

YMCHWILIAD Y PWYLLGOR SAFONAU YMDDYGIAD I LOBÏO

Tystiolaeth ysgrifenedig a gyflwynwyd gan Transparency International UK i'r Pwyllgor Safonau Ymddygiad, Mehefin 2022

CRYNODEB

Mae Transparency International UK yn un o brif sefydliadau gwrth-lygredd y DU. Rydym yn cynnal ymchwiliad i lygredd yn y DU, gyda'r nod o gynnal uniondeb mewn bywyd cyhoeddus a diogelu adnoddau'r cyhoedd. Fel rhan o'r gwaith hwn, rydym yn ymchwilio i faterion yn ymwneud â lobïo. Er enghraifft, yn 2015 cyhoeddwyd ein hadroddiad 'Dylanwad Atebol: Dod â lobïo allan o'r cysgodion' a oedd yn cynnwys ein hymchwiliad ledled y DU i lobïo.¹

Yn ein hadroddiad yn 2015, gwnaethom ddau argymhelliad ynghylch tryloywder lobïo yng Nghymru, sef y dylai Llywodraeth Cymru ymgynghori ar gyflwyno cofrestr statudol o lobïwyr ar gyfer y rheini sy'n ymgysylltu â Llywodraeth Cymru a'r Senedd. Dylai hefyd gyhoeddi manylion cyfarfodydd rhwng Gweinidogion a sefydliadau allanol yn brydlon, fel data agored y gellir ei ddarllen gan beiriant. Ers hynny, gwnaed cynnydd sylweddol o ran y ddau argymhelliad hyn, ond mae lle i wella o hyd. Mae'r cyflwyniad hwn yn dadansoddi'r gwelliannau hyn a beth arall sydd i'w wneud.

COFRESTR STATUDOL O LOBÏWYR

Pan gaiff ei gynnal yn foesebol ac yn dryloyw, gall lobïo helpu i lywio a chryfhau'r broses ddemocrataidd. Mae'n ffordd i lywodraethau a deddfwrfeydd ddeall ac ymgysylltu â'r rhai y gallai eu penderfyniadau o bosib effeithio arnynt; gallai hyn gynnwys elusennau, cwmnïau preifat a chymdeithasau proffesiynol. Fodd bynnag, pan fo lobïo'n digwydd y tu ôl i ddrysau caeedig ac wedi'i gyfyngu i grŵp cul o randdeiliaid, gall y rheini sy'n dymuno elwa o fuddiannau preifat gamddefnyddio'r broses hon.

Mae Transparency International UK yn credu, er mwyn lliniaru unrhyw ddrwgweithredu, y dylai lobïo fod yn agored, yn dryloyw ac yn foesebol, ac y dylai unrhyw ymateb o ran rheoleiddio hefyd fod yn gymesur, yn addas at y diben ac na ddylai rwystro cyfranogiad.

Fel cam tuag at arfer gorau, rydym o blaid cyflwyno cofrestrau lobïo statudol cynhwysfawr sy'n cynnwys lobïwyr mewnol yn ogystal â rhai aml-gleient ac ymgynghorol. Cofrestrau statudol yw'r ffordd fwyaf effeithiol o greu'r cymhellion cywir ar gyfer ymddygiad priodol a'r pŵer i sancsiynu er mwyn atal camddefnydd.

Diben cofrestr o'r fath ddylai fod i ddatgelu gwybodaeth am:

- pwy sy'n cael ei lobïo,
- pwrpas y lobïo (er enghraifft, y polisi, mater neu faes gwariant sy'n cael ei dargedu),
- y ffurf o ymgysylltu (er enghraifft, cyfarfodydd, galwadau ffôn, e-byst a.y.b.), ac
- amcangyfrif o faint sy'n cael ei wario ar y gweithgaredd hwn.

Yn Ionawr 2018, pan ryddhaodd y Pwyllgor Safonau Ymddygiad ei adroddiad ar lobïo, ni chawsant dystiolaeth bendant i gefnogi cofrestr lobïo statudol.² Roedd rhai o blaid gwneud hyn er mwyn atal unrhyw sgandal a chamddefnydd o'r system yn y dyfodol, ac eraill yn dadlau y byddai fel "gordd i gracio cneuen".

