Standards, Procedures and Public Appointments Committee

Lobbying (Scotland) Bill

Written submission received from Alcohol Focus Scotland

1. When the Scottish government first took up the issue of lobbying, Alcohol Focus Scotland (AFS) was encouraged and hopeful that Scotland would lead the way in the UK in making lobbying more transparent. However, as it stands, we are disappointed in the Scotland (Lobbying) bill, as it falls a long way short of delivering a meaningful level of transparency around lobbying in Scotland.

2. The limited scope of the lobbying register proposed in the bill means that the bulk of lobbying activity in Scotland will be excluded from registration. As currently drafted, the register will fail provide the Scottish public with an accurate picture of the extent of lobbying activity in Scotland and who is lobbying whom on what issues.

3. AFS believes that full disclosure of all lobbying activity is necessary to ensure the integrity and probity of policy and political decision-making processes. We would therefore like to see the current bill enhanced to deliver greater lobbying transparency. In line with the Scottish Alliance for Lobbying Transparency, we support the following amendments:

   - **Expand the types of communications covered by a statutory register**
     Individuals and organisations, including AFS, lobby using multiple modes of communication, not just face-to-face meetings. If a lobbying register is to serve a useful purpose in shedding a light on the nature and extent of lobbying then it must cover all the types of communications lobbyists are known to use to influence decision-making and the policy process.

   - **Extend registration to cover lobbying of civil servants and special advisers**
     Special advisers and civil servants have a significant role in the formulation, modification or adoption of policies and legislation, and they are lobbied in this regard. To provide a true picture of lobbying activity in Scotland and the potential for officials and advisers to be used as a route into government and parliament, the scope of the register should be extended to cover lobbying of civil servants and special advisers.

   - **Expand the information to be disclosed to include spending on lobbying**
     Information that lobbyists are required to disclose should include an estimate of how much they are spending on lobbying.

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1 See our previous submissions on lobbying transparency:
4. Extending the scope of registration along the lines above would not in our view be disproportionate or burdensome. Accepted norms and standards of good governance and accountability now mean that most organisations already have in place a range of recording and reporting mechanisms - for members, shareholders, funders etc. If information on lobbying activity is collected for other reporting purposes, then a requirement to register lobbying activity should not impose a significant additional burden for the majority of organisations. For small community organisations and charities that engage in a limited amount of lobbying activity, thresholds can be set to exempt them from reporting.

5. A more transparent lobbying process can build public trust in political institutions. As the Bill progresses through the next stages of the parliamentary process, the Scottish Parliament has the opportunity to strengthen the current bill to provide a greater degree of lobbying transparency in Scotland.

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