

## PRCA General Election Guidance for public affairs members

A UK General Election has been called for 4 July 2024. Parliament was dissolved on 30 May, which marked the start of the 'short campaign'.

This guidance is provided to members of the PRCA who conduct public affairs activity, are listed on the Public Affairs Register, and are bound by the PRCA Public Affairs Code (the 'Code').

We have defined public affairs activity as follows: "Public affairs" means activities that are carried out in the course of a business for the purpose of (a) influencing government, or (b) advising others how to influence government. The full link can be found here: <u>Definition of Public Affairs</u>

The questions and answers below are based on issues raised with the PRCA, adapted for this specific period. They are for general guidance only and cannot be relied upon in the event of a complaint. The PRCA's Standards Committee has the remit to consider formal allegations of breaches of the PRCA's codes and standards.

Alongside the PRCA Public Affairs Code, legislation and regulation which is applicable to those conducting lobbying, campaigning, or related activity close to a General Election includes:

- The Transparency of Lobbying, Non-party Campaigning and Trade Union Act 2014
- The Electoral Commission Advice for Charities engaging in Public Debate
- The Bribery Act 2010

## **Political Party activity**

Q. We are a PRCA member and one of our staff who works as a public affairs professional is also a candidate for a political party. What are the rules around this?

PRCA members who appear on the PRCA Public Affairs register are required to declare if they are an elected councillor or officer on the register (Clause 20). There is no requirement to declare on the register if you have been selected as a candidate.

However, members must always keep separate their duties and activities as public affairs practitioners from any personal activity or involvement on behalf of a political party (Clause 13).

In practice, this means keeping activity related to being a candidate separate from your work as a public affairs professional, and to always abide by the principle of transparency.

For example, if you are in a meeting in your capacity as a candidate and a topic related to one of your clients is raised, you must be transparent about the fact that you are employed separately as a professional acting on behalf of your client. You must not use a campaigning opportunity (for

example, an event with a front bencher) to undertake lobbying on your clients' behalf, as this would blur the boundary between the two roles.

Similarly, if you are at a work event, you must not undertake election campaigning. You must be transparent about your campaigning role to ensure it is kept separate from any work carried out on behalf of your employment.

Q. I am being seconded to a political party, is this within the guidance?

There is no part of the Code which prevents members going on secondments.

During the time of their secondment the individual must be removed from the PRCA Public Affairs Register<sup>1</sup>. This is because they must not conduct public affairs work during the time of their secondment and the two things must be kept separate. It is appropriate for companies and individuals to keep a record of the steps they have taken to ensure this separation - for example, removing email and company system access for the duration of the secondment.

The individual may not use any confidential or privileged information that came to their attention as part of their professional role while they are seconded.

Q. Can I campaign or volunteer for a political party?

Many PRCA members are party activists and campaigners in their spare time. They must keep their duties and activities as public affairs practitioners separate from any personal activity or involvement on behalf of a political party (Clause 13).

In practice, this means being transparent about the clients you work with when it is appropriate, such as in conversations when you are campaigning or volunteering.

Q. A member of my team is taking a role in a political party for the short campaign. What should I make them aware of?

In many ways, this will be similar to the guidance relevant for secondments. The important things to be aware of are:

 Keeping work with a political party separate to public affairs work, such as not speaking to clients during this time

<sup>&</sup>lt;sup>1</sup> It is the responsibility of the parties to whom members are seconded to report the seconding of staff and their salaries (for that period of time) as donations. Our members and their employers do not have any particular responsibilities but should be aware that the Electoral Commission publishes details of donations to parties. This includes donations in kind. The Electoral Commission does this on a weekly basis and details may appear on their website, if any single donation in a week is over £11,180.



- Being transparent in all dealings while working on the campaign, such as making people aware of the clients you were working with and any conflicts of interest at the appropriate time
- Keeping relevant documentation for the period, such as making a note of conversations you
  may need to refer to, or noting processes, such as diverting emails to a colleague.

Q. I am active in party politics and post on my social media, are there restrictions on this?

In line with Clause 13 of the Code, members must keep their professional activities separate from their involvement with a political party. In practice, members can indicate in their bio whether the views expressed are personal and not made in a professional capacity, or it may be more appropriate to create a separate account for some activity.

This guidance was updated on 6 June 2024 following additional information provided by the Electoral Commission.

Whilst the PRCA offers to guide and assist members, members must reach their own conclusions on what their professional obligations under the Codes of Conduct require of them in an any situation. Responses to enquiries and published guidance are based on the information provided by members or situations that have arisen in the past but neither the PRCA nor any individual involved in drafting guidance, responding to an enquiry or giving assistance accepts any responsibility or liability for any action taken in reliance on it and it does not consist of nor can it be relied on as giving legal advice. Following the advice or guidance given by the PRCA does not prevent a subsequent investigation being carried out or a finding of a breach of the Codes of Conduct being made by the Standards Committee, though it may be relied on in mitigation in respect of any sanction imposed.

