

Code of Conduct

Portcullis Public Affairs believes that lobbying is about informing the public policy debate to help Government reach better policy decisions - in the interests of both good government and democracy. We firmly believe that pursuit of this broader objective is consistent with the pursuit of clients' individual interests. We are proud that no client has ever been embarrassed by their association with Portcullis Public Affairs - and our intent is that no client ever will be.

So to inspire confidence that we really do set and demand the highest possible standards, as we have for 25 years, this Code of Conduct covers every employee of Portcullis Public Affairs and every consultant and agent acting on our behalf as part of a contractual or sub-contractual agreement in which the main contractor is Portcullis Public Affairs.

Integrity

- We will fulfil our duties and obligations responsibly.
- We will act in a way that is professional and that deserves the confidence of those with whom we have dealings.
- We will only act for reputable, *bone fide* organisations, whose identity and objectives are transparent.
- We will not act for organisations whose policies or objectives are invidiously discriminatory, or that deliberately carry out illegal activities, or which are considered a threat to national security.
- We will not advise on, nor participate in, any activity that we consider illegal, offensive or defamatory and if we become aware of a client's public affairs activities that breach the Law we will bring this to the attention of the client and, if the said activities continue, will cease to act for that client.
- We will not make extravagant, exaggerated or inaccurate claims to clients about the nature and extent of our influence. Similarly, we will not make extravagant, exaggerated or inaccurate claims on behalf of clients when making representations to anyone in Government or to political audiences.
- We will remain morally and politically neutral in dealings with clients regardless of personal beliefs. We believe that the least clients can expect is that those working on their account will be personally committed to achieving the desired outcomes.
- We will not compel any member of staff to work on an account that represents a major conflict with their personal moral or religious beliefs.
- We will comply with codes of practice as they apply to clients, which are notified to us by clients and on which we are briefed by clients.

Accuracy and reliability

- We will provide clients with accurate, factual, balanced, timely and relevant information that is verified and referenced wherever possible using its original source. Where information is unverified, this will be identified clearly.
- We will not ignore inconvenient facts or relevant considerations when providing advice or taking decisions.
- We will correct any errors as soon as possible.
- We will use publicly available sources of information unless confidential information is voluntarily given and permission to use it is granted, in which case we will abide strictly by the terms of any such permission.
- We will provide advice to clients which is fair and balanced, including alternative options and interpretations to assist clients in making informed decisions.

Openness and transparency

- We will not attempt to pass off the company or ourselves as being any other organisation, for the purpose of gaining access to an individual or organisation, exerting influence on an individual or organisation, or for any other purpose.
- We will not pass ourselves off in false roles to elicit information, obtain appointments or access individuals.
- We support The Transparency of Lobbying, Non Party Campaigning and Trade Union Administration Act 2014 and the setting up of a Registrar listing consultancies like PPA, identifying their Directors and listing their clients.

- We will continue to register our Directors through Companies House.
- We will continue to disclose our full list of clients on request to all public officials and elected representatives, and bona fide journalists whose identity has been verified by us, as well as to our existing clients and prospective new clients.

Influence and privilege

- We will not offer financial inducements or apply improper influence to an elected representative or any person acting for or on their behalf, including public officials and advisors, or any individual or organisation. This excludes reasonable hospitality or business mementos which do not compromise personal judgement or integrity.
- We will never arrange events (including political dinners of any sort) with Parliamentarians or public officials where attendance at such an event is dependent on payment of an entry fee or charge.
- We will not employ any sitting elected national or regional representative or Peer or MEP.
- We will not procure or hold or use for the purpose of business any privileged pass or permit that allows access to non-public areas of a Parliament or Assembly except where the relevant institution is a client and requires the consultant to hold a pass.
- We will continue to permit any staff member to be a local authority councillor, but we prohibit any such staff member from working on a client assignment the objective of which is to influence a decision of that same local authority.
- We will always conduct ourselves in a professional manner, with due regard for relevant recommendations from the Committee on Standards in Public Life, and abide by all statutes and rules of the public and private institutions and buildings which we visit, and comply with all reasonable requests of staff employed in those premises.
- We will ensure that we do not gain undue benefit as a result of activities taken by or on behalf of a client or as a result of privileged information gained as a result of same.

Conflicts of interest

- We will report to a senior manager in the company any possible conflict of interest as soon as possible.
- We will act if a conflict of interest does occur - the member of staff will have no further contact with the client or the account. A declaration will normally be made to the client, with the involvement of the individual staff member concerned. Where a conflict of interest occurs between two clients, we will either:
 - ✓ Seek informed permission in writing from all parties involved, only proceeding if all agree, or...
 - ✓ Resign from or cease to pursue one of the clients (depending on the circumstances).

Senior Management

- Senior managers are responsible for and to their employees. Every person will be recognised as an individual, respecting his / her dignity and merit.
- Senior managers will be mindful of ways to help employees fulfil their family responsibilities.
- Senior managers will always seek to provide competent management, acting justly and ethically.
- Senior managers will provide equal opportunity for employment, development and advancement for those qualified.
- Senior managers will ensure that all employees feel free to make suggestions and complaints, and operate an agreed procedure to deal fully and fairly with any formal complaint, with direct access to an independent director if a member of staff or a consultant wishes to raise any concerns of a sensitive nature.
- Senior managers will ensure that working conditions are kept safe, clean, orderly and comfortable.



Sir Charles Cockburn Bt.

Chairman

6th June 2017