



## Public Affairs Code

### Preamble

This Public Affairs Code applies to the public affairs activities of a member. This Public Affairs Code applies equally, including to all clients, whether fee-paying or not, and all in-house teams. It is a condition of membership that members will accept and agree to abide by this Public Affairs Code and that members will be jointly and severally liable for their actions in relation to the Public Affairs Code. Members are required to endorse the Public Affairs Code and to adopt and observe the principles and duties set out in it.

Other conditions of membership of include:

- Being bound by the terms of the Public Affairs Complaints, Determination, and Disciplinary Rules and Procedures.
- Providing four times a year to Public Affairs Board the names of all relevant clients and practitioners during the previous three months for publication in the Public Affairs Register.
- Undertaking an annual compliance procedure in respect of the Public Affairs Code.
- Including Public Affairs Code compliance in practitioners' contracts, be they of employment or of service.

The Public Affairs Code applies the principles that public affairs practitioners should be open and transparent in their dealings with parliamentarians or representatives of institutions of government; and that there should be no financial relationship between them. Members are determined to act at all times with the highest standards of integrity and in a professional and ethical manner reflecting the principles applied by this Code. In the view of Public Affairs Board, it is inappropriate for a person to be both a legislator and a public affairs practitioner.

### Definitions

"Public affairs" means activities which are carried out in the course of a business for the purpose of (a) influencing government, (b) or advising others how to influence government. Activities are to be taken as having the purpose specified if a reasonable person would assume, having regard to all the circumstances, that the activities were intended to have the effect described. The full definition can be viewed [here](#).

"Government" includes, within the United Kingdom: (a) central government, devolved government, local government; (b) members and staff of either House of Parliament or of a devolved legislature; (c) Ministers and officials; and (d) public authorities (within the meaning of section 6 of the Human Rights Act 1998).

"Member(s)" means any entity which is in membership of the Public Affairs Board. Public affairs practitioners at consultancy members and in-house members are themselves members alongside those practitioners with individual membership.



## Code

1. In pursuance of the principles in the Public Affairs Code, members are required to adhere to this Public Affairs Code in its entirety in order to ensure that the reputation of the Association, the Public Affairs Board, or the profession of public affairs is not brought into disrepute. The Code should be honoured not only to the letter, but in the full spirit of its intent. Where a member has concerns about the activities of a parent or connected company, it must ensure that the parent company is acquainted with the provisions of this Public Affairs Code.
2. Members must act with honesty towards clients (or, if not applicable, their employer) and the institutions of government.
3. Members must use reasonable endeavours to satisfy themselves of the truth and accuracy of all statements made or information provided to institutions of government, whether directly or on behalf of clients, as is applicable. Public affairs practitioners retained by clients must do similar for information provided to clients.
4. In making representations to the institutions of government, members must be open in disclosing the identity of those clients (or, if not applicable, their employer) and must not misrepresent their interests.
5. Members must advise their clients (or, if not applicable, their internal teams and employer) where their activities to deliberately and intentionally interact with the institutions of government may be illegal, unethical, or contrary to professional practice, and to refuse to act in pursuance of any such activity.
6. Members must not make misleading, exaggerated, or extravagant claims about, or otherwise misrepresent, the nature or extent of their access to institutions of government or to political parties or to persons in those institutions.
7. Members must comply with the Bribery Act 2010.
8. Any person who is required to appear on the Public Affairs Register who takes up an advisory role within a Government Department or any agency or body associated with that Department, or within a department, body or agency linked directly to the Scottish Government, Welsh Government or Northern Ireland Executive, must immediately declare publicly that they have done so and also notify the Chair of the Executive Committee of the Public Affairs Board; and any such role shall be declared in the Public Affairs Register in every quarter that the role is held by that person.  
  
An 'advisory role' is defined as a formal position in the public body concerned which may be paid or pro bono, in which the person concerned is in contact with a Minister, Special Adviser, Permanent Secretary or Director-General or equivalent person, whether face-to-face or via any form of electronic communication, for the explicit purpose of offering advice or opinion about any aspect of the work of the policy or administration of that public body.
9. Members must not:
  - Employ any MP, MEP, Member of the House of Lords, or any member of the Scottish Parliament or Senedd Cymru or the Northern Ireland Assembly or the London Assembly to conduct public affairs in any capacity.
  - Make any award or payment in money or in kind (including equity) to any MP, MEP, Peer, or to any member of the Scottish Parliament or Senedd Cymru or the Northern Ireland Assembly or the London



Assembly, or to connected persons or persons acting on their account directly or through third parties.