Os yw'r Senedd am fod yn gyfochrog â deddfwrfeydd democrataidd eraill cyffelyb, a dilyn yr arferion gorau, yna mae'n ymddangos mai cofrestr statudol yw'r opsiwn cywir. Mae tabl sy'n cymharu systemau lobïo wedi'i gynnwys yn Atodlen 1.

¹ Transparency International UK, *Accountable Influence: Bringing lobbying out of the shadows* (Medi 2015) <https://transparency.org.uk/publications/accountable-influence-bringing-lobbying-out-shadows>

² Pwyllgor Safonau Ymddygiad, *Lobio*, (Ionawr 2018)

<https://business.senedd.wales/documents/s70855/Committee%20Report%20-%202011%20January%202018.pdf>

Fodd bynnag, mae Transparency International UK hefyd yn cydnabod profiadau cofrestr lobïo statudol yr Alban, ac nad oedd y Pwyllgor Archwilio Cyhoeddus a Chraffu Ôl-ddeddfwriaethol, yn eu hadroddiad yn 2021, yn gallu dweud i unrhyw sicrwydd a gafodd eu cofrestr lobïo statudol yr effaith a ddymunwyd o gynyddu tryloywder lobïo yn yr Alban.³ Gallai hyn fod oherwydd graddau hygyrchedd y gofrestr, a dywedodd y Pwyllgor eu bod yn "cydnabod bod y Ddeddf wedi golygu mwy o dryloywder mewn rhai gweithgareddau lobïo yn yr Alban, gan fod yn rhaid i'r achosion o gyfathrebu wyneb-yn-wyneb gael eu cofnodi mewn cofrestr gyhoeddus".⁴

Canfu tystiolaeth o adolygiad yr Adran Gwariant Cyhoeddus a Diwygio o 'Ddeddf Rheoleiddio Lobïo 2015' lwerddon nad oedd cyflwyno cofrestr statudol yn cael effaith o 'lyffetheirio' ymdrechion lobïo ac nad oedd y ddeddf yn "atal unrhyw weithgareddau lobïo angenrheidiol".⁵ Mae hyn yn awgrymu nad oedd cofrestr lobïo statudol yn creu rhwystrau i gyfranogiad democrataidd yn y cyd-destun Gwyddelig.

Argymhelliad: Yn unol ag arfer gorau, dylai Senedd Cymru barhau i ystyried yr opsiwn o gyflwyno cofrestr statudol o lobïwyr.

CYHOEDDI CYFARFODYDD RHWNG GWEINIDOGION A SEFYDLIADAU ALLANOL

Ers ein hadroddiad yn 2015 'Dylanwad Atebol', mae'r Senedd, yn unol ag adran 3(7) o'r côd gweinidogol, wedi dechrau cyhoeddi data tryloywder ynghylch cyfarfodydd ac ymgysylltiadau rhwng Gweinidogion a sefydliadau allanol.⁶ Mae hwn yn gam i'w groesawu.

Pan gyhoeddir data am gyfarfodydd lobïo, rydym yn argymhell bod y data hwn yn: gywir, hygyrch ac ystyrion. O edrych ar y camau diweddaraf i ryddhau data er mwyn tryloywder ynghylch cyfarfodydd a gynhaliwyd gan weinidogion rhwng Ionawr 2022 a Mawrth 2022, gallwn ddadansoddi i ba raddau y mae data Cymru'n bodloni'r safonau hyn.

Cywir

Dylai'r data fod mor fanwl gywir â phosibl gan gynnwys cofnodion cyflawn. Mae'n gadarnhaol gweld bod y cyfarfodydd a'r ymgysylltiadau'n cael eu categorio yn ôl math. Fodd bynnag, mae'n ymddangos bod anghysondeb o ran lefel y manylder a ddatgelir yn y data. Yn y chwarter rhwng Ionawr 2022 a Mawrth 2022, cafodd y Prif Weinidog 35 o gyfweiliadau, ond yn wahanol i ddata gan Weinidogion eraill, nid oedd manylion ynghylch gyda phwy oedd y cyfweiliadau hyn. Yn y chwarteri blaenorol, mae disgrifiad y Prif Weinidog yn dweud 'Cyfryngau' a dim mwy na hynny. Dylai pob gweinidog ddisgrifio gyda phwy y mae eu cyfweiliadau.

