

# PRCA Guidance notes on the Code for Professional Lobbying

## General

### **Q1: Why has the Code been updated?**

A: The new [Code for Professional Lobbying](#) came into effect on 15 September 2025, replacing the Public Affairs Code. It is clearer and more concise, strengthening ethical standards and tightening rules on employing MPs, Peers and Non-Executive Directors (NEDs). The changes reflect current expectations around professional lobbying transparency and accountability.

### **Q2: Who does it apply to?**

A: The Code applies to the professional lobbying activities of all members of the PRCA. This means Professional, Associate and Company Members. Where specified, certain provisions apply only to Company Members. Company Members can either be entities that specialise in public relations and communications work for clients (such as agencies) or the inhouse department of a larger organisation that undertakes public relations and communication work solely on behalf of that organisation. Although such organisations may become Company Members, the Code for Professional Lobbying only applies to those staff, usually in house communications or public affairs professionals working for the Company Member, who undertake Professional Lobbying as defined in this Code. We have added this to the preamble to the Code so that it is clearer so, for example, all of the 50,000 employees of a large PLC which has a small professional lobbying department are not, for example, required to provide information about their political appointments for disclosure in the Register.

### **Q3: Which is more important – the Code of Conduct or the Code for Professional Lobbying?**

A: Both are equally important, but each has a different purpose. The [Code of Conduct](#) applies to all of our members - whatever work they do. The Code of Conduct makes sure that all of our members uphold the highest professional standards of integrity and ethics in their work. The Code for Professional Lobbying sets out the additional requirements for those of our Members who undertake "professional lobbying".

### **Q4: What do you mean by "professional lobbying"?**

A: Lots of different organisations and individuals have contact with institutions of government and are not all necessarily involved in professional lobbying. The Code only applies to our members who are involved in professional lobbying. This can be when acting for a client, an employer, or as a volunteer. We have defined professional lobbying as meaning activities, carried out by our members during a business, for the purpose of

influencing (or advising others how to influence) the public functions of a Relevant Public Body. The full definition can be found on page 1 of the [Code for Professional Lobbying](#).

Members should note that the Code specifically provides that activities are to be taken as having this purpose if a reasonable person would consider, having regard to all the circumstances, that the activities were intended to have that effect. You should always ask yourself “What would a member of the public think of me acting in this way? Would they think that I am involved in trying to influence government?” What we mean by influencing has been expanded from the previous Code for Public Affairs and is also intentionally wide - it includes “informing, advising or advocating for particular interests or points of view”. You should therefore err on the side of caution and we suggest, if in doubt, you keep a note of your thinking which may assist if a complaint about your conduct was later made.

The definition of professional lobbying is subject to some exceptions, so its effect is not disproportionate. Activities such as making personal representations, fulfilling official duties, responding to legal or statutory requirements and responding to public tenders are not regarded by us as professional lobbying.

**Q5: The definition of professional lobbying includes volunteers working on behalf of a charity or other organisation- should this be included?**

A: Yes, if one of our members volunteers to act on behalf of a charity or other organisation to influence a Relevant Public Body, this is professional lobbying under the Code and the member will have to comply with all of the Code’s requirements, including making a declaration in the PRCA’s Professional Lobbying Register to ensure transparency. It is the activity, not payment status, that determines application of the Code.

**Q6: What is the definition of Relevant Public Body?**

A: Relevant Public Bodies include:

- Central government, devolved legislatures, and local government.
- Members and staff of either House of Parliament or devolved legislatures.
- Ministers, officials, and special advisers.
- Other bodies that exercise public functions.

Special Advisers and Regional Mayors are now specifically included in this definition because of the role they can have in making decisions in the public interest or influencing those who do. The definition of what may constitute a Relevant Public Body is deliberately wide and we appreciate that the reference to “other bodies that exercise public functions” might be considered by some to be vague. We expect our members to exercise their professional judgement about whether the entity they are lobbying is the type that would fall within the spirit of the rule. If unsure, we suggest that they keep a record of why they considered that it was not a Relevant Public Body and/ or seek the PRCA’s views.

