

Updating the ministerial code



About this report

Repeated controversies over ministerial behaviour and failures in the process of investigating possible breaches of the ministerial code show that the code, in its current form, is no longer working. This paper offers the Institute for Government's recommendations on how the prime minister should overhaul the ministerial code to better reflect the complexities of modern government and restore public confidence in his administration.

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Summary

The prime minister needs to overhaul the ministerial code. That code sets out the standards of behaviour to which ministers are expected to adhere. But repeated controversies about ministerial behaviour and failures in the process of investigating possible breaches – or in applying sanctions when a breach has occurred – show that the existing code and the system that upholds it is no longer working. Boris Johnson has said he wants to uphold the highest standards in government: he needs to seize this chance to show he means it.

The fallout from Matt Hancock's resignation as health secretary has once again raised serious questions about how well the ministerial code is working and whether it provides sufficient protection against ministerial misbehaviour. How and why Gina Coladangelo was first appointed as an adviser and then a non-executive director in the Department of Health and Social Care, the apparent conflicts of interest even before any romantic relationship started and the wider reports of Hancock's use of a personal email account are all controversies the ministerial code should have guarded against.

The controversies do not stop at the health department. During this government we have seen the prime minister's independent adviser on ministerial interests resign when Johnson disagreed with his assessment that the home secretary, Priti Patel, had breached the code in her behaviour towards civil servants. The communities secretary, Robert Jenrick, was not even investigated over his handling of planning decisions in favour of a housing development by a Conservative Party donor. And the prime minister himself has been accused of failing to live up to the code, including by being unable to explain definitively who had first paid for the refurbishment of the No.11 Downing Street flat.¹

The ministerial code matters because the behaviour of ministers in their job matters. It is part of the patchwork of rules and conventions that govern politicians' behaviour when holding high office. The Cabinet Manual sets out more detail on particular processes of government while, as MPs or peers, ministers are also subject to the codes of conduct for members of the Commons and the Lords. But the ministerial code is the definitive rulebook on the standards they must operate under and the rules around their conduct.

The current ministerial code has several fundamental flaws. It has no permanent constitutional status, which means it can be disregarded. The independent adviser tasked with investigating potential breaches of the code is not actually that independent, as they are unable to act without the prime minister's permission. And the code's content urgently needs updating: it has no explanation of what sanctions might be applied to different breaches, for example, and lacks clarity over how ministers should respond to lobbying – the subject of another recent scandal surrounding the conduct of a recent Conservative prime minister. It contains only minimal guidance on how ministers should use social media.

The ministerial code alone will never be enough to ensure proper behaviour in government. It cannot dictate every aspect of ministerial behaviour. As such it must be accompanied by a culture of good government and a desire among ministers to maintain high standards in public office. Given that ministers are appointed by the prime minister, whose duty it is to hold them to account for their behaviour in office, it is essential that the prime minister leads from the front and establishes a culture of propriety.

In both the version of the ministerial code Johnson issued on becoming prime minister, and in his more recent 'Declaration on Government Reform', he has claimed that he expects high standards in government.² But he has not acted in a way that matches his rhetoric. His dealings with ministers accused of misbehaviour show that he is willing to sacrifice those high standards in return for short-term political benefit. By calling on Conservative MPs to "form a square around the Pritster [Patel]",³ and by saying he "considered the matter closed" when the news of Hancock's breach of Covid rules broke,⁴ Johnson undermined the code.⁵

When he appointed Lord Geidt as his new independent adviser on ministerial interests, Johnson committed himself to publishing a new version of the ministerial code "in due course".⁶ He should now take the opportunity for a more fundamental refresh of the code – one that strengthens how potential breaches are investigated and clarifies what sanctions should be applied should a breach be found. He should give it the degree of permanence that both the civil service and special adviser codes have by enshrining its existence and general principles in statute.

Other governments' ministerial codes provide lessons for the UK

The constitutional status of the ministerial code – or lack of it – is a classic example of how the British constitution operates. Since it was first published as 'Questions of Procedure for Ministers' under John Major in 1992, it has been reissued by convention by every prime minister and has remained fairly consistent in content. It reflects the constitutional, legal, ethical and political expectations that have long existed around ministerial roles. But while it has become the authoritative guide to these rules and conventions, it has no formal constitutional status.

The UK is not alone in using a ministerial code in this way. Other countries, as well as the UK's devolved governments, have similar documents – some having taken the UK code as their starting point. All have faced questions about what rules such codes should address and how they should be enforced. But the way they have since evolved shows that the UK risks falling behind in how the code is upheld and the types of issues the code should cover.

Table 1 **Length and status of ministerial codes**

Government	Name	Number of subsections	Statutory?
UK	Ministerial code	149	No
Northern Ireland	Ministerial code	45	Yes
Scotland	Ministerial code	232	No
Wales	Ministerial code	166	No
Australia	Statement of ministerial standards	52	No
Canada	Open and accountable government	95	Partially
New Zealand	Chapters within the Cabinet Manual	331 (of 840 total)	No

One of the most important lessons the UK can take from other countries is about what the code should cover. As the different lengths of the codes show, there is no standard set of provisions – like many constitutional documents they accrue new sections over time. Many go into more detail on particular processes of government that in the UK are dealt with in the Cabinet Manual. For example, the UK ministerial code deals only briefly with collective decision making, leaving much to the discretion of the prime minister. All the other codes, apart from Australia’s, set out more detail on how this process should work.

Some go into greater detail, or prohibit behaviour not covered at all in the UK’s code. The Scottish code, for example, states that ministers must follow international law, a requirement that David Cameron removed from the UK code in 2015.⁷ And the Australian and New Zealand codes ban ministers from having relationships with their staff, something currently not covered in the UK’s – though Johnson may decide to add a similar provision given the circumstances surrounding Hancock’s resignation.

Other countries also go further than the UK in upholding their codes. In Canada, an independent commissioner can investigate potential conflicts of interests; in Northern Ireland the commissioner for standards in the assembly can also investigate potential breaches of the code without needing to be asked to do so by the first minister.

It is right for the UK’s code to take into account each prime minister’s priorities for their government. It needs to be usable, not overlong and unwieldy. But comparison with other codes reinforces the argument that the prime minister should, as he prepares to update the code, take a much deeper look at what the gaps are in the current UK code, and why confidence in how it operates has declined in recent years.

