

FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

ADDENDUM TO THE SECOND COMPLIANCE REPORT

UNITED KINGDOM



Adopted by GRECO
at its 99th Plenary Meeting (Strasbourg, 17-19 March 2025)



Group of States against Corruption
Groupe d'États contre la corruption

COUNCIL OF EUROPE



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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (top executive functions, PTEF) and law enforcement agencies (LEA)."

2. This Addendum to the Second Compliance Report assesses the measures taken by the authorities of the United Kingdom to implement the recommendations issued in the Fifth Round Evaluation Report on the United Kingdom which was adopted at GRECO's 78th Plenary Meeting (8 December 2017) and made public on 17 May 2018, following authorisation by the United Kingdom ([GrecoEval5Rep\(2017\)1](#)). The corresponding Compliance report was adopted by GRECO at its 87th Plenary Meeting (22-25 March 2021) and made public on 28 May 2021 ([GrecoRC5\(2020\)4](#)). The Second Compliance Report was adopted by GRECO at its 94th Plenary Meeting (5-9 June 2023) and made public on 25 August 2023 ([GrecoRC5\(2023\)5](#)).

3. As required by GRECO's Rules of Procedure¹, the authorities of the United Kingdom submitted a Situation Report on measures taken to implement the recommendations contained in the Evaluation Report. This report was received on 2 October 2024 and, together with the additional information submitted on 24 February 2025, served as a basis for this Addendum to the Second Compliance Report.

4. GRECO selected Ireland (with respect to top executive functions in central governments) and Germany (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Mr Nicholas MURPHY, on behalf of Ireland, and Ms. Julia PAUL, on behalf of Germany. They were assisted by GRECO's Secretariat in drawing up the Compliance Report.

II. ANALYSIS

5. GRECO addressed 12 recommendations to the United Kingdom in its Evaluation Report. In the Second Compliance Report, GRECO concluded that recommendations v, vii, viii, ix and xii have been implemented satisfactorily, or dealt with in a satisfactory manner, recommendations i, ii, iii and xi have been partly implemented and recommendation iv has not been implemented. Compliance with the outstanding recommendations is examined below.

Corruption prevention and promotion of integrity in respect of central governments (top executive functions)

Recommendation i

6. *GRECO recommended establishing a centralised mechanism for analysing and mitigating risk areas of conflicting interests and corruption in respect of individuals with top executive functions at central government level.*

7. It is recalled that recommendation i remained partly implemented in the Second Compliance Report. GRECO notes the updating of the guidance to departments aiming at

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised bis.

regular declarations of interests by public servants of relevant departments, but the measures set out in the guidance, as well as the oversight carried out in respect of special advisers, remained mainly focussed on conflicting interests, without offering a broader anti-corruption risk assessment.

8. The authorities now report that, following the change of government as a result of parliamentary elections of 4 July 2024, the Labour Party that is now in Government had made significant pledges in the Labour Manifesto,² including with regard to public integrity. This includes the commitment to establish a new independent Ethics and Integrity Commission, with an independent Chair, to ensure probity in government. According to the Labour Manifesto, the Commission is to be set up and resourced in a manner able to deliver a reset of trust and confidence in public life. A commitment was also made to review and update the post-employment rules. The [new Ministerial Code](#)³ was [published](#) on 6 November 2024 and includes the Terms of Reference for the Independent Adviser on Ministerial Standards,⁴ now allowing him/her to initiate an investigation in the event of an allegation of misconduct, without requiring the Prime Minister's permission. In addition, the authorities indicate that the latest List of Ministers' Interests was published in November 2024.⁵ When completing declarations of interests, the ministers are to confirm that they accept the provisions of the Ministerial Code and personal responsibility for deciding how to act and conduct themselves in consideration of the Code.

9. GRECO takes note of the change of government in the UK, first in the last 14 years, and the intended renewal of policies and priorities in various fields of governance, including anti-corruption. The adoption of new terms of reference of the Independent Adviser on Ministerial Standards, allowing investigations of alleged misconduct, is to be welcomed. GRECO also notes with much interest the political commitment to establish a new independent Ethics and Integrity Commission and to review post-employment rules. However, for the time being, no further measures have been taken to address the remaining aspects of this recommendation, in particular with regard to broader, more holistic anti-corruption risk assessments of all PTEFs, including special advisers and permanent secretaries.

