

UNITED KINGDOM

2020

TOBACCO
INDUSTRY
INTERFERENCE
INDEX

Background and Introduction

This report measures the intensity, frequency, and severity of incidents of Tobacco Industry Interference (TII) reported in the United Kingdom (UK) between 1 January 2019 and 31 December 2019. However, for the sake of completeness, it also includes information on incidents which took place in the five years prior (2014-2018) but which only emerged in 2019 and which were not covered in the previous (2019) UK Tobacco Industry Interference report, which is available here: <https://globaltobaccoindex.org/country/GB>

This report is based on the Southeast Asia Tobacco Control Alliance's (SEATCA) Tobacco Industry Interference (TII) Index and scoring guidelines. The scoring range for most questions is from 1 to 5. The lower the score, the better the compliance with the Framework Convention on Tobacco Control (FCTC) Article 5.3 it suggests. For details on scoring, please see <https://seatca.org/> and Assunta M, Dorotheo EU. [SEATCA Tobacco Industry Interference Index: a tool for measuring implementation of WHO Framework Convention on Tobacco Control Article 5.3](#). *Tobacco Control* 2016; 25:313-318.

To complete the SEATCA TII Index of 20 indicators under seven key themes for the UK, an expert consultation was conducted with several of the UK's leading public health and tobacco control specialists. This was supplemented by a scoping review of the academic literature, publicly available evidence, including UK media websites, UK government websites, and the Tobacco Tactics resource.

Four reviewers separately searched for evidence and agreed on the scoring together. To avoid subjectivity, regular communication was maintained with the SEATCA team to ensure that each indicator was well understood by the reviewers and the scoring was done with accuracy.

NB: The Global Index uses the term 'government' for simplicity, but has been interpreted widely to cover not only government and public officials but also backbench politicians and political parties which are private organisations. Although these are not technically part of 'government', they play an important role in policy development and law making in the UK's parliamentary system.

Summary Findings

1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The UK government, and devolved administrations, do not accept offers of assistance from the tobacco industry, endorse their policies, nor invite industry representatives to attend policy meetings. The UK delegation to the FCTC Conference of the Parties excludes industry representatives. However, there are instances of industry representatives, or organisations affiliated to the industry, participating in informal parliamentary groups. The tobacco industry is allowed to provide responses to public regulatory consultations but is not treated as a 'stakeholder' in health policy.

2. INDUSTRY CORPORATE SOCIAL RESPONSIBILITY (CSR) ACTIVITIES

Tobacco industry activities described as 'socially responsible' are not banned in the UK. However, UK government (and devolved administrations) agencies and their officials do not endorse, support, form partnerships with, or participate in, industry CSR activities. Nonetheless, the tobacco industry continues to promote its CSR activity among parliamentarians using informal parliamentary groups and direct lobbying.

3. BENEFITS TO THE INDUSTRY

The UK government does not grant exemptions to the tobacco industry. However, there are no clear rules mandating the government not to provide preferential treatment to the industry. The major tobacco companies pay very low levels of corporation tax in the UK, which is due to generic rules on corporation tax and is not specific to the tobacco industry. The UK, as part its ongoing obligations to the European Union (EU), must apply duty-free allowances on tobacco products brought from outside the EU but applies the most generous limit permitted by the EU for such allowances.

4. UNNECESSARY INTERACTION

There is no evidence that top-level UK officials attend tobacco industry social functions, but several such instances have been identified for individual backbench parliamentarians in England and the devolved administrations, and for political parties. In addition, the Westminster parliamentary data on functions and hospitality only covered the first half of 2019. There is no evidence that the government or devolved administrations accept assistance from the industry for their tobacco-control activities, but there have been cases of limited engagement of the tobacco industry with the local authorities.

5. TRANSPARENCY

In the past, the Department of Health & Social Care (DHSC) adopted guidelines for the implementation of Article 5.3 requiring organisations it engages with to disclose any links with the tobacco industry. However, there is no general requirement for the industry and affiliated entities to register with the government. Given the industry's growing use of third parties and the challenges of tracing its links to, and funding of, third parties, this is an important omission.

6. CONFLICT OF INTEREST

General rules regulate political contributions to political parties, candidates and campaigns, and the disclosure of such contributions worth over £7,500. However, no legislation specifically prohibits the tobacco industry from making political donations. No current government officials hold positions in the tobacco industry, but several instances of past involvement, direct and indirect, have been identified, including for senior government officials.

7. PREVENTIVE MEASURES

There is no comprehensive set of rules regulating public officials' interactions with the tobacco industry, aside from the Foreign and Commonwealth Office (FCO) code. There is a government procedure for disclosing the records of interaction with the tobacco industry, but this has only been implemented in part. Some agencies (e.g. Public Health England) publish minutes of meetings with stakeholders linked to the industry and the Scottish government requires a declaration of interests at its Ministerial Group on Tobacco. Some departments (e.g. HM Revenue and Customs (HMRC)) publish very little detail about meetings, while others (e.g. HM Treasury), reported meetings regularly for a period but then stopped.

Tobacco manufacturers collect data on profits, taxes, prices, sales, marketing and research spend and are required to provide some of these data to government. However, the government is only allowed to publish information on the ingredients in, and emissions from, tobacco products, not sales and marketing data, which prevents industry activity from being fully transparent to the public. There is no evidence that there is a systematic strategy for raising the awareness of government departments or devolved administrations on policies relating to Article 5.3 guidelines. Finally, there is no specific policy preventing government officials from accepting industry contributions (or persons moving from civil service posts to jobs in the tobacco industry, or vice versa), although such interactions are separately governed by anti-corruption regulations.

