

Recommendations for good lobbying practice

We are committed to responsible lobbying

Introduction

In accordance with the Finnish Transparency Register Act, the National Audit Office of Finland (NAOF) has appointed an Advisory Board tasked with preparing recommendations for good lobbying practice. The recommendations support the development and adoption of a good lobbying culture, and they can also be used to promote the objectives set out in the Finnish Transparency Register Act. The recommendations for good lobbying practice can be applied to all activities within the scope of the act, and they are also suited for other types of lobbying and lobbying consultancy.

The actors submitting their registration to the Finnish Transparency Register may declare their commitment to comply with the recommendations for good lobbying practice. The recommendations are based on the principles of self-regulation, and they encourage actors carrying out lobbying to adhere to responsible practices.

The task of the Advisory Board is to periodically review and update the recommendations. The recommendations are not legally binding.

Our hope is that as lobbying becomes more open and is carried out in a more responsible manner, decision-makers are encouraged to assess stakeholder activities and the progress towards societal dialogue. We also hope that in their own activities, decision-makers encourage extensive and active use of the Finnish Transparency Register and adhere to these recommendations as applicable.

We commit ourselves to meet the obligations set out in the Finnish Transparency Register Act and to observe the recommendations for good lobbying practice.

Advisory Board of the Finnish Transparency Register
16 May 2024

Recommendations for good lobbying practice



1 We respect the democratic decision-making process

- We carry out lobbying in a manner that supports the integrity of the political and administrative system and strengthens citizens' trust in the decision-making processes.
- We are committed to supporting a political culture in which democracy and the rule of law are strengthened by influencing decision-making.
- We observe the Act on a Candidate's Election Funding when financing the election campaigns of political parties or candidates. Our policy is to disclose our participation in the election funding of political parties and candidates, and this also includes the purchasing of tickets to election funding seminars.

2 We act in an honest and respectful manner

- We respect fundamental and human rights in our lobbying activities.
- We treat decision-makers and parties carrying out lobbying activities in a fair and respectful manner. We act in a responsible manner and set an example of honest lobbying in which differing opinions are respected and which does not involve pressure, manipulation or bribery or other types of corruption.
- We obtain all information by appropriate and honest means.

3 We openly disclose for whom we are working and which interests we are promoting

- We always disclose our identity, our stakeholders, and the names of our clients when we are acting on behalf of a client. We openly disclose the names of the client company or other organisations whose interest we represent.
- We openly disclose what we are lobbying for. To the extent possible, we disclose the concrete objectives of our lobbying activities, the key contents of our messages directed to decision-makers and the material that we use in our lobbying activities.
- We ensure that we represent the views of our stakeholders, members and clients and relay these views to decision-makers as agreed.
- We openly explain to the lobbying targets all relevant matters that are known to us.

- We take special care to ensure that the information that we use in our lobbying is accurate and based on facts. We correct any misunderstandings that we have noticed. We do not intentionally use misleading or excessive claims in our lobbying activities.

4 We openly disclose our interests

- Our policy is to identify any potential conflicts of interests and actively prevent them.
- We are fully aware of our own interests. We disclose at our own initiative to the decision-makers all interests that may have a material impact on the assessment of our lobbying activities. The interests may involve Parliament, Government, public officials, or companies, economic actors or associations that the decision-making concerns.
- We also inform the lobbying targets of our dual roles (when, for example, acting as decision-makers or elected officials) when this has a material impact on the assessment of our lobbying activities.

5 We respect confidentiality

- We are aware that we may receive confidential information during or in connection with the lobbying activities. We keep and use this information in a reliable manner and in a manner that has been agreed on with the decision-maker and that is in accordance with the purpose for which the information has been received. Confidentiality may not lead to a situation where the openness of the lobbying activities is unnecessarily restricted.
- If we are carrying out lobbying activities on behalf of a client, we use the information supplied by the client only for the purposes specified by the client.

6 We observe the rules of hospitality

- When arranging events and catering as part of our lobbying activities, we act in accordance with the reasonable practices commonly observed on such occasions. The programme or catering at such events should not be of such type that could significantly influence the targets of our lobbying.
- We are aware of the rules that [political decision-makers](#) and [public officials \(both websites are in Finnish\)](#) must observe in matters concerning gifts and hospitality, and we adhere to these rules.
- We are aware of the [provisions on offences in public office contained in the Criminal Code \(Chapter 40\)](#). We refuse to offer direct or indirect personal financial benefits to decision-makers or to parties related to them.

Lobbying and influencing – part of democracy

Giving a say to a broad range of experts and stakeholders and a dialogue with them in the drafting and implementation of matters falling within the scope of public authority is a key part of the political system. Lobbying means influencing public decision-making or drafting or implementation of matters, directly or indirectly. Lobbying is also referred to as lobbying activities and influencer communications.

The aim of the register established under the Finnish Transparency Register Act (430/2023) is to enhance the transparency of the lobbying targeting preparation of matters and decision-making in Parliament and ministries and in this way to strengthen the trust in the process among citizens. The purpose of the act is to encourage the creation of good lobbying practices and to combat inappropriate lobbying.

The aim is to make lobbying more transparent, responsible and trustworthy and to increase and diversify societal dialogue between decision-makers and lobbying organisations. Under the Finnish Transparency Register Act, parties carrying out lobbying and lobbying consultancy must disclose their activities to the Finnish Transparency Register.