



Ms. Sherry Perreault
Head of Ethics and Lobbying Regulation
Standards in Public Office Commission
18 Lower Leeson Street
Dublin 2

30th July 2018

Re: Code of Conduct for persons carrying on lobbying activities

Dear Ms. Perrault,

I refer to your letter of 19th June 2018 to Minister Regina Doherty regarding the development by the Standards in Public Office Commission of a Code of Conduct for persons carrying on lobbying activities and your invitation to submit comments for consideration in the development of the Code.

As requested, I am attaching the comments from the Department of Employment Affairs and Social Protection for your consideration.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'John McKeon', is written over a horizontal line.

John McKeon
Secretary General



Submission response

What do you consider should be included in a Code of Conduct for persons carrying on lobbying activities?

To maintain the fundamental objective of public interest, lobbying activities need to be carried out in a transparent and ethical manner.

The 9 main principles outlined are an absolute requirement in the Code.

Since some of the descriptors of these principles are subjective e.g., "undue pressure", "preferential access" and may lead to misunderstanding or misinterpretation. It is suggested that the inclusion of some examples of acceptable and un-acceptable practices would be helpful.

Given the nature of a regulatory document a brief and general statement on the potential implications of non-compliance might be included.

What do you consider should not be included in a Code of Conduct for persons carrying on lobbying activities?

No comment.

Do you think the Code of Conduct should contain different provisions in relation to different descriptions of persons carrying on lobbying activities?

No - a principle based code is appropriate.

However since lobbyists come from a variety of background it may be helpful to include descriptions or examples of what is deemed acceptable and non-acceptable practice.

Any other comments, views or suggestions?

As Ireland is increasingly diverse it is suggested, in order to facilitate as many representative groups as possible, that the code be made available in the variety of languages.

In addition, versions of the code should be available in formats suitable for people with disabilities (e.g. audio and braille versions)