

# STATES OF JERSEY



## LOBBYING GUIDANCE AND ENGAGEMENT CODE FOR ELECTED MEMBERS OF THE STATES

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Lodged au Greffe on 10th February 2026  
by the Privileges and Procedures Committee  
Earliest date for debate: 24th March 2026

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STATES GREFFE

## **PROPOSITION**

**THE STATES are asked to decide whether they are of opinion –**

to approve the Lobbying Guidance and Engagement Code for Elected Members of the States set out in Appendix 1 to the report accompanying the proposition, effective from 7th June 2026.

**PRIVILEGES AND PROCEDURES COMMITTEE**

## **REPORT**

The Lobbying Guidance and Engagement Code for Elected Members to the States provides details relating to lobbying in Jersey and the voluntary code for States Members and the associated lobbying register.

The key aim of the lobbying register is to increase transparency and public trust in States Members by providing a public record of who is seeking to influence decisions made by States Members and revealing potential conflicts of interest or unethical practices.

States Members are approached by members of the public through constituency meetings and drop-ins, letters/emails, scheduled meetings and by other means. States Members are contacted in relation to matters that affect individuals and by lobbyists, representing the interests of a group of individuals.

The lobbying code for Members and voluntary recording of Members engagement with lobbyists on a public register aims to provide greater transparency in relation to the lobbying of States Members and a documented trail of interactions by Members with lobbyists.

The lobbying code and register supports Members in their duty to be transparent in accordance with their Code of Conduct by providing a formal way for them to publicly record their engagements with lobbyists.

### **Financial and staffing implications**

There are no financial and staffing implications arising from this proposition.

### **Children's Rights Impact Assessment**

We consider that this proposition has no direct or indirect impact on children and that the duty to have due regard to the UN Convention on the Rights of the Child does not arise. Accordingly, a Children's Rights Impact Assessment is not required under the Children (Convention Rights) (Jersey) Law 2022.

**Appendix 1**

**Lobbying Guidance and Engagement Code**



# Lobbying Guidance and Engagement Code

## Lobbying Guidance and Engagement Code

### Introduction

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This document provides details relating to lobbying in Jersey and the voluntary code for States Members and the associated lobbying register.

The key aim of the lobbying register is to increase transparency and public trust in States Members by providing a public record of who is seeking to influence decisions made by States Members and revealing potential conflicts of interest or unethical practices.

### Background

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States Members (Members) are approached by members of the public through constituency meetings and drop-ins, letters/emails, scheduled meetings and by other means. Members are contacted in relation to matters that affect individuals and by lobbyists, representing the interests of a group of individuals.

The lobbying code for Members and voluntary recording of Members engagement with lobbyists on a public register aims to provide greater transparency in relation to the lobbying of Members and a documented trail of interactions by Members with lobbyists.

The lobbying code and register supports Members in their duty to be transparent in accordance with their Code of Conduct by providing a formal way for them to publicly record their engagements with lobbyists.

### Definition of Lobbying

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Lobbying has been defined by Oxford Reference as:

*'When an individual or a group tries to persuade someone in Parliament to support a particular policy or campaign. Lobbying can be done in person, by sending letters and emails or via social media.*

*Lobbying is when individuals, businesses, trade unions, groups or charities try to get a government to change its policies. "Political persuasion" might be a better term.*

*An attempt by individuals or private interest groups to influence the decisions of government; in its original meaning it referred to efforts to influence the votes of legislators, generally in the*

*lobby outside the legislative chamber. Lobbying in some form is inevitable in any political system. In essence, it is to 'seek to influence (a legislator) on an issue'<sup>1</sup>*

Appendix 2 includes details of lobbying in other jurisdictions.

### **Definition of Lobbying in Jersey**

For the purposes of this code lobbying is defined as:

***'a person(s) representing an organisation, body, or group, with a shared purpose, who seeks to influence a States Member to support a particular outcome.'***

This includes any person(s) representing a business, trade body, union, charity and non-profit body, and any other group of people with a shared interest or purpose.

A lobbyist may be based in Jersey or elsewhere and will try to influence decision makers in relation to laws, regulations, policies and decisions that benefit their interests, using direct and indirect communication, public campaigns, and relationship building.