Recommendations

1. Require, collect and publish tobacco industry data on profits, taxes, prices, spending on marketing, research and CSR, and local data on sales of all products as recommended by the backbench All Party Parliamentary Group on Smoking and Health and ensure such data is published in useable format.
2. Ensure comprehensive procedures for publishing details of all meetings with the tobacco industry are fully implemented across all government departments.
3. Implement and embed central and devolved government programmes to regularly raise and maintain awareness of Article 5.3 and how to comply with it across the whole of government.
4. Require the DHSC to develop and disseminate, in partnership with devolved administrations, a comprehensive set of rules for public officials, prescribing standards with which public officials should comply in dealings with the tobacco industry.
5. Ban tobacco industry CSR activities in the UK.
6. Create and ensure a comprehensive and legally binding lobbying transparency register across UK administrations and make it a legal requirement for tobacco industry affiliated organisations and individuals to register with the government and disclose their funding before lobbying.
7. Avoid conflicts of interest by prohibiting the tobacco industry from making contributions (monetary or otherwise), to political parties and government officials at all levels. The latter would include offers of assistance, policy drafts, study visit invitations, or funding. Prohibit public officials from holding positions in, or being seconded to, the industry, or taking up posts with the industry within a defined number of years after leaving public positions (and vice versa).
8. Audit HMRC to ascertain whether the government provides preferential tax exemption to the tobacco industry and remove duty-free concessions for tobacco products. Exempt the tobacco industry from being able to reclaim against corporate tax for marketing (including CSR) and promotions.
9. Ensure that bilateral trade agreements developed as a result of Brexit are compliant with the UK's obligations as a Party to the WHO FCTC and Illicit Trade Protocol, and contain exemptions allowing for the protection of public health.

2020 Tobacco Industry Interference Index

Results and Findings

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INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ¹ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry ² in setting or implementing public health policies in relation to tobacco control ³ (Rec 3.1)		x				
<p>There is no evidence of tobacco industry involvement in government groups and agencies directly setting public health policies. However, tobacco industry representatives, or tobacco-industry affiliated organisations, were involved in informal cross-party parliamentary groups which have no official status.</p> <p>An All-Party Parliamentary Group (APPG) for E-cigarettes was set up in the UK Parliament in 2014 to “explore the most appropriate parliamentary and regulatory response to e-cigarettes and to raise education and literacy amongst policy makers regarding e-cigarettes and related public policy questions”.⁴ By January 2019 the group was renamed the APPG for Vaping. The APPG’s Secretariat is based at the UK Vaping Industry Association (UKVIA). UKVIA also contributed “benefits in kind” of between £66,000 and £74,000 to the APPG between 2015 and 2019. UKVIA’s membership includes tobacco manufacturers Japan Tobacco International (JTI), Imperial Brands, Philip Morris International (PMI), and British American Tobacco (BAT). The list of APPG officers includes (largely backbench) Members of Parliament (MPs) and Lords from both of the UK’s leading political parties (Conservative and Labour), some of whom have a history of accepting tobacco industry hospitality.⁵ However, the Ministry of Health has previously stated on the record in parliament that it will not work with the UKVIA because of its tobacco industry links.⁶</p> <p>Another parliamentary group, the APPG on Corporate Governance, received £10k from BAT in 2015, and £5k every year from 2014 to 2019.⁷</p> <p>The UK House of Commons Science and Technology Committee performs, as a Select Committee, a specific scrutiny role and the government is expected to respond to any recommendations it makes. Between 2017 and 2018 it conducted an inquiry into the “impact of electronic cigarettes on human health, the suitability of regulations guiding their use, and the financial implications of a growing market on both business and the NHS”. Representatives of the tobacco industry, including JTI, BAT, Philip Morris Limited (the UK subsidiary of Philip Morris International), and Fontem Ventures (a subsidiary of Imperial</p>						

¹ The term “government” refers to any public official whether or not acting within the scope of authority as long as cloaked with such authority or holding out to another as having such authority

² The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

³ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

⁴ [Register of All-Party Parliamentary Groups: E-Cigarettes](#), UK Parliament website, as at 26 April 2018, accessed April 2020

⁵ Tobacco Tactics, [All-Party Parliamentary Group \(APPG\) for Vaping \(E-Cigarettes\)](#), 2019

⁶ [Vaping: 01 November 2017: Volume 630](#), House of Commons Hansard, accessed August 2020

⁷ [Register Of All-Party Groups: Corporate Governance](#), UK Parliament website, as at 30 March 2015, accessed May 2020

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Brands) were invited to give evidence to the Committee. The inquiry concluded with a report published by the Committee in August 2018, calling for the liberalisation of restrictions on e-cigarette use. However, these calls were not acted on by the government. In October 2019, a parliamentary debate took place to discuss the ‘E-Cigarettes’ report of the Committee (published in August 2018) and the government’s response to it (published in December 2018). ⁸						
In November 2019, HMRC published a guidance document for its staff regarding legal responsibilities during interaction with the tobacco industry under WHO FCTC Article 5.3. Although the document banned many scenarios of interactions, it allowed others including “Consultation on tax design - receiving input into proposals”. ⁹						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)		x				
<p>The government did not support or endorse policies or legislation drafted by, or in collaboration with, the tobacco industry in 2019.</p> <p>It was noted that, as a parliamentary democracy, the UK conducts public regulatory consultations to which any person or organisation can provide responses. The failure to allow the tobacco industry to participate in such public consultations could leave any tobacco control legislation open to legal challenge. In 2019, in line with Article 5.3, these consultations were transparent, the responses were made public, and the government was under no obligation to implement the tobacco industry’s recommendations. However, in two cases detailed below it appears that minor suggestions of the tobacco industry may have been followed.</p> <p>In 2019, changes and guidance for the taxation of heated tobacco were added to Excise Notice 476: Tobacco Products Duty.¹⁰ In the preparations for these changes, the Treasury conducted a consultation from 20 March 2017 to 12 June 2017, setting out proposals to deal with the tax treatment of tobacco for heating. The largest group of respondents to the consultation was tobacco manufacturers and retailers (52%).¹¹ This very large industry response has been a consistent pattern in public consultations.¹² Some of the opinions of the tobacco manufacturers seem to have been taken into consideration. For example, the Treasury’s summary of the response to the consultation states that “Manufacturers generally disagreed with the requirement for a heated tobacco product to be encapsulated [...]”, and that the government’s response was “to remove the requirement for the tobacco to be encapsulated [...]”.¹³ However, the government also made clear that it was “aware that, depending on the duty rates, there could be an advantage to designing products that</p>						

