**Appendix 1 – Draft Code of Conduct**

**Appendix 2** -**Template submission response.**

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| What do you consider should be included in a Code of Conduct for persons carrying on lobbying activities? |
| In principal, the observations of Alcohol Action Ireland (AAI) on the Draft Code of Conduct broadly fall under six central observations of language, namely:   1. Strengthen vocabulary on ‘honesty and integrity’ 2. Broaden the perspective of ‘disclosure of interests’ 3. Widen the concept of ‘respect’ for the bodies to the process 4. Strengthen the criteria brought to ‘information presentation’ 5. Extend concept of ‘Improper Influence’ to incorporate indirect/secondary preferment, while   proposing the process of ‘Consent for Cooling Off’ is open and transparent.  By way of outlining our views, this presentation extracts the relevant sections of the Draft Code of Conduct and outlines the changes we believe should be considered:  **Preamble**  This draft preamble sets out nine principles by which persons carrying on lobbying activities should govern themselves. Our comments focuses on the language articulated for principle 2 and 5.  In 2 ‘Acting with honesty and integrity’ the Commission may consider strengthening this principle to incorporate concepts of *fabrication or falsehood; deliberately misleading*.  In 5 ‘Disclosure of interests’ the Commission may consider broadening this principle to incorporate concepts of *networks of pecuniary interests, direct or indirectly*.  **Code of Conduct;**  Principle 1) Demonstrating Respect for Public Bodies  AAI propose that the Commission may add ‘and the democratic process’ to the opening sentence:  Persons carrying on lobbying activities should act in a manner that demonstrates respect for public bodies ***and the democratic process***  Principle 2) Acting with Honesty and Integrity  AAI propose that the Commission may amend the sentence three of the opening paragraph:  *Persons carrying on lobbying activities should make their case without manipulating or presenting information in ways that could be regarded as dishonest or false*, to:  ***Persons carrying on lobbying activities should make their case without manipulating or presenting information in ways that is knowingly understood as dishonest, fabricated and/or false.***  Principle 3) Ensuring Accuracy of Information  AAI propose that the Commission may amend the opening sentence:  *Persons carrying on lobbying activities should take all reasonable measures to satisfy themselves that the information they are providing to public bodies or to elected or appointed public officials is accurate and factual.* to  AAI propose that the Commission may amend the opening sentence:  ***Persons carrying on lobbying activities should take all reasonable measures to satisfy themselves that the information they are providing to public bodies or to elected or appointed public officials is accurate, factual and legitimate.***  Principle 4) Disclosure of Identity and Purpose of Lobbying Activities  AAI propose that the Commission may amend the second sentence of the opening paragraph:  *Where a person is carrying on lobbying activities on behalf of a client or other person the person carrying on the lobbying activities should disclose the identity of the client or other person and the nature of their relationship with that person****. To***  ***Where a person is carrying on lobbying activities on behalf of a client or other person the person carrying on the lobbying activities should disclose the identity of the client or other person and the nature of their relationship with that person or organisations.***  And the three paragraph:  *A person carrying on lobbying activities should always inform the elected or appointed public official of their interests, ….* ***to***  ***A person carrying on lobbying activities should always inform the elected or appointed public official of their direct and indirect interests, ….***  Principle 7) Avoiding Improper Influence    AAI propose that the Commission may amend line four of the opening paragragh:  *the course of their lobbying activities, make any offer of gifts or hospitality which might ….* ***To***  ***the course of their lobbying activities, make any offer of gifts, hospitality, or propose indirect preferment to others, which might ….*** |
| What do you consider should not be included in a Code of Conduct for persons carrying on lobbying activities?? |
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| Do you think the Code of Conduct should contain different provisions in relation to different descriptions of persons carrying on lobbying activities? |
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| Any other comments, views or suggestions? |
| The following comment on  Principle 8) Observing the provisions of the Regulation of Lobbying Act  B) “Cooling off” period  Is a general observation and proposal from AAI on the current practice by the Commission with regard to the operational principles underpinning the procedures of Section 22.­­­­­­­  **It is our view that the processes of evoking Section 22, and the Commission’s management of such applications, are not sufficiently open or transparent to assuage legitimate public concern.**  **It is our view that any application under Section 22 should be made public on application, and that the decision making process undertaken, and agreed, by the Commission, in respect of the applicant, should be published on delivery.**  **We believe the current practice of anonymised historical reporting of the applications is insufficient to garner public confidence.**  ­ |