.
8. Attendance at functions hosted by government non-executive directors, unless in the capacity of other non-government roles the non-executive director may hold.
9. Hospitality received in a party-political capacity, unless received from senior media figures<sup>7</sup>.
10. Offers of hospitality which were declined.
11. Attendance at receptions, seminars, conferences and meetings (including overseas) would not normally be subject to declaration.
12. Hospitality received from another special adviser, MP or Peer, unless the special adviser MP or Peer was acting in an external capacity.
13. The names of any accompanying guests.

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<sup>4</sup> <https://www.gov.uk/government/publications/special-advisers-code-of-conduct>

<sup>5</sup> See page 12 for table of Media Proprietors, Editors and Senior Executives.

<sup>6</sup> Further guidance on accepting hospitality is set out in the Departmental Staff Handbook

<sup>7</sup> See page 12 for table of Media Proprietors, Editors and Senior Executives



## How to format and present the data

- Ensure all special advisers are declared on a consolidated departmental special advisers' hospitality return.
- Where a special adviser 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 the data in each cell separating text using full stops, semicolons, backslashes or commas only.
- Departments may wish to consult the current [GDS style guide](#)<sup>8</sup>, for help with style, spelling and grammar conventions.

|  |  |
|--|--|
| <b>Special Adviser</b>                                     | <ol style="list-style-type: none"> <li>1. List the special adviser's full name for each entry/row using the format, [Forename][Surname] e.g., Hilary Bloggs.</li> <li>2. Do not include titles or honorifics. For example, please do not include: 'Mr/Sir/Lady' etc.</li> </ol>  |
| <b>Date</b>  | <ol style="list-style-type: none"> <li>1. 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>2. Ensure dates correspond to the given reporting period.</li> </ol>   |
| <b>Individual or Organisation that offered hospitality</b> | <ol style="list-style-type: none"> <li>1. 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>2. For senior media figures,<sup>9</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>3. <u>Do not</u> include contextual information such as 'dinner with' etc.</li> <li>4. Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g., BBC.</li> <li>5. Honorifics may be used here.</li> </ol> |
| <b>Type of Hospitality Received</b>                        | <ol style="list-style-type: none"> <li>1. Report the nature of the hospitality received e.g., "Lunch", "Flight upgrade", "Tickets to screening".</li> </ol>  |
| <b>Accompanied by Guest</b>                                | <ol style="list-style-type: none"> <li>1. Specify whether the special adviser was accompanied to the hospitality event by selecting 'Yes'/ 'No' as applicable from the drop-down menu in the template.</li> </ol>  |

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

<sup>9</sup> See page 12 for table of Media Proprietors, Editors and Senior Executives.

|  |   |
|--|---|
|  | <p>2. Do not name the accompanying guest.</p> <p>3. In instances where the special adviser's guest had received a personal invitation to the event, it is recommended departments declare the attendance of the plus one.</p> |
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**Example of data: HOSPITALITY RECEIVED**

| <b>Special Adviser</b> | <b>Date</b> | <b>Individual or Organisation that offered hospitality</b> | <b>Type of Hospitality Received</b> | <b>Accompanied by Guest</b> |
|------------------------|-------------|--|-------------------------------------|-----------------------------|
| Jo Bloggs              | 2023-11-01  | Bircaster University                                       | Dinner                              | No                          |
| Faizan Bannister       | 2023-12-19  | Lord Mustermann  | Ticket to The Ashes                 | Yes                         |
| Fazian Bannister       | 2023-12-22  | Giles Small, Political Editor, Universe News.              | Tickets to film screening           | Yes                         |
| Chris Anderson         | Nil Return  | Nil Return   | Nil Return                          | Nil Return                  |
| Phillip Anthropy       | Nil Return  | Nil Return   | Nil Return                          | Nil Return                  |
| Alex Bailey            | Nil Return  | Nil Return   | Nil Return                          | Nil Return                  |

