

The Rycroft Review

Report of the Independent Review into Countering Foreign Financial Influence and Interference in UK Politics

Return to an Address of the Honourable the House of Commons dated 25th March 2026 for

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Foreword

Secretary of State, Minister

You asked me in December last year to conduct a review of foreign financial influence and interference in UK politics. The terms of reference for the review are set out at Annex A.

This report fulfils the remit you gave me.

I have not attempted here to offer a full account of the UK's electoral system and processes. It is a complicated domain and one that has been subject to much analysis by many experts in the field and to extensive debate in Parliament. My aim has been rather to use the limited time available to me to focus on the risks posed to our democracy by the deployment of foreign money and to make recommendations as to how those risks can be mitigated.

I have drawn freely on what others have said and written. The proposals set out here have been developed and tested through conversations with a wide range of stakeholders, including political parties, parliamentarians, academics and experts, third sector organisations, social media companies and government departments and agencies. A full list of those I have spoken to is set out at Annex B. I am grateful to everyone who offered me their time and expertise.

My report is structured as follows:

- Overview
- Summary of recommendations
- Key considerations that have shaped the work
- Analysis of the extent and nature of the problem
- Detail of findings and recommendations on the regulation of the political process under the following headings:
 - political finance: proofing the system against foreign interference
 - the role of political parties in combating foreign financial interference
 - effective enforcement of the regulations, in particular through the Electoral Commission
- Detail of findings and recommendations on the wider influencing environment, in particular social media
- Prioritisation in government

Thank you for the opportunity to work on this important area of public policy. I hope my recommendations are of value to you as a Government, to all the legislatures of the UK and to the political class as a whole.

A handwritten signature in black ink, appearing to read 'P. Rycroft', with a stylized, cursive script.

Philip Rycroft

Overview

1. This country faces a persistent problem of foreign interests seeking to exert influence on, and to interfere in, our politics. Too much of this is malign and seeks to sow distrust and exacerbate divisions in UK society, with the ultimate aim of undermining confidence in our democracy.
2. This review is timely. A combination of heightened geo-political tensions and new technology enabled routes of access to the British public has created the incentive and the means for hostile states and other actors to increase their efforts to interfere in UK politics.
3. How much impact this interference has had to date is difficult to ascertain. At one level, the public can be credited with sufficient common sense to see off the more egregious attempts to suborn their opinions. Moreover, many indicators show that British democracy remains robust. With at least five or six parties in serious contention for seats in forthcoming elections across the UK, political debate is as vigorous as ever and the political choice for more voters wider than it has been for many years. Recent democratic events, elections and referenda, have commanded broad losers' consent.
4. The UK enjoys a vibrant, free press and, through social media and other sources, more information is available to voters on political issues than ever before. Our democracy has always been open to, and has benefited from, good ideas and positive influence from overseas; this remains the case today.
5. Trust in the actual mechanics of our electoral system also remains high¹. Very few politicians fall on the wrong side of the high standards rightly expected of them; most are hard-working, conscientious and deeply committed to the public good.
6. There is, then, no immediate crisis of democratic legitimacy in the United Kingdom. But there is no guarantee that this will persist. In particular, there is a long-term and worrying loss of trust in our democratic system and processes². That is not solely caused by, but correlates to, public unease in the way in which our politics is financed³. Many of the people I have spoken to, notably politicians, point to a coarsening of the political debate in a toxic online environment that is allowing the normalisation of the public expression of deeply unpleasant attitudes.

¹ The Electoral Commission (2025), 'Public attitudes 2025', accessed at <https://www.electoralcommission.org.uk/research-reports-and-data/public-attitudes/public-attitudes-2025>.

² National Centre for Social Research (2024), 'British Social Attitudes 41: Damaged politics?', accessed at <https://natcen.ac.uk/publications/british-social-attitudes-41-damaged-politics>.

³ The Electoral Commission (2025), 'Public attitudes 2025', accessed at <https://www.electoralcommission.org.uk/research-reports-and-data/public-attitudes/public-attitudes-2025>.

7. This is the situation which foreign actors seek to exploit. While the overall effect of their activities might still be containable, in our newly volatile politics even marginal impacts could have a disproportionate bearing on the civility of democratic discourse, on democratic outcomes and, ultimately, on confidence in our democracy. And loss of confidence could in turn lead to a rapid downward spiral in the integrity of our democracy as people seek other means to settle political differences.
8. Foreign financial influence and interference comes in two broad domains: attempts to directly infiltrate our politics by gaining direct leverage over political parties and political process; and attempts to create division and distrust among the wider public through activity on social media and other vectors.
9. Neither problem is new but both are now arguably more acute. Many wise heads have proffered potential solutions to these problems, not least the Committee on Standards in Public Life whose 2021 report gave a comprehensive and well-researched overview of this landscape⁴. It is to the credit of the current Government that it is now taking action through the Representation of the People Bill 2026 to enact a number of the critical recommendations put forward by the Committee⁵.
10. I am glad to endorse the contents of that Bill; it will do much to plug the apparent loopholes in the governance of our political life through the regulation of the way in which political parties access finance. Nevertheless, there are a number of areas where I believe the Government should go further and I make recommendations accordingly in this review.
11. We as a nation also face, like all others, a radically new technology of information dissemination through social media. This is changing so much in the way that we go about our lives, much of it to our benefit, some of it not. Where those adverse effects are the consequence of hostile foreign interference, the public should expect the state to take robust action to counter the threat. There is, I believe, more that the Government should be doing in this space and I so recommend in this report.
12. I am not pressing the panic button in this report; that would serve the purposes of those who would undermine the trust in our democratic processes. But I am ringing the alarm bell. If Government does not act swiftly to gear up to counter these threats, there is a real risk they will run away from us. Recent allegations of attempted foreign interference in the electoral process in Moldova⁶ and Romania⁷ should serve as cautionary tales. It is a truism, but one apt for our times: the price of freedom is eternal vigilance.

⁴ The Committee on Standards in Public Life (2021). 'Regulating Election Finance', accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf.

⁵ Representation of the People Bill 2026, accessed at <https://publications.parliament.uk/pa/bills/cbill/59-01/0384/240384.pdf>.

⁶ BBC News (2025), 'Moldova's pro-EU party wins vote mired in claims of Russian interference', accessed at <https://www.bbc.co.uk/news/articles/cx2rdlj8ejgo>.

⁷ BBC News, (2024) 'Alleged Russian election-meddling in Romania resurrects dark memories', accessed at <https://www.bbc.co.uk/news/articles/c7vee5n5lp0o>.

Summary of recommendations

Recommendation number	Report chapter/ subheading	Recommendation text
1	Political finance/ Overseas voters	There should be an annual cap on political donations from British voters living abroad.
2	Political finance/ Corporate donations	The corporate donation test in the Representation of the People Bill should be amended to one based on post-tax profits, and no corporate donor should be able to donate more than their post-tax profits into UK politics in any given year.
3	Political finance/ Cryptoassets	The Government should legislate in the Representation of the People Bill to introduce a moratorium on political donations made in cryptoassets.
4	Political finance/ Campaign donations and spending: transparency	Non-party campaigner and candidate campaign spending should come from permissible donors and reporting and transparency requirements should apply to these groups year-round.
5	Political parties/ Checks on donations	‘Know your donor’ provisions in the Representation of the People Bill should be further developed to more closely mirror the customer due diligence provisions in the anti-money laundering regulations.
6	Political parties/ Internal policies and procedures	The Electoral Commission should work with political parties and the Ethics and Integrity Commission to develop a non-statutory code of conduct to ensure that robust procedures are in place within parties to equip party officials better to deal with the threat of foreign financial interference.

Recommendation number	Report chapter/ subheading	Recommendation text
7	Political parties/ Standardising reporting	The Electoral Commission should mandate political parties to submit their annual reports and accounts and campaign spending returns in a standardised format.
8	Political parties/ Information sharing	The Electoral Commission should coordinate with Government, the security services and the police to ensure that political parties receive regular updates on the threat landscape, so that they have a comprehensive and up-to-date picture of the risks around foreign financial interference.
9	Effective enforcement/ Investigatory and other powers of the Electoral Commission	The information-sharing powers of the Electoral Commission should be extended, so that it can not only share information with other agencies, but also require information of them.
10	Effective enforcement/ Investigatory and other powers of the Electoral Commission	The powers of the Electoral Commission should be extended to allow it to require information from any person or organisation who may hold relevant material that it reasonably requires for the purposes of carrying out its functions.
11	Effective enforcement/ Investigation and prosecution of offences	The Government, as part of the forthcoming reform of police structures, should ensure the creation and resourcing of a centre of police excellence to pursue the investigation of complex criminal offences under electoral law involving foreign interference in UK politics.
12	Effective enforcement/ Burden of proof and sentencing limits	The Political Parties, Elections and Referendums Act 2000 should be amended to reduce the burden of proof for criminal offences to show that an offender might have 'reasonable cause to suspect' that they were committing a crime and the sentencing associated with each criminal offence under the Act should be reviewed, to ensure it matches the seriousness of the offences.

Recommendation number	Report chapter/ subheading	Recommendation text
13	Wider influencing environment/Foreign interference and the online world	Dealing with hostile state online interference should be a far higher priority for Government. There should be clear lead accountability at ministerial and senior official level for leading the work to combat foreign online political interference, with resources commensurate to the challenge this poses to our democracy.
14	Wider influencing environment/Online political advertising	The Government should further tighten the regulation of online political advertising by banning foreign-funded adverts outright and ensuring that imprints include who has paid for them.
15	Wider influencing environment/Lobbying, think tanks and other channels of influence	The Lobbying Act should be amended to remove the VAT exemption for all foreign-based entities which would otherwise fall under the provisions of the Act.
16	Wider influencing environment/Lobbying, think tanks and other channels of influence	Consideration should be given to broadening the scope of the Ethics and Integrity Commission’s review into lobbying, disclosure and access to government so that it also examines potential channels for foreign money to flow into the wider political eco-system.
17	Government prioritisation	Given the on-going challenge to the integrity of our democracy, the Cabinet Secretary should give a clear signal of the priority to be afforded to this agenda by allocating to a Permanent Secretary lead responsibility for sustaining our democracy and coordinating the response to the threats to it.

Key considerations

13. The following considerations having guided my work and shaped the recommendations.
14. **Cross-border influence and the global contest of political ideas is part and parcel of a healthy democracy:**
 - Politics has always crossed national borders. The UK Government is clear that “Governments around the world, including the UK, seek to advance their interests through the lobbying and influencing of other states”⁸.
 - Domestic politics cannot sit isolated from wider political movements and ideas; it is right that political ideas are debated and contested internationally. Not all foreign involvement is inherently problematic.
15. **Freedom of speech is fundamental to a functioning democracy:**
 - Citizens must be able to hear diverse political views and to make their own contribution to political debate. That debate will always be robust and vigorous. No one can agree with every political position and some will find some opinions distasteful and even offensive. But so long as debate is held within the parameters of the law, it must be protected.
16. **In the current UK context, private funding of political parties is necessary to allow them to fulfil their democratic purpose:**
 - Political parties are a necessary part of our political process. They need money to organise, to develop policies and to campaign. There is little public or political appetite for funding for political parties to come from the public purse beyond that which is already available to them through instruments like Short money and Policy Development Grants, designed to help parties in opposition to develop policy. Where private money comes into the political process, tough regulation is required to sustain public trust in its legitimacy.
17. **Transparency of political funding is in the public interest:**
 - Transparency should be central to the regulation of the financing of political parties. Confidence in the political process is only possible if the public can see how parties raise and spend their money.

⁸ Home Office (2025), ‘Foreign interference: National Security Bill factsheet’, accessed at <https://www.gov.uk/government/publications/national-security-bill-factsheets/foreign-interference-national-security-bill-factsheet>.

18. Political parties and candidates should not be funded by foreign money – political funding must be restricted to those with a stake in the country:

- A foundational principle of democratic legitimacy is that political power derives from those who have a recognised stake in the political community.
- In the UK context, this principle has long underpinned the regulation of political finance. Successive reviews, as well as the current regulatory framework, reflect the view that the right to financially support political parties and candidates should be confined, as the 1998 Committee on Standards in Public Life report concluded, to “those who live, work and carry on business in the United Kingdom”⁹. The only exception to this should be British citizens who live abroad but are on the UK electoral register.

19. Foreign interference has no place in UK democracy:

- There is a clear distinction between activity conducted transparently and within the norms of diplomacy, and interference that is often covert and malign and designed to undermine our interests, institutions and political debate and weaken our democracy. In short, while foreign influence may be legitimate, foreign interference is not.
- This reflects approaches internationally. Other democratic states, including the US and Australia, draw a distinction between foreign influence activity that is open and transparent and activity by foreign state actors that is covert, deceptive, coercive or corrupting and which undermines sovereignty, democratic institutions and public trust^{10,11}.

Devolution picture

The oversight of political actors – parties, campaigners, and candidates – and their income and expenditure is generally a reserved matter. However, the regulation of the expenditure of non-party campaigners in periods around devolved elections, where these do not overlap with periods around UK Parliamentary General Elections, and the regulation of income and expenditure of candidates at devolved elections sits with the Devolved Governments. All provision relating to elections in Northern Ireland (including Northern Ireland Assembly and local government elections) is excepted¹².