Table 2 **Provisions in ministerial codes**

Type	Provision	UK	NI	Scot	Wal	Aus	Can	NZ
Standards	Must follow international law	✗	✗	✓	✓	✗	✗	✗
	Relationships with staff prohibited	✗	✗	✗	✗	✓	✗	✓
	Section on ministerial wellbeing	✗	✗	✗	✓	✗	✗	✗
	Restrictions on social media use	✓	✗	✓	✓	✗	✓	✗
Enforcement	PM/FM discretion in hiring and firing	✓	✗	✓	✓	✓	✓	✓
	Independent adviser investigates potential breaches	✓	✓	✓	✗	✗	✗	✗
	Misleading parliament means resignation	✓	✗	✓	✓	✗	✗	✗
Processes of government	Meetings with lobbyists must be recorded	✗	✓	✓	✗	✗	✗	✗
	Detail of collective responsibility process	✗	✓	✓	✓	✗	✓	✓

Note: Some aspects of the rules for ministers in Northern Ireland are from the Functioning of Government Act 2021. Wales does not have rules for registering meetings for lobbyists as formal meetings with lobbyists are prohibited.

Recommendations

This paper proposes changes to how the UK ministerial code is enforced and what it says. To judge how effectively, if at all, these are implemented we have designed four 'tests' we think the next update of the code needs to pass if it is to restore confidence in the government's approach to standards.

Overhauling and strengthening the code

- The existence of the ministerial code and the principles it contains, as well as the existence and role of the independent adviser, should be put into statute.
- The prime minister should expand and strengthen the role of the independent adviser, currently Lord Geidt.
 - The adviser should be able to start his own investigations, and publish the findings
 - The adviser should be able to propose changes to the code

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- The staff supporting the adviser should be fully independent from ministerial oversight
 - The prime minister should ensure the adviser's term in office is secure.
 - The new code should explain that a range of sanctions are available for breaches, and should set out some.
 - Ministers should have to publicly commit to abide by the code, to reinforce its importance.
 - The code should better distinguish between expected standards of behaviour and the current processes of government that should be followed, such as who can attend cabinet committees. This would make the code easier to understand and uphold.
 - The code also needs to be updated to respond to new concerns ranging from social media use to the accountability of advisers.
 - Ministers should not use personal phones for government business
 - The government should be more transparent about whom ministers meet
 - The code should expand and clarify rules on social media use
 - The code should update the rules on accountability for special advisers
 - More explicit guidance on relationships in government may be needed.

Our four tests

Once the new version of the code is published, we will review whether it has met these recommendations by considering it against these four tests:

- Does the new code have strong enough constitutional status to ensure it cannot be ignored and commands the confidence of the public?
- Does the independent adviser have the ability to investigate potential breaches of the code, and publish their findings, without the prime minister's permission?
- Does the new code help ministers distinguish between standards they are expected to uphold, and processes for government they are expected to follow?
- Does the new code provide clarity about the kinds of sanctions that will apply to any breaches?

Upholding the ministerial code

Whatever the rules say, they need to be properly enforced to be of value. To show that he takes the ministerial code seriously, the prime minister should first tackle how the code is upheld and enforced. That means securing its existence in statute, and that of the independent adviser; empowering the adviser to properly investigate allegations of poor behaviour; and being clearer about the sanctions that result from breaching the code.

The ministerial code should be given stronger constitutional status

Both the codes of conduct for civil servants and for special advisers are required to be published by the prime minister (in his capacity as minister for the civil service) as part of the Constitutional Reform and Governance Act 2010 (CRA).⁸ There is nothing similar that says that he must also publish a ministerial code, or what it should cover.

This is becoming untenable. Resistance to putting the ministerial code on a statutory footing in part stems from similar concerns to those that preceded the inclusion of codes for special advisers and civil servants in CRA. Before that Act, there were years of debate about whether to legislate for the existence of the civil service and the standards expected of those who work in it – opponents considered that legislation would be merely “declaratory” and that the legislation could lead to “inflexibility” in the management of the civil service.⁹

In the end, though, while the actual legislation that resulted was not long, it plays an important role. The section of the Act on special advisers includes some of the provisions that must be included in that code, while the section on civil servants simply says that there must be a code, that it must require civil servants to adhere to the civil service principles of integrity, honesty, objectivity and impartiality and that it must form part of the employment conditions for officials.¹⁰ But even this limited provision is now seen as an important protection in embedding conventions that have long existed.

The different legal status of the ministerial code weakens it. The content and enforcement of the code are totally within the gift of the prime minister – they could choose to fundamentally change it, ignore it or abolish it altogether. Legislating for the requirement to have a code and the role of the independent adviser would give greater reassurance that ministers are just as accountable for their personal behaviour as the officials and special advisers that serve them. This would underpin an independent system for upholding the standards expected of ministers.

At the same time, the prime minister’s ability to choose who serves in the government is of fundamental constitutional importance. It is right that prime ministers should set out the way they want their government to operate. It is ultimately their decision whether to sack a minister. But the code also contains deeper constitutional and legal expectations regarding the role of ministers: that ministers use the powers of

government appropriately, follow standards of behaviour expected from anyone in public office, and respect the limitations of how government resources are used. These principles should be a guide for all in government, regardless of the extent to which an individual prime minister values them.

Boris Johnson may be reluctant to establish the principle of having a ministerial code in law in case it opens up the actions of his ministers, or the code itself, to judicial review – something his administration has long battled against.¹¹ This is misguided. His government already faces a judicial review into decisions under the ministerial code in its current form. The FDA Union, which represents senior civil servants, is bringing a judicial review into Johnson’s decision to disregard the findings of Sir Alex Allan’s 2019 investigation into the conduct of Priti Patel, which concluded that the home secretary had bullied staff.¹² If the legislation is properly drafted the scope of the courts to intervene would not be substantially increased, but the principle of the code and the importance of ministers abiding by it would be reinforced.

The legislation should be tight and focused, setting out simply that there should be a ministerial code, that it should require ministers to abide by the ‘seven principles of public life’ (as the Localism Act 2011 requires staff and members of local councils to do) and that there should be an independent adviser on ministerial interests with appropriate powers to help the prime minister uphold the code (as we discuss below). This will ensure that the core tenets of the code are maintained and enforced, while allowing the prime minister sufficient leeway to alter the code as they see fit and maintaining their right to hire and fire ministers.

