

**INDEPENDENT ADVISER ON
MINISTERIAL STANDARDS**

ANNUAL REPORT 2025-2026

28 May 2026

1. Introduction

- 1.1. This is my fourth annual report as the Prime Minister’s Independent Adviser on Ministerial Standards and covers the period from April 2025 to the end of March 2026. It has been a year of significant developments in the “standards landscape”. In October 2025, the Ethics and Integrity Commission (EIC) was established and, at the same time, the Advisory Committee on Business Appointments (ACOBA) was closed and its responsibilities for advice under the Business Appointment Rules were transferred to a number of bodies and individuals including the Independent Adviser. The Ministerial Code, including my terms of reference, was revised to coincide with this change.
- 1.2. My role therefore now encompasses three main strands of activity: overseeing the ministers’ interests process, advising the Prime Minister on conduct matters under the Ministerial Code, and providing advice to former ministers under the Business Appointment Rules (BARs). This report covers these three areas and also gives a flavour of my engagement work — meeting with individuals and bodies who form part of the standards landscape, such as the EIC, the Public Administration and Constitutional Affairs Committee (PACAC) and others with an interest in my work. I would highlight the following during what has been a busy year:
 - The List of Ministers’ Interests was published, according to the quarterly publication cycle introduced by the Prime Minister after taking office in 2024, with editions issued in May 2025, October 2025 and January 2026 (see Section 2)
 - I provided written advice to the Prime Minister in relation to ministerial standards issues on four occasions (see Section 3)
 - My secretariat was joined by new team members who previously worked for ACOBA in order to establish my BARs advice work. I decided on 61 applications for advice from former ministers with this team’s support (see Section 4)
 - I met over 20 ministers and permanent secretaries, an engagement which I consider to be a key part of my work to support ministers with the management of their interests (see Section 5)
 - I provided written and oral evidence to PACAC on two occasions and contributed to the review being undertaken by the EIC into Lobbying, the Business Appointment Rules and Financial Disclosure (see Section 5)
- 1.3. A number of themes emerged during the course of the year.

Changes to the standards landscape

- 1.4. The package of measures implemented by the Government last autumn included significant changes. The creation of the EIC was an important step in bringing greater coordination and communication in relation to standards across the Government,

Parliament and the wider public sector. I have been pleased to attend meetings of the EIC's Network of Standards Bodies and to contribute to its work.

- 1.5. In October, my secretariat was joined by team members from ACOBA. The addition of BARs advice has proved to be a good fit with the IA role. During my regular conversations with serving ministers, I am now able to communicate the purpose and importance of the BARs and to alert ministers to their future obligation to apply for advice once they leave office. My secretariat has also been able to make good use of its established links with permanent secretaries' offices, developed as part of the ministers' interests process, to ensure that BARs applications are handled efficiently by departments.

Engagement with ministers

- 1.6. I consider engagement with ministers concerning their interests to be a core function of my role. I have met several ministers and permanent secretaries during the year to discuss the Ministerial Code and the ministers' interests process and, where relevant, to provide advice on the management of actual or perceived conflicts.
- 1.7. This type of personal, face-to-face interaction is particularly important when ministerial roles change or new members of government take up ministerial office for the first time. High expectations are rightly placed on ministers, starting immediately, to be ready to account publicly for their decisions and conduct. It is important, therefore, that ministers are able to perform their duties with confidence and with any actual or perceived conflicts identified, properly managed and, where appropriate, publicly disclosed. My meetings have been a useful opportunity to discuss the principles and provisions of the Ministerial Code and to provide clear advice to ministers where necessary. I view such engagement as part of a process of induction and support for ministers, the formal aspects of which are handled by permanent secretaries.
- 1.8. It is very clear to me that, whilst a thorough induction and the provision of advice and support on an ongoing basis is crucial for ministers, they would also greatly benefit from a degree of structured preparation before office. I would strongly encourage the EIC to champion the provision of facilities for politicians, who may be destined for ministerial positions, to familiarise themselves with the personal implications of compliance with the Ministerial Code in good time before they start.