Most of the recommendations in this report are therefore related to reserved matters. Where they do touch on devolved competences, the Scottish and Welsh Governments may wish to give them consideration. I would expect the UK Government to consult both Scottish and Welsh Governments and the Northern Ireland Executive if it is minded to take forward any of the recommendations I make.

⁹ The Committee on Standards in Public Life (1998), Fifth Report, ‘The funding of political parties in the United Kingdom’, accessed at https://assets.publishing.service.gov.uk/media/5a7daa32e5274a5eaea6596a/5thInquiry_FullReport.pdf.

¹⁰ US Government Department of Homeland Security (2018), ‘Foreign interference taxonomy’, accessed at https://www.cisa.gov/sites/default/files/publications/19_0717_cisa_foreign-influence-taxonomy.pdf.

¹¹ Australian Government Department of Home Affairs (2024), ‘Defining foreign interference’, accessed at <https://www.homeaffairs.gov.au/about-us/our-portfolios/national-security/countering-foreign-interference/defining-foreign-interference>.

¹² Under the devolution settlement for Northern Ireland, excepted matters are subjects reserved to Westminster which will not be transferred unless under primary legislation.

How serious is the problem?

20. In an uncertain geo-political context, hostile states and non-state actors have a clear incentive to attempt to undermine UK democracy and thereby weaken the UK's capacity to assert its interests. The UK has been central to the coalition supporting Ukraine's resistance to the Russian invasion. The UK remains conspicuous through its commitment to liberal, democratic values which are antithetical to the positioning of autocratic states across the world.
21. I have been extensively briefed in the course of this review by the security services, the police, the Electoral Commission and relevant Government officials. It is clear that foreign interference in our politics is real and persistent. As the National Protective Security Authority (NPSA) has put it in a briefing to MPs: "The UK is a target of long-term strategic foreign interference and espionage from elements of the Russian, Chinese and Iranian states which, in different ways, seek to further their economic and strategic interests and cause harm to our democratic institutions"¹³.
22. Separately, beyond these hostile state threats, I am also cognisant of a potential new threat: an emerging willingness of foreign actors and private citizens, including from allies like the United States, to interfere in, and influence, politics abroad in pursuit of their own agenda.
23. Overall, this interference manifests itself in two main, if intersecting, domains: attempts to directly suborn the political process through financial interference; and sustained efforts to undermine trust in democracy by stoking divisive debate, principally on social media.

The political process

24. The public has been alerted to the techniques deployed by foreign states through the prosecution and conviction of Nathan Gill for taking bribes to act as an advocate for Russia; and the security alert issued by MI5 against Christine Lee for using donations to covertly influence politicians to further the interests of the Chinese state; as well as the 2022 cyber attack on the Electoral Commission.
25. Self-evidently, the security services do not reveal publicly the nature and extent of their live investigations, but the NPSA has issued guidance to all elected representatives to alert them to the risk that they may be the target of covert foreign influence campaigns¹⁴.

¹³ National Protective Security Authority, 'Protecting our Democratic Institutions: Countering Espionage and Foreign Interference', accessed at <https://www.npsa.gov.uk/national-security-act/defending-democracy/countering-espionage-and-foreign-interference>.

¹⁴ Ibid.

26. The risk of impermissible donations of foreign money to political parties in the UK also remains high. Albeit from a low base, the number of donations that have had to be returned as impermissible is increasing¹⁵. By definition, the amount of foreign money that has actually leached into UK politics is unknowable.
27. The impact of foreign money and covert foreign activity is difficult to assess. My assessment from the evidence I have seen is that while there is persistent activity, the impact is still contained and felt only at the margins of UK political life.
28. Does this obviate the concerns that motivated the instigation of this review?
29. Far from it. In part, the limited damage caused by foreign financial interference is due to successful interventions by the relevant authorities. In my discussions with them, it is clear that more can be done in terms of strengthening the regulation of political finance to ensure that they can continue to successfully identify and prosecute illicit activity and interference.
30. Moreover, restoring trust in our democratic processes means ensuring not just that the regulatory system is robust but that it is also **seen to be** robust by the public. Suspicion that politics is tainted by foreign money is debilitating of confidence in democracy.
31. Other countries have dealt with this problem by substituting private financing of political parties with public funds. This clearly reduces the opportunity for illicit financing of politics as well as achieving some form of equality of arms between established political parties. I am clear, however, that – rightly or wrongly – there is no public appetite at the moment in the UK for more public funding of political parties; nor is it likely that any major party will see political advantage in making such a proposition in the near term.
32. That means that the public has to place confidence in the regulatory system that governs political finance, in particular to know that the barriers to illicit foreign finance and interference are high enough. There are disadvantages to more regulation. Political parties rely on much voluntary support. The law underpinning our electoral system is already complicated and additional regulation will not be universally welcome. But it is the price we are obliged to pay to sustain our system of political financing largely from private sources.
33. I welcome the recognition by this Government that there are too many gaps in current electoral law that mean it is difficult to be confident that foreign money is prevented from entering UK politics. The Bill before Parliament will, among other things:
 - tighten the rules around corporate donations to prevent shell companies acting as a front for foreign money;
 - increase the transparency around donations made by unincorporated associations; and
 - place new requirements on political parties to do thorough due diligence on the source of donations.
34. These changes respond to recommendations made repeatedly over the years by the Committee on Standards in Public Life and others and will go some way to ensuring that our electoral rules are robust in the face of the threat of foreign interference. However, it is my view that the proposed changes do not go far enough. In the light of what we now know

¹⁵ The Electoral Commission's political finance database, accessed at <https://www.electoralcommission.org.uk/political-registration-and-regulation/financial-reporting/political-finance-online>.

about the nature of foreign interference, and the continuing mistrust of the public in the way our politics is financed, more needs to be done to future proof the regulatory system. That is the purpose of the recommendations I make in this report.

The wider influencing environment: social media and beyond

35. There is widespread concern about the role social media now plays in our political discourse. Many of those I spoke to in the course of this review worried about the deeply unpleasant nature of much social media content and the proliferation of opinion seemingly distorted by exposure to false information. These concerns need to be balanced with a recognition of the benefits that social media can bring to democratic discourse; more people have more access to political points of view and, moreover, have a much increased opportunity to make their own views felt. Nevertheless, the amount of toxic content risks overwhelming the positive benefits of this still relatively new means of mass communication.
36. This raises issues that go well beyond the terms of this review, not least the immensely difficult question of if, and how, to moderate legal but malicious content that is generated by UK citizens. But it is part of my remit to worry about the way the debate on social media is subverted by foreign actors who deliberately seek to exacerbate division and increase polarisation with a view simply to destroying the capacity of the UK to function as a well-governed state.
37. My main concern is activity financed by foreign states and non-state actors that seizes on and amplifies divisive content. The NPSA is clear on the risk: “State actors can cultivate fake or misleading content to shape public debate and policy decisions and/or discredit individuals. Fake social media accounts and automated bots can push large quantities of disinformation. Personal data – for example from cyber targeting – can be combined with fake information to create realistic-appearing disinformation”¹⁶. The extensive means to achieve this are detailed in the Ofcom Register of Risks, published in December 2024¹⁷. This is a new and relatively cheap way of interfering with the democratic process of other countries. It does not require the expenditure of any money directly in the UK itself, so stemming the flow of finance to this type of activity from the UK is next to impossible. Instead the focus has to be on removing this content from social media.
38. It is hard to put a scale on the extent of this as a problem. By its nature it is difficult to quantify, particularly if interventions are targeted rather than widely broadcast. The boundary between state and non-state activity is also opaque.
39. It is also unclear what impact this activity has on public opinion. There is no evidence that the 2024 General Election was distorted by such foreign interference^{18,19}. In aggregate, this may not yet have had a destabilising influence, but the risk of a material effect is much increased in a more volatile political context.
40. Moreover, the sophistication of the dark arts of social media manipulation is only likely to increase over time, with the advent of AI and deepfake technologies that will both lower the cost and improve the targeting of these interventions.

¹⁶ Ibid.

¹⁷ Ofcom (2024), ‘Protecting people from illegal harms online: Register of risks’, accessed at

<https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/register-of-risks.pdf?v=390983>.

¹⁸ Security Minister (Dan Jarvis MP), oral evidence to the Joint Committee on the National Security Strategy, 17 March 2025, p. 3, question 1, accessed at <https://committees.parliament.uk/oralevidence/15590/pdf/>.

¹⁹ Minister of State for Europe, North America and Overseas Territories (Stephen Doughty MP), oral evidence to the Foreign Affairs Committee, 6 January 2026, p. 4, question 183, accessed at <https://committees.parliament.uk/oralevidence/16962/pdf/>. (committees.parliament.uk/oralevidence/15590/pdf/).

41. My assessment, then, is that we are, indeed, already experiencing ‘information warfare’²⁰. While our political life has not yet been subsumed by this assault, our defences are worryingly weak. If relentless exposure to disinformation on social media persuades even a small proportion of the UK population that our politics is irretrievably broken, the risk grows rapidly that some will seek to resolve their discontents by extra-political action.
42. This is a tough problem to solve. But delay will not make it go away. Indeed, the more embedded it becomes, the harder it will be to eradicate. I make recommendations in this report about how the Government might get a better grip on this assault, funded by foreign money, on our democracy.
43. Social media is not the only vector through which foreign money might seek to interfere with our politics. Political influence permeates through a rich ecosystem of think tanks, parliamentary groupings like All Party Parliamentary Groups, “friends of” groups and lobbying. The vast majority of this activity is benign and actively useful in stimulating policy thinking and informing the political process. But there are concerns about the ability of hostile interests to infiltrate this environment too and I make recommendations to guard against that.

²⁰ Ibid, p. 2, question 182.

Political finance

Overview

44. The majority of funding for political parties in the UK comes from private, corporate or other organisational sources. State funding accounts for around 10% of the total income of UK political parties²¹. There is no public or political appetite to increase the level of state funding, so the political parties will remain in competition to garner funding from non-state sources.
45. The way in which money was raised and spent by political parties and other campaigners went largely unregulated until the introduction of the Political Parties, Elections and Referendums Act 2000 (PPERA)²². This introduced tight rules on donations, placed limits on party spending and all but banned donations from foreign sources; individuals are only allowed to make donations if they are on the UK electoral register and only companies incorporated in the UK are permissible donors. The rules were further adjusted in successive pieces of legislation, most recently the Elections Act 2022²³. These same permissibility rules apply to candidates, for whom the legal framework is set out in the Representation of the People Act 1983 (RPA)²⁴, as amended by PERPA. All groups subject to permissibility requirements are, in this context, termed 'regulated groups'.
46. In the 25 years since PERPA was passed, gaps in the legal hurdles to foreign money getting into UK politics have become more apparent. Moreover, the world of finance has changed in ways not anticipated in 2000, notably through the advent of cryptocurrencies. And campaigning has spilled out from the regulated period of elections to become more or less constant. PERPA needs updating to reflect these changes.

²¹ Sam Power (2025), 'Political financing: Donations, loans and state funding', p.12, accessed at <https://researchbriefings.files.parliament.uk/documents/CBP-10441/CBP-10441.pdf>.

²² Political Parties, Elections and Referendums Act 2000, accessed at <https://www.legislation.gov.uk/ukpga/2000/41/contents>.

²³ Elections Act 2022, accessed at <https://www.legislation.gov.uk/ukpga/2022/37/contents>.

²⁴ Representation of the People Act 1983, accessed at <https://www.legislation.gov.uk/ukpga/1983/2/contents>.

Complexity of political finance laws

The legal and regulatory framework of political finance has developed over time, with incremental changes made in response to the changing nature of our system. Electoral law in the UK is currently spread across 25 major statutes and has become increasingly complex and fragmented²⁵. In turn this makes the law difficult to navigate and prone to loopholes. I am aware that, in making recommendations to respond to the specific threats within my remit, I am adding further incremental changes and thus additional layers of complexity. Although a full consolidation of political finance legislation sits beyond my remit, I urge Government to consider the recommendations made by the Law Commission²⁶, as yet unimplemented²⁷, with a view to improving the effectiveness and consistency of the law.

47. The recently introduced Representation of the People Bill will go some way to deal with these problems, not least by tightening up the rules on corporate donations and requiring greater transparency around the political engagement of unincorporated associations, that is bodies without formal legal personality that may raise money to donate to regulated groups.
48. These clauses in the Bill are to be welcomed. However, as requested by Ministers, I have considered whether more needs to be done to ensure that the risk of illicit foreign money getting into UK politics is reduced to the maximum extent possible. I have concerns about four areas. These are:
 - donations from overseas voters;
 - corporate donations;
 - donations made using cryptoassets; and
 - rules on campaign spending by candidates and non-party campaigners.
49. For completeness, I have considered whether new measures are necessary to manage the risk posed by cash donations. I have not seen or heard any evidence to suggest that they are and as such make no related comment or recommendation.

Overseas voters

50. British people who live abroad but who are still on the electoral register in the UK are permissible donors. By ending the rule which stipulated that anyone who had lived abroad for more than 15 years was no longer entitled to vote in the UK, the Elections Act 2022 extended the potential pool of overseas voters, from around 1.4 million to 3 million²⁸. Hitherto, only a fraction of these individuals has taken up the right to register to vote; nevertheless, there are many British people living abroad who take a welcome part in the political life of the country.