Yn ogystal, ceir amrywiaeth yn y manylion ynghylch gyda phwy y mae gweinidog yn cyfarfod ac yn ymwneud â nhw, gyda rhai yn disgrifio'r mudiad yn unig ac eraill yn nodi'r mudiad a'r unigolyn y bu iddynt gyfarfod â nhw. Fwl gwaelodlin, dylai Gweinidogion gyhoeddi gyda pha fudiadau y maent wedi cyfarfod neu ymwneud â nhw, a'r unigolion a fynychodd y cyfarfodydd hynny.

Hygyrch

Dylid cyhoeddi'r data'n brydlon ac fel data agored y gellir ei ddarllen gan beiriant. Cyhoeddir y data ar ffurf CSV, sy'n fformat hygyrch, a gellir lawrlwytho'r data ar gyfer pob Gweinidog, yn wahanol i system San

³ Pwyllgor Archwilio Cyhoeddus a Chraffu Ôl-ddeddfwriaethol, *Craffu Ôl-ddeddfwriaethol: Deddf Lobio (Yr Alban) 2016*, tud. 7-9 (Mawrth 2021) <https://sp-bpr-en-prod-cdnep.azureedge.net/published/PAPLS/2021/3/22/79252553-8fd1-49af-acc0-66899fb52338/PAPLSS052021R3.pdf>

⁴ Ibid, tud. 15

⁵ Yr Adran Gwariant Cyhoeddus a Diwygio, *Ail Adolygiad Statudol o Ddeddf Rheoleiddio Lobio 2015*, (Chwefror 2020), <https://www.gov.ie/cy/publication/7ef279-second-statutory-review-of-the-regulation-of-lobbying-act-2015/t14>

⁶ Llywodraeth Cymru, *Côd Gweinidogol* (Awst 2021), <https://llyw.cymru/cod-gweinidogol-html>

Steffan lle mae pob adran yn cyhoeddi datganiad ar wahân. Fodd bynnag, yn ddelfrydol, byddai unrhyw un yn gallu cyrchu gweithgareddau pob chwarter a aeth heibio mewn un lawrlwythiad, fel y gallent gynnal dadansoddiad hanesyddol ar draws chwarteri neu hyd yn oed flynyddoedd.

Ystyrion

Dylai'r data gynnwys digon o fanylion perthnasol i helpu'r cyhoedd i gael mewnwelediad ystyrion. Yn anffodus, nid yw'r wybodaeth sy'n cael ei rhyddhau'n cynnwys disgrifiad o'r ymgysylltiad na diben y lobiö. Mae'n ymddangos bod y côd gweinidogol yn gwneud disgrifiad o'r fath yn angenrheidiol, gan fod adran 3.7 yn nodi "dylid cofnodi'r rhesymau dros y cyfarfod".⁷ Yn y data ar gyfer cyfarfodydd gweinidogol San Steffan, er eu bod yn brin o ran lefel manylder y disgrifiadau o ddiben y cyfarfodydd dan sylw, maent yn rhoi cipolwg sylfaenol ar yr hyn y mae cyfarfod amdano. Er enghraifft, un o'r disgrifiadau o gyfarfod a ddefnyddiwyd amlaf yn ystod y chwarter diwethaf a gyhoeddwyd oedd "Cyfarfod i drafod y Cynllun Rheilffyrdd Integredig".⁸ Dylai fod angen disgrifiad byr, sy'n osgoi ymadroddion fel 'cyfarfod cyffredinol' neu 'gyfarfod rhagarweiniol' o'r diben ar gyfer pob cyfarfod neu ymgysylltiad.

Argymhelliad: Dylid gwneud gwelliannau i sicrhau bod y data ynghylch cyfarfodydd ac ymgysylltiadau gweinidogol mor gywir, hygyrch ac ystyrion â phosibl.

YNGLŶN Â TRANSPARENCY INTERNATIONAL UK

Transparency International (TI) yw sefydliad anllywodraethol gwrth-lygredd mwyaf blaenllaw yn y byd. Gyda mwy na 100 o ganghennau ledled y byd, mae gan TI arbenigedd a dealltwriaeth helaeth o lygredd byd-eang.