## **Duty to disclose the identity of clients and must not mislead – Rules 1 and 3**

### **Q7. If I do use a party conference pass, how do I ensure that I am behaving transparently?**

If you obtain a pass from your local party, you should ensure that you behave with the utmost transparency during the conference.

We have set out below some guidelines on behaviour that may be adopted by relevant members when using a party pass:

- When meeting an elected representative (or an advisor to one) in any context, you should make clear that you work for a named employer who is involved in professional lobbying. If you intend to or do act on behalf of a specific client, then that too should be made clear.
- If you appear on panels at conference, you should declare the capacity in which you are appearing.
- If you hold elected office, or are seeking to hold office, you can undertake activity relating to that office or election to that office. However, you must not use that office or platform to get undue access to a Relevant Public Body on behalf of your employer and (if applicable) clients. If a matter of interest to your employer or client(s) does come up during discussions of your (prospective) office, you should declare that you represent that employer/client(s).
- When engaging with anyone else, you must not misrepresent your connection to a particular party nor your employment by an organisation. Deliberately concealing or omitting to mention your employment status is not acceptable where such disclosure is reasonably likely to have an impact on the course of the conversation.

In addition, and more generally, our members must not make exaggerated or misleading statements as to the extent of their influence on, or access to, Relevant Public Bodies, or individuals within those organisations. See rule 3.

### **Q8: I have recently been elected as a councillor. How do I approach the issue of conflicts?**

A: Many of our members take up roles as councillors (or are involved in politics) and the Code does not, in any way seek to prevent this. However, the member should always be aware of the need to avoid actual or apparent conflicts – so, for example, they must not be involved in lobbying their own council on behalf of clients or their employer and should avoid lobbying activity in their own ward or within the council's geographic area in case a conflict – or a perception of one – arises. Members should also take care with organisations in which the council is a stakeholder (e.g. airport, police, fire authorities). The member must also make sure that they provide the PRCA with details of their councillor role for inclusion in the PRCA's Professional Lobbying Register (see rule 7 (e)).

## Requirements around employment of MP, Peers etc - Rule 4

**Q9. We are a Company Member subject to the Code for the Professional Lobbying who would like to enter into a consultancy arrangement with a former MP to provide some professional lobbying activities, as now defined in the Code, on our behalf. Does the Code prevent this?**

A: No. The Code does not apply to previous MPs in this way. It only prevents our members from engaging with current MPs, Peers and the equivalent to undertake professional lobbying on their behalf. The Code also sets requirements for our members who want to employ or renumerate current MPs, Peers and the equivalent to provide services to them or their clients that do not fall within our definition of professional lobbying. This is now set out in rule 4.

However, if employing an ex-MP to undertake such services, members should be aware that the ex-MP cannot continue to hold a parliamentary pass (as this is prohibited by rule 6 (see relevant Q and A below). They will also have to comply with any other organisation's rules or regulations that apply to former MPs. The member will also have to meet the Register requirements set out in Rule 7.

## **Q10: What does “engage” mean in rule 4 (a)?**

A: The wording “engage” is deliberately broad. It follows on from the much clearer description we have now adopted about the activities now in scope of the Code – i.e. professional lobbying (rather than the previous much vaguer and wider reference to “public affairs”).

The prohibition of engaging a role holder is therefore intentionally wider than just employing or remunerating them (for example, when someone does a piece of consultancy work for a fee or receives an emolument for acting as an executive director).

Someone can be “engaged” to do something for a benefit in kind or even if no money actually changes hands. The focus of this rule is about the activities undertaken. Put simply, relevant role holders should not be used by our members to undertake professional lobbying for them or their clients. We advise that our members should always have the definition of what professional lobbying means at the forefront of their minds. They should ask themselves “Are we using the role holder to seek to influence (that is inform, advise or advocate for particular interests or points of view) the public functions of a Relevant Public Body?” “Would a reasonable person think that is what we are actually doing here?”