There is precedent for ministerial codes to be based in law. The strongest example is in Northern Ireland, where the Northern Ireland Act 1998, as amended by the Northern Ireland (St Andrews Agreement) Acts 2006 and 2007,¹³ states that there must be a ministerial code; that it must have certain provisions; and that it can be changed only by cross-community agreement in the assembly. More recently, the Functioning of Government Act 2021 set out further rules for ministerial conduct in Northern Ireland – particularly around lobbying – and empowered the commissioner for standards in the assembly to investigate potential breaches of the code when asked to do so by ministers or assembly members, or when they believe the code may have been breached.¹⁴

The prime minister should expand the role of the independent adviser

Though the ultimate arbiter of the code, the prime minister does not act alone in judging whether ministers have breached its provisions. He can ask the cabinet secretary to investigate potential breaches, and is also advised by his (so-called) independent adviser on ministerial interests. This post was created by Tony Blair in 2006 and has been occupied continuously since, apart from between November 2020 and April 2021.

The adviser supports ministers in complying with their obligation to declare their personal interests. They can also investigate potential breaches of the ministerial code – though, crucially, only if requested to do so by the prime minister. Despite the title, therefore, the adviser is not fully ‘independent’.

When the current adviser on ministerial interests, Lord Geidt, was appointed he noted that the prime minister had agreed to “stiffen the degree of independence of the post”.¹⁵ In the end this increased independence turned out to be a provision that the adviser would be able to suggest to the prime minister that they undertake an investigation, and that they would be able to “require” that any findings be published “in a timely manner”. While welcome, these are limited changes that do not make the adviser truly independent.

The prime minister’s position as ultimate enforcer of the code should not change. Alternatives include asking parliament to enforce the code or appointing an independent adviser or commissioner who could both not only launch fully independent investigations into potential breaches but also enforce sanctions. The former would probably result in decisions shaped more by the government’s majority and party politics than by the facts of the case; indeed, the difficulty for MPs of adjudicating on the actions of their peers was the reason the Commons recently concluded MPs should have no involvement in decisions on bullying and harassment cases.

Conversely, a single, independent figure who could in effect sack ministers (or more likely, apply other less severe sanctions) would break the direct link between the prime minister and the rest of the government, and hand a huge amount of power to an unelected individual. Though if the code continued to be poorly adhered to even with an independent adviser properly able to investigate breaches, the question of whether an external body would need to more formally regulate ministers should be reconsidered.

The adviser should be able to start their own investigations, and publish the findings

Ahead of Lord Geidt’s appointment, the chair of the Committee on Standards in Public Life, Lord Evans, wrote to the prime minister to recommend that the new adviser should be able to start investigations into ministerial conduct independently, without needing to be asked to do so by the prime minister.¹⁶ Johnson declined to do this, arguing that he “would not wish to abrogate the ultimate responsibility for deciding on an investigation into allegations concerning ministerial conduct. That vital responsibility is quite properly mine alone.”¹⁷

As the person who appoints ministers, it is right that the prime minister retains their unique ability to decide whether a minister continues to serve in government. But giving the adviser the ability to begin their own investigations would not take away the prime minister’s role as ultimate judge of ministerial standards. What it would do, however, is show that these investigations are not simply driven by political interest,

and stop accusations that the prime minister is 'marking his own homework'. With growing criticism that there is one rule for ministers and another for everyone else, this would be as much in the prime minister's interest as the public's.

Sir Alex Allan told a UCL Constitution Unit event on the topic in May that such an arrangement would make the advice of the adviser "more credible".¹⁸ His successor, a month after taking the role, told the Public Administration and Constitutional Affairs Committee (PACAC) that he had agreed with the prime minister that he could suggest "further variations to the current terms of reference" of his role after he had gained some experience in it.¹⁹ He should argue, and the prime minister should accept, that only by having the ability to initiate his own investigations will the adviser's role be properly independent.

There is a question of whether giving the adviser this power would mean they would be inundated with vexatious complaints about ministerial behaviour, from opposition parties or others; the Cabinet Office and the Committee on Standards in Public Life often receive letters complaining about ministerial behaviour. The adviser would need to be able to assess the merits of any complaint and set out publicly when they do not believe it requires a full investigation. This may open the adviser up to criticism but if they are to be truly independent they should be empowered to investigate, or decide not to.

This would bring the UK system into line with some other jurisdictions. In Canada ministers are subject to the Conflicts of Interest Act, which is enforced by the conflict of interest and ethics commissioner.* The commissioner, currently Mario Dion, can assess complaints brought against ministers by members of the Canadian House of Commons or Senate, or at his own initiative. If he finds that a minister has breached the act, he can impose a – symbolic rather than punitive – fine of up to \$500 (around £290).²⁰

In May 2021, Dion investigated Bill Morneau, finance minister from 2015 to 2020. He found that Morneau gave a charity headquartered in his constituency "preferential treatment by permitting his ministerial staff to disproportionately assist it when it sought federal funding".²¹ Morneau had already stepped down from government to run for OECD secretary general by the time the investigation concluded.²² In September 2020, Dion also considered complaints brought against a deputy minister but found that there was "no reason to believe that the subject may have contravened the Act" and therefore decided not to open a full investigation.²³

Following the passage of the Functioning of Government Act earlier in 2021, the commissioner for standards in the Northern Ireland assembly is now also responsible for enforcing the ministerial code in Northern Ireland. The commissioner, Dr Melissa McCullough, can initiate her own investigations if someone makes a complaint against a minister or if she believes that either the code of conduct for members of the assembly or the ministerial code has been breached. Under the terms of the Act,

* Other aspects of Canada's 'Open and Accountable Government' are effectively enforced by the prime minister, although there has not been a major test of this.

she can also decide not to investigate a complaint if she believes it is “frivolous or vexatious or otherwise an abuse of the complaints process”. This is an important caveat that the UK government should replicate when expanding the remit of the independent adviser.

The Canadian and Northern Irish examples show how giving advisers on standards a statutory underpinning can work. In neither instance has the responsibility of the prime or first minister for upholding high standards in their government been diluted, but in both the legal underpinning indicates that standards are taken seriously. The ability to publish detailed accounts of their investigations – and to choose not to investigate allegations if they deem them to be without merit – also reinforces the public’s perception of the post-holder’s independence and allows for clear judgments on what has happened in particular circumstances. Johnson should follow these examples.