Correspondence

- 1.9. I have received an increasing number of requests during the year from MPs and members of the general public to open inquiries into particular ministers. I attribute this in part to the increased publicity associated with my role and my ability to initiate inquiries at my own discretion. Letters can be prompted by a conduct matter where I am already undertaking work to establish the facts and provide advice, as set out in Section 3. Correspondence can also focus on topics that are the subject of parliamentary and media attention at the time, with the details of letters sent to me being made publicly available.

- 1.10. An example of this related to events leading up to the Budget of 26 November 2025, with concerns being raised that misleading market sensitive information had been released from within the Government and requests that I should investigate for evidence of impropriety in the context of the Ministerial Code. Given the public statements made by or on behalf of HM Treasury, the Office for Budget Responsibility and the Financial Conduct Authority at the time, I saw no basis for my involvement. There was, however, as acknowledged by the Chancellor of the Exchequer in her evidence to the Treasury Select Committee on 10 December 2025, a recognition that there had been excessive speculation and “too many leaks” leading up to the Budget statement. Ministers and their special advisers (for whom ministers are responsible) can be expected to be mindful of these comments and the importance of vigilance in maintaining the confidentiality of market sensitive information.
- 1.11. During March 2026, I received letters concerning statements made by the Prime Minister in relation to the appointment of Lord Mandelson as HM Ambassador to the United States, which were followed by further letters in April. I responded, on the basis of the substantial evidence disclosed in Parliament, that I saw no basis for an investigation in the context of the Ministerial Code.
- 1.12. I also receive letters that relate to an individual’s personal interactions with the Government and/or a particular minister’s department. My terms of reference only extend to the specific personal conduct of a minister in relation to the principles and rules set out in the Ministerial Code. It is not within my remit to investigate the actions, decisions or policies of particular departments, or of government more broadly. It is also not part of my role to investigate where correspondence has not been handled effectively by a department, unless the matter relates to correspondence from an MP or Member of the House of Lords to a minister, as set out in paragraph 9.8 of the Ministerial Code. Ministers are ultimately accountable to Parliament for the Government’s actions taken within their areas of responsibility.
- 1.13. Opinion polls show that trust in politics remains very low. The Prime Minister has made clear his commitment to restoring that trust, emphasising the high standards of behaviour that he expects in his Ministerial Code, with its prominent focus on the Seven Principles of Public Life. I am wholehearted in my commitment to support the Prime Minister and all those who serve in the Government to ensure that exemplary standards are observed.

Sir Laurie Magnus CBE
Independent Adviser on Ministerial Standards

28 May 2026

2. Ministers' interests

- 2.1. The Ministerial Code makes clear that at all times ministers must personally manage any private interests they retain whilst in office with the utmost care. The overriding principle set out in paragraph 1.5 (f) states: 'Ministers must ensure that no conflict arises, or could reasonably be perceived to arise, between their public duties and their private interests'. Part B chapter 3 of the Code then provides more detail on the standards expected of ministers in the handling of their private interests. Paragraph 3.2 states: 'It is the personal responsibility of each minister to decide whether and what action is needed to avoid a conflict or to manage the perception of a conflict, taking account of advice received from their permanent secretary and the Independent Adviser on Ministerial Standards.'

The ministers' interests process

- 2.2. On appointment to a new office, ministers are required promptly to complete a declaration of their interests in order to identify any that might be thought to give rise to a conflict, actual or perceived. Ministers disclose, in confidence, a wide variety of information, including details of financial interests covering trusts, pensions, shareholdings and investment property, directorships, public appointments, links with charities, trade union memberships, details of previous employment, relevant acquaintances and constituency interests and any relevant interests of their spouse, partner or close family members. Ministers also make declarations in relation to their tax affairs.
- 2.3. When completing their declarations of interests, ministers attest that they accept the provisions of the Ministerial Code - including those that continue to apply after leaving office, such as the Government Business Appointment Rules - and acknowledge their personal responsibility for deciding how to act and conduct themselves in light of the Code. This attestation, required at least annually, serves as a reminder of their ongoing duty to uphold the provisions of the Code throughout their time as ministers.
- 2.4. The information provided in a minister's declaration of interests form is reviewed initially by their permanent secretary or accounting officer who, given their in-depth understanding of the minister's responsibilities and the associated activities of their departments, have a critical role in the assessment and management of interests and the provision of advice on how any relevant interests should be managed. I would expect permanent secretaries to meet any minister joining their department specifically to address the ministers' interests process and to remain vigilant concerning the need for ministers to keep their declarations up to date so that, where mitigations are needed, these are discussed and implemented promptly. Ministers and their permanent secretaries are also asked to consider together whether any recent donations (as published in the parliamentary registers of interests) may have a bearing on the minister's portfolio and duties and, where necessary, to agree appropriate mitigations. Given their full disclosure in the parliamentary registers, I do not duplicate details of donations received in a non-ministerial context in the List of Ministers' Interests. Information on gifts and hospitality received by ministers as part of their work for the Government is made public on [GOV.UK](https://www.gov.uk) on a monthly basis.