10. GRECO concludes that recommendation i remains partly implemented.

Recommendation ii

11. *GRECO recommended making more information available regarding meetings held by ministers, special advisers and senior civil servants with third parties, including lobbyists, and that such entries contain a sufficient amount of detail on matters discussed, to identify the specific subject matter(s) of the discussion and the specific purpose or intended outcome of the discussion.*

² The "Change. Labour Party Manifesto 2024", issued in the context of the Labour Party electoral campaign, is accessible via the following link: <https://labour.org.uk/wp-content/uploads/2024/06/Labour-Party-manifesto-2024.pdf>

³ The text of the new Ministerial Code is accessible via the following link: <https://www.gov.uk/government/publications/ministerial-code/ministerial-code#annex-a>

⁴ According to the Terms of Reference, the Independent Adviser on Ministerial Standards is appointed by the Prime Minister to advise them on matters relating to the Ministerial Code. The post-holder is independent of government and expected to provide impartial advice to the Prime Minister.

⁵ The latest publication of Ministers' Interests is accessible via the following link: <https://www.gov.uk/government/publications/list-of-ministers-interests>

12. GRECO recalls that this recommendation remained partly implemented in the Second Compliance Report. Further work was in the pipeline to enhance transparency, and the authorities were to broaden the scope of information to be published regarding meetings with third parties and lobbyists. Finally, a substantial revision of the existing Guidance to departments was planned to ensure quarterly transparency. However, these measures had not been completed at the time.

13. The authorities now submit that in December 2023, a Quarterly Transparency Guidance⁶ was published on the Government website by the Cabinet Office, detailing stricter minimum standards for meeting descriptions to ensure declarations contain relevant and instructive information. The Guidance specifies that descriptions should succinctly capture: (a) the key topic(s) discussed and (b) state any specific area(s) of government policy, legislation etc. affected. Since April 2024, Departments are required to disclose all phone calls and virtual meetings, as well as in-person meetings. The Guidance also expands the scope of transparency declarations for senior officials to include meetings held between external organisations/individuals and Directors General, Finance and Commercial Directors, and Senior Responsible Owners in the Government's Major Projects Portfolio. The Cabinet Office provides training, consistency checking and feedback on ministers, senior officials and special advisers' teams in drafting transparency data, to support departments in ensuring their data meets the requirements set out in the Guidance. Following the update of the Ministerial Code on 6 November 2024, publication of the Register of Ministers' Gifts and Hospitality will take place on a monthly basis.⁷

14. GRECO takes note of the information provided by the authorities. It welcomes the adoption and publication of transparency guidelines, addressed to public officials in the top executive at different levels of the executive branch. It is to be noted that the Transparency Guidance for ministers, as well as the one for senior officials, establishes specific disclosure requirements with regard to meetings with external organisations and individuals, including registered lobbyists. The Guidance also defines the "external organisation"⁸ and "external individual"⁹ and requires declaring all meetings with these, held in official capacity by ministers and senior officials. In addition, the Guidance requires to disclose physical, telephone and online meetings, including date, purpose, persons met, and topics discussed. The information on subjects covered by transparency guidance documents is made available on the respective websites.¹⁰

⁶ The Guidance consists of three parts, addresses, respectively, to ministers, senior officials and special advisers. The relevant texts are accessible via the following links: for ministers https://assets.publishing.service.gov.uk/media/6604110bf9ab41001aeea39c/2024_04_02-Ministers-Transparency-Guidance.pdf for senior officials 2024_04_02 Senior Officials' Transparency Guidance.docx and for special advisers 2024_04_02_ Special Advisers' Transparency Guidance.docx

⁷ First registers under the updated Ministerial Code were published on 30 January 2025 and are accessible via the following link: <https://www.gov.uk/government/collections/register-of-ministers-gifts-and-hospitality>

⁸ According to Transparency Guidance, an external organisation means any group, company or organisation external to government.

⁹ According to Transparency Guidance, an external individual means any individual representing their own interests, rather than those of an external organisation.