The adviser should be able to propose changes to the code

Lord Geidt explained to PACAC that when he was appointed he had agreed with the prime minister that he could suggest further changes to the remit of his role after he had gained some experience in it. This is important and welcome – hopefully Lord Geidt will be confident enough to propose changes, and the prime minister will be wise enough to accept them.

But Lord Geidt should also be able to propose changes to the ministerial code itself, drawing on his experience in supporting ministers to comply with it. As he spends more time in the role, Lord Geidt will see where changes need to be made and can advise the prime minister accordingly so that updates are not just made when ministers do something wrong that is not yet covered by the code. If the prime minister decides not to accept Lord Geidt’s advice on changes to the code, he should have to explain his reasons for this to parliament.

Appointing staff to support the adviser is welcome, but the structure can be given greater independence

Given this expansion of the role of the independent adviser that we are proposing, it is right that they should have a proper team to support them. This is already at least partly in place. When Lord Geidt was appointed the prime minister agreed that he would be supported by a team of civil servants who “will not report to Cabinet Office ministers”.²⁴ This is a good move and should be made permanent. The role will not need a large team of officials, but a permanent staff, even on secondment, will help it operate more effectively.

The Cabinet Office’s propriety and ethics team have provided much of this support for previous independent advisers in their role of advising ministers on the ministerial code, investigating breaches, dealing with complaints and concerns about ministers, and advising the cabinet secretary (and, ultimately, the prime minister). But a permanent team of officials, who work solely for the adviser, will bolster confidence in their ability to work fully independently.

This is particularly important so that officials have a route to raise concerns about ministers' behaviour without going via their own ministers or permanent secretary. The current system requires officials to talk to their own line managers, who then escalate things as necessary, meaning the departmental permanent secretary is ultimately responsible for resolving the issue. Given the permanent secretary relies, informally, on the secretary of state's patronage and support to remain in their job, they may find it difficult to tackle allegations of poor behaviour by that same minister.

A more discreet route via which to raise complaints about a minister's behaviour, that would not place the complainant or their permanent secretary in a difficult position, would be an improvement. A similar mechanism has been introduced in parliament to raise concerns over MPs' behaviour, so staff who want to raise a complaint can do so without involving that specific MP.

The prime minister should ensure the adviser's term in office is secure

On appointing Lord Geidt, the prime minister explained that he had agreed that he would take on the role for a five-year, non-renewable term. This should help encourage Lord Geidt's independence – he does not need to worry about keeping the prime minister happy to secure reappointment. To further strengthen his position, his dismissal should be allowed only if approved by a relevant select committee, probably PACAC. This is the arrangement for the head of the OBR.²⁵

The new code should explain that a range of sanctions are available for breaches

The ministerial code sets out only one sanction for a specific breach: "ministers who knowingly mislead parliament will be expected to offer their resignation to the prime minister". Other than this, it does not set out any sanctions explicitly, stating only that the prime minister is the judge of "the appropriate consequences of a breach".

The code's silence on possible sanctions means that, in recent times, an expectation has developed, at least among some outside government, that ministers found to have broken the code in any way will resign from their post. However, when Matt Hancock was found to have breached the code by not declaring that a company owned by his sister, and in which he was a shareholder, had been awarded a 'framework contract' by the NHS,²⁶ Lord Geidt ruled that this was a "minor"²⁷ breach of the code, and Johnson decided not to pursue the matter any further.²⁸ Labour called this outcome "ridiculous", with deputy leader Angela Rayner arguing: "This precedent of a cabinet minister being found by an independent investigation to have broken the ministerial code and then not resigning sends a very clear message that the rules don't apply to cabinet ministers."²⁹

But it is right that not all breaches should result in resignation. There are precedents for this. In 2012 Baroness Warsi, then minister without portfolio in David Cameron's government, was found to have breached the ministerial code because she did not declare certain business relationships, including with a businessman who helped organise part of a visit to Pakistan. Sir Alex Allan, still in post as independent adviser

at the time, said that he believed “the breach of the code was a minor one, and that Baroness Warsi did not use her office for personal financial gain”.³⁰ Cameron accepted an apology from Baroness Warsi and she remained a minister.

Various sanctions have always been possible, but this is not widely known. This leads to public and opposition calls for resignations whenever any minister is *accused* of breaking the code, let alone when they are found to have done so. Addressing this by setting out that other sanctions are available will create a less febrile approach to the code. This will help the minister in question, the independent adviser or anyone else tasked by the prime minister to investigate, and the prime minister. If it is made clearer that a breach of the code does not mean that the prime minister automatically loses a member of their team, they will be better able to assess the case on its details.

To achieve this the updated code should state explicitly that a range of sanctions, including among others a written apology, a fine and, ultimately, resignation may apply to breaches. The Committee on Standards in Public Life has also called for this.³¹ It also has precedent elsewhere. The House of Commons Committee on Standards has recently called for a wider range of sanctions to be available if an MP is found to have broken the Code of Conduct for MPs, ranging from private resolution of the complaint with the complainant, through a public apology, a requirement to attend training, to a fine, and, finally, suspension. More serious sanctions like suspension can be imposed only with the agreement of the whole House of Commons.

Suspending ministers would be tantamount to requiring their resignation, but fines or public apologies, either in writing or to parliament, or having their breach investigated and the key findings published, would be strong deterrents. In any case, the model of a range of penalties is helpful, with resignation still an important sanction when a minister has committed a serious breach or lost the confidence of the prime minister. When he appointed Lord Geidt, the prime minister agreed that his new adviser would be able to recommend “the appropriate sanction” when a minister has breached the code.³² The prime minister should make this part of the adviser’s role clear in the next edition of the ministerial code.

The prime minister does not need to set out which sanctions would apply to specific breaches but setting out the range of likely consequences would be helpful. But a formal system of sanctions that are proportionate to the breach will work only if the prime minister enforces it properly. The public will continue to lose confidence if serious breaches of the code lead only to ministers writing quick, insincere letters of apology.