²⁵ Law Commission and Scottish Law Commission (2020), 'Electoral Law – A joint final report', accessed at https://assets.publishing.service.gov.uk/media/5f47cf79d3bf7f5d7d18a5ef/6.6339_LC_Electoral-Law_Report_FINAL_120320_WEB.pdf.

²⁶ Ibid.

²⁷ Ministry of Justice (2026), 'Report on the implementation of Law Commission recommendations', accessed at <https://assets.publishing.service.gov.uk/media/6980807df0e5cf1ed2612dc8/lord-chancellors-implementation-report-law-commission-recommendations.pdf>.

²⁸ House of Commons Library (2025), 'Overseas voters', p.6, accessed at <https://researchbriefings.files.parliament.uk/documents/SN05923/SN05923.pdf>.

51. While the vast majority of donations to political parties and other regulated groups made by British people living abroad will be entirely unproblematic, donations by this route do pose an additional risk of foreign money leaching into British politics. Inevitably, tracing the source of funds offered by individuals living abroad is more complex than for domestic donations. This complicates the risk assessment that political parties will be obliged to undertake under the proposals in the Representation of the People Bill (the 'know your donor' clauses). Moreover, the investigatory route is also more complex for the Electoral Commission and other UK authorities if malfeasance is suspected.
52. A question of the perception of democratic fairness sits alongside these more practical considerations. Though many individuals' decisions to move abroad are not financially motivated, it remains the case that wealthy individuals who have chosen to live abroad in order to have their wealth taxed abroad are nevertheless currently entitled to make unlimited donations to UK political parties. Despite choosing to minimise their contribution to the UK Exchequer, these individuals have the opportunity to make potentially game-changing donations into British politics.
53. These two issues, of practical traceability and democratic fairness, risk undermining the perception of the legitimacy of the system of political funding. By the same token, it would be overly heavy-handed to ban donations from overseas electors or, indeed, to constrain such donations to de minimis sums. In my view the best way to mitigate the risk would be to impose a cap on individual donations from UK electors living abroad. I do not, however, believe that this cap should apply to those in the category of 'service voters', who are located or resident abroad by reason of their membership of the armed forces, their employment in service of the Crown or their connection to such a person.
54. If the recommendation of a cap on donations is accepted, this will be the first time that limits have been placed on individual donations in UK politics. Political parties will need time to adjust their fundraising strategies to reflect this new reality. I suggest therefore that this be set initially at a reasonably high level, perhaps in a range from £100,000 – £300,000 per donor per year. This would still allow generous donations over an electoral cycle, but would prevent very large foreign donations slipping through that might have a game-changing impact on politics in the UK.

RECOMMENDATION 1: There should be an annual cap on political donations from British voters living abroad.

Scottish and Welsh franchise

Scotland and Wales have recently expanded the right to vote in local and devolved elections to foreign residents^{29,30}. As with the changes to the franchise in the Elections Act 2022, this has had knock-on effects for political finance regulation, since the inclusion of these individuals on the electoral register means that they become permissible donors able to make political donations in the UK.

I have been told that, following the expansion of the franchise, no evidence of foreign money entering UK politics through this route has been provided to the Scottish and Welsh Governments. I recognise, however, that it is a potential channel for abuse and therefore urge that this is monitored and kept under review by the Electoral Commission and the Scottish and Welsh Governments.

Corporate donations

55. Under the current rules, UK-based companies registered at Companies House which are incorporated in the UK and carry on business in the UK are 'permissible donors'. Corporate donations to political parties are significant and have been on a rising trend. Total corporate donations to all parties rose from £13.6m in 2017, to £21m in 2019 to £30.6m in 2024³¹.
56. The Committee on Standards in Public Life identified the risk in its 2021 report that the current rules for corporate donations require only a weak link to activity in the UK³². So-called shell companies could be established with no real earnings from business conducted in the UK and yet would be able to make unlimited donations to regulated groups.
57. The Bill now before Parliament proposes to significantly tighten up the rules around corporate donations. If the Bill were to become law as currently drafted, it would only allow companies meeting the following requirements to be permissible donors:
 - Registered under the Companies Act 2006 and incorporated in the UK;
 - Carrying on business in the UK;
 - No persons of significant control; or a majority of shares/voting rights held by a person/ persons of significant control who are on the UK electoral register or British citizens usually resident in the UK; or, where the company has no person or persons of significant control holding a majority of shares/voting rights, all persons of significant control are on the UK electoral register or British citizens usually resident in the UK;
 - Remaining available revenue at least equal to their donation;
 - Company accounts for at least one of the financial years falling within the relevant period delivered to the registrar of companies.

²⁹ Scottish Government (2020), 'Right to vote extended', accessed at <https://www.gov.scot/news/right-to-vote-extended/>.

³⁰ Welsh Government (2023), 'Local Government and Elections (Wales) Act 2021', accessed at <https://law.gov.wales/local-government-and-elections-wales-act-2021-0>.

³¹ The Electoral Commission's political finance database, accessed at <https://www.electoralcommission.org.uk/political-registration-and-regulation/financial-reporting/political-finance-online>.

³² Committee on Standards in Public Life (2021), 'Regulating Election Finance', p. 50, accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf.

58. These changes, if enacted, will do much to limit the opportunity to use shell companies and other illegitimate vehicles to funnel foreign money into UK politics. Nevertheless, I believe these provisions can be further tightened, in two ways.
59. First, the Government has chosen to make revenue the test of corporate donation permissibility. Some, like the Committee on Standards in Public Life³³ and the Electoral Commission³⁴, have argued donations should only be made from accrued profit. The distinction is significant: companies may be pre-profit or make little profit but generate significant revenues. A test on profit would therefore tighten the potential pool of corporate donors by ensuring that donations are only made from profits they have made and paid tax on in the UK. Many commentators have suggested that this should be calculated from post-tax profits averaged over the preceding two years.
60. Second, the test, as currently drafted in the Bill, will also allow corporate donors to donate up to their revenue multiple times in any given year. Instead, the limits on donations from corporate entities should apply cumulatively, however many regulated groups are the beneficiaries. In other words, no corporate donor should be able to donate more than their post-tax profits, averaged over the preceding two years, into UK politics in any given year. The Electoral Commission will wish to consider how this might best be policed, though that is likely to be through a combination of donor declaration and recipient due diligence.
61. These changes, together with what is proposed in the Bill, will severely diminish the risk that foreign interests make large donations into British politics via the company route. However, risks remain. Political parties will have to remain vigilant that foreign actors do not try to find ways round the rules, for example by inflating the profits of a UK-based business through fees for nugatory work or outright gifts, and then directing the profits to be made over to a political party as a donation. In a small subset of companies, the ultimate beneficial owner may not be on the electoral register, even if the majority of other persons of significant control are, and might seek to direct funding into UK politics. No political party should accept such donations and the Electoral Commission should support political parties and other regulated entities in understanding how the rules apply to such donations.

RECOMMENDATION 2: The corporate donation test in the Representation of the People Bill should be amended to one based on post-tax profits, rather than revenue, and no corporate donor should be able to donate more than their post-tax profits, averaged over the preceding two years, into UK politics in any given year.

³³ Committee on Standards in Public Life (2021), 'Regulating Election Finance', p.50, accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf.

³⁴ The Electoral Commission (2026), 'Media briefing: Representation of the People Bill', p.10, accessed at https://www.electoralcommission.org.uk/sites/default/files/2026-02/Media%20briefing%20-%20Representation%20of%20the%20People%20Bill_0.pdf.

Political donations in Northern Ireland

For the avoidance of doubt, the recommendations on political finance that I make in this review are intended to apply across the UK, including in Northern Ireland.

I note that the arrangements for political donations in Northern Ireland differ from those in the rest of GB in that political parties in Northern Ireland may accept donations from permissible donors (individuals and organisations) based in Ireland. These provisions reflect the principles set out in the Good Friday Agreement, particularly those relating to equality and respect for the different political traditions on the island of Ireland. I am aware that not all parties in Northern Ireland are supportive of these arrangements. However, any change to them will need to be considered in the context of wider concerns in NI politics, which are beyond the remit of this review.

Donation thresholds

Concerns have been raised with me about the level of the thresholds above which donations have to be declared, currently £11,180 for political parties.

In the devolved parts of the UK, for instance, the vast majority of donations to political parties now fall below the threshold. This has led to a serious lack of transparency, with most donations not needing to be declared and thus invisible to voters.

Some therefore argue that the thresholds should be significantly reduced, and the £500 below which donations to political parties from any source is permissible should be reduced to £50. These suggestions also go beyond my remit, but would no doubt increase the transparency of political finance. Reducing these thresholds might usefully be considered as the Representation of the People Bill is debated.

Cryptoassets

62. Use of cryptoassets looks set to become an important feature of modern economies. They can reduce the cost of transactions³⁵, thereby facilitating ease of exchange in the economy. Cryptoassets also hold out the prospect of perfect traceability; every movement is recorded, making cryptoasset transactions potentially far more transparent than transactions in fiat currency.
63. However, many of the people I have spoken to in the course of this review have expressed deep reservations about political donations made in cryptoassets at this time. This is due to a combination of factors:
 - The incomplete framework of regulation for cryptoassets, particularly at international level;
 - The difficulty of tracing ultimate ownership of cryptoassets;
 - The proliferation of different cryptoasset vehicles, not all of which offer the same ease of traceability; and

³⁵ Bank of England (2023), 'Regulatory regime for systemic payment systems using stablecoins and related service providers', accessed at [Regulatory regime for systemic payment systems using stablecoins and related service providers | Bank of England](#).

- The advent of AI assisted technologies which allow cryptoassets to be broken down into small amounts, potentially below the threshold at which donations have to be declared.
64. Moreover, I heard a lot of concern that regulators such as the Electoral Commission, and political parties themselves, simply do not yet have the capability and expertise to understand the history of cryptoassets that might find their way into the coffers of political parties.
 65. Taken together, this suggests that there is a risk that cryptoassets are used as the vehicle to channel foreign money into the political system in the UK. The Government needs a strategy for dealing with that risk.
 66. The number of donations made in cryptoassets is currently unknown; none have reached the threshold which mandates reporting to the Electoral Commission. One option would be to allow this small market to grow, under tight supervision by the Electoral Commission and subject to strict rules, for example the use of only UK-regulated exchanges. That would allow the system to slowly habituate itself to use of cryptoassets as a vehicle for donations.
 67. I understand that argument and have some sympathy for it. However, this is a comparatively new technology and, like all new technologies, its growth path will be in the short term unpredictable. It would do public confidence in our system of political finance no good at all if a rapid uptick in use of cryptoassets for donations to political parties led to a large-scale loss of transparency of where the donations were ultimately sourced. That risk, in my view, is unacceptable.
 68. I agree, therefore, with those who argue that we should pause the use of cryptoassets for political donations for the time being. This should not be seen as a prelude to an outright and permanent ban, rather an interlude in which the regulatory environment can catch up with the reality of cryptoassets and the Electoral Commission, the political parties and other actors can invest in the capability and expertise necessary to allow safe use of cryptoassets in the political process. If the Government were to agree and to legislate accordingly in the Representation of the People Bill, I would further suggest that the Bill include a power that would allow the moratorium to be ended once it is determined that the relevant regulation is effective.
 69. Cryptoasset technology can be used to break up large assets into smaller blocks. If under £500, these would fall beneath the permissibility test. The moratorium on donations made using cryptoassets should therefore apply to all cryptoassets, not just those valued above the £500 threshold.
 70. It is important to note that no form of ban on cryptoassets is a panacea. Potential donors will still be able to sell their cryptoassets and donate the proceeds. But once this money enters the fiat banking system, traditional anti-money laundering checks will be triggered, which provide an additional layer of security.

RECOMMENDATION 3: The Government should legislate in the Representation of the People Bill to introduce a moratorium on political donations made in cryptoassets, with a power to end the moratorium only once Parliament and the Electoral Commission are assured that relevant regulation is effective.

Campaign donations and spending: transparency

71. PPERA introduced rules around transparency and permissibility which apply to donations. For political parties, all donations must be permissible and any over £11,180 (or £2,230 in certain instances) must be reported to the Electoral Commission. Parties are obliged to submit quarterly returns on donations each year, irrespective of any regulated period of elections³⁶, and weekly returns during the six-week 'short' campaign in the lead-up to a general election.
72. Parties must also file annual accounts which delineate what they have spent on campaigning, whether within or outwith regulated periods. Within the 3 or 6 months following a regulated period (depending on the level of expenditure a party has), they must file a separate report on their campaign spending during that time.
73. The rules for so-called non-party campaigners – that is organisations that are not registered to a political party but campaign for or against political parties or candidates or on issues around elections– and candidates differ significantly. Where permissibility rules do apply, they only apply to donations used to fund certain 'campaigning activity' (defined as "controlled expenditure" for non-party campaigners and as "election expenses" for candidates).
74. There is a significant loophole in the current rules, in that non-party campaigners spending under £10,000 in regulated periods can receive donations from anyone, including impermissible donors. This allows foreign money to enter the UK political system.
75. Additionally, there are no reporting requirements for campaign spending outside regulated periods for either non-party campaigners or candidates. This means that there is no transparency around what is spent, or around the donations being used to fund this spending, outside of regulated periods.
76. Many commentators – including the Committee on Standards on Public Life³⁷ and the former Chief Executive of the Electoral Commission³⁸ – have expressed concern about these loopholes. It mattered less when campaigning was largely restricted to electoral events and therefore to the regulated period. However, campaigning has now spilled out well beyond the bounds of the regulated period: we see political activity from non-party campaigners year-round, which extends to the continuous criticism or promotion of political parties, influencing political parties and government to adopt certain policies, and pushing issues up the political agenda. Many of the activities undertaken by candidates to increase their political profile and connections, as well as any salary-type payments they may receive to run for election or staff provided to service their campaign, take place throughout the electoral cycle.
77. For candidates, the regulated period varies by election type; it is linked to either a set period of time prior to an election or the point at which a candidate officially becomes a candidate (at the dissolution of Parliament, for UK parliamentary general elections). Prospective candidates can begin raising their political profile and campaigning well before either of these points, and therefore before the regulated period begins. Tracking who has declared as a candidate or

³⁶ Regulated periods are periods in the run up to elections, during which spending limits and rules apply. Regulated periods can also trigger increased reporting requirements.