- 2.5. The process of a minister disclosing their interests and these being reviewed and advised upon by the accounting officer should be undertaken promptly and, in any event, within 14 days of appointment or a change in role. Ministers' declarations and any associated advice are then forwarded to my office, where each declaration is scrutinised and further advice is provided to ensure all ministers are able to meet the principle set out in paragraph 1.5 (f) of the Ministerial Code and also to ensure consistency in the approach taken by departments.
- 2.6. This formal process of declaration and tailored advice is repeated on a regular cycle throughout the year. Outside of this cycle, ministers are expected to update proactively their declarations and to seek fresh advice whenever it may be needed. Ministers are asked to update their declaration whenever there is a substantial change to their ministerial portfolio and are expected to inform their department promptly of any substantive change in their circumstances.
- 2.7. Ministers, who will be members of either the House of Commons or House of Lords, must in addition abide by the relevant parliamentary rules on the management of interests and keep their entries in the respective Houses of Parliament registers of interests up to date.

Approaches to mitigation

- 2.8. It is highly probable that, with approximately 120 ministers in post at any one time, ministers and their close family members collectively will have a wide range of interests, some of which may be relevant to a specific minister's portfolio. A number of approaches are used to manage relevant interests and mitigate any actual or perceived conflicts. These can include removal of the interest, for example by stepping down from a position with a public body, institution or charity or through the sale of an asset such as shares. However, it is not always necessary or possible for an interest to be removed, for example the employment of a family member or an interest that derives from a minister's constituency. Where a relevant interest is retained, there are a range of ways in which it can be managed, for example through recusal from Government activity that may have a bearing on that interest or through the involvement of a second minister in the decision-making process. Oral and written declaration is also an important tool for ministers, allowing them to ensure that particular connections are always transparent and understood.
- 2.9. Where a minister holds financial interests (such as shares or a partnership in a commercial enterprise) whose prospects may potentially be influenced by decisions for which the minister may be directly or indirectly responsible, it is important that those interests are kept at arm's length, with the minister having no control over decisions to buy or sell such interests and no contact with the related underlying business. There are a number of ways in which this can be achieved, depending upon both the nature of the interest and the particular responsibilities of the relevant minister. The most effective means of ensuring the removal of any actual or perceived conflict is for a minister to dispose of their interests or to place their interests into a blind management arrangement whereby all decisions concerning such interests are taken on their behalf without reference to them and without their knowledge. I consider that this is particularly relevant

in the case of ministers with responsibilities that have wide ranging and significant economic, financial and/or commercial relevance, such as the Office of the Prime Minister, HM Treasury, the Department for Business and Trade, the Department for Science, Innovation and Technology and the Department for Energy Security and Net Zero.

- 2.10. It is acceptable, however, for ministers to hold interests directly, including in collective funds managed at arm's length by professional investment managers, with appropriate provisions being made with their departments (and with my agreement) whereby they are recused from any decisions that might have, or be perceived to have, an impact upon such interests. All shareholdings held by ministers above certain thresholds are included in the parliamentary registers of interests.¹ In general, this information is not duplicated in the List of Ministers' Interests. However, where a minister holds a financial interest that I consider to be relevant to their ministerial portfolio and which falls below the thresholds specified by the parliamentary disclosure regimes, such an interest will be published in the List of Ministers' Interests.