Ministers should have to publicly commit to abiding by the code

The ministerial code states clearly that “ministers are personally responsible for deciding how to act and conduct themselves in the light of the code” and “It is not the role of the Cabinet Secretary or other officials to enforce the code”.³³ When a minister is first appointed, officials from the Cabinet Office and/or their private office explain the main points of the ministerial code to them. The head of propriety and ethics in the Cabinet Office writes to each minister setting out the terms of the code, and ministers respond to these letters saying that they commit to upholding the code.

This now feels insufficient. Given so much of the system relies on good behaviour, it is important that ministers commit to upholding the standards expected of them. To put pressure on ministers to show that they mean what they say, the letters they write committing to abide by the code should be published on their departmental websites.

Updating what the ministerial code says

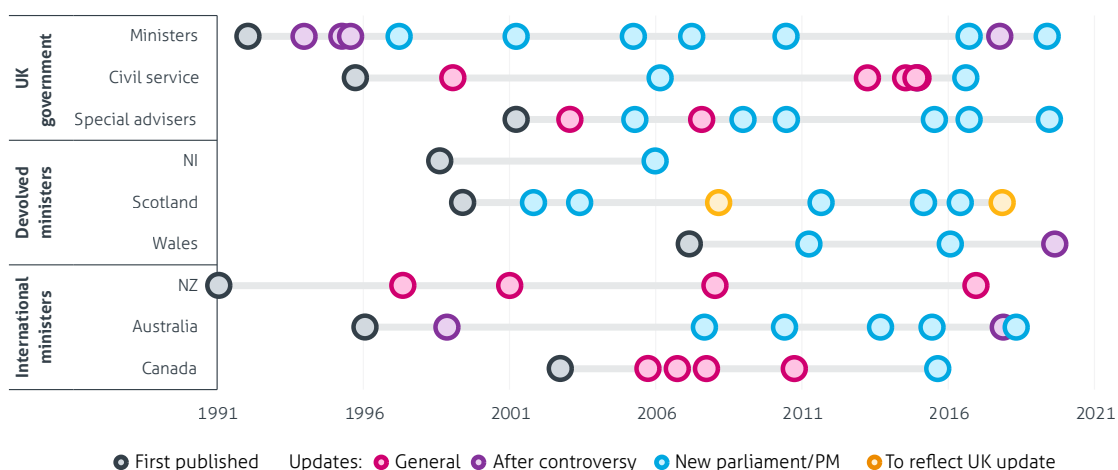
As well as changing the status of the code and expanding the powers of his adviser to properly uphold it, the prime minister should make sure the next version of the code is rewritten so that it better helps ministers guide their conduct. This would be an improvement on the current version, and help avoid controversies such as those seen in the Johnson government to date.

The ministerial code tends to be reissued and sometimes updated or revised in limited ways whenever a new prime minister takes office, the most recent version having been published by Boris Johnson in August 2019. It has sometimes been updated when there is a controversy around ministerial behaviour. But these changes tend to be limited to specific provisions and limited redrafting.

Theresa May made several such changes, responding to scandals surrounding her defence secretary, Michael Fallon, and international development secretary, Priti Patel. Fallon faced allegations of inappropriate behaviour towards women, and Patel held undeclared meetings with officials in Israel.³⁴ May's reissued code expressly prohibited harassment, bullying or any other inappropriate or discriminatory behaviour, and clarified the rules on ministers meeting officials when on trips abroad.

Other countries have updated their ministerial codes after particular incidents or scandals that have highlighted deficiencies. The Australian code was updated to ban relationships between ministers and their staff following the revelation that deputy prime minister Barnaby Joyce had a secret relationship with one of his staffers.³⁵ And in Wales the ministerial code was amended in November 2019 to include a section on "Ministers and their wellbeing", following the death of former minister Carl Sargeant.³⁶

Figure 1 **Updates to ministerial, civil service and special adviser codes of conduct across governments**



Source: Institute for Government analysis of GOV.UK, parliament.uk, dpmc.gov.nz, pmc.gov.au and pm.gc.ca.

While specific changes are needed to the code to respond to recent events, another set of piecemeal updates will not, on its own, be enough to fix the deficiencies in the code that have been exposed. A more thorough overhaul is needed to ensure that the code is clear and firm enough on what is expected of ministers. This will mean that they, and those of us outside government, can understand their responsibilities in office – and that they can be better held to account for their actions.

The code should better distinguish between standards and processes

The ministerial code serves two purposes. First, it sets the expected standards of behaviour for ministers: what they should avoid doing and how they should act in government. Second, it establishes many of the processes of government, including the functioning of cabinet committees, the write-round process and how cover should be arranged when ministers are not in London.

Its format reflects its origins as 'Questions of Procedure for Ministers' and early versions of the document were initially focused on process, with sections on standards being added over time.³⁷ The document currently contains 129 subsections. Of those, 35 deal with standards of behaviour, such as a requirement for ministers to be professional when dealing with civil servants, and 94 set out processes of government, such as when policy discussions should be taken to a cabinet committee for a decision. But these are not clearly separated and defined. This makes it harder for ministers to abide by the code and, as noted, leads to those outside government calling for ministerial resignations for relatively minor breaches.³⁸

The new code should clearly distinguish between the two sets of instructions. This would help justify that a range of sanctions apply to breaches of the code, dependent on the type of breach (already the case in practice, but should be formalised). Generally, a breach of standards should attract a more severe sanction than a breach of process – not using all their time in a ministerial car to work is much less serious than bullying officials, for instance, and any sanctions applied should reflect this. Of course, this is not a hard and fast distinction – each case will need to be assessed in detail – but the distinction will help make the code easier to understand and uphold.

Two separate sections within the code would emphasise this distinction. The first should outline the standards expected of ministers and stress the severity of breaching them. The other should outline the processes of government that ministers need to abide by, such as when to use cabinet committees or inform No.10 about a media interview; this would be read in conjunction with the Cabinet Manual.* This will make the code easier to interpret by ministers, as well as members of other political parties, the media and the public, and clarify the gravity of future breaches of the code.

* There is a separate question about how often the Cabinet Manual, which goes into more detail about constitutional principles as well as process of government, should be updated. The cabinet secretary recently voiced support for updates to the manual at the start of every new parliament.

The code also needs to be updated to respond to new concerns

Several recent controversies – including over David Cameron’s lobbying for Greensill and Kemi Badenoch’s use of social media – have highlighted the need for greater clarity in some areas, and new rules in others. The changes suggested here will both help foster better behaviour on the part of ministers by helping clarify how they should act, and help avoid further controversy.