³⁷ The Committee on Standards and Public Life (2021), 'Regulating Election Finance', p.63, accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf.

³⁸ Bob Posner (2026), 'Regulating political party spending year-round', accessed at <https://www.spotlightcorruption.org/report/party-spending-year-round/>.

began campaigning at any given time would be an almost impossible task for the Electoral Commission, so any control of candidate donations and expenditure outwith the regulated period will have to be retrospective.

78. To fix this, I recommend that the Government makes the following changes:
- donations to **all** non-party campaigners to fund any ‘campaign spending’ throughout the electoral cycle should be from permissible donors³⁹;
 - non-party campaigners who meet the **reporting threshold** (currently those spending over £20,000 in England, or £10,000 in Scotland, Wales or Northern Ireland in a regulated period) should submit an annual account of ‘campaign spending’ and relevant donations throughout the electoral cycle, in addition to their current reporting requirements;
 - any donations received by candidates to fund their campaign activity at any time during the electoral cycle should be from permissible donors; and
 - upon submitting their nomination papers, candidates should be required to declare **all** donations received to fund their ‘campaign activity’ that are above £2,230, even if received before they officially became or declared as a candidate, or the regulated period began.
79. For a year-round regime to be impactful, the Government should also revisit the definitions of ‘campaigning activity’ and the thresholds for non-party campaigners to register with and report to the Electoral Commission.
80. Currently, the definitions of ‘campaign activity’ are tightly drawn to reflect the types of campaigning that have historically been seen directly in advance of a specific election. Yet, these definitions (“controlled expenditure” and “election expenses”) do not capture all of the political activity we now see from non-party campaigners and candidates year-round and I am concerned that the definitions currently used do not adequately cover significant political activity that may be funded by foreign interests.
81. Broadening the definition to capture of the kind of campaigning activity that we now see will widen the scope of the current regime and potentially bring a large range of political activity and organisations into the regulatory framework. I recognise this will be an unwelcome increase in bureaucracy for those concerned. Any change will need to be proportionate and workable, with the burden, particularly for small or volunteer-led organisations, balanced against the risk of uncontrolled and untransparent amounts of foreign money influencing the political debate in the UK.
82. This is a complex area that will take time to develop and implement, and will require wide consultation with interested parties. I therefore recommend that the Government start work with the Electoral Commission as soon as possible on a new regime to apply throughout the electoral cycle and amend the current definitions accordingly.
83. Given the recommended shift in focus from ‘campaign spending’ in regulated periods to ‘campaign spending’ throughout the electoral cycle, the Government should also consider revising the thresholds for non-party campaigners to register with and report to the Electoral Commission to an appropriate level of annual ‘campaign spending’.

³⁹ This would also close a loophole that allows any donations, including from foreign actors, to fund the ‘campaign spending’ of non-registered non-party campaigners (currently those spending below £10,000 in a regulated period).

RECOMMENDATION 4: Non-party campaigner and candidate campaign spending should come from permissible donors and reporting and transparency requirements should apply to these groups year-round. The definitions of 'campaign spending' should be revised to more comprehensively capture the campaigning activity of non-party campaigners and candidates.

Spending limits and donation caps

Spending limits are imposed on political parties, non-party campaigners and candidates during the regulated period that applies to them. There are no such limits outwith those regulated periods.

Some commentators have long worried that the spending limits in the regulated period are too high, not least since they were substantially raised by the Elections Act 2022; this, combined with unlimited spending possibilities outwith the regulated period, drives a sort of arms race among political parties and actors to out-raise and out-spend their competitors. Indeed, when spending limits were initially recommended by the CSPL and adopted under PPERA the aim was that they were to be set below the level that the largest parties spent at elections to prevent such an arms race and the need to secure more (and bigger) donations.

Reducing the spending limits and introducing such limits across the whole electoral cycle could potentially relieve some of the fund-raising pressure, in turn diminishing the inducement to look to non-permissible sources to stay ahead.

This question sits, in my view, beyond my remit. So does the question of a universal cap on donations. I have made a recommendation to cap donations from overseas electors because of the particular salience of that issue to the question of foreign money coming into UK politics. The issue of spending limits and wider caps is one for the political class as a whole to consider if it wishes to restore confidence in the political process and to keep big money out of UK politics. This might be something that could be usefully debated during the passage of the Representation of the People Bill.

Political parties

Overview

84. Political parties are central to our democracy; parties marshal political thought into policy programmes which allow voters to choose the form of government they want. Public funding of parties in the UK is limited, so parties must raise sufficient monies to be able to formulate their policy ideas, promote them to the public and campaign for election. This is a constant challenge, for new parties and old alike.
85. While the larger parties in particular can afford a centralised professional staff, much of the work of all parties is carried out by volunteers in regional and local associations and branches. Given the complex landscape of electoral rules, registered parties face a heavy bureaucratic burden to respect their legal obligations. This includes duties to meet permissibility requirements in relation to political donations; to abide by statutory campaign spending limits; to submit periodic reports on donations, loans and expenditure, as well as annual statements of accounts, to the Electoral Commission; and to adhere to the rules on imprints on printed and digital election material. All this is in addition to their on-going work of organising fund raising, membership outreach and campaigning.
86. Abusing these rules can carry heavy penalties. It is a criminal offence, under PPERA, for a treasurer or campaigns officer to knowingly or recklessly submit false declarations to the Electoral Commission. Other mistakes or compliance failures are subject to civil sanctions. The Representation of the People Bill is taking welcome steps to ensure that the right balance is struck between which offences carry criminal and civil sanctions, to ensure police resources are directed towards the more serious offences. The National Security Act created a new statutory aggravating factor where the “foreign power condition” is met, that is when an offence is carried out for, on behalf of, or to benefit a foreign power⁴⁰. This applies to any criminal offence, including electoral finance offences.

⁴⁰ Home Office (2025), ‘State threats aggravating factor: National Security Bill factsheet’, accessed at <https://www.gov.uk/government/publications/national-security-bill-factsheets/state-threats-aggravating-factor-national-security-bill-factsheet>.

Checks on donations

87. Parties therefore have a crucial responsibility to ensure that political finance is kept clean of contamination by foreign money and other impermissible donations and they must do so in a way which is transparent and commands public confidence. There is evidence that the number of donations that have had to be returned as impermissible by political parties is increasing, albeit from a small base⁴¹. Moreover, a test run by the Bureau of Investigative Journalism found that five out of six main UK parties accepted donations structured to circumvent foreign impermissibility rules⁴². Vigilance on the part of the political parties is more important than ever.
88. All the parties that I spoke to in the course of this review told me that they had procedures to ensure that all large donations, particularly those over the required reporting threshold of £11,180, went through robust central controls to check provenance and permissibility. The Representation of the People Bill will require further codification of how parties manage donations over £11,180 through the ‘know your donor’ provisions which will oblige parties to carry out a risk assessment before donations are accepted. This will mean taking into account the type of person who is making the donation, the person’s previous donation history, the type of donation, the amount of the donation, and any other risk factors the party considers to be relevant. Parties will have to have regard to Electoral Commission guidance on how to carry out the risk assessment.
89. These new rules will help to ensure that parties act in the public interest when they are offered large donations. ‘Know your donor’ provisions are in many ways similar to the anti-money laundering checks that are required of thousands of organisations, large and small, in the private sector to ensure the legitimacy of financial transactions. However, I am concerned that the new ‘know your donor’ rules are not as rigorous as the customer due diligence checks required under anti-money laundering regulations. I suggest that the Government amend the Bill to require enhanced ‘know your donor’ checks for donations that meet certain ‘risk factors’. These risk factors should be set out in legislation and should include location and very large donations. The Electoral Commission should set out the requirements for enhanced checks in statutory guidance.
90. This would provide an extra layer of assurance to the public. Since regional and local associations and branches tend to deal with donations well below the £11,180 threshold, this should not add to the burden on them. For party headquarters, this proposal would impose requirements on them no more onerous than what is required under anti-money laundering legislation of thousands of small accountancy and legal practices up and down the land.

RECOMMENDATION 5: ‘Know your donor’ provisions in the Representation of the People Bill should be further developed to more closely mirror the customer due diligence provisions in the anti-money laundering regulations.

⁴¹ The Electoral Commission’s political finance database, accessed at <https://www.electoralcommission.org.uk/political-registration-and-regulation/financial-reporting/political-finance-online>.

⁴² The Bureau of Investigative Journalism (2024), ‘Five parties accept illegal donations, exposing flaws in foreign-influence rules’, accessed at <https://www.thebureauinvestigates.com/stories/2024-07-02/five-parties-accept-illegal-donations-exposing-flaws-in-foreign-influence-rules>.

Internal policies and procedures

91. Political parties are complex organisations. The larger ones engage hundreds of candidates, thousands of volunteers and tens of thousands of members. It is in their reputational, and ultimately electoral, interest that parties ensure that those within their ambit respect the values of the party. That may include vetting of candidates, training for volunteers and constitutional rules which set out what is expected of all associated with the party.
92. Particular care is required where individuals are in situations where they might be exposed to inducements to act in a way that suits the interests of malign foreign actors and not those of the UK. The case of Nathan Gill is a reminder that this sort of suborning of politicians is not a thing of the past. Officials at central headquarters of parties might also find themselves dealing with large sums of money offered as donations from a very wide range of individuals and corporations.
93. Organisations in other sectors – like accountancy, financial services, estate agents and solicitors – which face analogous risks are required to put in place training for those who might be exposed to bribery or corruption and to institute whistleblowing procedures to allow individuals within the organisation a safe and confidential route to call out individuals who they suspect of malfeasance⁴³. It is not unreasonable, in my view, for political parties which are operating at scale to put in place similar procedures.
94. I have considered whether this might extend to a statutory duty, as required of other regulated sectors, to pass something akin to Suspicious Activity Reports (SARs) to the relevant authorities if they suspect criminal wrongdoing. Given the limited evidence of the scale of the problem within political parties, in my view that would be a step too far. Rather, I propose that the Electoral Commission work with the political parties and the Ethics and Integrity Commission to draw up a template for a code of conduct to deal with the risk of foreign money entering the political process. This need not be complex but should encompass as a minimum training requirements for those dealing with large donations, cyber security essentials as set out by the National Cyber Security Centre, and a whistleblowing policy for staff at central headquarters.
95. I hope that political parties would see this as something that is in their interests, a positive signal to the public of their intent to keep politics in the UK clean of foreign money and interference. To give parties the necessary flexibility to reflect their own particular circumstances, I would propose that adherence to such a code of conduct would, for now at least, be voluntary. Moreover, given the relative scale of political finance, it might apply differently to political parties according to their gross income or total expenditure, as is the case with some existing requirements.
96. However, I suggest that there is a role for the Electoral Commission to monitor what relevant parties do in this space and so I recommend an annual report from parties to the Commission on the action they are taking to guard against the risk of the infiltration of foreign money. The Electoral Commission has to sustain the trust of the parties and any sort of public scorecard on party performance could be destructive of that trust. Instead, I propose that the Electoral Commission include, in its annual report to Parliament, an anonymised thematic section to reflect its view on the robustness of controls on foreign financial interference across the party system as a whole. Parliament then might wish to propose more robust action to the Government of the day if they are not content that adherence to a proper control framework is sufficient across political parties.

⁴³ HM Revenue & Customs (2025), 'Your responsibilities under money laundering supervision', accessed at <https://www.gov.uk/guidance/money-laundering-regulations-your-responsibilities#internal-controls-and-ongoing-monitoring-of-your-business>.

RECOMMENDATION 6: The Electoral Commission should work with political parties and the Ethics and Integrity Commission to develop a non-statutory code of conduct to ensure that robust procedures are in place within parties to equip party officials better to deal with the threat of foreign financial interference.

Standardised reporting

97. All companies registered with Companies House and all charities registered with the charity commissions of the UK must produce annual reports and accounts in a format sufficiently detailed to allow the general public to understand the financial affairs of the organisation in question. These basic transparency requirements are essential to sustaining public trust in the good governance of the business and charity sectors and the integrity of organisations with which they might have dealings.
98. That same level of detail and consistency applied to the returns of political parties would serve a similar function in allowing the general public to understand the financial activity of parties and to come to their own conclusions regarding this activity – ultimately supporting the democratic process.
99. There is currently no mandated, standardised template for political parties' annual accounts or campaign spending returns. The Electoral Commission has created a standardised annual report and accounts template for the use of political parties⁴⁴, but not all parties use it. Additionally, the detail it is currently able to request in returns is constrained by the outdated spending categories set out in legislation. In my view, it is important that political parties use a standardised, detailed format for both annual and campaign spending returns in order to allow the public and journalists to make comparisons between them. As such, the spending categories should be updated and the Electoral Commission should use its existing power⁴⁵ to mandate that annual returns are submitted using their template. An equivalent provision is also needed with regard to campaign spending returns.
100. This is most important for parties that have a significant presence in the legislatures of the UK. The Electoral Commission may wish to consider a lighter-touch regime for smaller parties, along similar lines to those required of smaller companies by Companies House.