In all such matters, we expect our members to exercise their professional judgement about such issues and always to consider the spirit and scope of the Code as a whole. Again, if unsure, we suggest that you err on the side of caution and keep a record so you can explain, if a complaint is made, why you considered at that time that the role holder has not been engaged by you to undertake professional lobbying. A practical way of monitoring and

assessing these sorts of interactions might be for you to keep a record of all your (and your staff's) contact with such role holders to show the nature of any engagement you had with them.

**Q11: Members are prohibited from engaging NEDs to carry out professional lobbying (rule 4 (a)). Why is that?**

A: Rule 4 has now been simplified and strengthened to provide that our members must not engage "any MP, Member of the House of Lords, any member of a Devolved Legislature or a Non-Executive Director of a Government Department\* to carry out Professional Lobbying". We consider that such role holders should not be involved in professional lobbying for our members. This is due to the risk of damage to public confidence in the lobbying industry and the perception of compromising the impartiality and independence of those involved in public decision making at senior levels. Those covered by the prohibition now also include Non-Executive Directors of a Government Department. Such individuals often have access to senior ministers and special advisers who set policy direction on significant matters in the public interest.

\* "government department" refers to ministerial departments only.

**Q12. Can we employ serving politicians in any capacity? What about an advisory role to provide strategic communications advice to clients?**

Rule 4 (b) of the Code deals with the situation where one of our members wishes to employ or remunerate an MP, Peer, NED or their equivalent to provide services which aren't within the definition of professional lobbying. For example, providing in house training or strategic communications advice. We recognise that it is important to strike the right balance between the valuable expertise that such persons can provide to our members and vice versa and the importance of public confidence in professional lobbying and in our government institutions.

The rule therefore requires that the member who wishes to employ or remunerate that role holder must satisfy a number of conditions and evidence this by a written definition of compliance. These conditions are set out in subsections i) to iv) of rule 4 (b). These are designed to make sure that the member avoids a risk of a conflict arising or the misuse of confidential information. The rule also requires that the member must declare the employment or remuneration of the role holder on the Register to ensure public transparency and accountability.

Our members are also expected to ensure full compliance with that any other laws, rules and regulations that might apply to this situation. for example, the [MP's code of conduct](#) and [House of Lords members' conduct - UK Parliament](#).

## **Duty to avoid conflicts of interest – rule 5**

### **Q13. Can I campaign for a political party?**

Many of our members are party activists and campaigners in their spare time. Under rule 5, members must avoid actual or apparent conflicts of interest which are likely to arise between their professional lobbying activities and their personal affairs, their work or professional appointments outside of professional lobbying. We advise that to avoid any such perception of a conflict, members should keep strictly separate from their activities as a professional lobbyist, any personal activity or involvement on behalf of a political party. Our members are also always subject to the wider ethical obligations and standards in the general Code for Conduct and also need to be aware of any wider legal obligations on this issue.

## **Holding a parliamentary pass - Rule 6**

### **Q14: We wish to use a freelancer on a regular basis to undertake professional lobbying for us. However, they have a part-time job as an MP's researcher and thus hold a parliamentary pass. Can we contract with them?**

A: Members who are subject to the Code are prohibited from holding parliamentary or devolved legislature passes. This is set out in rule 6. This means that you should not employ someone with a pass (even if they agree not to use it) as this would involve a breach the Code. It is important for confidence in the lobbying industry that our members are not seen to have any special access privileges to those who work in parliament even if they have no intention of conducting lobbying activities when there. There is no bar on an individual Member of the PRCA accepting, say, an invitation to attend an event in the Senedd at the invitation of an MS. However, holding a pass with its consequential ability to access those at the very heart of our Government institutions would risk giving the impression of an unfair advantage and possible conflict.