Ministers should not be able to use personal phones for government business

In 2021 Boris Johnson has been criticised for discussing government business via messages on his personal phone, including by offering to “fix” tax issues for Sir James Dyson during the early stages of the pandemic.³⁹ And his former adviser Dominic Cummings leaked images from WhatsApp conversations with the prime minister and others at the top of government, providing ammunition for the government’s critics.

As the cabinet secretary told PACAC in April, “government business is government business however it is conducted and by whatever means of communication”.⁴⁰ This means that government information held on personal phones is still subject to legislation such as the Freedom of Information and Public Records Acts.

But the use of personal phones blurs the lines between personal and government communication. It also means that officials do not have easy access to records of conversations where key decisions are made, making understanding and implementing those decisions more difficult. To help avoid accusations of unfair treatment of particular contacts, and to help ministers and their civil service staff work more effectively, ministers should stop using their personal phones for government business. This change would be easy to add to the ministerial code and would help to avoid informal communication networks generating controversy in the future.

The government should increase transparency around whom ministers meet

After the controversy over Cameron’s lobbying of the government on behalf of Greensill Capital, Matt Hancock claimed he had notified officials of his meeting with Lex Greensill in October 2019.⁴¹ However, his department did not publish any record of this meeting.⁴² Of course, Cameron’s messages to ministers and senior officials on behalf of Greensill were not published either, as there is currently no requirement to do so – the lobbying only came to light because of the work of journalists.

Currently the ministerial code does not explicitly require ministers to report and publish lobbying to which they are subject. They must register gifts received, meetings to discuss government business (including meetings with officials when overseas) and any meetings with media proprietors or editors. But they do not have to declare when they have discussed government business with outside groups over email, phone or messaging or social media. This system is inadequate as it does not reflect the reality of how government business is conducted in the 21st century, particularly during the pandemic when many more conversations have happened remotely. As the Committee on Standards in Public Life has also argued, ministers should be required in the new code to register all meetings or other discussions of government business, including texts, phone calls and emails, and to publish them monthly.⁴³

The next edition of the code should expand and clarify rules on ministers' use of social media

In January 2021, Kemi Badenoch, the exchequer secretary to the Treasury and parliamentary under-secretary of state for equalities, faced criticism after she used her personal Twitter account to accuse a journalist who had sent questions to her ministerial office of “looking to sow distrust”, posting screenshots of private emails sent to her government account.⁴⁴ Alex Chisholm, the permanent secretary at the Cabinet Office, said that as the tweets were not posted from a government account there would not be any investigation.⁴⁵ But this ignores the fact that Badenoch was tweeting about questions she had been asked in her capacity as a minister – clearly, she was responding as a minister.

When Johnson issued his updated version of the code when he took office, he added a sentence saying that ministers must take care “to ensure that official social media accounts are not used for party political or constituency purposes”,⁴⁶ but the rules need more detail. Social media is an essential tool for the government, ministers and MPs to interact with constituents and inform the public about their actions. Many ministers have hundreds of thousands of followers, and poor behaviour, whether in the form of attacking journalists or otherwise, can reflect badly on the government and blur the important line between ministers' dual roles in government and as MPs.

The next version of the code should state explicitly that standards set out in the code apply to social media use as well as in person. Behaviour that would not be acceptable for a minister in person should be prohibited online as well. The code should also make clear that when a minister uses their personal social media account to discuss government business, or to respond to questions they receive in their capacity as a minister, they are doing so as a minister and are expected to uphold the standards in the code.

Johnson may want to go further and expand the rules for ministers' conduct on social media to avoid potential future controversy. He could look to the example of the Canadian 'Open and Accountable Government' document, which includes an extensive annex detailing how ministers should keep government and private social media accounts separate. This includes a specification that departmental Twitter accounts may not like or retweet any content from ministers' or MPs' personal Twitter pages. The Welsh ministerial code also says that “in any use of social media, whether in a constituency or ministerial capacity, ministers must express views with moderation and with regard to the reputation and good standing of the Welsh Government”. Introducing extra clarity like this to the UK ministerial code will help avoid future criticism of the way in which ministers use social media.

The code should update the rules on ministerial accountability for special advisers

The current code says that ministers are responsible for the behaviour of the special advisers they appoint. Since becoming prime minister, however, Johnson and members of his team have appointed special advisers to work for other ministers. The best known example of this is the joint team of economic advisers who work for both the chancellor and prime minister – but previous Institute for Government research revealed that during 2020 the proportion of advisers across government appointed on No.10's say so was on the increase.⁴⁷

All special advisers require the prime minister's permission to work in government, so there is nothing inherently wrong with this. But if a minister is not responsible for appointing a special adviser on their team, it is not appropriate for them to be responsible for that adviser's conduct. The code should be updated to clarify that if senior advisers in No.10 appoint an adviser to a department, then as the minister ultimately in charge of that adviser, it is the prime minister who is responsible for their conduct.

More explicit guidance on personal relationships in government may be needed

The events surrounding Matt Hancock's resignation have raised the question about whether ministers should be explicitly banned from having relationships with those who work in their departments – whether special advisers, civil servants or non-executive directors. The Australian ministerial code does this. This is not about passing moral judgment on ministers' private lives, but about avoiding conflicts of interests. The fact that Hancock appointed an old friend to a paid position on the board of his department raises serious questions about the propriety of the appointment, but also about whether the subsequent relationship created a conflict of interests in discharging her duties of scrutinising the work of the department and ultimately Hancock.

Both the ministerial code and the code of conduct for non-executive directors say that it is important to avoid any real *or perceived* conflicts of interest. The ministerial code also says that any working relationships should be "proper and appropriate". Whether or not Hancock and Coladangelo were lovers or just friends when she joined the DHSC board, it was clearly inappropriate to appoint someone with whom he was close to scrutinise the performance of his department. This was overwhelmingly the view in a YouGov poll in which just 25% of respondents suggested he should remain in post.⁴⁸

This should therefore raise questions in government more broadly about the propriety of giving paid jobs to those with whom ministers have any pre-existing personal relationship, and about the possible reaction if ministers are found to be in a relationship with someone whose job depends on them. While Boris Johnson may not want to be the prime minister who explicitly bans ministers from romantic relationships at work, the Hancock affair has set a precedent that other ministers must seek to avoid.