⁸ [E-cigarettes: 31 October 2019: Volume 667](#), House of Commons Hansard, accessed August 2020

⁹ Her Majesty’s Revenue and Customs, [The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019

¹⁰ Her Majesty’s Revenue and Customs, [Notice: Excise Notice 476: Tobacco Products Duty](#), 2019

¹¹ Her Majesty’s Revenue and Customs, [explanatory memorandum to the tobacco products \(descriptions of products\) \(amendment\) order 2019](#), 2018

¹² Hatchard JL, Fooks GJ, Gilmore AB. [Standardised tobacco packaging: a health policy case study of corporate conflict expansion and adaptation](#) BMJ Open 2016

¹³ Her Majesty’s Treasury, [Tax treatment of heated tobacco products: response to the consultation](#), 2018

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<p>were defined as heated tobacco products but could be smoked. It wishes to restate that if a product is capable of being smoked without further industrial processing it would likely fall within the existing duty categories.”¹⁴</p> <p>Between 11 February 2019 and 11 March 2019 HMRC conducted a consultation collecting views on the draft secondary legislation to implement track and trace and security features for tobacco products in the UK as required by the European Tobacco Products Directive (TPD). HMRC declared that it “received 21 responses from the tobacco industry. Most respondents supported the need for robust sanctions and, as a result, minor changes have been made to the circumstances in which a non-compliant business could be prevented from trading in tobacco products”.¹⁵ Strengthening the circumstances under which non-compliant businesses could be prevented from trading supports public health. However, it is not appropriate for such a change to be made ‘as a result’ of intervention by the industry.</p> <p>By contrast, in another case, in response to a tobacco industry attempt to promote a bill through an opposition MP, the government used the opportunity to stress its commitment to Article 5.3. In 2019, <i>The Guardian</i> obtained documents showing that, in 2018, PMI held discussions with MP Kevin Barron, who has a long history of promoting tobacco control in the UK. Discussions concerned a potential bill which would set up a £1 billion fund in the UK to be spent by local authorities and Public Health England (PHE) on persuading smokers to give up cigarettes in favour of IQOS and other next generation products. In exchange, PMI expected that the ban on the marketing of IQOS and other next generation products would be lifted. Mark MacGregor, PMI’s corporate affairs director, in an e-mail stated that “an exploratory conversation with the MP had been extremely positive. He understands the concept of the ‘deal’ that is on offer and is very attracted to the incentive that the fund could provide to change behaviours among smokers and the industry – though balanced by enabling industry to inform smokers”. Barron introduced a 10-minute-rule bill to the Commons on 30 October 2018 that proposed the tobacco transition fund, but it was not adopted.¹⁶ The Health Minister was asked about the PMI proposals and put on the record in parliament that the government is committed to living up to its obligations as a party to the WHO FCTC and in particular to Article 5.3.¹⁷</p>						
<p>3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8)</p>	x					
No such incidents were identified in 2019.						
<p>4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) (Rec 4.9 & 8.3) NB: <i>the minimum score for this indicator is ‘1’</i>,</p>		x				
The government has never allowed this, and no such incidents were identified in 2019.						

¹⁴ Her Majesty’s Treasury, [Tax treatment of heated tobacco products: response to the consultation](#), 2018

¹⁵ Her Majesty’s Revenue and Customs, [Consultation outcome, The Tobacco Products \(Traceability and Security Features\) Regulations 2019](#), 2019

¹⁶ Sarah Boseley, [Philip Morris drew up plan for £1bn tobacco transition fund](#), 2020

¹⁷ House of Commons official report [Parliamentary Debates Thursday 5 March 2020](#), Vol672, no35

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INDICATOR 2: Industry CSR activities						
5. A. The government agencies or its officials endorses, supports, forms partnerships with or participates in so-called CSR activities organized by the tobacco industry. (Rec 6.2)						
B. The government (its agencies and officials) receives contributions ¹⁸ (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)		x				
<p>No such incidents were identified in 2019 by the government, its agencies, or officials.</p> <p>Nevertheless, the tobacco industry has attempted to promote its CSR activity among parliamentarians. In February 2019, trade magazines <i>Talking Retail</i> and <i>The Grocer</i> reported that BAT used a meeting of the APPG for Vaping to promote their age verification scheme called “BAT Verify” and announced a “whistleblowing hotline” to report retailers selling e-cigarettes to under-18s (the sale of these products to people under the age of 18 is prohibited in the UK).¹⁹ According to <i>Talking Retail</i>, BAT had also used the meeting as an opportunity to suggest that the DHSC should engage more with the industry.²⁰ As of July 2019, the meeting minutes, detailing attendance, and activities, were not yet available.²¹</p> <p>On 4 June 2019, backbench minority party MP Ian Paisley hosted a “Tackling Illegal Tobacco Sale” Reception in the House of Commons, on behalf of DoDs Parliamentary Communications Ltd. The DoDs Group has a history of working with JTI. The tobacco company had a factory in Paisley’s constituency, although this closed in 2017.^{22,23,24} JTI subsequently funded a local charity of which Paisley is a board member.²⁵</p> <p>In addition, JTI hosted an event at the ruling Scottish National Party conference in October 2019 in Scotland entitled ‘Where Next for Vaping in Scotland?’.²⁶ The event was chaired by John Lee from the Scottish Grocers’ Federation, with speakers listed as MSPs Emma Harper (convener of the Health and Sport Committee) and John Mason (member of the Cross Party Group on Independent Convenience Stores). Tobacco companies have previously supported efforts to set up Scottish parliamentary groups on harm reduction using PR agencies and the Scottish Grocers’ Federation.²⁷</p>						

