



Sent by e-mail to info@lobbying.ie

18TH July 2018

Re: Draft Code of Conduct for persons carrying on lobbying activities – A Public Consultation Paper.

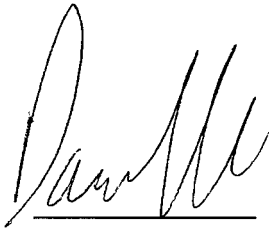
The Irish Mortgage Holders Organisation is a not for profit organisation which aims to facilitate independent mortgage/debt resolution between lenders/creditors & mortgage holders. We have been registered with SIPO in accordance with the Lobbying Act 2015 since 1 September 2015.

In response to consultation exercise currently being undertaken by SIPO and on the basis of our own experience as a SIPO registrant, we note the following:

1. Interplay between SIPO Code of Conduct and Charities Code of Conduct:
Pursuant to the Charities Act 2009 we follow the Charity Regulator's guidelines, codes of conduct, and model constitutional documents, including a Conflict of Interest Policy. A new Governance Code is also currently being developed for charities by the Charities Regulator, a code to which the IMHO will adhere. Any Code of Conduct issued by SIPO for persons carrying on lobbying activities should be must be mindful of existing obligations on the charity sector and the scope of the upcoming Governance Code to be issued by the Charities regulator.
2. Designated Public Officials:
Further education of DPOs as defined by the Lobbying Act is required and is especially relevant where DPOs are using the Act as a means to refuse engagement.
3. Section 22 Lobbying Act 2015
There is little evidence to suggest that this is being applied consistently with former advisers appearing in Public Affairs/Public Relations firms well within the 12-month cooling-off period while others are being subjected to the full 12 month cooling-off period. It is unacceptable that the rules in this regard are not being applied consistently.

In order to ensure full transparency on the application of Section 22 of the Act, there should be a requirement on SIPO to publish decisions and reasons for same and a robust appeals process, the responsibility for which should fall outside SIPO.

Thank you for your consideration.
Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Hall', written over a horizontal line.

David Hall
CEO, IMHO