RECOMMENDATION 7: The Electoral Commission should mandate political parties to submit their annual reports and accounts and campaign spending returns in a standardised format.

⁴⁴ The Electoral Commission, 'Guidance on submitting your statements of accounts', accessed at <https://www.electoralcommission.org.uk/our-guidance/political-party/guidance-submitting-your-statements-accounts>.

⁴⁵ Political Parties, Elections and Referendums Act 2000, Section 42 (2)(a).

Information sharing

101. As I have discovered in the course of this review, the routes to foreign financial interference in UK politics are varied and, by definition, opaque. Moreover, the threat mutates with time as the incentives of hostile foreign actors shift and technology opens up new windows of possibility for interference. Political parties need all the support they can get in countering those who would undermine our democracy.
102. The Electoral Commission already works closely with political parties to help them stay within electoral law and liaises with the Government, police and security services on the threat environment. Information that can be put into the public domain is already passed to political parties through ad hoc briefings. This should be systematised so that political parties know that they will receive detailed briefings in a timely fashion in advance of elections and through annual updates outwith election periods and real time alerts where appropriate.

RECOMMENDATION 8: The Electoral Commission should coordinate with Government, the security services and the police to ensure that political parties receive regular updates on the threat landscape, so that they have a comprehensive and up-to-date picture of the risks around foreign financial interference.

Effective enforcement

Overview

103. So long as the majority of political finance in the UK is derived from private rather than public sources, a tough regulatory framework is necessary to give reassurance to the public that donations into the political process do not come from illicit, in particular foreign, sources. Self-evidently, to be credible, a tough regulatory framework requires tough enforcement.
104. As the key regulator of electoral law, the Electoral Commission is central to the enforcement effort. As well as exercising its own powers, the Commission works closely with the police and other agencies to pursue malfeasance and to ensure that those who breach the rules are brought to justice.
105. Ensuring that there is a robust system of enforcement falls squarely within the remit of this review. I believe that there are a number of areas where the credibility and effectiveness of the enforcement infrastructure could be improved. I set out relevant recommendations under the following headings:
- Resourcing and independence of the Electoral Commission;
 - Investigatory and other powers of the Electoral Commission;
 - Organisation of the investigation and prosecution of offenders;
 - Burden of proof and sentencing limits for relevant offences.

Resourcing and independence of the Electoral Commission

106. The Electoral Commission is accountable primarily to the UK Parliament through the Speaker's Committee of the House of Commons, which is responsible for reviewing and approving the Commission's corporate plan. The Commission is also accountable to the Scottish Parliament, via the Scottish Parliament Corporate Body, and the Senedd, via the Llwydd's Committee, for its responsibilities in respect of devolved powers. While not directly accountable to the Northern Ireland Assembly, the Commission works closely with it.

107. The Electoral Commission has recently received a significant uplift in funding. This year, Parliament approved over £46 million⁴⁶, compared to £17 million in 2021⁴⁷. This is to be welcomed and will help to ensure that we have a fully effective electoral regulator. It is crucial for the future that the funding available to the Electoral Commission is commensurate with the vital job it has to do to protect our democracy.
108. Where once the Electoral Commission was only accountable to the legislatures of the UK, it now also has a duty to the UK government of the day. This was introduced by the Elections Act 2022, which imposed a requirement for the Commission to ‘have regard’ to an annual policy statement written by Ministers⁴⁸. This requirement has been regarded by many, including the chair of the Committee on Standards in Public Life⁴⁹, the Speaker’s Committee⁵⁰, and the Electoral Commission itself, as an infringement of the proper independence of the Commission before Parliament. In effect, it allows the political party that forms the government of the day to set its rule over the work of the Commission. This contradicts international best practice in terms of the independent oversight of electoral law⁵¹ and sits uneasily with the absolute requirement that the Electoral Commission is seen by politicians and the public alike as standing above the party fray^{52,53}.
109. On 2 March, the Secretary of State for Housing, Communities and Local Government announced the Government’s intention to reverse this change in the Representation of the People Bill⁵⁴. I welcome this decision, and trust that it will be implemented via full repeal of section 16 of the Elections Act 2002.

Investigatory and other powers of the Electoral Commission

110. The enforcement powers of the Electoral Commission are derived from a mishmash of statute that has never been thought through as a coherent whole. This has left various gaps and inadequacies that have seriously hobbled the ability of the Commission to pursue breaches of electoral and party funding law.
111. The Representation of the People Bill now before Parliament will address one of the problematic areas by adjusting the boundary between criminal and civil offences under electoral law, so that the Commission will be better able to pursue under civil law breaches of electoral law that are a consequence of administrative lapses and misunderstanding. This will allow a far more proportionate response to such breaches, thereby relieving the pressure on the hard-working volunteers who are the mainstay of our political parties.

⁴⁶ His Majesty’s Government (2025), ‘Supply and Appropriations (Main Estimates) Act 2025’, accessed at [Supply and Appropriation \(Main Estimates\) Act 2025](#).

⁴⁷ His Majesty’s Government (2021), ‘Supply and Appropriations (Main Estimates) Act’ 2021, accessed at <https://www.electoralcommission.org.uk/sites/default/files/2021-04/2021-22%20Final%20Main%20Estimate.pdf>.

⁴⁸ Elections Act 2022, section 16, accessed at <https://www.legislation.gov.uk/ukpga/2022/37/contents>.

⁴⁹ Letter from the Chair of the Committee on Standards in Public Life to the Secretary of State for Levelling Up, Housing and Communities (2022), accessed at https://assets.publishing.service.gov.uk/media/6262cb2be90e071693964391/2022-04-21_Letter_to_Rt_Hon_Michael_Gove_MP_Elections_Bill.pdf.

⁵⁰ The Speaker’s Committee (2023), ‘Response to the draft Strategy and Policy Statement for the Electoral Commission’, accessed at <https://committees.parliament.uk/publications/41177/documents/202589/default/>.

⁵¹ Office of the United Nations High Commissioner on Human Rights(2021), ‘Human Rights and Elections: A Handbook on International Human Rights Standards in Elections’, p. 4, accessed at <https://www.ohchr.org/sites/default/files/2022-02/Human-Rights-and-Elections.pdf>.

⁵² This change has also brought V-DEM’s UK Electoral Management Body autonomy ranking down several places, from 30th to 52nd between 2021 and 2023. Varieties of Democracy (2023), ‘Country Graph – EMB Autonomy’, accessed at https://v-dem.net/data_analysis/CountryGraph/.

⁵³ Spotlight on Corruption (2025), ‘Democracy in Danger’, p. 12, accessed at <https://www.spotlightcorruption.org/wp-content/uploads/2025/10/Spotlight-Democracy-in-Danger.pdf>.

⁵⁴ Hansard, Volume 781, column 629, 2 March 2026, accessed at <https://hansard.parliament.uk/commons/2026-03-02/debates/702183A9-7B57-487C-9634-BF459DB65DB2/RepresentationOfThePeopleBill>.

112. The Bill will also allow the Electoral Commission to share information with a broader range of relevant bodies. This is commonsense; breaches of electoral law, particularly those which involve suspected illicit foreign financing, may well involve actors who are known to other authorities; ease of information sharing is a basic requirement of effective enforcement. However, this provision is one way. Unlike other bodies such as the Charity Commission, there is no commensurate power available to the Electoral Commission to require relevant bodies to disclose information to it outwith a formal investigation. This is an unnecessary inhibition on the enforcement powers of the Commission.

RECOMMENDATION 9: The information-sharing powers of the Electoral Commission should be extended, so that it can not only share information with other agencies, but also require information of them.

113. Unlike other regulators, such as the Financial Conduct Authority and the Charity Commission, the Electoral Commission cannot demand information, other than data on donations and spending, from the entities it regulates outside a formal investigation. Further, outside of a full investigation, the Commission has no grounds to ask for information from any organisation or business other than political parties. This means that the Electoral Commission cannot work in real time to act on suspicious activity and head off the possibility that offences might be committed. It is also beneficial for regulated entities who risk facing a full investigation when earlier information sharing might allow for any problems to be dealt with earlier. Early engagement would also foster closer working relationships with relevant financial institutions and service providers that currently only takes place in the instance of a full investigation⁵⁵. This should be fixed in the Representation of the People Bill.

RECOMMENDATION 10: The powers of the Electoral Commission should be extended to allow it to require information from any person or organisation who may hold relevant material that it reasonably requires for the purposes of carrying out its functions.

Investigation and prosecution of offences

114. Under the current enforcement infrastructure, the investigation of offences that might carry a criminal sanction is dealt with by the police and the Crown Prosecution Service. I have heard contrasting views on whether the Electoral Commission itself should become a prosecuting authority again as it was prior to the 2022 Elections Act. This, in my view, is unnecessary and potentially counterproductive. It would require the Electoral Commission to invest heavily in prosecutorial expertise which might only be deployed sporadically and would impose a disproportionate cost burden. More importantly, the Electoral Commission must pursue its responsibility for administrative sanctions against the political parties without fear or favour while at the same time working constructively with the parties to support them in meeting the demands of electoral law. It is difficult to see how a constructive relationship can be sustained if the Electoral Commission is at the same time acting as a criminal prosecutor of party wrongdoing.

⁵⁵ Letter from the Chair of the Electoral Commission to the Chair of the Joint Committee on the National Security Strategy (2026), p.3, accessed at <https://committees.parliament.uk/publications/51525/documents/289886/default/>.

115. I am, therefore, satisfied that the current arrangements, whereby the Electoral Commission passes the investigation of potential criminal offences to the police who then in turn liaise with the Crown Prosecution Service, create the right division of responsibility. However, the robustness of this division of labour also requires the police apparatus that is dealing with the investigation of electoral offences to hold the requisite expertise and to be adequately resourced.
116. The police, no less than all other actors in this space, must deal with electoral law that is complex and, in its application, potentially controversial. Offences are not so frequent as to lead to the development of expertise across a wide range of police infrastructure. The police have recognised this in the handling of their responsibilities for local policing of electoral events. The City of London Police plays a key role; their Elections Unit acts as a point of contact and expertise for all 43 local police forces in England and Wales and each police force has a designated Single Point of Contact for the reporting of Electoral Offences. In 2024, the Home Office and National Police Chiefs Council, alongside the College of Policing, announced a further £31 million in funding and published refreshed guidance on policing democratic events⁵⁶.
117. It is essential that there is a commensurate concentration of resource and expertise at the national level to deal with the complex instances of criminal breach of electoral law, particularly where that involves suspicion of illicit foreign financing that might require investigation of financial dealings beyond these shores. Where that centre of excellence might sit is beyond the purview of this review but should be an important consideration in the forthcoming reform of police structures.

RECOMMENDATION 11: The Government, as part of the forthcoming reform of police structures, should ensure the creation and resourcing of a centre of police excellence to pursue the investigation of complex criminal offences under electoral law involving foreign interference in UK politics.

Burden of proof and sentencing limits

118. Most criminal law enables prosecution when the offender might have had ‘reasonable cause to suspect’ that they were committing a crime, or ‘suspects’ they are (see, for example, Section 328 of the Proceeds of Crime Act 2002⁵⁷). However, the bar for the burden of proof for certain criminal offences under PPERA is set higher, with convictions only possible where it can be proven the offender must have ‘known’ they were committing a crime⁵⁸. This means it is very difficult to successfully bring criminal proceedings for certain electoral offences; despite the risk they pose to the public good.

⁵⁶ The Home Office (2024), ‘£31 Million committed to protect democratic process’, accessed at <https://www.gov.uk/government/news/31m-committed-to-protect-democratic-process>.

⁵⁷ Proceeds of Crime Act 2002, Section 328, accessed at <https://www.legislation.gov.uk/ukpga/2002/29/section/328/enacted>.

⁵⁸ The Electoral Commission (2026), ‘Offences and proposed sanctions’, accessed at https://www.electoralcommission.org.uk/sites/default/files/pdf_file/Table-of-offences-and-sanctions_for_EP.pdf.

119. Moreover, the limit on sentences prescribed in PPERA – a maximum length of 12 months – inhibits the investigatory powers of the police. Under the Regulation of Investigatory Powers Act (RIPA), agencies may not deploy intrusive surveillance unless the suspected offender may be reasonably expected to be sentenced to 3 years or more for the offence⁵⁹. Given the complex nature of crimes under electoral law that involve illicit foreign financing, these potential offences cannot be appropriately investigated by the relevant authorities under the current legislative framework. Further, there is the question of whether the current sentencing guidelines are appropriate, given the scale of potential harm committed by an offender, especially given the upcoming sentencing reforms include a presumption against custodial sentences of 12 months or less⁶⁰.

RECOMMENDATION 12: PPERA should be amended to reduce the burden of proof for criminal offences to show that an offender might have ‘reasonable cause to suspect’ that they were committing a crime and the sentencing associated with each criminal offence under PPERA should be reviewed, to ensure it matches the seriousness of the offences.