### **Q15: Are there any members of the PRCA that due to 'exceptional circumstances' are permitted to hold parliamentary passes**

We appreciate that there may, rarely, be exceptional circumstances where a member may need to hold a pass. We may therefore consider in such exceptional circumstances granting permission to that member. If permission is granted, the decision will be published on the PRCA's website to ensure full transparency and may include conditions.

Any such application should be addressed in the first instance to the PRCA's Head of Public Affairs.

## **Register requirements - Rule 7**

**Q16. We did some professional lobbying work for an organisation but ultimately that relationship ended before a contract was signed and no payment was received. Should this be declared on the Professional Lobbying Register?**

A. Yes, you should declare the organisation as a pro bono client. The declarations that our members are now required to make have now been consolidated and are now set out in rule 7. The obligations apply to both fee-paying and nonfee-paying clients.

**Q17. We have both public relations and public affairs clients. How do we decide which clients to declare on the Professional Lobbying Register?**

A. If a consultancy is not carrying out any professional lobbying (as defined) whatsoever for a public relations client, there is no need to include them on the Register and therefore they do not need to be disclosed. However, paying close attention to the definition of professional lobbying, if any work is carried out by public relations teams (or for public relations clients) to seek to influence a Relevant Public Body, then details of that professional lobbying activity should be provided to the PRCA and will be disclosed on the Professional Lobbying Register – see the obligations in rule 7.

**Q18. What disclosures are required by the Parliamentary rules on All Party Parliamentary Group (APPGs) or their equivalents?**

A. The rules for APPGs can be found [here](#). The Code for Professional Lobbying requires any member providing secretariat or other services to an APPG to list the APPG as a client in the Register, together with the name(s) of the funder(s) and any associated organisations funding or otherwise supporting the APPG (or state 'no funding') (see rule 7 (d)).

**Q19. Do we have to declare clients on the PRCA register and the statutory register - The Office for Consultant Lobbyists (ORCL)? How is the PRCA's Register different from ORCL's?**

Yes, you must provide the required information to both organisations for inclusion in their respective registers. ORCL requires all 'consultant lobbyists' to follow a professional lobbying code and the PRCA's Code for Professional Lobbying is one of those accepted by ORCL as meeting its requirements, which can be found here: [Guidance from the Registrar of Consultant Lobbyists – ORCL](#)

Our Code is broader than ORCL's as we consider greater transparency of all professional lobbying activities undertaken by our members is important in the public interest. So for example, our Register asks for the names of all those involved in professional lobbying, not just clients, as requested by ORCL. Additionally, we require full disclosure of Advisory Roles (as defined) and if a member is elected as a Councillor or is an officer of a registered party.

**Q20. If a new piece of work comes in, should we add it to the Register straight away?**

A. The Register is retrospective, so it is gathered quarterly for the previous 3 months. The collection periods are in line with those of ORCL: January, April, July and October. However, the rule stipulates that the information we require must be provided to us in an

accurate and comprehensive manner. The Register is an important part of our commitment to transparency and accountability and a failure to meet our requirements may lead to us taking further action.

## **Training - Rule 8**

### **Q21. What does the Code say about training obligations?**

A. Our individual members are required to familiarise themselves, and comply with, the provisions of the Code, and keep up to date with any guidance issued. Company Members have additional obligations – they must provide access to training to ensure their employees and contractors are aware of, and understand, the provisions of the Code - see rule 8.

We regard training as an important element in raising ethical standards and encouraging a culture of compliance. We recommend that, where appropriate, each of our individual members' induction programme includes training on both Codes we have issued. There are resources to help with this on the PRCA's website,

Company Members might wish to consider other methods of ensuring application of the PRCA's Code – for example, by adding a requirement to abide by the Code for Professional Lobbying to employment contracts. Other ways to embed the Code could include a regular mention of the Code at appraisals and holding regular internal discussions on compliance for new clients or new workstreams.