Publication of the List of Ministers' Interests

- 2.11. My terms of reference require that I should prepare and publish a statement covering the relevant interests of ministers on a quarterly basis. This statement takes the form of the List of Ministers' Interests. The list is not a register of interests and is not intended to duplicate the information available in each minister's entry in either the House of Commons Register of Members' Financial Interests or the House of Lords Register of Members' Interests. The list does not include every interest that a minister has declared to their departments and the Independent Adviser in relation to themselves and their family members. Such extensive publication and disclosure would represent an excessive degree of intrusion into the private affairs of ministers that would be unreasonable, particularly in respect of their family members. I see my role in compiling the list as being to strike a balance between the need for appropriate transparency about ministers' interests - so that the public has sight of any interest that may be relevant, or may be perceived to be relevant, to a minister's role - and the need to ensure appropriate confidentiality for ministers and their family members in relation to interests which I consider fall below this relevance threshold.
- 2.12. Ministers are asked to make the fullest disclosure of their interests to their permanent secretaries and myself to enable these judgements to be made. Ministers should be confident, in recognition of such complete transparency, that where information is provided that is not relevant to their role and therefore not relevant for publication, it will remain confidential. I review carefully all of the information submitted and I prepare a list

¹ In the House of Commons, shareholdings greater than 15% of issued share capital, or greater in value than £70,000 are included on the Register of Members' Financial Interests. In the House of Lords, any shareholding either amounting to a controlling interest, or exceeding £100,000 in value; any private equity investment worth more than £100,000 or constituting more than 10 per cent of the fund or investment; and any corporate debt security with a value exceeding £100,000 is included in the Register of Members' Interests.

that documents those interests, including of close family, which are, or may be perceived to be, directly relevant to a minister's portfolio responsibilities or wider Government business.

2.13. The list should be read alongside the parliamentary registers of interests and any relevant information published by the Electoral Commission. The list includes information across a number of categories:

- financial interests, including trusts, pensions, shareholdings and investment property
- directorships
- public appointments
- formal links with charities and other non-public organisations, for example as a patron or trustee
- other relevant interests, including interests in ministers' constituencies that could have relevance to their portfolios or broader work in government, former employment or roles and membership of trade unions and other groups
- relevant interests of a minister's spouse, partner or close family members

2.14. During the year under review, I published a List of Ministers' Interests in May 2025, October 2025 and January 2026:

- [List of Ministers' Interests, May 2025](https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-may-2025-html)
<https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-may-2025-html>
- [List of Ministers' Interests, October 2025](https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-october-2025-html)
<https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-october-2025-html>
- [List of Ministers' Interests, January 2026](https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-january-2026-html)
<https://www.gov.uk/government/publications/list-of-ministers-interests/list-of-ministers-interests-january-2026-html>

Previous lists are available at:

www.gov.uk/government/publications/list-of-ministers-interests

2.15. The publication of the List of Ministers' Interests can be impacted by events such as ministerial reshuffles when additional time can be required to enable new ministers to complete their declarations of interests and for ministers with changed portfolios to reassess their interests in light of their new responsibilities.

2.16. I am grateful to departments, in particular to permanent secretaries' offices, ministers' private offices and to the team that supports me in the Cabinet Office, for the considerable work undertaken to compile and issue the List of Ministers' Interests.

3. Advice provided under the Ministerial Code

- 3.1. An important function of the Independent Adviser is to provide advice to the Prime Minister in relation to allegations concerning the behaviour of ministers in the context of the Ministerial Code. Following the updating of my terms of reference in November 2024, ministers may now request the Prime Minister's consent to refer themselves to me where they are facing allegations in relation to the Ministerial Code or believe that there is a matter that could benefit from independent scrutiny.

Former Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government (September 2025)

- 3.2. On 3 September 2025, the Rt Hon Angela Rayner MP, former Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, referred herself to me in light of allegations about her property ownership and tax affairs. I undertook an examination of the circumstances and facts connected to these allegations and provided advice to the Prime Minister on 5 September. Ms Rayner decided to resign later that day. The exchange of letters between Ms Rayner and the Prime Minister and my advice are available online at:

<https://www.gov.uk/government/publications/letter-from-the-independent-adviser-on-ministerial-standards-exchange-of-letters-between-the-prime-minister-and-angela-rayner-mp>

Chancellor of the Exchequer (October 2025)