Transparency International UK (TI-UK) yw cangen y DU o TI. Rydym yn codi ymwybyddiaeth ynghylch llygredd; yn siarad o blaid diwygio cyfreithiol a rheoleiddiol ar lefelau cenedlaethol a rhyngwladol; yn cynllunio offer ymarferol ar gyfer sefydliadau, unigolion a chwmnïau sydd am frwydro yn erbyn llygredd; ac yn gweithredu fel canolfan flaenllaw ar gyfer arbenigedd gwrth-lygredd yn y DU. Rydym yn annibynnol, yn anwleidyddol, ac yn seilio ein heiriolaeth ar ymchwil gadarn.

⁷ Llywodraeth Cymru, *Côd Gweinidogol* (Awst 2021), <https://llyw.cymru/cod-gweinidogol-html>

⁸ Y chwarter oedd Hydref - Rhagfyr 2021.

Atodlen 1: Cofrestrau Lobïo: Cymhariaeth Ryngwladol

	Agosaf at arfer gorau
	Rhywle yn y canol
	Pellaf oddi wrth arfer gorau

Gwlad	Cylch gorchwyl: Lobïwyr		Cylch gorchwyl: Swyddogion cyhoeddus		Ffurf o gyfathrebu				Adrodd yn ôl		
	Yn fewnol	Ymgynghorydd	Adran Weithredol	Cyng-horwyr arbennig	Deddf-wyr	Wyneb-yn-wyneb	Ysgri-fenedig	Llafar (o bell)	Diben y lobïo	Gwariant	Cyfnod adrodd yn ôl
UDA: (cofrestr statudol) Sef. 1946	SEC 3(7) 2 USC 1602	SEC 3(9) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(4) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 5 2 USC 1604 Enghraifft		Chwarterol
Canada (cofrestr statudol) Sef. 1989	Adran 7	Adran 5	Adran 2(1)	Adran 2(1)	Adran 2(1)	SOR/2008-116 (Adrannau 6 a 9) Adran 5(1)	Adran 5(1)(a) DS. yn cael ei gynnwys yn y manylion cofrestru	Adran 5(1)(a) DS. yn cael ei gynnwys yn y manylion cofrestru	Adran 5(2) Enghraifft		Misoly SOR/2008-116 (Adrannau 6 a 9)
Iwerddon (cofrestr statudol) Sef. 2015	Adran 5(2)	Adran 5(1)	Adran 6(1)	Adran 6(1e)	Adran 6(1 b)	Adran 5(4)	Adran 5(4)	Adran 5(4)	Adran 12 Enghraifft		Bob pedwar mis (Adrannau 7 a 12)
Yr Alban (cofrestr statudol) Sef. 2016	Adran 1	Adran 1	Adran 1(1)(a)(1)	Adran 1(1)(a)(1)	Adran 1(1)(a)(1)	Adran 1 gan gynnwys fideo-gynadled da			Adran 6 Enghraifft		Bob dwy flynedd (Adran 11)
San Steffan (cofrestr statudol) Sef. 2014		Adran 2	Adran 2(3)	Gellir ei gyflwyno trwy S.I.		Adran 2(3)	Adran 2(3)	Adran 2(3)	Adran 5 Enghraifft		Chwarterol (Adran 5)
San Steffan (côd gweinidogol)									Enghraifft		Chwarterol (Para 8.14) DS yn amodol ar y grid
Cymru (côd gweinidogol)		Mae Adran (3.7) yn datgan na ddylai Gweinidogi on gyfarfod yn ffurfiol â sefydliadau materion cyhoeddus proffesiynol .							Mae Adran 3 (2) yn datgan y "dylid cofnodi rhesymau dros y cyfarfod". Ond nid yw hyn yn digwydd yn ymarferol.		Chwarterol DS heb ei gynnwys yn y cod gweinidogol

THE STANDARDS OF CONDUCT COMMITTEE'S INQUIRY INTO LOBBYING

Written evidence submitted by Transparency International UK to the Standards of Conduct Committee, June 2022

EXECUTIVE SUMMARY

Transparency International UK is one of the UK's leading anti-corruption organisations. We carry out research into corruption in the UK, with the goal of upholding integrity in public life and protecting the public's resources. As part of this work, we look into issues around lobbying. For example, in 2015 we published our report 'Accountable Influence: Bringing lobbying out of the shadows' which featured our UK-wide research into lobbying.⁹

In our 2015 report we made two recommendations around lobbying transparency in Wales, that the Welsh Government should consult on introducing a statutory register of lobbyists covering those engaging with the Welsh Government and Senedd and that they should publish the details of meetings between Ministers and external organisations in a timely manner, as machine readable open data. Since then, both of these recommendations have seen significant progress but there is still room for improvement. This submission analyses these improvements and what more there is to be done.