¹⁸ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

¹⁹ Tobacco Tactics, [All-Party Parliamentary Group \(APPG\) for Vaping \(E-Cigarettes\)](#), 2019

²⁰ <https://www.talkingretail.com/news/industry-news/british-american-tobacco-tackles-youth-vaping-26-02-2019/>

²¹ Tobacco Tactics, [All-Party Parliamentary Group \(APPG\) for Vaping \(E-Cigarettes\)](#), 2019

²² Tobacco Tactics, [Ian Paisley](#), 2020

²³ House of Commons, [Events and Function Booking Data](#), 2018

²⁴ The Detail, [Countdown to Brexit in the Northern Ireland constituency most in favour of leaving the EU](#), 29 August 2019

²⁵ Japan Tobacco International media release [JTI announces £5m legacy for the Ballymena community](#), 19 July 2016

²⁶ Tobacco Tactics, [E-cigarettes – Japan Tobacco International](#), 5 February 2020, accessed May 2020

²⁷ Tobacco Tactics, [Scottish Grocers’ Federation](#), 5 February 2020, accessed May 2020

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<p>The Welsh Assembly Member Darren Millar in his blog suggested that he, ‘along with his Welsh Conservative Assembly colleagues, met representatives from JTI in the Senedd to discuss the availability of cheap, illegal tobacco [...]’.²⁸</p> <p>Similarly to 2017 and 2018, in 2019 PMI had a promotional stand at the Conservative Party conference that showcased its heat-not-burn IQOS product.^{29,30} Juul, partly owned by the cigarette manufacturer Altria, held two closed events for MPs and their special advisers at the same conference, and sponsored panels at Labour and Conservative party events.^{31,32,33} In 2018 and 2019, PMI sponsored stands at the conference of the Local Government Association (LGA) conference; the LGA (which is not a public authority but a cross party national membership organisation which local authorities can opt in or out of) said this will not happen again.³⁴</p>						
INDICATOR 3: Benefits to the Tobacco Industry						
6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)	N/A					
No such incidents were identified for 2019.						
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)				x		
<p>There is no evidence of exemptions being granted to the tobacco industry by the government. The FCO guidelines stipulate that support should be given to British tobacco companies operating abroad only “in cases where local policies could be considered protectionist or discriminatory”.³⁵</p> <p>However, it was noted that the tobacco industry continued to enjoy two specific privileges in 2019. First, the major tobacco companies continued to pay very low levels of corporation tax in the UK, although low levels of corporation tax payments are not unique to the tobacco industry (and the tobacco industry has been avoiding taxes in other countries</p>						

²⁸ Darren Miller, Assembly Member [Call for clampdown on illegal tobacco trade in Wales](#), official website of the Assembly Member for Clwyd West, Darren Miller, 22 November 2019

²⁹ Philip Morris International, [Point-by-point response to questions put to Philip Morris International by The Bureau for Investigative Journalism](#), 2020

³⁰ Peter Walker [twitter.com](#), (active user as of 26 June 2020), 29 September 2019, accessed June 2020

³¹ The Bureau of Investigative Journalism, [Vaping giant Juul pushes for more addictive e-cigarettes](#), 23 November 2019

³² Jacobin Magazine, [Buying the Tory party](#), 6 October 2019

³³ Onward.com, [Next generation reception at Conservative party conference](#), 15 October 2019

³⁴ The Bureau of Investigative Journalism, [PMI sidesteps global health treaty to lobby councils](#), 20 March 2020, accessed May 2020

³⁵ [United Kingdom’s revised guidelines for overseas posts on support to the tobacco industry](#), Department of Health and the Foreign & Commonwealth Office, UK Government website, December 2013, accessed April 2020

as well).^{36,37} In the absence of clear rules ensuring no preferential tax exemption for the tobacco industry, an audit of HMRC conduct on this matter would be advisable for greater transparency.

Second, the UK as part of the EU had to apply duty-free allowances on tobacco products brought from outside the EU, but chose to apply the upper limit of 200 cigarettes or 100 cigarillos or 50 cigars or 250g tobacco, rather than the lower limit of 40 cigarettes or 20 cigarillos or 10 cigars or 50g tobacco.^{38,39}

In addition, some willingness to extend existing privileges in the future has been noted among senior government figures. In September 2019, the Treasury and the then Chancellor, Sajid Javid, announced that in the event of a no-deal Brexit, duty-free purchase of cigarettes would be reintroduced with “immediate effect” for trips to EU countries.⁴⁰

Following this announcement, the Treasury and Chancellor were reported to the Advertising Standards Authority for a tweet promoting tobacco sales after Brexit.⁴¹ The tweet read “People travelling to EU countries will be able to buy beer, spirits, wine and tobacco without duty being applied in the UK.”⁴²

Finally, although UK signed the WHO FCTC in 2003⁴³ and ratified it in 2004,⁴⁴ and joined the Protocol to Eliminate Illicit Trade in Tobacco Products in 2013⁴⁵ and ratified it in 2018,⁴⁶ the country only extended the ratification of the WHO FCTC to the Bailiwick of Guernsey and the Bailiwick of Jersey on 7 November 2019. The UK also only extended the ratification of the WHO FCTC and the Protocol to Eliminate Illicit Trade to Gibraltar on 29 June 2020.⁴⁷ The extension of both the WHO FCTC and the Protocol to cover Gibraltar was a requirement in the agreement on the withdrawal of UK from the EU.⁴⁸

INDICATOR 4: Forms of Unnecessary Interaction

³⁶ Branston, J.R., & Gilmore, A. (2019). [The Failure of the UK to Tax Adequately Tobacco Company Profits](#), Journal of Public Health (United Kingdom)

³⁷ Tax Justice Network [Ashes to Ashes: How British American Tobacco avoids taxes in low and middle income countries](#), April 2019, accessed May 2020