### **What is not classed as lobbying in Jersey**

For the purposes of this code, a person representing individual views and interests is not considered a lobbyist. A member of the public or constituent, who engages with a Member regarding their individual situation or circumstances is not a lobbyist.

Should a Member be in doubt as to whether they are being lobbied or just being asked for assistance, guidance can be obtained from the States Greffe.

## **Lobbying in Jersey**

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Lobbying is an important, legitimate and valuable practice in democracies, helping towards more informed, balanced and fair decisions. Lobbying can offer an alternative perspective, provide expert input into complicated matters, and identify public concerns. It can also help towards finding solutions and achieving better outcomes.

Lobbying efforts can be highly organised, targeted and repeated, and are typically focussed on legislative and policy matters with direct local impact, such as employment legislation, planning policy and decisions, community infrastructure provision, education and housing policies, health and safety, community safety, budgets and expenditure.

Lobbying in a small jurisdiction can carry risks such as where Government might begin to act in the interests of an industry or activity it might reasonably be expected to regulate, at the cost of the more general protection of the public interest and institutional integrity. These risks can be increased in a small area such as Jersey where there are fewer regulatory bodies and greater potential for close relationships between lobbyists, Members, and Government personnel. In addition, a few well-resourced lobbyists may have disproportionate access to States Members and influence on them.

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<sup>1</sup><https://www.oxfordreference.com/display/10.1093/oi/authority.20110803100111162#:~:text=Activities%20engaged%20in%20by%20individuals,or%20against%20a%20specific%20cause.>

This can give rise to the perception of corruption, affecting public trust in States Members, and the potential for decisions to be influenced by special interests at the expense of the public good, which could likewise undermine public confidence in States Members.

Lobbyists in smaller jurisdictions may have fewer resources than lobbyists in larger authorities to dedicate to lobbying efforts, both in terms of financial capacity and personnel, and may use more informal channels for influencing States members without offering information that would enable the same States members to test assumptions and consider unintended consequences.

The impact of lobbying in a small jurisdiction can be magnified and potentially more controversial than in larger authorities, requiring careful consideration of public perception.

## **Members Engagement with Lobbyists**

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Whilst welcoming and encouraging free speech and transparency, Members must use their discretion on how to engage with lobbyists.

Accepting the importance of lobbying, the engagement between Members and lobbyists must always remain ethical and transparent, adhering to principles of selflessness, integrity, objectivity, and accountability. Members should be open about their interactions, maintain independence, and avoid conflicts of interest.

Under Standing Orders States Members have a responsibility to specify and register their interests with the States Greffe. Members must therefore declare if they are (or have been in the past, since the beginning of the previous political term), a lobbyist, represent a lobbying group, or are acting on behalf of a lobbyist. This disclosure must be made to the States Greffe and will be recorded and made public on the States Assembly website. Any failure by a Member to declare their interests will be treated as a breach of Standing Orders and dealt with accordingly.

## **Lobbying Register**

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For the sake of transparency, Members should record engagements they have with a lobbyist on the Members Lobbying Register (Register), which will be available for the public to view on the States Assembly website.

The recording of lobbying engagements on the register by Members is voluntary, however, it is expected by the Privileges and Procedures Committee.

The Members will need to use their discretion on what to record, and typically this will include any formal or informal in person or other communication between the Member and a person(s) representing an organisation, body or group with a shared purpose, where the person(s) seeks to influence the States Members to support a particular view or outcome. Informal and social interactions and communication between a Member and person where lobbying does not take place do not need to be recorded.

The Register will be available for Members to update themselves on the States Members Teams channel as an excel document, and this will be periodically uploaded to the States Assembly website. It will be for Members to ensure the information they add to the Register is accurate, and as they wish it to be recorded, and that any lobbyist personal information is

excluded. Members may be able to ask for assistance from Government and States Greffe staff to help them with updating the Register.

The engagement with Members by lobbyists who participate in public consultation meetings and events (such as Scrutiny Reviews and Government consultations) does not need to be recorded on the Register, but any follow up engagement between the Member and lobbyist outside of the public meeting, review or event should be recorded.

Details of the engagement to be recorded on the register include: date of interaction, who instigated the interaction, the States Member's name, name of lobbying body, and optional comments.

See Appendix 1 for an example of the register.

### **Data Protection**

The personal details of lobbyists will not be recorded on the register. The register will refer to a 'representative' and only details of the lobbying body will be recorded.