¹⁰ Ministers' transparency publications are available on the website of the Cabinet Office, accessible via the following link: <https://www.gov.uk/government/collections/ministers-transparency-publications> whereas transparency publications regarding senior officials can be accessed on the same website via the following link: <https://www.gov.uk/government/collections/business-expenses-and-hospitality-for-senior-officials>

15. In spite of the positive developments above, GRECO notes that meetings and contacts of special advisers with lobbyists are still not subject to disclosure.¹¹ In this regard, GRECO refers to the report of the House of Commons, entitled “Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters” (discussed in more detail below in paragraph 20), which highlights that special advisers *“often play a significant role in formulating policy and have a closeness to their Minister that few officials have. That any gifts or hospitality they receive are included in the transparency releases is clear acknowledgement of that influence; therefore to maintain that their meetings should not be disclosed, beyond those with very senior media figures, appears inconsistent.”* This report also suggests that *“there is genuine concern about the continued omission of Spads’ [special advisers] meetings from the transparency releases”*, which goes in the same vein as the findings of the Evaluation Report, underlying the present recommendation. GRECO calls upon the UK authorities to address this remaining issue. In view of the above, GRECO cannot consider that the present recommendation has been fully complied with.

16. GRECO concludes that recommendation ii remains partly implemented.

Recommendation iii

17. *GRECO recommended that the scope of the registry of consultant lobbyists be reconsidered, with a view to i) extending the existing registry of consultant lobbyists (to include third parties operating with “in-house lobbyists”) and ii) including the lobbying of special advisors and senior civil servants involved in policy making.*

18. It is recalled that this recommendation remained partly implemented in the Second Compliance Report. GRECO recognised that the post-legislative scrutiny of the Transparency of Lobbying Act, initiated in 2020, as well as the “Boardman review”¹² (with a narrower scope, compared to this recommendation) could be relevant to transparency in lobbying in general. However, the post-legislative scrutiny has not been completed, and no relevant follow-up policy or legislative steps have been taken at the time.

19. The authorities now report that on 2 May 2024, the Public Administration and Constitutional Affairs Committee of the House of Commons published a report entitled “Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters”, following the conclusion of the post-legislative scrutiny.¹³ The authorities indicate the Government’s intention to consider the report carefully in relation to the Labour Manifesto commitments and to set out its position in due course.

¹¹ Reference is made to Paragraph 78 of the Evaluation Report, which indicates, in particular, that *“there is no available record of meetings between lobbyists and special advisers (only meetings with media representatives are disclosed) ... Given the role of departmental staff in advising ministers on technical issues and their privileged access to ministers, they are likely to be actively targeted by lobbyists.”*

¹² A publication entitled “Review into the development and use of supply chain finance (and associated schemes) by Nigel Boardman, published on 21 July 2021, accessible via the following link: <https://www.gov.uk/government/publications/findings-of-a-review-into-the-development-and-use-of-supply-chain-finance-in-government>

¹³ The report is accessible on the following website: <https://committees.parliament.uk/publications/44541/documents/221331/default/>

20. GRECO takes note of the information provided by the authorities. It notes with interest the completion and publication of the report on “Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters”. The conclusions and recommendations of the report highlight several issues to address, which are of relevance to this recommendation. With regard to the Register of Consultant Lobbyists and lobbying of special advisers, the report indicates that *“the Register currently requires declarations of contact made by consultant lobbyists with Ministers and Permanent Secretaries. In line with the Government’s proposed extension of the transparency releases to include Directors General, Departmental Financial and Commercial Directors, and Senior Responsible Owners for Major Projects, as well as our recommendation that they include Ministerial Special Advisers, declarations in the Register should be extended to include lobbying of these groups.”* This goes in line with GRECO’s findings¹⁴ underlying the present recommendation.

21. Against the background of the above findings of the post-legislative scrutiny and its conclusions, GRECO notes that the new Government is yet to formulate its position and policy on the subject. GRECO encourages the authorities to take this opportunity and address all issues outlined in the present recommendation in a comprehensive manner. For the time being, as no tangible progress has been made, the present recommendation cannot be considered as implemented more than partly.

22. GRECO concludes that recommendation iii remains partly implemented.

Recommendation iv

23. *GRECO recommended i) that the status, remit and powers of the body advising on business appointments of former ministers and senior civil servants (ACoBA) be strengthened, with accompanying resources to carry out effectively its functions; ii) that individuals with top executive functions are not only required to apply for advice before taking up employment in the private or other sectors upon leaving office but also that breaches of rules on post-employment restrictions are subject to adequate sanctions.*

24. GRECO recalls that this recommendation remained not implemented in the Second Compliance Report. GRECO welcomed additional efforts to facilitate access to information regarding obligations of public officials related to post-employment rules and procedures and the consideration by the Cabinet Office of additional sanctions for not respecting contractual obligations. However, the Advisory Committee on Business Appointments (ACoBA) had still not been transformed into a statutory body, its remit and powers had not been broadened, and no adequate sanctions were put in place for breaches of post-employment rules.