A STATUTORY REGISTER OF LOBBYISTS

When conducted ethically and transparently, lobbying can help to inform and strengthen the democratic process. It is a way for governments and legislatures to understand and engage with those potentially affected by their decisions; this could include charities, private companies and professional associations. However, when lobbying happens behind closed doors and is limited to a narrow group of stakeholders, this process can be abused by those looking to further private interests.

Transparency International UK believes that in order to mitigate against any wrongdoing, lobbying should be open, transparent and ethical and that any regulatory response should also be proportionate, fit for purpose and not impede participation.

As a course of best practice, we support the introduction of comprehensive statutory lobbying registers that include in-house as well as multi-client and consultant lobbyists. Statutory registers are the most effective way to create the right incentives for appropriate behaviour and the sanctioning power to prevent abuses.

The purpose of such a register should be to reveal information about:

- who is being lobbied,
- the purpose of the lobbying (for example, the policy, issue or area of spending being targeted),
- the form of engagement (for example, meetings, phone calls, emails etc.), and
- an estimate of how much is spent on this activity.

In January 2018, when the Standards of Conduct Committee released their report into lobbying, they didn't receive conclusive evidence to support a statutory lobbying register.¹⁰ Some were in favour of it in order to prevent against future scandals and misuse of the system and others argued that it would be like a "sledgehammer to crack a nut".

⁹Transparency International UK, *Accountable Influence: Bringing lobbying out of the shadows* (September 2015) <https://transparency.org.uk/publications/accountable-influence-bringing-lobbying-out-shadows>

¹⁰Standards of Conduct Committee, *Lobbying*, (January 2018) <https://business.senedd.wales/documents/s70855/Committee%20Report%20-%202011%20January%202018.pdf>

If the Senedd wants to be in keeping with other, similar, democratic legislatures, and follow best practice, then a statutory register appears to be the right option. A comparison table of lobbying systems is included in Appendix 1.

However, Transparency International UK also recognises the experiences of the Scottish statutory lobbying register and that the Public Audit and Post Legislative Scrutiny Committee, in their 2021 report, were unable to ascertain if their statutory lobbying register had the desired impact of increasing the transparency of lobbying in Scotland.¹¹ This could be because of the degree of accessibility of the register and the Committee did state that they “recognise that the Act has introduced greater transparency of certain lobbying activity in Scotland in that incidence of face-to-face communications must now be recorded in a public register”.¹²

Evidence from the Department of Public Expenditure and Reform’s review into the Irish ‘Regulation of Lobbying Act 2015’ found that the introduction of a statutory register did not have a ‘chilling effect’ on lobbying attempts and that the act did not “inhibit any necessary lobbying activities”.¹³ This suggests that a statutory lobbying register did not create barriers to democratic participation in the Irish context.

Recommendation: In line with best practice, the Senedd should continue to consider the option of introducing a statutory register of lobbyists.

THE PUBLICATION OF MEETINGS BETWEEN MINISTERS AND EXTERNAL ORGANISATIONS

Since our 2015 report ‘Accountable Influence’ the Senedd, as per section 3(7) of the ministerial code, has begun to publish transparency data on meetings and engagements between Ministers and external organisations.¹⁴ This is a welcome step.

When data is published about lobbying meetings, we recommend that this data is: accurate, accessible and meaningful. Looking at the most recent transparency release of data of meetings held by ministers between January 2022 and March 2022, we analyse how far the Welsh data meets these standards.

Accurate

The data should be as precise as possible and contain complete records. It is positive to see that the meetings and engagements are categorised by type. However, there seems to be a discrepancy in the level of detail that is disclosed in the data. In the quarter between January 2022 and March 2022, the First Minister had 35 interviews, but unlike data from other Ministers, there was no description of who these interviews were with. In previous quarters, the First Minister’s description just says ‘Media’. All ministers should describe who their interviews are with.

Additionally, there is a variation in the detail of who a minister meets and engages with, with some describing the organisation only and others describing the organisation and the individual that they met. As standard, Ministers should publish both which organisation they met or engaged with, and the individual who attended.