## **Appendix 2 - Lobbying in other Jurisdictions**

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Laws are in place in Scotland and Ireland with regards to lobbying. The UK, Northern Ireland and Wales have lobbying guidelines which form part of their codes of conduct.

The Organisation for Economic Co-operation and Development (OECD) has published information relating to governance and lobbying, including the '[Recommendation of the Council on Transparency and Integrity in Lobbying and Influence](#)'.

### **Lobbying in the UK**

In the UK, lobbyists and lobbying groups must register with the statutory Office of the Registrar of Consultant Lobbyists (ORCL). The UK Government has published a [lobbying report and associated documents](#) and [Guidance for civil servants in contact with lobbyists](#).

### **Lobbying Laws in Scotland**

The Bill for this [Act of the Scottish Parliament](#) was passed by the Parliament on 10th March 2016 and received Royal Assent on 14 April 2016. It is an Act of the Scottish Parliament to make provision about lobbying, including provision for establishing and maintaining a lobbying register and the publication of a code of conduct. The law was last updated on 6th September 2017 and there are currently no plans for changes to the legislation.

### **The Scottish Lobbying Register**

The [Lobbying Register](#) contains information of instances of regulated lobbying and is administered by the Scottish Parliament. It is an online register for anyone to search and use free of charge. It contains registration details provided by every individual or organisation engaged in regulated lobbying plus information returns for each instance of regulated lobbying, made by each registered individual or organisation.

The Scottish Parliament must publish a [Code of Conduct](#) for people who want to lobby MSPs. The Code is not just about regulated lobbying but covers any kind of communication with an MSP, in relation to their role as an MSP.

Any registration from an organisational account on the Lobbying Register must also provide information about any other code of conduct it subscribes to which governs regulated lobbying. This includes if it also governs other activities.

### **Lobbying Laws in Wales (Senedd)**

Whilst not enshrined in law, the Welsh Parliament (Senedd) have published a [Guidance on lobbying and access to Members of the Senedd](#) document which forms part of their Code of Conduct. The document on lobbying was updated in May 2021.

The [Code of Conduct on the Standards of Conduct for Members of the Senedd](#) sets out the rules and regulations by which the Member must comply in terms of lobbying with the guidance intended to supplement and complement these requirements.

### **The Welsh Lobbying Register**

There is no register for lobbying in Wales, and each Member is required to abide by the standards contained within the Code of Conduct guidance.

### **Lobbying Laws in Northern Ireland**

Members' dealing with lobbyists in Northern Ireland fall within the scope of the Assembly [Code of Conduct and Guide to the Rules](#) ("the Code and Guide"). Members must not, in relation to any dealing with a lobbyist, do anything which breaches the Code and Guide. Appendix 1 of this guide deals specifically with [Guidance for Members on dealing with lobbyists](#).

### **The Northern Irish Lobbying Register**

There is no register for lobbying in Northern Ireland, and each Member is required to abide by the standards contained within the Code of Conduct guidance.

### **Lobbying Laws in Ireland (Oireachtas)**

The [Regulation of Lobbying Act 2015](#) in Ireland is to provide, establish and maintain a register of persons who carry on lobbying activities; to provide for a code of conduct relating to carrying on lobbying activities; to impose restrictions on involvement in lobbying by certain former designated public officials; to amend the Ethics in Public Office Act 1995; and to provide for related matters.

The Act came into effect on 1 September 2015. The first registration period ("relevant period") was 1 September 2015 – 31 December 2015 and the Regulation of Lobbying (Amendment) Act 2022 was passed into law on 22 June 2023. There are currently no plans for changes to the legislation.

### **The Irish Lobbying Register**

Anyone who wishes to lobby, must register on the [lobbying.ie](http://lobbying.ie) website and make a return every four months. The Irish Parliament have a [3 step test](#) in which it asks potential lobbyists to undertake to be sure that they are actually lobbying.

It is also asked that those registering read a [welcome letter](#) prior to any registration which informs them of reporting deadlines, account administration for organisations, enforcement provisions and the Code of Conduct. The [Code of Conduct](#) came into effect on 1st January 2019.

Persons carrying on lobbying activities are required under section 16(5) of the Act to have regard to the Code of Conduct when carrying on lobbying activities. Lobbyist should therefore read and become familiar with this Code.