25. The authorities now submit that the Government has committed to review and update post-government employment rules. This includes enforcing restrictions on ministers lobbying for companies they used to regulate, with meaningful sanctions intended for any breach of

¹⁴ Reference is made to paragraph 79 of the Evaluation Report, which states that *“most big firms and organisations (which do not specialise on lobbying as such) will employ in-house lobbyists who will therefore not be required to register, rather than consultant lobbyists. Further, the GET was informed that a quarter of the registrants do not declare any client. This is linked to the fact that consultant lobbyists must only declare clients when they contact ministers and permanent secretaries on their behalf, but not special advisers or other senior civil servants in government.”*

rules and are, *inter alia*, outlined in the 21st Report of the ACoBA (April 2020 – March 2024)¹⁵ and the post-legislative scrutiny of the 2014 Lobbying Act (see paragraph 19 above).

26. GRECO takes note of the information provided by the authorities. It notes the commitment of the new Government to update post-employment rules and introduce meaningful sanctions for breaches. Further, GRECO also takes note with interest of the latest report of ACoBA, which describes areas and actions to be improved to provide for adequate safeguards in the face of risks inherent to individuals moving between the public and private sectors. In particular, GRECO notes that the recommendations for reforms contained in the ACoBA Report include introducing sanctions for non-compliance, which would be in accordance with the present recommendation. As to the reviewing the status, remit and powers of ACoBA, no new information has been submitted. Overall, while the authorities' reflection on and commitment to the reforms needed is promising, no tangible steps have been completed with regard to neither parts of this recommendation.

27. GRECO concludes that recommendation iv remains not implemented.

Corruption prevention and promotion of integrity in respect of law enforcement agencies

Recommendation xi

28. *GRECO recommended that the UK authorities pursue their efforts to improve the oversight of police misconduct, including regarding the Metropolitan Police Service (MPS) and the National Crime Agency (NCA), by simplifying the referral and appeals procedures and by keeping under close review the implementation and adequate resourcing of the ongoing reform of the oversight system.*

29. It is recalled that this recommendation remained partly implemented in the Second Compliance Report. GRECO noted with satisfaction the continuing reforms to strengthen complaints procedures, enhance the efficiency of proceedings in different police services, and encourage reporting of alleged wrongdoings. The increase of staff in the MPS Directorate of Professional Standards, and the peer review programme in the Police Force were also recognised as steps in the right direction. However, the National Crime Agency (NCA) was yet to adopt the necessary statutes for these changes to take effect.

30. The authorities now report that in 2023, the NCA amended their Discipline and Misconduct policy to codify the guidance of the Advisory, Conciliation and Arbitration Service (ACAS) into the Human Resources Policy document, entitled "HR05 OP01 Discipline and Misconduct" (confidential). The amended NCA policy was aligned with the ACAS disciplinary guidance, (guiding all organisations on grievance and disciplinary procedures), which stipulates: "*A first warning for misconduct if conduct does not meet acceptable standards. This will be in writing and set out the nature of the misconduct and the change in behaviour required and the right of appeal. The warning will also inform the employee that a final written warning may be considered if there is no sustained satisfactory improvement or change*". Following changes to the Discipline and Misconduct policy, clearer guidance has been provided to all employees on the respective referral and appeals procedures, implemented

¹⁵ The 21st Report of ACoBA is accessible via the following link: https://assets.publishing.service.gov.uk/media/669923de0808eaf43b50d22c/Advisory_Committee_on_Business_Appointments-21st_Report_-_April_2020_to_March_2024_PDF.pdf

since 2023. According to the authorities, 37 misconduct panel cases have been concluding between September 2023 and August 2024, and 16 further cases from September 2024 to January 2025. In addition, the authorities indicate that the NCA is currently reviewing the Agency's Complaints and Misconduct Regulations of 2013 with a view to updating and modernising its statutory complaints and misconduct process.