## Annex C: Special advisers meetings with senior media figures.

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

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

#### Departments should include:

1. **All meetings (official, political and social) with senior media figures** i.e., newspaper, broadcast, and other media proprietors, editors and senior executives as outlined in the table above. Meetings with media figures of equivalent seniority should also be declared in line with these guidelines.
  - a. 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.
2. Where special advisers 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.
3. Departments should make every effort to provide a meaningful and succinct description of the 'purpose of the meeting', capturing
  - a. the key topic(s) discussed *and*;
  - b. 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. Example purpose of meeting description - *'Discussion of challenges facing delivery of gigabit broadband in the UK.*

4. Any meetings with senior media figures held at a party conference should be recorded and published.
5. There will be instances where hospitality above de minimis levels is provided as part of a social or political meeting<sup>10</sup> with Senior Media Figures. Please declare such instances under hospitality only.
6. If a special adviser attended the same meeting as a special adviser in another department, private offices should liaise to ensure the purpose of the meeting and the list of attendees is consistent between departments. There is no need to list the other special adviser as an attendee.

**Departments should not include:**

7. Details of meetings with representatives of media organisations below the levels set out in the table of senior media figures, i.e., meetings with deputy political editors would not be included.
8. Where a special adviser accompanies their minister to an official meeting with a senior media figure, the special adviser's attendance does not need to be separately recorded as the minister will be the main attendee.
9. Daily communication briefings, media interviews and informal briefings.

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<sup>10</sup> Hospitality under de minimis levels includes minor refreshments e.g., tea or coffee

## How to format and present the data

- Ensure all special advisers are declared on a consolidated departmental special advisers' meetings return.
- Where a special adviser 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 [GDS style guide](#)<sup>11</sup>, for help with style, spelling and grammar conventions.

|                                    |  |
|------------------------------------|--|
| <b>Special Adviser</b>             | <ol style="list-style-type: none"> <li>1. List the special adviser's name full for each entry/row using the format, [Forename][Surname] e.g., Jo Bloggs.</li> <li>2. Do not include titles or honorifics. For example, please do not include: 'Mr/Sir/Lady' etc.</li> </ol>  |
| <b>Date</b>                        | <ol style="list-style-type: none"> <li>1. 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>2. Ensure dates correspond to the given reporting period.</li> </ol>  |
| <b>Name of senior media figure</b> | <ol style="list-style-type: none"> <li>1. Name the senior media figure, their job title and organisation in the following format, First name, Surname, role, organisation. E.g., Hilary Bloggs, Political Editor, UK TV News.</li> <li>2. Report organisation names in full, spelling out any acronyms for greater accessibility, except where these are in common use e.g., BBC.</li> <li>3. Honorifics may be used here.</li> <li>4. <u>Do not</u> include contextual information e.g., 'meeting with' / 'telephone call to discuss' etc.</li> </ol> |
| <b>Purpose of Meeting</b>          | <ol style="list-style-type: none"> <li>1. Provide a clear, informative description of the main topic(s) of discussion or meeting objective(s) <b>and</b> any area of policy implicated.</li> <li>2. Broad descriptions e.g., 'general discussion', 'introductory meeting', and 'informal catch-up' <b>should not</b> be used.</li> <li>3. Contextual information e.g., 'meeting' / 'telephone call to discuss' etc., should be included here only.</li> </ol>  |

<sup>11</sup> <https://www.gov.uk/guidance/style-guide>

**Example of data: MEETINGS WITH SENIOR MEDIA FIGURES (INCLUDING MEETINGS WITH NEWSPAPER AND OTHER MEDIA PROPRIETORS, EDITORS AND SENIOR EXECUTIVES**

| <b>Special Adviser</b> | <b>Date</b> | <b>Name of senior media figure</b>  | <b>Purpose of Meeting</b>  |
|------------------------|-------------|---|--|
| Alex Bailey            | 2023-11-30  | John Johnson, Business Editor, UK News TV; Delia Sanchez, Deputy Editor, Generix TV | Introductory meeting with journalists to discuss the long-term impact of COVID-19 on youth employment. |
| Jo Bloggs              | 2023-12-02  | George Cartwright, Political Editor, Bright News Network                            | To discuss the findings of the GreenTech Emissions Review.   |
| Faizan Bannister       | Nil Return  | Nil Return  | Nil Return   |
| Chris Anderson         | Nil Return  | Nil Return  | Nil Return   |
| John Smith             | Nil Return  | Nil Return  | Nil Return   |