³⁸ HM Government, [Bringing goods into the UK](#), UK Government website, accessed May 2020

³⁹ European Union, [Alcohol, tobacco, cash and excise duties](#), European Union official website, accessed May 2020

⁴⁰ L. Elliott, [Duty-free purchases of cigarettes and alcohol to return under no-deal Brexit](#), The Guardian, 10 September 2019, accessed May 2020

⁴¹ B. Glaze, [Sajid Javid reported to advertising watchdog over no-deal Brexit cheap cigarettes tweet](#), 14 September 2019, accessed May 2020

⁴² M. Belam, [Treasury under fire for pushing no-deal Brexit duty-free shopping](#), The Guardian, 11 September 2019, accessed May 2020

⁴³ United Nations, [C.N.622.2003.TREATIES-34 \(Depositary Notification\)](#), 17 June 2003, accessed June 2020

⁴⁴ United Nations, [C.N.1272.2004.TREATIES-124 \(Depositary Notification\)](#), 16 December 2004, accessed June 2020

⁴⁵ United Nations, [C.N.1029.2013.TREATIES-IX.4.a \(Depositary Notification\)](#), 17 December 2013, accessed June 2020

⁴⁶ United Nations, [C.N.308.2018.TREATIES-IX.4.a \(Depositary Notification\)](#), 27 June 2018, accessed June 2020

⁴⁷ United Nations, [UN Treaty Collection: WHO FCTC](#), 30 June 2020, accessed June 2020

⁴⁸ EUR-Lex, [Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community](#), 12 December 2019, accessed June 2020

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8. Top level government officials (such as President/Prime Minister or Minister ⁴⁹) meet with/foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)		x				
<p>A search of UK government websites and newspapers did not locate references to unnecessary meetings between top-level government officials and the tobacco industry in 2019. However, at the time of writing this report parliamentary data on functions and hospitality only covered the period to 31 July 2019.</p> <p>While no interactions with top-level government officials have been identified, several interactions have been identified between the tobacco industry and members of the devolved parliaments of the UK, backbench parliamentarians of the UK Parliament, as well as tobacco industry presence at political party conferences.</p> <p>In Scotland, JTI had six, and Imperial seven, separate meetings with various Members of the Scottish Parliament (MSPs) in 2019 to discuss issues such as next generation products and illicit trade.⁵⁰ The Imperial Tobacco lobbyist Lindsay Mennell Keating⁵¹ conducted several meetings with MSPs to “Introduce Imperial Brands” and to discuss the role of vaping products in Scottish public health and harm reduction. These included meetings with backbench MSP Richard Lyle^{52,53} and the Minister for Public Health, Sport and Wellbeing, Joe Fitzpatrick, during the Scottish National Party Conference.⁵⁴</p> <p>The Welsh Assembly (as of 2020 renamed Senedd Cymru – Welsh Parliament) does not record lobbying information with the same degree of transparency, but no such meetings were listed in records available to the public.</p> <p>The Northern Ireland Assembly was suspended during the period in question, which meant that government officials were unable to attend meetings with any stakeholders, including the tobacco industry, in official government capacity.</p>						
9. The government accepts assistance/offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)		x				
<p>Local authority departments responsible for enforcing tobacco regulations have policies of non-engagement with tobacco companies and evidence of engagement is sporadic and</p>						

⁴⁹ Includes immediate members of the families of the high-level officials

⁵⁰ Scottish Parliament, [Lobby register](#), undated, accessed May 2020

⁵¹ Tobacco Tactics, [E-cigarettes Imperial Tobacco, 2020](#)

⁵² Tobacco Tactics, [Richard Lyle, 2020](#)

⁵³ The Scottish Parliament, [Lobbying Register](#), 2018

⁵⁴ The Scottish Parliament, [Lobbying Register](#), 2018

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historic. Nonetheless, according to <i>The Bureau of Investigative Journalism</i> , that has not stopped tobacco companies from trying to forge links with local authorities. PMI was identified as having contacted seven councils since 2017 as part of its marketing of next generation products as aids to smoking cessation. These contacts continued into 2019; these were rebuffed, or, in the case of Windsor and Maidenhead council, a meeting took place, but nothing was pursued. The company also employed several lobbyists with connections to the Conservative Party including former health minister Stephen Dorrell who hosted a drinks reception on behalf of the firm in September 2019. The event was aimed at healthcare and public health professionals and to discuss government plans for smoking cessation. ⁵⁵						
10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) <i>NOTE: This must not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>	x					
No evidence of the government or its agencies entering into agreements or partnerships has been identified for 2019.						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)	x					
No instances of meetings or interactions that have not been disclosed have been identified in 2019.						
12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)					x	
<p>While the government implements Article 5.3 provisions, it does not set out comprehensive rules on full disclosure or registration of tobacco industry entities.</p> <p>The 2011 government Tobacco Control Plan for England stated that “in the future, organisations engaging with the DHSC on tobacco control, for example by responding to consultation exercises, will be asked to disclose any links with, or funding received from, the tobacco industry.”⁵⁶ The DHSC confirmed to the authors of this report that when the government opens consultations which may involve tobacco industry input, a reference to Article 5.3 is included and respondents are formally asked to declare any ties with the tobacco industry.</p> <p>However, there continues to be no requirement for tobacco industry and affiliated entities to register with the government. A voluntary lobbying register has existed in the UK since</p>						

⁵⁵ The Bureau of Investigative Journalism, [PMI sidesteps global health treaty to lobby councils](#), 20 March 2020, accessed May 2020

⁵⁶ HM Government, [Healthy Lives, Healthy People: A Tobacco Control Plan for England](#), UK Government website, March 2011, accessed May 2020