Bribery

In the course of this review, I have asked whether the powers available to the authorities to deal with offences such as those committed by Nathan Gill are sufficient. I am satisfied that, with their existing powers under The Bribery Act 2010, as well as new powers created under the National Security Act 2023, the authorities have the means to investigate and prosecute such offences, as evidenced by the successful prosecution of Mr Gill.

⁵⁹ Regulation of Investigatory Powers Act’ 2000, accessed at <https://www.legislation.gov.uk/ukpga/2000/23/contents>.

⁶⁰ Ministry of Justice (2025), ‘Landmark sentencing reforms to ensure prisons never run out of space again’, accessed at <https://www.gov.uk/government/news/landmark-sentencing-reforms-to-ensure-prisons-never-run-out-of-space-again#:~:text=This%20means%20the%20annual%20budget,Orders.%20and%20in%20exceptional%20circumstances>.

Wider influencing environment

Overview

120. The context in which the democratic process functions has changed dramatically in recent years, driven by the advent of the internet and social media. The pace of this change will not relent, with AI presaging another leap in the way people interact with each other in online space.
121. This has created new opportunities for malign foreign influence and interference in UK politics. Although most of this activity does not require money to change hands in the UK, somebody somewhere, most likely furth of these shores, is paying for it. This therefore brings it within the purview of my review.
122. Meanwhile, traditional activity that has long sought to influence the political process continues, notably lobbying, the work of thinktanks and the organisation of legislators themselves in bodies such as All Party Parliamentary Groups and ‘friends of groups’. While the vast bulk of this activity is perfectly legitimate and enhances the mainstream work of legislatures, many of the people I have spoken to in the course of this review, both within and outside Parliament, have urged a precautionary assessment to seek assurance that there are sufficient safeguards in these spaces against foreign interference.
123. This section of my review looks at three issues in this wider influencing environment:
- The handling of the risk of foreign interference in the online world, in particular social media;
 - The proofing against foreign interference of the regulation of overt political presence on social media through advertising; and
 - The rules governing lobbying, thinktanks and other influencing vehicles in relation to the risk of foreign interference.

Foreign interference and the online world

124. Of all the issues covered by this review, the one that excites most concern is the fear of foreign interference on social media and in the wider online world. A Government minister has spoken of “information warfare”⁶¹; the stakes are deemed to be very high.

⁶¹ Minister of State for Europe, North America and Overseas Territories (Stephen Doughty MP), oral evidence to the Foreign Affairs Committee, 6 January 2026, p. 2, question 182, accessed at <https://committees.parliament.uk/oralevidence/16962/pdf/>.

125. The online environment has created a cheap and relatively simple means of getting anonymised content in front of ordinary people in a way that seeks to undermine their trust in the political process. The vectors for this are as numerous as the multifarious forms the internet takes, but the two main ones appear to be the use of so-called bots on social media platforms and the placing of comment in other online platforms, both in ways which seek to generate and amplify conflict and distrust.
126. Not all of this activity is necessarily driven by hostile foreign states; some foreign actors may seek to generate commercial or fraudulent advantage out of the attention whipped up by online storms. But this activity too can be destructive of people's faith in the political process.
127. Where driven by hostile foreign states, this activity is strategic, long-term and patient. It appears not to aim at any particular political outcomes; dissonance is its own reward. Paradoxically, fear of the penetration of online space by this malicious presence in itself serves its end, the undermining of belief that anything or anyone can be trusted.
128. Given the deterioration in the wider geo-political context and the "space between peace and war"⁶² in which we are now operating, countering this activity is more important than ever.
129. Regulating this space is far from straightforward. The broader handling of social media goes well beyond the remit of my review. But it is worth making two overarching comments which are relevant:
- Direct government regulation of **content** poses enormous ethical as well as practical challenges. Freedom of speech is fundamental to democratic discourse; in my view, that means the toleration of an uncomfortable level of noise and mis – or dis-information in the online world, not least where that is generated by ordinary citizens;
 - Given the proliferation now on many platforms of passive content, generated for the viewer by algorithms, the argument about whether social media companies are in fact **publishers** has moved into new space. Transparency about the way in which those algorithms work would do much to settle concerns about how content is driven to viewers.
130. All that said, it is worth emphasising that social media and the online world more generally have much to offer the democratic process. In no previous era has the ordinary citizen had such access to the views of different political actors or the ability to make their own views known in a way that can reach well beyond their own social circle. How this space is handled by democratic governments should not throw the baby of robust democratic debate out with the bathwater of illicit interference.
131. For social media at least, the new regulatory framework in place in the UK through the Online Safety Act 2023⁶³, buttressed by the National Security Act 2023⁶⁴, provides an adequate control mechanism to require the taking down of hostile state content. Under the Online Safety Act, foreign interference is a priority offence which requires in-scope social media companies to take systemic action to prevent users from encountering such material, and minimise how long any such content is present on their services. This is clearly well within the technical capabilities of the social media companies; both Meta⁶⁵ and TikTok⁶⁶ maintain

⁶² Blaise Metreweli, Chief of the Secret Intelligence Service (2025), accessed at <https://www.gov.uk/government/speeches/speech-by-blaise-metreweli-chief-of-sis-15-december-2025>.

⁶³ Online Safety Act 2023, accessed at <https://www.legislation.gov.uk/ukpga/2023/50>.

⁶⁴ National Security Act 2023, accessed at <https://www.legislation.gov.uk/ukpga/2023/32/contents>.

⁶⁵ Meta, 'Meta's threat disruptions' reporting, accessed at <https://transparency.meta.com/metasecurity/threat-reporting/>.

⁶⁶ Tiktok, 'Covert influence operation disruptions', accessed at <https://www.tiktok.com/transparency/en-us/covert-influence-operations>.

publicly accessible databases of the relevant content they have removed. If platforms fail to meet their duties under the Act Ofcom can implement fines of up to £18 million or 10% of global revenue, whichever is higher, as well as impose business disruption measures.

132. In my view, it is not a question of a need for new law – the Online Safety Act came into force very recently and in its first year the focus has rightfully been on protecting children from a range of online harms⁶⁷ – but more about how the law is enforced in respect of social media and how the state organises itself to deal with the more subtle interference that manifests itself in carefully placed commentary on other online platforms.
133. There are two preconditions for the effective deployment of state effort in this space, neither of which appear yet to be met.
134. The first is to understand the quantum of hostile state activity in the online world. There are many examples quoted of activity that looks as though it is driven by malign interference. Two recent examples are concerns about the exponential escalation of adverse social media commentary about London and the presence of hostile state activity in the debate on Scottish independence, as evidenced by the visible diminution of divisive commentary when the Iranian web went dark in recent weeks. Yet there is almost nothing in the public domain that would allow the general public to understand whether these effects are down to foreign interference or are driven by something else. Not being able to describe the scale of the problem inhibits efforts to deal with it and risks the public assuming the worst, that most of social media is infected, thereby achieving the aims of hostile states for them.
135. The second is the analysis of the impact that this malign activity has on voter behaviour. Most people turn to social media platforms for entertainment; political content is in their peripheral vision. Does this mean that, for all the noise, few opinions are swayed? A large study published in 2024, funded by Meta but conducted by independent academics, found very little evidence of social media driven behavioural change in the 2020 US election when Facebook and Instagram users deactivated their account⁶⁸. Ofcom’s secondary literature study also found that “the evidence available does not allow us to draw comprehensive conclusions about the impact and harm to individuals associated with foreign influence operations”, and that “research that identifies how operations have influenced people and societies by altering beliefs, changing voting behaviour, or inspiring political violence – is limited and scattered”⁶⁹.
136. However, the anecdotal evidence I heard from the politicians I spoke to as part of this review suggests that they experience the influence of social media in real time on the doorstep, often in ways that are deeply unpleasant. It is also likely that in an increasingly fragmented political space, one in which marginal results are likely to become more prevalent in more constituencies, a little misinformation could go a long way. One way or the other, understanding how malign online content influences opinion is critical to working out how to deal with it.
137. I am concerned that Government is not yet organised to seek the answers to those two basic questions, never mind coordinate effectively to use the powers of the state appropriately to counter hostile state online interference. Responsibilities are dispersed across different

⁶⁷ Ofcom (2025), ‘Online Safety in 2025’, p.3-5, accessed at <https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/research-statistics-and-data/os-standards/online-safety-in-2025-summary-of-the-technology-sectors-response-to-our-rules.pdf?v=408836>.

⁶⁸ Hunt Allcott, Matthew Gentzkow et al (2024), ‘The effects of Facebook and Instagram on the 2020 election: A deactivation experiment’, accessed at <https://www.pnas.org/doi/10.1073/pnas.2321584121#abstract>.

⁶⁹ Ofcom (2024), ‘Protecting people from illegal harms online, Register of Risks’, p. 318, accessed at <https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/register-of-risks.pdf?v=390983>.

departments and agencies with no apparent focal point. Government work is still divided between the foreign and domestic spheres, a distinction that is almost completely irrelevant in dealing with this problem.

138. The enforcement of the regulations under the Online Safety Act 2023 is a matter for Ofcom. Hostile foreign state interference is a priority offence under the Act and enforcement of the regulations should be a priority for Ofcom too, but Ofcom have not yet taken any enforcement action. Further duties under the Online Safety Act, expected to come into force in 2027, will ensure that large social media platforms consistently enforce their terms of service, increase transparency on how the platforms have dealt with illicit content, and give users more control over exposure to unverified accounts. All this is promising for the improvement of the online environment; there should be no delay in bringing these powers into force.
139. The Electoral Commission too has responsibilities in this space. It needs the ability to react in real time to malign online activity, particularly in the regulated period, that has the potential to adversely impact the electoral process, for example deepfakes of politicians such as appeared in recent Irish and Slovakian elections. If accepted, my recommendation that the Commission have the power to require information from any person or organisation who may hold relevant material should strengthen its ability to act to prevent online electoral interference.
140. Regulatory enforcement action can take time; due process must be followed. But much of the damage done by hostile state interference online is in the moment and needs to be dealt with in the moment. Only the Government has the convening power to work with the social media companies and other relevant actors to ensure that illicit content is removed in real time. Only the Government can ensure that the social media companies and other providers of online content are briefed to prepare for potential emerging threats.
141. The Government has made use of that convening power, for example when Russia invaded Ukraine. However, I am concerned that this is not accorded sufficient priority for dealing with the ever-constant background noise of hostile state interference in the online world which has the potential to steadily erode public trust in political process. Our adversaries understand the advantage of persistent corrosive activity over time; our defences must be geared up accordingly.
142. I am also concerned that the Government does not do enough to inform the public about the nature of the intent of hostile foreign actors and how that can infect their social media feeds. I recognise that this is not straightforward; sorting out hostile state content from the ordinary run of online commentary is no easy task. Nevertheless, the state appears to hold the information it has close; more information should be put into the public domain to help the ordinary citizen to understand what foreign interference looks like and to alert the public to specific instances of it.
143. While most of the capabilities required to deal with this problem are held somewhere in government, I am not persuaded that the coordination and effective utilisation of those capabilities is accorded sufficient priority. As far as I can see, no one senior official is accountable for the effective prosecution of the Government's effort in this space. Given the threats we face, that is no longer sustainable.

RECOMMENDATION 13: Dealing with hostile state online interference should be a far higher priority for Government. This requires a better understanding of the problem and better coordination to deal with it. There should be clear lead accountability at ministerial and senior official level for leading the work to combat foreign online political interference, with resources commensurate to the challenge this poses to our democracy.

Cyber threats

During this review I have considered whether the UK's cyber defences, in the context of interference from abroad, are sufficient. Like the wider threat, the risk from cyber attacks is real and persistent. The National Cyber Security Centre (NCSC), who lead our response to these threats, has recently revealed a record 204 nationally significant cyber attacks from September 2024 to September 2025, mostly linked to nation state actors and highly capable criminal groups⁷⁰. Our institutions, electoral administrators, political parties, and politicians have already been targeted. The NCSC work closely with local authorities, Parliament, devolved governments and institutions, political parties and individuals and have developed a toolkit as well as a cyber essentials package that will help organisations and individuals guard against the most common cyber-attacks.

The work of the NCSC is impressive and I see no need for further recommendations, save that ensuring the take up of their offer of support is as widespread as possible within the democratic and political community. I have accordingly suggested that the 'cyber essentials' and early warning services become the recommended minimum level of protection adopted by political parties and NCSC Individual Cyber Defence service for their candidates as part of the code of conduct in recommendation 6.

Voter education

Many of those I have spoken to during this review have emphasised the importance of voter education as a way of diminishing the influence of mis and disinformation.

The public must be allowed to make their own judgements about what they see online. However, there is a role for the state in supporting them to do this effectively.

Although it strays outside of my remit, I note the Government's recent policy proposals on improving media literacy, as set out in the recent publication "Protecting What Matters"⁷¹, and trust that they will be implemented as soon as possible.

⁷⁰ National Cyber Security Centre (2025), 'UK experiencing four 'nationally significant' cyber attacks every week', accessed at <https://www.ncsc.gov.uk/news/uk-experiencing-four-nationally-significant-cyber-attacks-weekly>.