- 3.3. On 29 October 2025, the Prime Minister sought my advice in relation to arrangements concerning the letting of the Chancellor of the Exchequer's family home. The following day I was asked to provide further advice in writing in light of additional information that had come to light. The Chancellor apologised to the Prime Minister for the inadvertent error of failing to obtain a selective licence required by the local authority for the renting out of her family home and took steps to rectify the matter. The correspondence between the Prime Minister and the Chancellor and my advice are available online at:

29 October 2025 - Exchange of letters between the Prime Minister and the Chancellor of the Exchequer

<https://www.gov.uk/government/publications/exchange-of-letters-between-the-prime-minister-and-the-chancellor-of-the-exchequer-on-the-advice-from-the-independent-adviser-on-ministerial-standards>

30 October 2025 - Letter from the Chancellor of the Exchequer to the Prime Minister

<https://www.gov.uk/government/publications/letter-from-the-chancellor-of-the-exchequer-to-the-prime-minister-and-correspondence-between-the-chancellor-of-the-exchequers-husband-and-agent>

30 October 2025 - Exchange of letters between the Independent Adviser and the Prime Minister, and the Prime Minister and the Chancellor of the Exchequer

<https://www.gov.uk/government/publications/letters-exchanged-between-the-independent-adviser-and-the-prime-minister-and-the-prime-minister-and-the-chancellor-30-october-2025>

Prime Minister - Appointment of Chair of Independent Football Regulator (November 2025)

- 3.4. On 12 November 2025, the Prime Minister wrote to me regretting the nature of his involvement in the process for the appointment of the Chair of the Independent Football Regulator. He had, despite a recusal agreed in Autumn 2024 concerning the Football Governance Bill, been asked to confirm he was content with the proposed appointment recommended by the Secretary of State for Culture, Media and Sport. My correspondence with the Prime Minister is available online at:

<https://www.gov.uk/government/publications/correspondence-between-the-independent-adviser-on-ministerial-standards-and-the-prime-minister-12-november-2025>

Former Parliamentary Under Secretary of State, Department for Science, Innovation and Technology and the Cabinet Office (February 2026)

- 3.5. On 15 February 2026, the Prime Minister asked officials in the Cabinet Office to carry out an exercise to establish the facts in response to allegations made about the conduct of Josh Simons, then Parliamentary Under Secretary of State jointly in the Department for Science, Innovation and Technology and the Cabinet Office. When that fact-finding process concluded, the Prime Minister referred the matter to me and asked for my advice. I provided my advice on 27 February. Mr Simons decided to resign from the Government on 28 February. The exchange of letters between Mr Simons and the Prime Minister and my advice are available online at:

28 February - Letter from the Independent Adviser on Ministerial Standards and exchange of letters between the Prime Minister and Josh Simons MP

<https://www.gov.uk/government/publications/letter-from-the-independent-adviser-on-ministerial-standards-and-exchange-of-letters-between-the-prime-minister-and-josh-simons-mp>

Advice to ministers

- 3.6. Under my terms of reference, ministers are able to ask for my advice in confidence in relation to the provisions of the Ministerial Code. In these instances, ministers fully disclose the circumstances of the issue of concern and provide any further information that I may request in order that I can advise accordingly. I may also approach ministers to request clarification of a particular matter. There is no implication of wrongdoing by ministers when undertaking this work and it is not necessarily the case that this engagement, which has carried on throughout the year, will be made public. I consider it

is an integral part of my role to engage with ministers in confidence to encourage the fullest possible open discussion, reporting as necessary to the Prime Minister so that he can determine any action required.

- 3.7. There have been instances during the year where a minister has recognised that a matter should have been handled with greater care. It is important that ministers have the ability and confidence to acknowledge such instances, recognising the Prime Minister's expectations concerning their adherence to the Ministerial Code and, where appropriate, apologise. The Ministerial Code makes clear that apologies can be an acceptable means to acknowledge conduct which falls, or may appear to have fallen, below the standards expected under the Code. It is the Prime Minister's prerogative as to whether an apology is accepted and also as to whether it is made public.

