

SCVO

SCVO opposes the creation of a lobbying register as it would be harmful to the positive relationships between the third sector and Scottish Parliament. To address the key challenges we face in tackling inequality, empowering people and delivering positive outcomes for the people of Scotland, it is vital that we do not put up barriers which restrict or discourage third sector organisations from participating in policy processes. The Scottish Parliament was founded on the principle of 'a participative approach to the development, consideration and scrutiny of policy and legislation' – let's keep it that way.

Unlock Democracy

A lobbying register is an essential tool for transparency and accountability in public policymaking. Ordinary citizens must be able to know who is lobbying whom, on what, and how much they are spending. Transparency promotes public confidence in the political system and helps stop scandals before they happen.

The increasingly diverse nature of lobbying activity means that it is most practical for those who lobby, rather than their targets, to assume responsibility for maintaining transparency. A comprehensive register would not disadvantage organisations that lobby, but put them on a level playing field, ensuring fair and open access to decision-makers.

RCN

RCN Scotland believes lobbying is a democratic right which helps engage the electorate and improves policy and legislation. One way of improving transparency would be to publish who – other than constituents – MSPs, Ministers and public officials meet. This would reinforce and enhance Parliament's open and transparent reputation.

As we do not believe there is a problem with lobbying, any decision to introduce a register should apply to third party lobbyists only and be compulsory, comprising a list of lobbying/public affairs companies and self-employed consultants and their clients. If introduced, a new independent body would be needed incurring significant financial/bureaucratic costs.

Scottish charity regulator

Transparency in public life is important. The proposal of a register of lobbyists is one route towards making lobbying transparent. If such a register is to be created, it is essential that it is clear who is required to register and what they are required to register. Proportionality comes into play and any negative impacts across the charity sector should be mitigated wherever possible. This would be important both in terms of minimising the regulatory burden for charities, especially small charities, as well as ensuring that the principle of accessibility to the Scottish Parliament is upheld.

SPF

The Scottish Property Federation (SPF) is strongly of the view that lobbying is a fundamental part of the Scottish and UK political processes. SPF members engage with government and parliament throughout policy development and implementation processes, both proactively and also in response to invitations by government when

asked to help to provide industry views and suggest appropriate policy solutions. We list our members publicly and declare membership rates as well. It is important that this communication flow is maintained from trade associations, who can bring market information and technical perspectives to policy issues for the information of the government/legislature.

The SPF is of the view that any solution put forward should be proportionate to the perceived problem and perhaps if necessary should be more directly focused on payment for lobbying purposes for very specific purposes as opposed to the broader nature of much of our work as a trade association.

Epilepsy Scotland

Although Epilepsy Scotland does not perceive that there is a tangible problem with lobbying in Scotland, we recognise that accountability around lobbying is integral to fair and open government.

We do believe, however, that responsibility for this rests ultimately with MSPs and that any proposed legislation must be a proportionate response to an evidenced issue.

We believe that any regulation of lobbyists in Scotland should be specifically formed to reflect the culture of political participation in Scotland and the working practices of the Scottish Parliament, and must not create a barrier to parliamentary engagement for organisations representing the most vulnerable and disadvantaged members of society.

Electoral Reform Society

Scotland has witnessed a democratic awakening. Our citizens are engaged in political discussion and are keen to participate in our democracy. Additionally, the Scottish Parliament is set to be charged with greater responsibility for the decisions that impact the lives of the Scottish people. Now is the time to ensure those decisions are made with the utmost transparency. We must ensure our citizens have faith in the system.

A register of lobbyists, detailing who is meeting with whom to discuss what, and how much they are spending, would greatly enhance the reputation of the Scottish Parliament and Scottish Government. It would also serve to provide the public with the means to access information about decision making in our democracy.

CIPR

Scotland's Parliament has an opportunity to demonstrate how politics can allow and encourage the free exchange of information to make better policy and law. It can do this by working with the entire lobbying profession to offer a process through which the public can access more information about their work with policy makers, whether that is through a register or better disclosure of Ministerial and MSP diaries. The debate about transparency in lobbying has given way to one which focuses on professional standards. Any proposals should support the voluntary structures which regulate lobbyists and promote lobbying as a professional community.

ASPA

MSPs legislate best when they're well-informed. As Ethical Standards Commissioner Stuart Allan says "Lobbying is a legitimate and recognised part of the democratic process".

There must be a level playing field – lobbyists should not get better or worse access to MSPs than anyone else.

Bad practice should be addressed, but we're not convinced by a register.

Regulation should be proportionate – in 6 years Stuart Allan has recorded no breach of lobbying rules.

Lobbyists must behave ethically, but MSPs have responsibilities too – MSPs should review their Code of Conduct, publish their diaries and record details of meetings with lobbyists.

ASH Scotland

ASH Scotland supports the development of a lobbying register and believes any lobbying regulations should reflect Scotland's existing obligations under the WHO's Framework Convention on Tobacco Control (FCTC) - a legally binding international health treaty, to which the UK is a signatory. FCTC guidelines advise Parties to protect public health policies from commercial interests of the tobacco industry. Because much of the tobacco industry's history of lobbying demonstrates both overt and covert lobbying tactics aiming to undermine public health policy, it is critical to track all tobacco industry lobbying practices and relationships with third parties so that the scope of commercial involvement and financial support is fully disclosed.