⁷¹ MHCLG (2026), 'Protecting What Matters: Towards a more confident, cohesive, and resilient United Kingdom', at <https://www.gov.uk/government/publications/protecting-what-matters-towards-a-more-confident-cohesive-and-resilient-united-kingdom/protecting-what-matters-towards-a-more-confident-cohesive-and-resilient-united-kingdom#annexa>.

International best practice

Other Western Governments have established capabilities and structures to combat the threat of online foreign interference.

France:

- Under the SGDSN (General Secretariat for Defence and National Security), France have established VIGNIUM (Service for Vigilance and Protection against Foreign Digital Interference)⁷², the State's technical and operational department responsible for vigilance and protection against foreign digital interference.
- VIGNIUM's main missions are to detect and characterise foreign digital interference affecting the public debate in France. The department studies inauthentic phenomena (suspicious accounts, malicious content, abnormal, irregular or coordinated behaviour) that manifest on digital platforms.
- It has played a key role in identifying and exposing such operations – including Russia-linked manipulations around the Paris Olympics and Azerbaijani-sponsored campaigns designed to undermine France's territorial integrity.

Sweden:

- Sweden has established the Psychological Defence Agency (Myndigheten för psykologiskt försvar)⁷³. The agency's main task is to lead efforts to coordinate and develop the operations of agencies and other actors concerned with Sweden's psychological defence. They offer support to agencies, municipalities, regions, companies and organisations, and help to strengthen the resilience of the Swedish population.
- The Psychological Defence Agency identifies, analyses and provides support in countering malign information influence and other misleading information that is directed at Sweden or Swedish interests by antagonistic foreign powers. This can concern disinformation aimed at weakening Sweden's resilience and the willingness of the population to defend itself, or unduly influencing people's perceptions, behaviours and decision-making.

Online political advertising

144. Given the enormous reach of social media, political parties seek, perfectly legitimately, to communicate their messages to potential voters online. Regulation designed for a printed world does not translate well to the online world. Steps have already been taken to ensure that online political advertising is not misleading through the requirement in the Elections Act 2022 for digital imprints, showing the promoter on online adverts. This has been widely welcomed and has provided voters with the basic information they need to understand who is competing for their attention.

⁷² General Secretariat for Defence and National Security – France, accessed at <https://www.sgdsn.gouv.fr/sgdsn-english>.

⁷³ Psychological Defence Agency – Sweden, accessed at <https://mpf.se/psychological-defence-agency/about-us/our-mission>.

145. The Representation of the People Bill will further tighten the law in respect of online advertising by extending the requirement for an imprint to third party campaigners who spend under £10,000 on regulated campaign activity and are thus currently excluded from the rules.
146. In keeping with the remit of this review, I have considered whether more needs to be done to regulate online political advertising to diminish the possibility that it is funded by foreign money. There are three relatively simple and low-cost ways the Government could further reduce that risk.

£700 threshold

147. The current rules on campaign expenditure do not explicitly ban foreign individuals or entities from spending on campaign advertising. Anyone outside of the UK, and not on the electoral register, can spend up to £700 during the regulated period, targeting UK voters with online advertising without breaking electoral law and outside of the regulated period there is no limit.
148. When these rules were created, £700 was seen as a de minimis limit below which paid for adverts would not have much reach or impact. In the modern online world, particularly where political memes can go viral, that assumption is no longer warranted. In line with the recommendation made by the Committee on Standards in Public Life in its 2021⁷⁴ report, the simplest way to deal with this loophole is simply to ban foreign funded adverts targeted at UK voters outright.

Digital imprint requirements

149. While the digital imprint regime already requires adverts to bear the name of the promoter or the person on whose behalf the material has been published, there is no explicit requirement to specify who has paid to produce them. This gap leaves the voter without full transparency about who is behind the advert they are seeing. Other reports have called for this gap to be plugged⁷⁵. I concur.
150. Paid-for adverts are only one of the ways in which funding can procure favourable content for political parties. In a world of influencers, individuals may transmit political messages to their followers without revealing that they are being paid to do so. Much as influencers are now required to be open about payments they receive to endorse consumer products, so they should be covered by the imprint rules, making clear who has paid them to promote their messages.
151. Currently, the definition of material for which a digital imprint is required assumes that it will be related to an on-going election campaign. As I have suggested earlier in this report, the nature of political campaigning has changed; as such, consideration should be given to amending the definition of material for which digital imprints are required to reflect this new reality.

⁷⁴ Committee on Standards in Public Life (2021), 'Regulating Election Finance', p.76-77, accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf.

⁷⁵ APPG on Electoral Campaigning Transparency (2020), 'Defending our Democracy in a Digital Age', recommendation 8, accessed at https://assets-global.website-files.com/636ab77db23b205f934b1888/63ab83c2ce1c7d5261e4e22e_Defending-our-Democracy-in-the-Digital-Age-APPG-ECT-Report-Jan-2020-1.pdf

RECOMMENDATION 14: The Government should further tighten the regulation of online political advertising by banning foreign funded adverts outright, ensuring that imprints include who has paid for them and requiring influencers who promote paid-for political views to come under the imprint regime, and should consider adjusting the definition of material for which digital imprints are required to make it suitable for the type of campaigning we see today.

Advert libraries

One means of creating transparency in online political advertising is through the use of advert libraries by the social media companies. Such libraries allow journalists and the wider public to see in one place all the adverts placed on the platform, including those by political entities, providing legitimate insight into the focus of campaigning and the facts deployed. A number of the commentators I spoke to, and the Committee on Standards in Public Life⁷⁶, have called for advert libraries to be made available on all platforms for political adverts, where the following information would be presented

- precise figures for amounts spent
- who paid for the advert
- for targeted adverts, information about the intended target audience of the advert and the types of people who actually saw the advert.

Some social media companies already have advert libraries in place. For example, Meta offers a library where adverts about social issues, elections or politics that have run in the past seven years are publicly available, and the library offers additional information about spend range, reach breakdown and the name of the entity or person responsible for the advert⁷⁷. But the provision of advert libraries across social media companies is inconsistent and not all that do exist are accurate and up to date.

Strictly speaking, this issue of advert libraries strays beyond my remit, However, I have heard enough evidence to suggest that there would be considerable benefit to transparency of online advertising if the Government were to use its convening power to work with social media companies to extend the practice and to achieve consistency in how advert libraries are presented.

Lobbying, think tanks and other channels of influence

152. The world of politics sits within a rich ecosystem of influencing, lobbying and policy thinking. Most of this is perfectly legitimate and informs the political process. All sorts of interests find a way to channel their views to politicians through multiple routes and the policy development process is enhanced by contributions from the many, often expert, actors who sit at the edges of politics.

⁷⁶ Committee on Standards in Public Life (2021), 'Regulating Election Finance', p.76, accessed at https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSP_L_Regulating_Election_Finance_Review_Final_Web.pdf.

⁷⁷ Meta, Meta Advert Library report, accessed at <https://www.facebook.com/ads/library/report/?source=nav-header>.

153. This world of influence is usually mediated through the complex process of policy making and legislation, by which the democratically elected government of the day thrashes out policy propositions to a point at which they become acceptable to Parliament. Lobbyists and think tanks do not own the policy process and it often suits their interests to talk up the influence they have had on policy outcomes.
154. Nevertheless, there are well documented concerns about the susceptibility of this penumbra round politics to foreign influence⁷⁸. Much of that will, of course, be transparent and benign; friends and allies of the UK will seek to ensure their viewpoint is reflected in government decisions, much as the UK uses its diplomatic muscle to influence outcomes in other countries in a way that is favourable to UK interests. While the evidence base is patchy, enough concern was expressed to me in the course of this review about the instances where foreign involvement in this extra-Parliamentary activity was less benign to warrant a review of the current control framework for this activity.
155. I have done so under three headings:
- Lobbying
 - Think tanks
 - Parliamentary standards

Lobbying

156. Lobbying is already regulated through the Lobbying Act⁷⁹, which requires lobbyists to register with the Office of the Registrar of Consultant Lobbyists if they are engaged in direct lobbying of a UK Government Minister or Permanent Secretary (or equivalents specified in the Act). Moreover, the National Security Act 2023 introduced the Foreign Influence Registration Scheme (FIRS)⁸⁰, which obliges individuals or entities to register their arrangements if they are directed by foreign powers to influence UK politics.
157. A number of commentators, including many I spoke to in the course of this review, believe that these arrangements are not strong enough to deter, or make sufficiently transparent, lobbying efforts on behalf of foreign actors whose interests may not be aligned with those of the UK.
158. In regard to the controls on lobbying, some argue that these should be extended from consultant lobbyists to in-house public affairs teams and the scope of the Act extended beyond those it currently covers to include lobbying of MPs and a wider range of civil servants. These are concerns that go beyond the scope of my review and I make no comment on them.
159. However, there is one specific regard in which the Lobbying Act is clearly deficient in terms of the transparency of foreign-based influencing. That is the VAT exemption which means that foreign lobbying firms, or the foreign-based subsidiaries of UK lobbying companies, do

⁷⁸ Spotlight on Corruption (2025), 'The VAT exemption: a key weakness in the system for lobbying transparency that risks foreign influence over UK politics', accessed at <https://www.spotlightcorruption.org/vat-exemption-lobbying-transparency/>; Peter Geoghegan (2024), 'Peter Mandelson's Firm Secretly Lobbied for Qatar Freeports' at <https://democracyforsale.substack.com/p/peter-mandelsons-firm-secret-lobbying-freeports>; Centre for European Policy Analysis (2026), 'I Can Buy a British Election for \$25m: Here's How', accessed at <https://cepa.org/article/i-can-buy-a-british-election-for-25m-heres-how/>.

⁷⁹ Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, accessed at <https://www.legislation.gov.uk/ukpga/2014/4>.

⁸⁰ For more detail on the scheme, see Home Office (2025), 'Introduction to the Foreign Influence Registration Scheme', accessed at <https://www.gov.uk/government/publications/foreign-influence-registration-scheme-introduction/introduction-to-the-foreign-influence-registration-scheme-firs-accessible-version>.

not have to register under the Act. In my view, this was an inadvertent consequence of a provision to exclude from the bureaucratic burden of the Act those fledgling consultancies that sit beneath the VAT threshold in the UK, but also benefits foreign-based entities who do not, as a matter of course, pay VAT in the UK. That is a loophole which should be closed.

160. Many of those I spoke to in the course of this review were of the view that the FIRS regime is a step in the right direction in terms of improving the transparency of the influencing efforts of hostile foreign states. However, I have heard much concern about the rigour with which it is currently enforced. The requirements are relatively new and these things take time to bed down. The Government will wish to ensure that sufficient attention is paid to the scheme to demonstrate that it is meeting its objectives in a way which is enhancing public confidence in the transparency of foreign state influencing.

RECOMMENDATION 15: The Lobbying Act should be amended to remove the VAT exemption for all foreign based entities which would otherwise fall under the provisions of the Act.

Think tanks

161. There is no special regulatory regime for think tanks. Many are registered as charities and, as such, are obliged to abide by the rules that apply to charities in respect of political activity. Charities cannot be party-political and do not have to disclose their donors. They are, however, allowed to campaign to change law and government policy if it directly supports their charitable purpose. Think tanks that choose not to become charities face no such restrictions, but they are subject to the rules on non-party campaigners in the same way as any other organisation.
162. It goes without saying that the UK political process benefits from the rich contribution of ideas and policy propositions from the many think tanks which operate right across the political spectrum. Some worry that not all think tanks reveal their donors and that some donors, openly declared or not, are foreign based individuals or entities. I understand those worries and I recognise there is a real risk going forward of more partisan activity funded by foreign actors, potentially using think tank-style organisations as conduits.
163. At first instance I suggest that the onus lies with those who make use of think tanks. Government ministers and senior civil servants should as a matter of course already declare for transparency registers when they have met a think tank. It should be a matter of course in agreeing to such meetings that they satisfy themselves that the funding of the think tank is above board and not swayed by malign foreign influence. The same should broadly apply to members of all the UK's legislatures.
164. However, the Government, working with the Charity Commission as appropriate, should ensure it has the capability to monitor the think tank landscape and ready itself to act if it appears that the existing mechanisms are not a sufficient control to make transparent the engagement of foreign-funded think tanks in the policy process.

Parliamentary standards

165. Parliamentary standards are a matter for the Parliamentary authorities in the four legislatures of the UK. It is not part of my remit to make recommendations to them. Nevertheless, it would be remiss of me not to record the concerns raised with me about the possibility of foreign financial interference at the heart of our democratic institutions.