Conclusion

The spate of recent controversies over ministerial behaviour means that more than just piecemeal updates to the code are needed. The failure of the prime minister to reinforce the importance of ministerial standards makes it vital that the current problems in the code are tackled.

The next edition of the ministerial code should be a serious statement of intent. A more effective code, and a more effective system to enforce it, will help stop scandals before they occur. To avoid the perception that ministers believe in one rule for themselves and one for everyone else, it is in the prime minister's interests to grasp this opportunity to bolster the ministerial code and the role of the independent adviser. This means clarifying what the code says, about both expected standards and processes, bringing it up to date with how government works today, and putting it on a statutory basis. The prime minister should also properly empower the adviser to investigate potential breaches of the code independently and to publish their findings.

Beyond this, the prime minister needs to show that the code is not just a dusty document to be brought out every now and again. Requiring ministers to commit publicly to abiding by it will focus minds. But ultimately, Boris Johnson needs to show that he means what he said in his 2019 foreword to the code when he wrote that "we must uphold the very highest standards of propriety".⁴⁹ So far during his time in office it is not clear this message has got through to his ministers, and Johnson himself has been questioned on his conduct, while also showing that he is willing to ignore the advice of standards bodies.⁵⁰ A new ministerial code, accompanied by meaningful action against those who are independently found to have broken it, will show that he does indeed mean what he says.

References

- 1 Durrant T, Pannell J and Haddon C, 'Investigations into the Downing Street flat refurbishment', Institute for Government, 10 May 2021, retrieved 29 June 2021, www.instituteforgovernment.org.uk/explainers/investigations-downing-street-flat-refurbishment
- 2 Cabinet Office, *Declaration on Government Reform*, GOV.UK, 15 June 2021, www.gov.uk/government/publications/declaration-on-government-reform
- 3 Pyman T and Wright J, 'Boris Johnson "pressured adviser to tone down Priti Patel bullying report to make findings more palatable" – as PM urges Tory MPs to "form a square around the Pritster" after her apology', *Daily Mail*, 20 November 2020, retrieved 29 June 2021, www.dailymail.co.uk/news/article-8971909/PM-tried-failed-investigator-water-Patel-bullying-report.html
- 4 Woodcock A, 'Matt Hancock keeps job as Boris Johnson accepts apology and considers matter "closed"', *The Independent*, 26 June 2021, retrieved 29 June 2021, www.independent.co.uk/news/uk/politics/matt-hancock-job-affair-boris-johnson-b1872769.html
- 5 Haddon C, 'The handling of the Priti Patel bullying inquiry has fatally undermined the Ministerial Code', blog, Institute for Government, 20 November 2020, retrieved 29 June 2021, www.instituteforgovernment.org.uk/blog/priti-patel-bullying-inquiry-undermined-ministerial-code
- 6 Johnson B, Letter from the Prime Minister to Lord Evans, Prime Minister's Office, 28 April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/981905/Letter_from_the_Prime_Minister_to_Lord_Evans__28_April_2021.pdf
- 7 Taylor D, 'Lawyers express concern over ministerial code rewrite', *The Guardian*, 22 October 2015, retrieved 29 June 2021, www.theguardian.com/law/2015/oct/22/lawyers-express-concern-over-ministerial-code-rewrite
- 8 Constitutional Reform and Government Act 2010: Section 5, 2010 c. 25, UK Public General Acts, retrieved 29 June 2021, www.legislation.gov.uk/ukpga/2010/25/section/5
- 9 Treasury and Civil Service Committee, *The Role of the Civil Service: Volume 1, Session 1993-1994*, November 1994.
- 10 Constitutional Reform and Government Act 2010: Section 5, 2010 c. 25, UK Public General Acts, retrieved 29 June 2021, www.legislation.gov.uk/ukpga/2010/25/section/5
- 11 Hogarth R, Haddon C and Nice A, *Judicial review and policy making*, Institute for Government, 15 April 2021, www.instituteforgovernment.org.uk/publications/judicial-review
- 12 Syal R, 'PM can be challenged in court over Priti Patel bullying decision, hearing rules', *The Guardian*, 27 April 2021, retrieved 29 June 2021, www.theguardian.com/politics/2021/apr/27/boris-johnson-can-be-challenged-in-court-over-priti-patel-bullying-decision-hearing-rules
- 13 Functioning of Government (Miscellaneous Provisions) Act (Northern Ireland) 2021, 2021 c. 3, Acts of the Northern Ireland Assembly, retrieved 29 June 2021, www.legislation.gov.uk/nia/2021/3/contents/enacted
- 14 Pannell J, 'Northern Ireland Functioning of Government Act 2021', Institute for Government, 15 April 2021, retrieved 19 June 2021, www.instituteforgovernment.org.uk/explainers/northern-ireland-functioning-government-act
- 15 Geidt C, Letter from Lord Geidt to the Prime Minister, Cabinet Office, 28 April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/981671/20210428___PM__Independent_Adviser_.pdf
- 16 Evans J, Letter from Lord Evans, Chair of the Committee, to the Prime Minister about the Independent Adviser on Ministers' Interests, Committee on Standards in Public Life, 15 April 2021, www.gov.uk/government/publications/letter-from-lord-evans-chair-of-the-committee-to-the-prime-minister-about-independent-adviser-on-ministers-interests
- 17 Johnson B, Letter from the Prime Minister to Lord Evans, Prime Minister's Office, 28 April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/981905/Letter_from_the_Prime_Minister_to_Lord_Evans__28_April_2021.pdf
- 18 UCL Constitution Unit event, 'Ministerial appointments', 24 May 2021, retrieved 29 June 2021, the-constitution-unit.simplecast.com/episodes/ministerial-standards