If Members employ an MP, MEP, Member of the House of Lords, or any member of the Scottish Parliament or Senedd Cymru or the Northern Ireland Assembly or the London Assembly to conduct services in any other capacity other than public affairs, or if any individual associated with a Member has taken up a role under clause 8 above, they must not, in any circumstances, make use of any Privileged Information made available or known to them as a result, including in their dealings with the staff, associates, clients, new business prospects and/or other contacts of the Member.

For the purposes of this clause 8, "Privileged Information" means any and all information, whether in writing, in an electronic format, or passed on verbally, that a Member receives, obtains or otherwise becomes aware of through disclosure by the relevant MP, MEP, Member of the House of Lords, or member of the Scottish Parliament or Senedd Cymru or the Northern Ireland Assembly or the London Assembly, or as a result of a role taken up under clause 8 above, and which is information that the Member has been informed is confidential and/or privileged or which it ought reasonably to know is confidential and/or privileged information, having regard to all the circumstances.

Privileged Information excludes information which:

- (i) at the time of receipt by the Member is in the public domain; and/or
- (ii) subsequently comes into the public domain through no fault of the Member, its officers, employees or agents.

10. Members that are part of a group of companies are not in breach of the Public Affairs Code if the group (but not the member) employs any MP, MEP, Member of the House of Lords, or any member of the Scottish Parliament or Senedd Cymru or the Northern Ireland Assembly or the London Assembly in a role that prohibits the parliamentarian from carrying out public affairs services for the benefit of the member (and, if applicable, its clients). Members must ensure that they do not benefit unreasonably by actions of any third party that, if undertaken by the member, would be considered a breach of the Public Affairs Code.

11. Members must comply with any statute, any resolution of an institution of government, and with the adopted recommendations of the Committee on Standards in Public Life in relation to payments to a political party in any part of the United Kingdom. Members must satisfy themselves that they are compliant with the obligations in the Privacy and Electronic Communications Regulations and the General Data Protection Regulations.

12. Members who also serve as members of decision-making public bodies (including local authority councillors) are prohibited from working on assignments of which the objective is to influence a decision of the body on which they serve. Where members employ, or are, public affairs practitioners who serve as members of decision-making public bodies, those individuals must have no involvement in advising on or supporting work that relates to those bodies, either directly or indirectly.

13. Members must keep strictly separate from their duties and activities as public affairs practitioners any personal activity or involvement on behalf of a political party, including as an office holder or candidate for office.



14. Members must always abide by the internal rules on declaration and handling of interests laid down by any public body on which they serve.
15. No person required to appear on the Public Affairs Register may hold a pass conferring entitlement to access to the Palace of Westminster, the Scottish Parliament, Senedd Cymru the Northern Ireland Assembly, the Greater London Authority, or their associated departments or agencies, except with the explicit written and public permission of the Public Affairs Board Executive Committee, and only then in truly exceptional circumstances.
16. Members must conduct themselves in accordance with the rules of any institution of government while within their precincts, and otherwise.
17. Members must abide by the rules and conventions for the obtaining, distribution, and release of documents published by institutions of government.
18. Members must not exploit public servants or abuse the facilities of institutions of central, regional, or local government.
19. Members must disclose the names of public affairs practitioners on the Public Affairs Register and, where applicable, all their relevant clients. A member providing secretariat or other services for an All-Party Parliamentary Group (APPG), Cross-Party Group (CPG), or All Party Group (APG) must list that APPG, CPG, or APG as a client, together with the name(s) of the funder(s) and any associated organisation(s). Where a client has outside or multiple funders, the names of those funders do not need to be listed on the face of the Public Affairs Register, but must be included in the same way as funders of an APPG, CPG, or APG.
20. Members must disclose the names of public affairs practitioners who are elected councillors and those who are elected officers of a political party registered with the Electoral Commission. Members can indicate which employees are elected councillors or officers of a constituency party or association by including 'Councillor' or the 'Party Officer' in parentheses next to relevant employee's name on the Register.
21. Members must ensure that they/their practitioners have received thorough training on this Public Affairs Code, delivered either internally or by the Public Affairs Board.

In all their activities and dealings, members must be aware at all times of the importance of observing the principles and duties set out in this Public Affairs Code to protect and maintain their own reputation, the good name and success of their business, and the standing of the profession as a whole.

*This document was updated on 1 July 2024, when the PRCA Standards Committee introduced a new procedure for the consideration of complaints. This procedure can be found here: [PRCA-Complaints-Procedure 0.pdf](#)*