	0	1	2	3	4	5
2011. ⁵⁷ The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act, which came into force on 1 April 2015, requires any person (corporate or natural) who carries on “the business of consultant lobbying” to be entered in the Register of Consultant Lobbyists. ⁵⁸ The act only requires the registration of consultant (professional) lobbyists who are VAT-registered. ⁵⁹						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11)					x	
There are general rules regulating political contributions, and the disclosure of such contributions. Donations worth over £7,500 to national political parties must be declared. ⁶⁰ However, there is no legislation specifically prohibiting the tobacco industry from donating to political parties, candidates, or campaigns. In addition, unlike in previous years, it has been noted that several politicians who have become senior government officials in 2019 had a history of receiving money from the tobacco industry (see answer to #15 for more details).						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)			x			
Mark MacGregor, PMI’s corporate affairs director from 2016 to 2020, was previously chief executive of the Conservative Party from 2002-2003. ⁶¹						
According to <i>The Bureau of Investigative Journalism</i> , in 2019 PMI “used the services of the former Conservative health minister Stephen Dorrell, an influential figure in UK health circles.” ⁶²						
As last year, one case has been identified of an MP who has been previously a tobacco industry executive. However, his relationship with the industry ended over a decade ago and he stopped being an MP in December 2019. ⁶³						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)			x			

⁵⁷ [UK Lobbying Register](#), UKLR website, accessed May 2020

⁵⁸ [Office of the Registrar of Consultant Lobbyists](#), Office of the Registrar of Consultant Lobbyists website, accessed May 2020

⁵⁹ Transparency of Lobbying, [Non-party Campaigning and Trade Union Administration Act 2014](#), UK Legislation website, accessed April 2020

⁶⁰ [Donations and loans reported every quarter by political parties](#), The Electoral Commission website, accessed May 2020

⁶¹ Sarah Boseley, [Philip Morris drew up plan for £1bn tobacco transition fund](#), 2020

⁶² The Bureau of Investigative Journalism, [PMI sidesteps global health treaty to lobby councils](#), 2020, accessed May 2020

⁶³ [Kenneth Clarke](#), Tobacco Tactics, 25 January 2018, accessed May 2020

No current government officials have been identified as holding positions in the tobacco business. There are, however, several instances of past involvement, direct and indirect, of senior Conservative Party political figures with the tobacco industry, including among ministers selected to the Cabinet of the United Kingdom in 2019. These ties are significantly more extensive than in the case of the previous Cabinets in the recent years.

Boris Johnson, the prime minister since July 2019, received a £20,000 loan and £3,000 donation to his leadership campaign from CTF Partners (Crosby, Textor, Fullbrook), a company with long links and financial ties to the tobacco industry.⁶⁴ One of the company's co-founders, Lynton Crosby, was at the centre of a controversy over the government's abandonment of tobacco plain packaging in 2013, when he was an election advisor for the ruling Conservative Party. Crosby also helped Johnson with his London mayoral election campaigns in 2008 and 2012.^{65,66} Boris Johnson also received a payment for a speech of up to £10,000 from the Association of Tobacco in June 2007.⁶⁷

Priti Patel, Home Secretary, in 2000-2001 was employed as a lobbyist by Weber Shandwick for its client BAT to help influence EU tobacco control regulation and improve its image in Burma.^{68,69}

Munira Mirza, the head of the Number 10 Policy Unit, was co-founder of the so-called 'civil liberties' Manifesto Club, which has produced reports in collaboration with tobacco industry-funded front group FOREST.^{70,71,72,73}

Jacob Rees-Mogg, leader of the House of Commons, in 2014 was reported to Parliament's standards watchdog for potentially breaching the rules on declaring financial interests in the House of Commons. This was in relation to, amongst others, speaking in support of the tobacco industry in debates on the Finance Bill and against plain packaging, without declaring that he is a founder and director of a firm with investments in the tobacco industry.⁷⁴

Matt Hancock, the health secretary, received £32,000 in donations from Institute of Economic Affairs (IEA) trustee Neil Record, before becoming health secretary.⁷⁵ The IEA has a well-documented history of close collaboration with the tobacco industry and has been

⁶⁴ T. Colson and A. Bienkov, [Bankers, climate change sceptics, and Brexiteers: The donors funding Boris Johnson's campaign for prime minister](#), "Business Insider", 1 July 2019, accessed May 2020

⁶⁵ Tobacco Tactics, [Crosby Textor Group](#), accessed May 2020

⁶⁶ Tobacco Tactics, [Lynton Crosby](#), accessed May 2020

⁶⁷ [Changes to the Register of Members' Interests Boris Johnson](#), They Work For You, last updated 12 August 2019, accessed May 2020

⁶⁸ Jamie Doward, [Minister worked as spin doctor for tobacco giant that paid workers £15 a month](#), "The Observer", 31 May 2015, accessed May 2020

⁶⁹ Tobacco Tactics, [Priti Patel](#), accessed May 2020

⁷⁰ Policy exchange, [Munira Mirza](#), accessed May 2020

⁷¹ Josie Appleton, [First They Came for the Smokers...](#), Spiked Online, 5 August 2019, accessed May 2020

⁷² Tobacco Tactics, [Manifesto Club](#), accessed May 2020

⁷³ Tobacco Tactics, [Forest](#), accessed May 2020

⁷⁴ J. Merrick, [Leading Tory backbench MP Jacob Rees-Mogg 'failed to declare interests'](#), The Independent, 14 December 2014, accessed May 2020

⁷⁵ J. Gornall, [Big Tobacco, the New Politics, and the Threat to Public Health](#), British Medical Journal, 15 May 2019, accessed May 2020

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a key front group in opposing tobacco control in the UK.⁷⁶ Hancock declined to confirm if he knew of the IEA’s tobacco funding before he accepted the donation.⁷⁷

Numerous other senior politicians in post in 2019, including Cabinet members, have, in the past, spoken at events organised by, or received hospitality from, tobacco companies or think tanks funded by the tobacco industry and promoting tobacco industry positions, most notably the IEA. These included Sajid Javid (Chancellor of the Exchequer), Theresa Villiers (Environment Secretary), Therese Coffey (Minister for Work and Pensions), Kwasi Kwarteng (Minister of State in the Department for Business, Energy and Industrial Strategy), Robert Buckland (Lord Chancellor and Secretary of State for Justice), Alun Cairns (Secretary of State for Wales), and Liz Truss (Minister for International Trade).^{78,79,80,81,82,83,84,85,86}

INDICATOR 7: Preventive Measures

16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)			x			
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The UK government has stated a commitment to, and put in place policies for, disclosing the records of interaction with the tobacco industry. However, apart from the health departments, such policies have only been implemented partially in 2019.