166. The main issue I have heard about is the risk that All Party Parliamentary Groups (APPGs) and similar entities such as ‘friends of’ groups in the UK Parliament, and analogous groups in the devolved legislatures, are not sufficiently proofed against foreign funding and, therefore, influence. In the UK Parliament, the rules have recently been tightened to prevent foreign funding of the secretariats of APPGs. Many of those I have spoken to have asked whether that is sufficient or whether the Parliamentary authorities need to take further steps to ensure full transparency about the extra-Parliamentary interests that sit behind APPGs.
167. The second important issue raised with me was that of overseas trips made by Parliamentarians paid for by the foreign government in question. Many such trips, of course, have great value in helping Parliamentarians understand legitimate interests in other countries and their bearing on the UK. Parliamentarians must declare such trips and, in the UK Parliament, are prevented from seeking a material benefit for that government for 12 months afterwards. They are not, however, prevented from speaking about them in proceedings or initiating approaches to Ministers or others about them⁸¹.
168. Nevertheless, from a public perspective, this is one of those areas where Parliamentarians should not only do the right thing but be seen to do the right thing. Many members of the public will wonder what obligations come with the accepting of paid-for travel and hospitality from foreign governments. It would be a perverse outcome if the upshot of those concerns was to lead to the shutting down of such fact-finding missions, but it might alleviate public concerns if trips were funded out of UK Parliamentary or government coffers. That might be a relatively small price to pay for an improvement in the perception of the integrity of our democratic institutions.
169. In the course of this review, I have also noted concerns about the discrepancy between the rules on second jobs between members of the House of Commons and members of the House of Lords. Members of the Lords can accept paid-for work from foreign states as long as they do not exploit their position by providing paid parliamentary advice or services, such as lobbying⁸². Members of the Lords therefore can and are accepting financial reward for their services from foreign actors while participating in the legislative process. This appears to run counter to the rubric that foreign money should not influence the UK political process.
170. This report is for Government, not the Parliamentary authorities. But I would encourage both to consider whether the issues I have outlined here deserve more thorough consideration by the Ethics and Integrity Commission, utilising their ability to convene the Parliamentary Standards bodies.

⁸¹ House of Commons (2023), ‘The Code of Conduct’, pp. 34-35, accessed at <https://publications.parliament.uk/pa/cm5803/cmcode/1083/1083-1.pdf>.

⁸² House of Lords Conduct Committee (2020), ‘Registration of members’ foreign interests’, accessed at <https://publications.parliament.uk/pa/ld5801/ldselect/ldcond/182/18203.htm>.

Betting and polling

Two issues were raised with me in the course of this review which I have not had time to consider in detail but might merit further attention.

One is the possibility of foreign money being used to place bets in a way that alters the odds on a particular political outcome. This might not have much impact at a country wide level, but could have a significant impact on public perceptions of the relative placing of political parties in by-elections or in individual constituency or other local contests. Given the volatility of political allegiance and more frequent encouragement of tactical voting in three- and four-way contests, strategically placed bets which shift the betting odds could have a real influence on voter views on likely outcomes and hence where best to place their tactical vote. It is not clear to me that this is currently a serious concern, nor do I see any easy ways to counter it. But I do encourage the Government to do the necessary work, liaising with the Gambling Commission as appropriate, to assess whether action on this would be merited.

The other domain of concern is around the use of foreign money to inject biased polling into the political discourse at sensitive moments. All respectable polling companies abide by the standards set by their profession, but it is not clear to me that this prevents newly established polling organisations funded by foreign money to seek to use biased polling to influence public opinion. This too might merit further consideration by Government.

171. In the time available I have not been able to fully consider the evidence of foreign financial interference in our wider political eco-system and conclude with specific recommendations. I have heard enough, however, for me to believe that there could be significant challenges posed by foreign actors in this area. The Government, and Parliament, must be alive to the risks and ready to act.

RECOMMENDATION 16: Consideration should be given to broadening the scope of the Ethics and Integrity Commission's review into lobbying, disclosure and access to government so that it also examines potential channels for foreign money to flow into the wider political eco-system.

Government prioritisation

172. Alongside defence of the realm and upholding the rule of law, sustaining our democracy is one of the central functions of the state. Responsibility for protecting democracy is dispersed across four governments and a range of UK government departments and agencies:
- the Cabinet Office, Home Office, security services and police and National Cyber Security Centre to counter foreign interference and corruption;
 - the Electoral Commission to oversee the electoral system;
 - the Ministry of Housing, Communities and Local Government to develop and implement electoral policy;
 - the Department of Science, Innovation and Technology and Ofcom to regulate the social media environment;
 - the Scottish and Welsh Governments for the management of devolved responsibilities for the electoral process.
173. Beyond central government, local authorities and all police forces have an important role in maintaining the integrity of the electoral process at a local level.
174. The work of protecting our democracy engages many expert and dedicated public servants through all those organisations and beyond. That our democratic process continues to be respected, and electoral rules to function, is down to their professionalism and commitment.
175. Because the perceived threat to our democracy has been relatively muted over the decades, central coordination of this complex system has been light touch. An official team has come together at election times in the Joint Election Security and Preparedness Unit to monitor the electoral process. Otherwise there has been no central official apparatus to consider the health of the system as a whole over time.
176. Recognising the changing nature of the threat to our democracy, the previous Government established the Defending Democracy Taskforce, with a remit to protect the democratic integrity of the UK from foreign interference. Supported by a secretariat in the Homeland Security team in the Home Office, the Taskforce continues to meet under this Government. Chaired by the Security Minister, it brings together a wide range of departments and agencies to consider emerging issues; its focus latterly has been on preventing harassment and intimidation of parliamentary candidates and other political actors.
177. The operation of the Taskforce has not been matched by a wider reconfiguration or reprioritisation of responsibilities within Whitehall. There is no civil servant at a senior level, Director General or Permanent Secretary, who is accountable for this overall agenda; no one is responsible for ensuring that the Whitehall machinery as a whole is responding

coherently to the threats to our democracy and that the policy and statute that underpins our democratic processes remains fit for purpose. In conducting this review, I discovered that there was no one official who could confidently explain to me how all the different parts of this jigsaw fit together.

178. Given the systemically vital nature of our democratic processes for our freedoms and how we hold ourselves as a country, an outside observer might find this surprising. It means that there is no one round the most senior table of Permanent Secretaries, the so-called Wednesday Morning Colleagues meeting, to speak to this agenda. Nor is there a senior official with sufficient authority to convene the right actors across Whitehall and beyond to develop a coherent response to the sort of issues that are covered by this review.
179. This lacuna is, in my experience, not unique. Whitehall has in recent years trod quite lightly on constitutional and related issues. Constitutional expertise and understanding of the polity that is the UK and how it functions is not a core competence even for policy civil servants. Sustaining the long-term health of our democracy slips into the second rank of important issues, crowded out by the more pressing exigencies of day-to-day politics.
180. Combined with a certain complacency about the enduring nature of our democratic institutions, this lack of understanding and focus has meant that the official machine is simply not geared up to deal with the nature of the challenges that our democracy now faces. This must change and must change quickly.
181. This is not about brigading together all those parts of the system that have some bearing on our democratic process. That would be disruptive and unproductive; different aspects of this issue rightly engage the deep expertise of many different parts of the system. It is rather about the effectiveness of coordination and the level of priority given to these issues.
182. Tempted as I am to rearrange the Whitehall deckchairs, it is for others to decide how a revamped machinery might better support this crucial agenda. I offer the following thoughts to guide that thinking:
- This agenda must be led at Permanent Secretary or Second Permanent Secretary level. It may be combined with other roles, but must be a priority objective for the post holder.
 - Whoever leads this must have sufficient support to track what is going on across Whitehall and beyond, to liaise with all the key players, to ensure the involvement and input of the devolved governments, parliamentarians and external stakeholders, and to be able to conduct the right sort of research and outreach to thoroughly understand the issues.
 - Whitehall is a hierarchical place. Whoever holds this role needs to be able to deploy the authority of the centre to ensure that departmental and other interests are subordinated to the interests of the whole.
183. This, then, is my final recommendation:

RECOMMENDATION 17: Given the on-going challenge to the integrity of our democracy, the Cabinet Secretary should give a clear signal of the priority to be afforded to this agenda by allocating to a Permanent Secretary lead responsibility for sustaining our democracy and coordinating the response to the threats to it.

Annex A: Terms of Reference for the Independent Review into Countering Foreign Financial Influence and Interference in UK Politics

Introduction

The sentencing of Nathan Gill, a former MEP, for bribery, alongside other recent cases, has exposed vulnerabilities in the UK's political and electoral systems, particularly politicians being targeted by foreign states.

In this context, and in support of the Cross-Government Counter Political Interference and Espionage Action Plan, this review will involve an in-depth assessment of current financial and bribery related rules and safeguards that regulate political parties and political finance, and drawing on any lessons learned, recommend improvements to mitigate risks from foreign interference.

Review findings will be delivered to the Secretary of State for Housing, Communities and Local Government and the Security Minister (in his capacity as the Cabinet Office Minister), and used to inform final provisions to be introduced under the UK Government's proposed Elections Bill.

Scope and Aims of the Review

The review aims to:

Draw on an understanding of recent events and common methods of foreign interference, assess the resilience of political parties, including financial safeguards and current political finance laws and other regulatory checks in identifying and mitigating foreign interference, including measures to enhance the scope and effectiveness of criminal enforcement.

Take account of other relevant reviews and evidence provided by relevant statutory bodies, including the Electoral Commission.

Provide recommendations for strengthening the rules governing political parties and political finance so that lessons can be learned and future risks mitigated.

Detailed Terms of Reference

1. Examine the effectiveness of political finance laws and current checks and balances within the UK's political regulation in identifying and mitigating foreign interference and bribery.
2. Consider whether political finance laws could be strengthened in light of recent case studies on covert funding and foreign interference, including specific consideration of strengthening criminal enforcement measures.
3. Specifically consider safeguards against illicit funding streams including the use of difficult-to-trace assets such as crypto-currencies, cash and third parties using foreign funding for political campaigns and advertising.
4. Review the rules governing the constitution and regulation of political parties, and the Electoral Commission's enforcement powers.

Recommendations

Provide recommendations to ensure lessons are learned and identify opportunities for strengthening mitigations against foreign interference risks.

Governance and Procedure

The independent reviewer will be appointed by the Secretary of State of Housing, Communities, and Local Government and, given the links to the wider Action Plan, will report jointly to the Secretary of State and the Security Minister for delivery and implementation of the review.

Procedure and conduct, including the approach to consultation with Parliamentary Authorities, central government and agency partners, will be agreed between the appointed lead reviewer, the Secretary of State, and the Security Minister, as appropriate. The review will focus on strengthening our regime for the future and, for the avoidance of doubt, past allegations surrounding the 2016 referendum will be out of scope for this work.

Report and Recommendations

The reviewer will provide a final report to the Secretary of State and the Security Minister, as the Chair of the Defending Democracy Taskforce, within the agreed timeline (by the end of March) with recommendations as considered appropriate.

Annex B: List of stakeholders

During the course of my review, I spoke to the following stakeholders:

Political parties

The Alliance Party
The Conservative Party
The Democratic Unionist Party
The Labour Party
The Liberal Democrats
Plaid Cymru
Reform UK
The Scottish National Party

Parliamentarians

Phil Brickell MP, Chair of the All-Party Parliamentary Group on Anti-Corruption and Responsible Tax
Lloyd Hatton MP, member of the All-Party Parliamentary Group on Anti-Corruption and Responsible Tax
Alberto Costa MP, Chair of the Committee on Standards
Paula Barker MP, Deputy Chair of the Committee on Standards
Rt Hon Dame Emily Thornberry MP, Chair of Foreign Affairs Committee
Florence Eshalomi MP, Chair of the Housing, Communities and Local Government Committee
Simon Hoare MP, Chair of the Public Administration and Constitutional Affairs Committee
Rt Hon Sir Lindsay Hoyle MP, Speaker of the House of Commons and Chair of the Speaker's Committee on the Electoral Commission
Alex Sobel MP, Chair of the All-Party Parliamentary Group on Fair Elections
Lisa Smart MP
Ben Goldsborough MP
Emily Darlington MP

Parliamentary bodies

Parliamentary Commissioner for Standards
Parliamentary Security Directorate

Academics and experts

Dr. Sam Power, Lecturer, School of Sociology, Politics and International Studies, University of Bristol

Piers Coleman, specialist adviser to the Committee on Standards in Public Life during its review of regulating election finance

Professor Justin Fisher, Director of Brunel Public Policy and Professor of Political Science, Brunel University

Nathaniel Persily, James B. McClatchy Professor of Law at Stanford Law School, Co-Director of the Stanford Law AI Initiative, Stanford University

Ciaran Martin, Professor of Practice in the Management of Public Organisations. Blavatnik School of Government, University of Oxford

Professor Martin Innes, Co-Director of the Security, Crime and Intelligence Innovation Institute, Cardiff University

Matthew Pearce, founder of SE42 Labs

Neil Barnett, CEO, Istok Associates Limited

Sir Nick Clegg, former Deputy Prime Minister, former President of Global Affairs at Meta

Lord Evans of Weardale, Chair, Committee on Standards in Public Life 2018-2023

Peter Geoghegan, broadcaster and journalist

Industry bodies

Crypto UK

Third sector organisations

Transparency International UK

Royal United Services Institute – Centre for Finance and Security

Spotlight on Corruption

Demos

Electoral Reform Society

The International Foundation for Electoral Systems

Democratys

Social media companies

Meta

TikTok

Google

Government bodies

Ministry of Housing, Communities and Local Government

Cabinet Office

Department for Science, Industry and Technology

Home Office

His Majesty's Treasury

Foreign, Commonwealth and Development Office

Prime Minister's Anti-Corruption Champion

Northern Ireland Office

Devolved Governments

The Scottish Government

The Welsh Government

Enforcement bodies

City of London Police
National Crime Agency
MI5
National Protective Security Authority
Metropolitan Police
National Cyber Security Centre
Crown Prosecution Service

Regulatory bodies

The Electoral Commission
The Financial Conduct Authority
The Charity Commission
Ofcom

Other

Ethics and Integrity Commission
Eversheds Sutherland, Public Inquiries and Investigations Team