¹¹ Public Audit and Post Legislative Scrutiny Committee, *Post-Legislative Scrutiny: The Lobbying (Scotland) Act 2016* p 7-9 (March 2021) <https://sp-bpr-en-prod-cdnep.azureedge.net/published/PAPLS/2021/3/22/79252553-8fd1-49af-acc0-66899fb52338/PAPLSS052021R3.pdf>

¹² Ibid, p 15

¹³ Department of Public Expenditure and Reform, *Second Statutory Review of the Regulation of Lobbying Act 2015*, (February 2020), <https://www.gov.ie/en/publication/7ef279-second-statutory-review-of-the-regulation-of-lobbying-act-2015/> p14

¹⁴ Welsh Government, *Ministerial Code* (August 2021), <https://gov.wales/ministerial-code-html>

Accessible

The data should be published in a timely manner and as machine readable, open data. The data is published in CSV format, which is an accessible format, and the data for all Ministers is able to be downloaded, unlike the Westminster system whereby each department publishes a separate release. However, ideally, anyone would be able to access all past quarters in one download, so that they might be able to conduct historical analysis across quarters or even years.

Meaningful

The data should contain enough relevant detail to help the public gain meaningful insights. Unfortunately, the releases don't contain an engagement description or the purpose of the lobbying. The ministerial code does seem to require such a description, as section 3.7 states "the reasons for the meeting. should be recorded".¹⁵ In the Westminster ministerial meetings data, whilst there is still much to be desired in the level of detail of these purpose descriptions, they give a basic insight into what a meeting is about. For example, one of the most used meeting descriptions of the last, published quarter was "Meeting to discuss the Integrated Rail Plan".¹⁶ A short description, which avoids phrases like 'general meeting' or 'introductory meeting' of the purpose should be required for all meetings or engagements.

Recommendation: Improvements should be made to ensure the data on ministerial meetings and engagements are as accurate, accessible and meaningful as possible.

ABOUT TRANSPARENCY INTERNATIONAL UK

Transparency International (TI) is the world's leading non-governmental anti-corruption organisation. With more than 100 chapters worldwide, TI has extensive global expertise and understanding of corruption.

Transparency International UK (TI-UK) is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK. We are independent, non-political, and base our advocacy on robust research.

¹⁵ Welsh Government, *Ministerial Code* (August 2021), <https://gov.wales/ministerial-code-html>

¹⁶ The quarter was October- December 2021.

Annex 1: Lobbying Registers: An International Comparison

	Nearest to best practice
	In-between
	Furthest from best practice

Country	Scope: Lobbyists		Scope: Public officials		Form of communication				Reporting		
	In-house	Consultant	Executive	Special advisors	Legislators	Face-to-face	Written	Oral (remote)	Purpose of lobbying	Spending	Reporting period
US (statutory register) Est. 1946	SEC 3(7) 2 USC 1602	SEC 3(9) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(3) 2 USC 1602	SEC 3(4) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 3(8) 2 USC 1602	SEC 5 2 USC 1604 Example		Quarterly
Canada (statutory register) Est. 1989	Section 7	Section 5	Section 2(1)	Section 2(1)	Section 2(1)	SOR/2008-116 (Sections 6 and 9) Section 5(1)(a)	Section 5(1)(a) NB. is included in registration details	Section 5(1)(a) NB. is included in registration details	Section 5(2) Example		Monthly SOR/2008-116 (Sections 6 and 9)
Ireland (statutory register) Est. 2015	Section 5(2)	Section 5(1)	Section 6(1)(a)	Section 6(1)(e)	Section 6(1)(b)	Section 5(4)	Section 5(4)	Section 5(4)	Section 12 Example		Every four months (Sections 7 and 12)
Scotland (statutory register) Est. 2016	Section 1	Section 1	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1(1)(a)(1)	Section 1 incl. video conferencing			Section 6 Example		Biannually (Section 11)
Westminster (statutory register) Est. 2014		Section 2	Section 2(3)	Can be introduced via S.I.		Section 2(3)	Section 2(3)	Section 2(3)	Section 2 Example		Quarterly (Section 5)
Westminster (ministerial code)									Example		Quarterly (Para 8.14) NB subject to the grid
Wales (ministerial code)		Section 3(7) states that Ministers should not formally meet with professional public affairs organisations.							Section 3(7) states that "the reasons for the meeting" should be recorded. But this does not happen in practice.		Quarterly NB not enshrined in the ministerial code

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