Policies:

- The 2011 government Tobacco Control Plan for England stated that, in order to “ensure further transparency, the Government commits to publishing the details of all policy-related meetings between the tobacco industry and government departments” (with exceptions made for meetings discussing operational matters to reduce illicit tobacco trade and bilateral meetings between tobacco manufacturers and HMRC).⁸⁷
- In 2016, then updated in 2018, PHE issued a Protocol for engagement with tobacco and nicotine producers: “Protocol for engagement with stakeholders with links to the tobacco industry”. The protocol states that “Face-to-face meetings with stakeholders on policy

⁷⁶ Tobacco Tactics, [Institute of Economic Affairs](#)

⁷⁷ J. Gornall, [Big Tobacco, the new politics, and the threat to public health](#), British Medical Journal, 15 May 2019, accessed May 2020

⁷⁸ D.Sabbagh, [Sajid Javid: combative capitalist and courtier of US neocons](#), The Guardian, 4 May 2018, accessed May 2020

⁷⁹ Lisa O’Carroll, [IEA’s Brexit Proposals: the Main Points](#), The Guardian, 24 September 2018, accessed May 2020

⁸⁰ M. Townsend and R. Evans, [Watchdog Slams IEA over Pro-Brexit Report Backed by Jacob Rees-Mogg](#), The Guardian, 1 December 2018, accessed May 2020

⁸¹ Tobacco Tactics, [Therese Coffey](#), accessed May 2020

⁸² [Transparency data, Ministerial hospitality](#), October to December 2018, gov.uk, accessed May 2020

⁸³ Robert Buckland, [Register of Members’ Financial Interests](#), 23 November 2016, accessed May 2020

⁸⁴ Tobacco Tactics, [Alun Cairns](#), accessed May 2020

⁸⁵ [Free Enterprise Group](#), undated, accessed May 2020

⁸⁶ M.Savage, [New trade minister Liz Truss had private talks in US with libertarian groups](#), The Observer, 4 August 2019, accessed May 2020

⁸⁷ HM Government, [Healthy Lives, healthy people: A tobacco control plan for England](#), UK Government website, March 2011, accessed May 2020

issues related to the regulation of nicotine products should be as transparent as practicably possible”.⁸⁸

- In 2017, the Tobacco Control Plan for England committed to the continued publication of information on all meetings with the tobacco industry,⁸⁹ and in its Delivery Plan, a commitment was made to “routinely liaise with DH and cross-government officials to publish meetings with industry.”⁹⁰
- The 2019 HMRC guidance document on responsibilities for interacting with the tobacco industry stated that “In the event interactions are required, these should be conducted with maximum transparency to demonstrate compliance with the FCTC”.⁹¹

Examples of full implementation:

- PHE publishes all minutes of meetings with stakeholders with links to the tobacco and nicotine industries.⁹²
- The DHSC regularly publishes details of meetings between special advisers and senior media figures. It also includes details of gifts and hospitality received by special advisers.⁹³

Examples of partial implementation:

- HMRC regularly publishes notices of its officials' meetings with tobacco stakeholders, although, due to its duty of confidentiality,⁹⁴ the data includes very little detail on the meetings beyond the general topic of discussion.⁹⁵
- In November 2019, HMRC published a guidance document on HMRC’s responsibilities for interacting with the tobacco industry under WHO FCTC Article 5.3. Although the document advises that any interaction with the tobacco industry on matters related to tobacco control should be accountable and transparent, it stipulates that this “excludes meetings held for customer compliance issues and operational meetings on illicit tobacco”.⁹⁶
- The Treasury used to publish a list of its officials’ meetings and topics of discussion with the tobacco industry until March 2013 but appears not to have released similar data

⁸⁸ Public Health England, [Protocol for engagement with stakeholders with links to the tobacco industry](#), 2016, accessed May 2020

⁸⁹ Department of Health & Social Care, [Towards a smokefree generation: A tobacco control plan for England](#), UK Government website, July 2017, accessed May 2020

⁹⁰ Department of Health & Social Care, [Tobacco Control Plan Delivery Plan 2017-2022](#), UK Government website, June 2018, accessed May 2020

⁹¹ Her Majesty’s Revenue and Customs, [The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019, accessed May 2020

⁹² Public Health England, [Minutes of meetings held and copies of correspondence published under Article 5.3 protocol, October 2019](#), accessed May 2020

⁹³ Department of Health and Social Care, [DHSC: special advisers' gifts, hospitality and meetings](#), March 2020, accessed May 2020

⁹⁴ HM Revenue and Customs, [HMRC Internal Manual: Information Disclosure Guide](#), UK Government website, 19 August 2020, accessed August 2020

⁹⁵ HM Revenue and Customs, [HM Revenue and Customs officials' meetings with tobacco stakeholders](#), UK Government website, 23 January 2020, accessed May 2020

⁹⁶ Her Majesty’s Revenue and Customs, [The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019

