

Public Relations and Communications Association (PRCA) response to The Committee on Standards inquiry into All Party Parliamentary Group (APPGs).

Who we are:

- The Public Relations and Communications Association (PRCA) welcomes the opportunity to contribute to this inquiry. The PRCA is the world's largest professional PR body. We represent and regulate more than 35,000 PR professionals in 70 countries worldwide.
- The PRCA promotes all aspects of public relations and communications work, helping organisations and individuals to maximise the value they deliver, within an ethical and professional framework. The Association exists to raise standards in PR and communications, providing members with industry data, facilitating the sharing of communications best practice, and creating industry understanding. All PRCA members are bound by our Professional Charter and Codes of Conduct. The Association works for the greater benefit of the industry and society, representing the profession, and lobbying on its behalf.
- Within the PRCA is the PRCA Public Affairs Board (PAB), the voice of the public affairs and lobbying industry. The PRCA PAB's role is to ensure transparency through our quarterly Public Affairs Register; to enforce high standards through our Public Affairs Code; and to promote a wider understanding of public affairs and the contribution it makes to public life. The PRCA's public affairs membership totals 124 organisations, employing approximately 2000 practitioners, and working for approximately 3000 clients.

Executive summary:

- As the voice of the public affairs industry, we believe that lobbying is integral to a thriving democracy and contributes positively to the policy-making process. Our membership is varied and includes consultancies, in-house teams (including charities, private sector organisations, and public sector bodies), and individual practitioners. MPs, Ministers, and civil servants rely on the expertise provided by our members to deliver well-informed legislation and scrutiny.
We are clear that All-Party Parliamentary Groups play an important role in our democracy. They offer Parliamentarians access to expert insight. They ensure policymakers are properly informed about public policy matters.
- Within this overall framework, we are clear that transparency and disclosure are vital. Our members observe the highest ethical standards and are regulated by the industry's most rigorous self-regulation mechanisms: the PRCA Public Affairs Code and the PRCA Professional Charter.
- Our members are required every quarter to disclose full details of their work for APPGs on the PRCA Public Affairs Register - whether this is done on a paid for or pro bono basis. The Public Affairs Code also provides clear rules on how members should engage with politicians.
- Our members and our industry are committed to transparency. We therefore welcome any effort to make Parliament more transparent, and we support any effective and proportionate changes that enhance the already high ethical standards that exist. However, our overall view is that current arrangements are proportionate and effective.

Detailed Commentary:

The PRCA's response addresses the following issues:

The value and benefits of APPGs to the House

Transparency and appropriateness of funding of APPG activities and secretarial support

The role of external secretariats to APPGs

The risk of APPGs being used for access by lobbyists, other organisations or by foreign Governments, and how any conflicts of interests arising can be managed

Use of Parliamentary passes by staff exclusively supporting APPGs

Who should be accountable for ensuring an APPG complies with the rules

- As the voice of the public affairs industry, we believe that APPGs perform a valuable function in the democratic process. They are set up on a cross-party basis, by MPs for MPs. Not only do they offer Parliamentarians access to insight, but they ensure that policymakers are properly informed about public policy issues. The public affairs industry plays an important role as it supports what APPGs do and enables Parliamentarians to do their job.
- Due to a lack of Parliamentary resources, APPGs rely on outside support in order to function. The role therefore of external secretariats is critical. A significant number of PRCA members provide secretarial support to various APPGs. There is no fundamental problem with involving further outside expertise, given that the very reason APPGs exist is to bring insight, research, understanding, and expertise to the process. Their involvement improves the APPGs' outputs, and decision-making is better for it.
- However, transparency is key. Our members are regulated by robust rigorous self-regulation: the PRCA Public Affairs Code is recognised as the UK benchmark of ethical professionalism in the public affairs industry. In fact, the Registrar of Consultant Lobbyists deems the PRCA Public Affairs Code as the only automatically relevant Code to the business of consultant lobbying.
- The PRCA Public Affairs Code applies to all members equally, and members are required to provide quarterly updates to the PRCA with the names of all relevant clients and practitioners during the previous three months for publication in the Public Affairs Register. This includes details of their work for APPGs whether that is on a paid for or pro bono basis. Members who breach the Code are subject to a well-established independent disciplinary procedure. Bell Pottinger's activities, expulsion, and subsequent dissolution some years ago would be a pertinent example here.
- The PRCA Public Affairs Code strictly prohibits members from holding Parliamentary passes unless there are truly exceptional circumstances which requires an individual to hold one. Members must request explicit public permission from the PRCA Public Affairs Board Executive Committee to hold a pass. This permission must be made public. Our rules on Parliamentary passes are stringent because we believe it is simply wrong for a lobbyist to hold a Parliamentary pass. The abuse of Parliamentary passes damages trust in our industry.
- Equally, we have strongly condemned the use of Parliamentary passes by ex-MPs who become lobbyists. The PRCA has granted the use of a Parliamentary pass to only one PRCA member due to truly exceptional circumstances. We do not believe that APPG staff who work solely on APPG matters need Parliamentary passes.
- As the Committee can see, the industry already subscribes to the highest ethical standards and is self-regulated in an effective manner. We believe that there is sufficient transparency already, as any work done for APPGs is declared on the PRCA Public Affairs Register on a quarterly basis. This information is also recorded on the Register of APPGs. We do not

believe that the Committee needs to impose any further measures to increase transparency, as the process is transparent already.

- Imposing additional measures on the industry would be burdensome for the industry and would provide nothing in terms of transparency. We strongly believe in proportionate regulation which strikes a balance between the regulatory burden on lobbyists, and those running APPGs and achieving transparency. Increasing the regulatory burden on our members and others who support the work of APPGs might well reduce the number of APPGs that are viable, and so reduce the crucial expertise and insight that APPGs provide to Parliamentarians.

Conclusion:

- To conclude, the PRCA believes that APPGs perform a valuable role in the democratic process. They bring together a cross-section of MPs, and they offer Parliamentarians the expertise they need to perform their duties and to pass good legislation.
- We are also clear that transparency and disclosure are key, which is why PRCA members observe the highest ethical standards, and disclose already all of their work for APPGs and other clients.
- Our members observe strict rules on Parliamentary passes, because it is simply wrong a lobbyist to hold a Parliamentary pass. The misuse of Parliamentary passes erodes the public's trust in our industry and democracy. APPG secretariats should not hold Parliamentary passes unless there are truly exceptional circumstances.

In our view, current levels of transparency and disclosure are appropriate, and we do not believe that the Committee should impose any further measures on APPGs and the industry. We have continuously shown that the industry's self-regulatory mechanisms work, and that the industry is committed to the utmost level of transparency.

- If, however the Committee should conclude that changes to the current Parliamentary rules are necessary, we would be delighted to work with it to make such changes practicable and well-understood.