



## Parliamentary Commissioner for Standards

**PCS / AN / 2023.02**

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### **TRANSPARENCY OF REGISTRATION OF INCOME, DONATIONS AND OTHER FINANCIAL INTERESTS**

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*Summary: When considering registrable interests Members should aim to maximise transparency and accountability. Register entries should aim to describe the real-world source of income or donations. Giving full details of income reduces the risk of confusion or misrepresentation.*

1. This Advice Note is provided to Members in accordance with Standing Order 150. It is issued jointly by the Commissioner and the Registrar of Members' Financial Interests.
2. The purpose of this Advice Note is to assist Members in considering and applying the Code of Conduct for Members of Parliament; it is designed to supplement, and not supersede or contradict, specific provisions of the Code. Where specific or formal advice for a particular situation is required, we will be happy to provide it in accordance with the Guide to the Rules relating to the Conduct of Members.

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3. The principle of the registration system as set out in the Code of Conduct and the Guide engages two of the Nolan principles of public life in particular: openness and accountability. The overall purpose of the Register is to provide transparency about financial interests and other benefits which Members receive and which might reasonably be thought to influence them in performing their functions.
4. It is helpful for Members, when considering registrable interests, to ask themselves, “Am I registering my interests in a form that provides effective transparency and accountability?”
5. The answer to that question should in particular include consideration of whether a register entry describes the real-world source of income or donations. For payments, this includes the name and address of any client to whom the Member has personally provided services, if different from the payer, and a brief description of their business (if not self-evident). For donations, this includes the name and address of the donor and of any organisation acting as an intermediary (including trust details where relevant).
6. Accurate information may still fall short of transparency. For example, registering a donation made through an intermediary company will generally not provide a useful degree of transparency. Registering a source that appears to be a mere conduit for payment may lead to suspicion that the recipient is anxious to conceal the true origin of the donation.

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7. Giving full details of an interest serves an additional and important purpose: it reduces the risk of the media, social media and others representing donations in a way that is inaccurate, intentionally or unintentionally.
8. In the case of monetary donations, transparency is enhanced if Members add, where appropriate, a brief description of what they are to be used for. This can reduce the risk of donations for political activity being aggregated with personal earnings of a Member and distorting the true picture of their private income.
9. As always, the Registrar and his staff stand ready to provide practical advice to Members on how to make their registrations as transparent and serviceable as possible.
10. We are sending this Advice Note to: the Chair and Members of and the Clerk to the Committee on Standards; Mr Speaker; the Leader of the House; the Shadow Leader of the House; the Clerk of the House; the Clerk of the Journals; and Counsel to Mr Speaker. It will also be placed on our webpage on the House of Commons website.

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**James Davies**

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