31. Further, in November 2023, the NCA launched a Confidential Reporting Tool for staff, allowing officers to report misconduct and corruption anonymously, which was advertised across the Intranet, alongside links to Frequently Asked Questions regarding the tool. Since its launch up until January 2025, a total of 140 reports have been submitted via the Confidential Reporting Tool. The authorities indicate that an in-depth analysis on the Confidential Reporting Tool has been conducted by the NCA's Internal Anti-Corruption Unit and is due to be published on the internal website. The main findings of the analysis outline a detailed breakdown of the subject matters of the submissions received (internal recruitment processes, bullying, misuse of NCA assets, culture in specific teams and inaccurate claims of overtime), outcomes, how to improve the quality of reports and continue promoting the tool to improve standards across the NCA through enhancing staff awareness.

32. GRECO takes note of the information provided. It welcomes the adoption and implementation of the amended Discipline and Conduct policy document, and a new tool for reporting misconduct and corruption, which appears to be in active use. The Discipline and Conduct policy contains detailed provisions defining types of violations (minor misconduct, misconduct, gross misconduct) and sets out steps to be taken in case of allegations of a criminal nature. It also establishes the reporting procedures and channels, determines the roles of departments and units responsible in disciplinary investigations and proceedings, the procedure for conducting disciplinary panels, and defines sanctions which can be applied for established violations. With the adoption and entry into force of the new disciplinary policy in the NCA, along with the new confidential reporting tool and the analysis of its operation in practice, GRECO is satisfied that the requirements of the present recommendation have been met.

33. GRECO concludes that recommendation xi has been implemented satisfactorily.

III. CONCLUSIONS

34. **In view of the foregoing, GRECO concludes that the United Kingdom has now implemented satisfactorily or dealt with in a satisfactory manner eight of the twelve recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, three have been partly implemented and one has not been implemented.

35. More specifically, recommendations v, vi, vii, viii, ix, x, xi and xii have been implemented satisfactorily, or dealt with in a satisfactory manner, recommendations i, ii and iii remain partly implemented and recommendation iv remains not implemented.

36. As regards PTEFs, several considerable steps have been completed to address the recommendations. The Independent Adviser on Ministers' Interests has been given the authority, through revised Terms of Reference and Ministerial Code, to autonomously initiate investigations into alleged breaches of the Code. Guidance to departments on declarations of

interests by public servants have been updated and transparency guidance documents have been revised in respect of ministers, senior officials and special advisers. However, the disclosure by special advisers of their contacts with lobbyists and third parties has not been introduced. As to risk-assessment, the regular publishing of declarations of interests by public servants of relevant departments has become more frequent, but the current disclosure system is mainly placed on conflicting interests, without offering a broader anti-corruption risk assessment approach. In this regard, promising political commitments have been made during the election campaign by the Labour Party, which is in Government since July 2024. The post-legislative scrutiny of the 2014 Lobbying Act, published in April 2024, shed much light on the necessary measures to enhance transparency in this regard, which goes along with the recommendations of GRECO. The authorities are encouraged to follow up on its findings. Finally, no progress has been made with regard to the revision of the status, remit and powers of ACoBA, and the introduction of concrete, tangible sanctions for breaches of post-employment restrictions. Here as well, the authorities have pledged reforms and are encouraged to follow through.

37. As to LEAs, commendable progress has been made in the implementation of all recommendations. Training has been strengthened, including by integrating the Policing Code of Ethics, and the National Crime Agency (NCA) has adopted its own Code of Ethics. Vetting renewals have been improved in the Metropolitan Police Service (MPS) and the disciplinary procedure has been overhauled, along with the increase of staff of the Directorate of Professional Standards in the MPS and the introduction of internal and external reporting systems, allowing anonymous reporting of misconduct. In addition, the Independent Office for Police Conduct (IOPC) has been set up, and legal provisions were enacted to provide for whistleblower identity protection. New, a more comprehensive disciplinary policy has been introduced in the NCA, and a confidential reporting tool regarding misconduct has been set up and made fully operational. Finally, due consideration has been given to expanding the post-employment restrictions to cover all police officers leaving their function to take up employment elsewhere, although it has been decided not to introduce such restrictions at this time.

38. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Second Compliance Report terminates the Fifth Round compliance procedure with respect to the United Kingdom. The authorities of the UK may, however, wish to inform GRECO of the developments concerning the implementation of recommendations i, ii, iii and iv, which remain incomplete.

39. Finally, GRECO invites the UK authorities to authorise, as soon as possible, the publication of the report.