-
- 19 Public Administration and Constitutional Affairs Committee, Post appointment hearing: The Independent Adviser on Ministers' Interests (HC 40), 13 May 2021, <https://committees.parliament.uk/event/4508/formal-meeting-oral-evidence-session>
 - 20 Office of the Conflict of Interest and Ethics Commissioner, 'Administrative monetary penalties', parl.ca, 21 April 2021, retrieved 29 June 2021, ciec-ccie.parl.gc.ca/en/investigations-enquetes/Pages/Penalties-Penalites.aspx
 - 21 Dion M, *Morneau II Report*, Office of the Conflict of Interest and Ethics Commissioner, May 2021, ciec-ccie.parl.gc.ca/en/publications/Documents/InvestigationReports/Morneau%20II%20Report.pdf
 - 22 ZiMononjic P and Cochrane D, 'Bill Moreneau resigns as finance minister and MP, will seek to lead OECD', CBC, 17 August 2020, retrieved 29 June 2021, www.cbc.ca/news/politics/bill-morneau-justin-trudeau-decision-1.5689890
 - 23 Dion M, Report on Alleged Wrongdoing by a Deputy Minister: Referral from the Public Sector Integrity Commissioner, Office of the Conflict of Interest and Ethics Commissioner, September 2020, ciec-ccie.parl.gc.ca/en/investigations-enquetes/Pages/WrongdoingDMReport-RapportActesReprehensiblesSM.aspx
 - 24 Johnson B, Letter from the Prime Minister to Lord Evans, Prime Minister's Office, 28 April 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/981905/Letter_from_the_Prime_Minister_to_Lord_Evans__28_April_2021.pdf
 - 25 Budget Responsibility and National Audit Act 2011: Schedule 1, 2011 c.4, UK Public General Acts, retrieved 29 June 2021, www.legislation.gov.uk/ukpga/2011/4/schedule/1/enacted
 - 26 'Matt Hancock allowed to use ridiculous excuse to keep job, says Labour', BBC News, 1 June 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-politics-57316899
 - 27 *Ibid.*
 - 28 Johnson B, Letter from the Prime Minister to the Secretary of State of Health and Social Care, 28 May 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/990403/PM_to_SoS.pdf
 - 29 'Matt Hancock allowed to use ridiculous excuse to keep job, says Labour', BBC News, 1 June 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-politics-57316899
 - 30 Allan A, Report on investigation under the Ministerial Code, Cabinet Office, 26 June 2012, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/62352/Alex-Allan-report.pdf
 - 31 Evans J, Letter from Lord Evans, Chair of the Committee, to the Prime Minister about the Independent Adviser on Ministers' Interests, Committee on Standards in Public Life, 15 April 2021, www.gov.uk/government/publications/letter-from-lord-evans-chair-of-the-committee-to-the-prime-minister-about-independent-adviser-on-ministers-interests
 - 32 Johnson B, Letter from the Prime Minister to the Secretary of State of Health and Social Care, 28 May 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/990403/PM_to_SoS.pdf
 - 33 Cabinet Office, *Ministerial Code*, August 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/826920/August-2019-MINISTERIAL-CODE-FINAL-FORMATTED-2.pdf
 - 34 Syal R and Asthana A, 'Priti Patel forced to resign over unofficial meetings with Israelis', *The Guardian*, 8 November 2017, retrieved 29 June 2021, www.theguardian.com/politics/2017/nov/08/priti-patel-forced-to-resign-over-unofficial-meetings-with-israelis
 - 35 Murphy K, 'Australia bans ministers from having sex with staff after Barnaby Joyce scandal', *The Guardian*, 15 February 2018, retrieved 29 June 2021, www.theguardian.com/australia-news/2018/feb/15/australia-bans-ministers-having-sex-with-staff-barnaby-joyce-malcolm-turnbull
 - 36 Welsh government, 'Ministerial code', gov.wales, 26 November 2019, retrieved 29 June 2021, <https://gov.wales/ministerial-code>
 - 37 Gay O, Questions of Procedure for Ministers, research paper 96/53, House of Commons Library, April 1996, <https://researchbriefings.files.parliament.uk/documents/RP96-53/RP96-53.pdf>
 - 38 'Matt Hancock allowed to use ridiculous excuse to keep job, says Labour', BBC News, 1 June 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-politics-57316899
 - 39 'Boris Johnson told Sir James Dyson by text that he would "fix" tax issue', BBC News, 21 April 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-politics-56819137
 - 40 Public Administration and Constitutional Affairs Committee, Oral evidence: The Work of the Cabinet Office (HC 118), 26 April 2021, <https://committees.parliament.uk/oralevidence/2084/pdf>

-
- 41 'Matt Hancock "had private drink" with David Cameron and Lex Greensill', BBC News, 11 April 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-56706619
 - 42 Department of Health and Social Care, 'DHSC's ministerial meetings, October to December 2019', 26 March 2020, retrieved 29 June 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876059/Q3_Ministers_MEETINGS.csv/preview
 - 43 Committee on Standards in Public Life, Standards Matter 2 – Committee Findings, June 2021, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993233/Committee_on_Standards_in_Public_Life_-_Standards_Matter_2_-_Report_of_Findings.pdf
 - 44 Brammar J, 'Who is accountable For Kemi Badenoch's public attack on our journalists', HuffPost, 25 February 2021, retrieved 29 June 2021, www.huffingtonpost.co.uk/entry/kemi-badenoch-twitter-huffpost_uk_603780a1c5b69ac3d35ca3e5
 - 45 'Kemi Badenoch Twitter complaint dismissed by government', BBC News, 25 February 2021, retrieved 29 June 2021, www.bbc.co.uk/news/uk-politics-56196969
 - 46 Cabinet Office, *Ministerial Code*, August 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/826920/August-2019-MINISTERIAL-CODE-FINAL-FORMATTED-2.pdf
 - 47 Durrant T, Blacklaws N and Zodgekar K, *Special advisers and the Johnson government: How the prime minister and his team are changing the role*, Institute for Government, 22 October 2020, www.instituteforgovernment.org.uk/publications/special-advisers
 - 48 'Do you think Matt Hancock should resign from his role as Health Secretary or should he remain in the role?', YouGov, 25 June 2021, retrieved 29 June 2021, <https://yougov.co.uk/topics/politics/survey-results/daily/2021/06/25/5e96b/1>
 - 49 Cabinet Office, *Ministerial Code*, August 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/826920/August-2019-MINISTERIAL-CODE-FINAL-FORMATTED-2.pdf
 - 50 White H, 'For Boris Johnson, following advice on ethics is the exception not the rule', blog, Institute for Government, 4 June 2021, retrieved 29 June 2021, www.instituteforgovernment.org.uk/blog/boris-johnson-following-advice-ethics-exception-not-rule

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