FSB

The openness of the Scottish Parliament's processes and the integrity of our elected representatives mean we see no need to introduce new statutory regulations on lobbyists.

However, should Parliament disagree, we submit that trying to define adequately which individuals must register and what activity they must record would prove impractical.

We believe that a less burdensome, more cost effective solution lies in elected representatives maintaining a public register of their meetings with anyone who is seeking to advocate a particular policy to them. Doing this through an enhanced MSPs' Register of Interests would seem to be a neat, cost-neutral option.

Spinwatch

The Committee's acceptance of the case for change is very welcome. It is vital that proposals for lobbying registration are proportionate and will aid transparency and accountability. As Holyrood is set to gain more powers it is also likely to attract more lobbying. Now is an ideal time to create a lobbying register that discloses key information on who is lobbying, whom they are lobbying, on what issues and what resources are devoted to influencing decision making. The lobbying information

already available is piecemeal, disjointed and often unreliable – a central mandatory register that captures all organized lobbying is required.

CBI

Lobbying is essential to the political process and must be conducted in an open and transparent way. Measures already exist to support transparency, including the register of Scottish Government ministers' external meetings and the MSP code of conduct. Any new regulatory proposals should adhere to the Scottish Government's principles for better regulation and be a workable and proportionate response to a clearly defined problem. We believe that further clarification and evidence is needed of a problem with lobbying in Scotland before legislation is taken forward. Concern should also be given to regulatory convergence with the regime at UK level in order to minimise the burden on those affected.

Cancer Research UK

"Cancer Research UK supports the introduction of a universal register, accompanied by a Code of Conduct, in order to uphold public confidence in lobbying. We believe that bad practice in campaigning activity should be exposed and eradicated, using this opportunity to regulate reasonably all professional lobbyists.

We welcome the Scottish Standards, Procedures and Public Appointments Committee inquiry into lobbying. Lobbying is a hugely important tool for charities, whether used to encourage change or maintain a positive status quo, raise awareness, or provide expertise to strengthen strategy. We believe the Scottish Government should protect the ability of charities to campaign."

APPC

The Association of Professional Political Consultants is the self-regulatory and representative body for professional political practitioners, ensuring the highest standards of honesty, integrity and professionalism amongst members, who are all required to adhere to a strict code of conduct.

We suggest that the simplest way to achieve transparency in lobbying would be to make public the official diaries of Ministers, civil servants and MSPs.

We could only support the introduction of a statutory register of lobbying, providing that it applies equally to all those who engage in lobbying on a professional basis and does not extend to financial information.

Scottish Grocers Federation

We would urge the Scottish parliament to take the view that not-for-profit trade association such as Scottish Grocers Federation be exempt from any register of lobbyists. We are entirely open and transparent about who our members are and we engage solely on the issues which directly affect them. We are not 'paid political consultants' who represent a range of clients on a commercial basis. Our members need an effective voice in parliament: creating a register of lobbyists could act as a barrier to this.

PRCA

The PRCA is the UK professional body representing the public relations and public affairs industry. Its membership includes consultancies, in-house communications teams and also individual PRs and lobbyists.

The PRCA is in favour of a statutory lobbying register in Scotland.

The PRCA believes any lobbying register must be universal in order to capture all who perform the “act of lobbying in a professional capacity”. There should be no exemptions. To avoid the major issues faced by Westminster’s legislation, the act must be defined properly to cover an industry where 80% of practitioners work in-house.”

Scottish Environment Link

“Scottish Environment LINK is supportive of efforts to regulate lobbying, as long as any such regulation is financially and administratively proportionate, does not affect NGOs’ ability to campaign, and does not restrict or inhibit the ability of small organisations – many of whom are LINK members - from taking a full part in the political process.

We believe that Ministers and MSPs must also play their role in ensuring the transparency of lobbying by publishing their diaries. As an additional safeguard, senior officials of Government and public bodies should similarly publish details of any engagement they participate in where lobbying could take place.”

Invicta

Invicta supports the introduction of a statutory register of consultant lobbyists, on similar terms to Westminster’s Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014. Consistency of approach is important to business like ours who serve a client base with business interests in the UK as a whole.

Invicta believes we should invest time in improving standards of engagement between business and those in public office and legislation will help address any perceived problems in the lobbying industry. Professional standards and a code of conduct are essential to address rogue operators too closely associated with the world of political parties.

In taking this approach, Invicta has set itself apart from many in the industry who take the view that nothing needs to change. The status quo is not an option.

Chartered Society of Physiotherapy Scotland

CSP Scotland would have no objection to belonging to a register of organisations, and is expressly involved in seeking to influence public policy in health and social care and education for example. However, retaining accessibility to decision makers is an important founding principle of the Scottish Parliament. It might be counterproductive to seek to impose requirements or afford privileges to registered organisations or individuals. CSP Scotland would not wish to see its wider membership disadvantaged in seeking to represent themselves on local issues.