4. Business Appointment Rules

- 4.1. In October 2025, the Advisory Committee on Business Appointments (ACOBA) was closed and its functions – to provide advice to former ministers and crown servants under the Business Appointment Rules (BARs) – were transferred to a number of bodies, with the responsibility for advising former ministers falling to the Independent Adviser. Accordingly, since 13 October 2025, I have been issuing advice to former ministers wishing to take up appointments and employment.
- 4.2. The BARs apply to all former ministers for two years from their last day in office. Their purpose is to protect the integrity of government, whilst allowing interchange between government and other sectors. In particular the rules seek to avoid:
- suspicion that an appointment might be a reward for past favours
 - the risk that an employer might gain an improper advantage by appointing a former minister who holds sensitive information about its competitors, or about impending Government policy
 - the risk of a former minister improperly exploiting privileged access to contacts in government or external contacts made whilst serving as a minister
 - unfair questioning or criticism of the integrity of former ministers
- 4.3. As part of the change to the operation of the BARs and building on approaches developed by ACOBA, the Government has determined that there should be a greater focus on proportionate, risk-based scrutiny, using intensive analysis only where warranted and to improve efficiency and handling times. In order to achieve this, the Government introduced two categories of application, based on the type of prospective role on which advice is being sought. Accordingly, I have adopted two categories when determining my advice:
- Level 1 – a briefer application form and a streamlined process are used for appointments where the risks to Government integrity are recognised to be low and appropriately managed by the standard conditions (see 4.4 below), for example for unpaid positions and non-executive charity roles.
 - Level 2 – for all other roles, including proposals to establish consultancies, applicants must submit detailed information about the role and any previous involvement they had with the appointing entity whilst serving as a minister, including any involvement in related matters that might be relevant to such entity. The relevant government departments verify the information submitted and provide a view on appropriate mitigations. My advice is then based on a risk analysis of all of the information received.
- 4.4. The standard conditions – applied either following risk analysis or, in Level 1 cases, across the board – are:
- *Privileged information condition* – former ministers must not draw on any privileged information available from their time in ministerial office. This is an

ongoing duty irrespective of the time elapsed since leaving office.

- *Lobbying condition* – former ministers must not become personally involved in lobbying the Government or its arm’s length bodies; nor should they make use of contacts in government or ministerial office to influence policy, secure business or funding or otherwise unfairly advantage the employing organisation.
- *Contracts and bids condition* – former ministers must not undertake any work that involves providing advice on bids or contracts relating directly to the work of the Government or its arm’s length bodies.

4.5. I may also add conditions to suit particular cases. I will, for example, ask a former minister not to contact potential business partners/customers who they met only by reason of their ministerial role in order to prevent such contacts providing a competitive advantage.

4.6. I share my draft advice, for all applications, on a provisional basis with applicants to provide them with an opportunity to clarify their understanding, contribute any further information they consider relevant and, ultimately, to indicate their acceptance of the advice and to confirm their intention to abide by it. I aim to issue provisional advice within 20 working days from receipt of a Level 2 application, inclusive of the time taken to consult relevant departments. The target turnaround time for Level 1 applications is 10 working days.

4.7. Once this process is completed, I issue my final advice, which enables applicants to take up or announce the role – at which point, or when applicants otherwise request it, my letter of advice is published online at www.gov.uk/government/publications/advice-issued-under-the-business-appointment-rules-for-ministers/advice-issued-under-the-business-appointment-rules-for-ministers.

4.8. I am supported in my work on BARs applications by my secretariat, which now includes some former ACOBA employees. The secretariat handles communication with applicants and departments, monitors and keeps me abreast of performance data, and briefs me on the process and on individual cases.

Performance

4.9. In the period 13 October 2025 to 31 March 2026, I considered 61 applications, seven of which were received during the period when ACOBA had stopped receiving new applications as part of closing down its operations (“the transition period”).

4.10. I am grateful to the secretariat and to permanent secretaries’ offices across government for achieving the following results on applications received since 13 October:²

Provisional advice provided:

- within 20 working days - **98% of all applications**

² 54 applications: 18 Level 1, 36 Level 2

- within 20 working days - **97% of Level 2 applications**
- within 10 working days - **100% of Level 1 applications**

Average handling times for applications before provisional advice stage:

- Level 1 applications - 3.5 working days
- Level 2 applications - 14.9 working days

- 4.11. Not every application can be handled within the standard timeframe, not least because there are more complex cases which merit fuller consideration. One application for my advice warranted a longer timeframe owing to complexity. The secretariat worked closely with the relevant department to secure the information required to reach an outcome, and kept in touch with the applicant to ensure transparency.

