

## SIAA Response

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### Lobbying Transparency Bill

Consultation response  
SIAA

**Question 1 – Do you agree that the Government’s three core principles are appropriate to inform the delivery of an effective and proportionate lobbying registration regime in Scotland?**

We would like to see principles that clearly outline the aims and objectives of this legislation.

**Question 2 – Do you agree that a publicly available register of lobbyists should be introduced in Scotland?**

In a democracy it is important that political activity is transparent and that all citizens have the opportunity to engage with parliamentarians. If there is a register of lobbyists then there needs to be proper consideration about how this might hinder smaller third sector organisations that already find engaging with the Scottish Parliament and Government sometimes difficult, intimidating and time consuming.

We support the idea that there should be a greater responsibility on parliamentarians and civil servants to be accountable regarding lobbying.

**Question 3 – Do you agree that no fee should be payable by lobbyists for registering or updating the register?**

Yes, the register should be free.

**Question 4 – What are your views on whether the onus to register should lie with individuals who lobby as part of their work, or organisations who lobby?**

**Please provide reasons in support of your response.**

It should be organisations as naming individuals could be problematic for many smaller third sector organisations as there may be a number of individuals that might be involved in lobbying in an 'informal' way without it being clearly defined in their role.

**Question 5 – Should both consultant lobbyists and in-house lobbyists be required to register?**

Yes

**Question 6 – Should any types of in-house lobbyist be exempt from registration?**

No

**Question 7 – Do you agree that the register should cover the lobbying of MSPs and Ministers?**

Yes but also senior civil servants and Special Advisers.

**Question 8 – What types of communication do you think should be covered by a statutory register?**

Face to face meetings and events.

**Question 9 – Do you agree with the Government's view that paid lobbyists should be required to register?**

Yes

**Question 10 – Do you agree that the register should also allow for voluntary registration by lobbyists not required to register?**

We feel there should be further clarity about this.

**Question 11 – What are your views on what kind of information each lobbyist should be required to provide on registration?**

There needs to be a balance between transparency and openness and the amount of information required being onerous.

**Question 12 – How often should lobbyists be required to provide a return detailing their lobbying activity?**

At regular intervals, perhaps every 3-6 months.

**Question 13 – Do you agree that the Parliament should introduce a Code of Practice for lobbyists setting out guidance on the registration regime and expected standards of behaviour?**

Yes

**Question 14 – Do you agree that a register should include the facility for lobbyists to indicate if they already subscribe to any industry Codes of Conduct?**

Yes

**Question 15 – Do you have any views on the Committee's proposals for who should be responsible for upkeep and oversight of the Register?**

An independent body, ideally with no conflicts of interest.

**Question 16 – Do you have any views on what enforcement mechanisms and sanctions should be available in connection with the registration regime?**

There should be sanctions in order for the register to have any credibility.

**Question 17 – Do you have any views on whether Parliament, by resolution, should be able to adjust the scope and operation of the registration regime once established?**

A review of the legislation should be built-in to ensure that it is operating in the way envisaged.

**Question 18 – Do you have any views on whether there could be impacts on equalities groups as a result of the proposals outlined?**

We think that there could potentially be impacts on specific groups who may feel further excluded or marginalised if they perceive the register to be burdensome or onerous, user led groups such as people with learning disabilities, mental health problems or BME groups.

**Question 19 – Do you have any views on whether there could be any additional costs or other implications for businesses as a result of the proposals outlined?**

The potential implications will be dependent on the nature of the register and the level of information required from individuals or organisations.

**Question 20 – Do you have any other comments on the general operation of a register of lobbyists, or on any of the proposals put forward by the Committee or the Government?**

There needs to be careful consideration of the balance between transparency and openness and the duties on third sector organisations that lobby and campaign

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The Scottish Independent Advocacy Alliance (SIAA) is Scotland's national membership body for advocacy organisations. The SIAA promotes, supports and defends independent advocacy in Scotland. It aims to ensure that independent advocacy is available to any person who needs it in Scotland.

SIAA is a Scottish Charitable Incorporated Organisation Charity number SC033576 –

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