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<p>since.⁹⁷ Instead it currently just publishes list of ministers' meetings with any organisations.⁹⁸</p> <ul style="list-style-type: none"> – At the time of writing this report, Parliamentary data on functions and hospitality only covered the period to 31 July 2019. <p>For other government departments and agencies, information on meetings with the tobacco industry and its representatives is not readily available online.</p>						
<p>17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Rec 4.2)</p>				x		
<p>Some departments adopted guidance for dealing with the tobacco industry. However, no comprehensive set of rules exists for public officials within the UK on regulating their interaction with the tobacco industry.</p> <ul style="list-style-type: none"> – A detailed code of conduct, issued by the DHSC and the FCO, exists for overseas civil servants dealing with the tobacco industry, emphasising the need for transparency, and limiting what support should be given to the tobacco industry by UK posts.⁹⁹ – The DHSC, in its 2017 Tobacco Control Plan for England, formulates the need to limit “direct contact with the tobacco industry to that necessary to discuss the implementation of regulatory provisions or operational matters”, and encourages tobacco companies to engage with government in writing rather than face to face.¹⁰⁰ – The PHE 2016 protocol for engagement with stakeholders with links to the tobacco industry stipulates that meetings with stakeholders on tobacco policy issues should be in writing with a previously prepared agenda, and states that “PHE employees in an official capacity should not attend or speak at conferences that are organised entirely or largely by the tobacco industry or those with links to the tobacco industry other than to enable effective communication of regulation in accordance with FCTC Guidelines on Article 5.3 Recommendation 2.1.”¹⁰¹ <p>The 2019 HMRC guidance document on responsibilities for interacting with the tobacco industry details HMRC responsibilities under WHO FCTC Article 5.3 and divides scenarios of interaction into green, red and amber with examples.¹⁰²</p>						
<p>18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)</p>				x		

⁹⁷ HM Treasury, [Treasury officials' meetings with tobacco stakeholders](#), UK Government website, 19 April 2013, accessed May 2020

⁹⁸ HM Treasury, [Ministers' meetings](#), UK Government website, February 2020, accessed May 2020

⁹⁹ [United Kingdom's revised guidelines for overseas posts on support to the tobacco industry](#), Department of Health and the Foreign & Commonwealth Office, UK Government website, December 2013, accessed May 2020

¹⁰⁰ Department of Health & Social Care, [Healthy Lives, healthy people: A tobacco control plan for England](#), UK Government website, July 2017, accessed May 2020

¹⁰¹ Public Health England, [Protocol for engagement with stakeholders with links to the tobacco industry](#), 2016, accessed May 2020

¹⁰² Her Majesty's Revenue and Customs, [The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019, accessed May 2020

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<p>The UK government requirements focus on the tobacco industry obligation to report in detail the data on ingredients and emissions of tobacco products.¹⁰³ The EU TPD of 2016 imposed further reporting requirements on the tobacco industry in those areas.¹⁰⁴ HMRC and the DHSC also collect data from tobacco manufacturers on profits, taxes paid, product prices, marketing and research spending, and local data on sales of all products.¹⁰⁵</p> <p>However, unlike the data on emissions and ingredients, the government is not allowed to publish the sales and marketing data.¹⁰⁶ Pressure has been exerted by civil society organisations and charities, including Action on Smoking and Health, to increase transparency in this regard. In April 2019, a bill was introduced to parliament by a backbench MP requiring that these data be made public. However, the bill failed to complete its passage through Parliament before the end of the session.¹⁰⁷</p>						
<p>19. The government has a program / system/ plan to consistently¹⁰⁸ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)</p>			x			
<p>In England’s 2017 Tobacco Control Plan Delivery Plan 2017-2022 report, the DHSC committed to issuing active reminders in the officials and delivery groups to limit contact with the tobacco industry.¹⁰⁹ However, no information was found detailing a comprehensive or systematic strategy for raising awareness on this issue.</p> <p>In February 2019, the All Party Parliamentary Group on Smoking and Health recommended that the DHSC “should provide all parts of Government [...] with advice on their responsibilities to protect public health policy from the commercial and vested interests of the tobacco industry based on the WHO FCTC Article 5.3 guidelines.”¹¹⁰</p> <p>In March 2020, the health minister, when asked about the PMI proposal to set up a £1 billion smoking cessation fund in the UK, put on the record in parliament that the Government remains “fully committed to the convention and, importantly, to article 5.3 [...]”. He also assured that he writes “to NHS trusts and local authorities to remind them of their obligations under article 5.3 to protect public health interests from tobacco industry interference.”¹¹¹</p>						
<p>20. The government has put in place a policy to disallow the acceptance of all forms of contributions/gifts from the tobacco industry (monetary or otherwise) including offers of assistance,</p>			x			

¹⁰³ [Explanatory memorandum to the Tobacco and Related Products regulations 2016](#), UK Legislation website, accessed May 2020

¹⁰⁴ Action on Smoking and Health, [Tobacco Products Regulation](#), ASH website, accessed May 2020

¹⁰⁵ [Consumer Protection: The Tobacco and Related Products Regulations 2016](#), UK Legislation website, accessed May 2020

¹⁰⁶ Action on Smoking and Health, [Tobacco Companies Transparency Bill](#), ASH website, 26 April 2019, accessed May 2020

¹⁰⁷ [Tobacco Companies \(Transparency\) Bill 2017-2019](#), UK Parliament website, accessed April 2020

¹⁰⁸ For purposes of this question, “consistently” means: a. Each time the FCTC is discussed, 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

¹⁰⁹ Department of Health & Social Care, [Tobacco Control Plan Delivery Plan 2017-2022](#), UK Government website, June 2018, accessed May 2020

¹¹⁰ All-Party Parliamentary Group on Smoking and Health, [Delivering the vision of a ‘Smokefree Generation’](#), ASH website, February 2019, accessed May 2020

¹¹¹ House of Commons official report of [Parliamentary Debates Thursday 5 March 2020](#), Vol672, no35

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policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)						
No specific policy to disallow contributions from the tobacco industry exists. However, such interactions are governed by the UK's broader anti-corruption regulation. ¹¹²						
TOTAL	32					

¹¹² HM Government, [United Kingdom Anti-Corruption Strategy 2017-2022](#), UK Government website, December 2017, accessed May 2020