Compliance

- 4.12. Where a former minister fails to uphold the standards set by the BARs, for example by taking up or announcing an appointment before receiving my final advice or failing to comply with the designated conditions, I will write to the individual concerned and generally publish that letter on [GOV.UK](https://www.gov.uk). My terms of reference state that I may also inform the Prime Minister where I deem this appropriate.

5. Engagement with others responsible for standards in public life

- 5.1. I am one of a number of office-holders and bodies charged with upholding standards in public life. I welcome opportunities to share knowledge and best practice with others in the field. We have a common objective to champion high standards of conduct and robust adherence to the Seven Principles of Public Life.
- 5.2. During the year, I held meetings with the Chair of the Ethics and Integrity Commission (EIC), Doug Chalmers CB DSO OBE; the Parliamentary Commissioner for Standards, Daniel Greenberg CB; the First Civil Service Commissioner, the Rt Hon the Baroness Stuart of Edgbaston; both the current and now former Registrar of Consultant Lobbyists, Claire Bassett and Harry Rich; and Sir William Shawcross, the Public Appointments Commissioner. I have attended meetings of the EIC's Network of Standards Bodies, which are held quarterly and provide a useful opportunity to hear feedback from other participants and to discuss common themes.
- 5.3. I also met various overseas parties to discuss the regulation of standards, including the Ambassador of the Netherlands (together with representatives of the Government of the Netherlands) and the Organization for Security and Co-operation in Europe (OSCE).
- 5.4. On 27 January 2026, I gave evidence to PACAC in a session that covered both the role of the Independent Adviser and the wider ethics landscape. On 30 June 2025, I provided written evidence to PACAC for its inquiry into Ministerial Statements to Parliament in the context of the Ministerial Code.³ I have also contributed to the EIC's review of Lobbying, the Business Appointment Rules and Financial Disclosure, which was in progress at the end of the year.
- 5.5. I have given lectures concerning my role on various occasions during the year, including at the Bank of England and the University of Westminster.

³ <https://committees.parliament.uk/publications/48674/documents/255186/default/>

6. Terms of Reference

The Independent Adviser on Ministerial Standards is appointed by the Prime Minister to advise them on matters relating to the Ministerial Code. The post-holder is independent of government and expected to provide impartial advice to the Prime Minister. The post-holder is required to observe the Seven Principles of Public Life.

1. Ministers' interests

- 1.1. Under the Ministerial Code (paragraph 3.2), "it is the personal responsibility of each minister to decide whether and what action is needed to avoid a conflict or to manage the perception of a conflict, taking account of advice received from their permanent secretary and the Independent Adviser on Ministerial Standards".
- 1.2. Ministers are required, upon appointment to each new office, to provide to the Independent Adviser a full list of interests which might be thought to give rise to a conflict with the minister's public duties. This must occur within 14 days (paragraphs 3.3-3.4). The list should have been reviewed where relevant by the appropriate permanent secretary or Accounting Officer. Ministers have an ongoing duty to ensure that their declarations are kept up to date and that they notify their permanent secretary and the Independent Adviser of any relevant change in circumstances.
- 1.3. The personal information which ministers disclose to those who advise them is treated in confidence (paragraph 3.6).
- 1.4. The Independent Adviser must review any information provided by a minister and may, in confidence, provide advice to that minister on any action that should be taken by the minister in order to uphold the standards set out in the Ministerial Code (paragraph 3.4). Advice on the handling of interests may also be provided on an ad-hoc basis (see paragraph 3.2 below).
- 1.5. A minister to whom advice is given must provide the Independent Adviser with a record of what action has been taken in response to the advice (paragraph 3.4).
- 1.6. On a quarterly basis the Independent Adviser must prepare and publish a statement covering the relevant interests of ministers (paragraph 3.6). The statement must set out such information about those relevant interests as the Independent Adviser considers appropriate. The Independent Adviser will advise the Prime Minister of their intention to publish the list which will then be published as promptly as possible.

