

**Steven Fadian**

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**From:** Dara Larkin [REDACTED]  
**Sent:** 09 May 2019 14:05  
**To:** Lobbying  
**Subject:** Submission to Second Review of the Regulation of Lobbying Act 2015  
**Categories:** Filed to eDocs

Name of the individual making the submission: Dara Larkin

Name of the organisation that you are affiliated to: Private Submission

[REDACTED]  
[REDACTED]  
[REDACTED]

I welcome the Second Review of the Regulation of Lobbying Act 2015. This submission relates to the operation of the Transparency Code prepared in Accordance with Section 5(7) of the Regulation of Lobbying Act 2015.

The particular aspect that is of concern is the non-compliance of many Local Authorities of their requirement, under the above, in relation to the provision of information on the operation of Strategic Policy Committees. This relates in particular to the availability of minutes of these meetings.

The requirement of the Transparency Code, in relation to the provision of information obliges local authorities to conduct their SPC activities in a transparent way. By adhering to the Transparency Code, communications within these bodies would meet the exemption from the requirement to register and report on lobbying activities. A review of local authority websites in relation to the availability of the information required shows a wide divergence in adherence to the Transparency Code; some Local authorities are very good, others less so.

I am sure that there are ways means of encouraging local authorities to comply with the Lobbying Act without having the Standards in Public Office Commission monitor their adherence to the requirements. One that would engage the authorities is the requirement to declare on an annual basis the groups and bodies within the local authority that are availing of the Transparency Code as a means exempting them from the requirement to register and report on their activities. This should also include a declaration that they are adhering to the Transparency Code in relation to the provision of information in relation to these groups/bodies and would also include the excerpt below from the Appendix of the Information Notice for Strategic Policy Committees, Advisory Groups and the Regulation of Lobbying in relation to the provision of information that they will provide

**Appendix**

**“Information must be published on the public body’s website setting out the following:**

- Name of Chairperson together with details of his or her employing organisation;
- Names of Members together with details of their employing organisation
- Whether any non-public servant members were previously designated public officials;
- Terms of reference of the group;
- Agenda of each meeting;
- Minutes of each meeting;

Expected timeframe for the group to conclude its work;

Reporting arrangements.

This information should be in a prominent place on the website of public bodies and should be easily accessible.

In addition, the Chairperson of the Group is responsible for overseeing and conducting the work of the Group in a manner which ensures that the Group operates in a manner fully in accordance with its terms of reference and in the public interest. The Chairperson will include with the final or annual report of the Group a statement confirming its compliance with the Transparency Code.”