2. Investigation of alleged breaches of the Ministerial Code

- 2.1. Under the terms of the Ministerial Code (paragraph 2.6a): "If there is an allegation about a breach of the Code and the Prime Minister, having consulted the Cabinet Secretary, feels that it warrants further investigation, the Prime Minister may ask the Cabinet Office to investigate the facts of the case and/or refer the matter to the Independent Adviser on Ministerial Standards".

- 2.2. Where the Independent Adviser believes that an alleged breach of the Code warrants further investigation and that matter has not already been referred to them, they may initiate an investigation (paragraph 2.6b). Before doing so, the Independent Adviser will notify the Prime Minister in writing.
- 2.3. Where a minister is concerned that they have failed to uphold the standards set by the Prime Minister in the Ministerial Code, or faces allegations in relation to the Code, they may refer the matter to the Independent Adviser in writing having notified the Prime Minister. The Independent Adviser will determine whether further action is needed and will advise the Prime Minister accordingly.
- 2.4. Following an investigation carried out by the Independent Adviser, the Independent Adviser may advise the Prime Minister on whether, in their view, there has been a breach of the standards expected in the Ministerial Code. Additionally, the Independent Adviser may recommend what sanction should be considered.
- 2.5. The decision on whether a minister remains in office is for the Prime Minister, as the ultimate judge of the standards of behaviour expected of a minister and the appropriate consequences of a breach of those standards (paragraph 2.3).
- 2.6. Following an investigation carried out by the Independent Adviser, the Independent Adviser may require that any advice provided to the Prime Minister on the outcome of such an investigation is published in a timely manner.

3. Further advice on Ministerial Code

- 3.1. Before the Ministerial Code is amended, the Prime Minister will consult the Independent Adviser.
- 3.2. The Independent Adviser may, at the request of a minister, provide the minister, in confidence, with general advice in relation to the Ministerial Code.

4. Information

- 4.1. A minister must provide the Independent Adviser with any information the Independent Adviser reasonably requires for the purposes of discharging the responsibilities set out in these terms of reference (paragraph 2.6b). Where the Independent Adviser considers that a minister is not providing such information, they will notify the Prime Minister.
- 4.2. Information provided to the Independent Adviser for the purposes of their functions is provided in confidence. The Independent Adviser may publish information provided to them, including in summarised form, if they consider this is necessary to discharge their responsibilities.
- 4.3. The Independent Adviser may require a minister to publish information relating to adherence to the Ministerial Code.
- 4.4. The Independent Adviser must publish an annual report on the exercise of the Independent Adviser's functions, which must:

- a. Set out information about the work carried out by the Independent Adviser during the year.
 - b. Include observations on matters relating to the role of the Independent Adviser.
- 4.5. The Independent Adviser will advise the Prime Minister of their intention to publish their annual report providing at least four weeks' notice of the publication date

5. Business Appointment Rules for Former Ministers

- 5.1. Under the terms of the Ministerial Code (paragraph 11.2.): “ For two years after leaving office, former ministers must abide by the Business Appointment Rules and seek advice from the Independent Adviser on Ministerial Standards about any appointments or employment they wish to take up. Former ministers must abide by the advice provided by the Independent Adviser, details of which will be published when a role is announced or taken up. Former ministers must ensure that no new appointments are announced, or taken up, before the Independent Adviser has provided their advice.”
- 5.2. Following an application made by a former minister for advice under the Business Appointment Rules, the Independent Adviser will provide advice in writing. Details of the advice provided will be published if a role is announced or taken up.
- 5.3. Where the Independent Adviser considers that a former minister has not upheld the standards expected in the Business Appointment Rules, they may inform the Prime Minister.
- 5.4. Before the Business Appointment Rules for Former Ministers are amended, the Independent Adviser will be consulted.

7. Publications and resources

Resources

Lists of Ministers' Interests

<https://www.gov.uk/government/publications/list-of-ministers-interests>

Independent Adviser on Ministerial Standards webpage

<https://www.gov.uk/government/organisations/independent-adviser-on-ministers-interests>

House of Commons Register of Financial Interests

<https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/registers-of-interests/register-of-members-financial-interests/>

House of Lords Register of Members' Interests

<https://members.parliament.uk/members/lords/interests/register-of-lords-interests>