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Citation for published version:

Digital Object Identifier (DOI):
10.1177/0007650320975023

Link:
Link to publication record in Edinburgh Research Explorer

Document Version:
Peer reviewed version

Published In:
Business and Society

Publisher Rights Statement:
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Towards a Professions-Based Understanding of Ethical and Responsible Lobbying

Abstract

Responding to calls for more substantive studies into ethical and responsible lobbying, we analyse data collected over a 5-year period in Brussels to explore how individual lobbyists understand the ethical dimensions of their work. Mobilising insights from the sociology of the professions, we expose an emerging lobbying professionalism, and unpack practitioners’ understandings of what being a professional lobbyist entails, focusing in particular on their espoused values of transparency and honesty. Whilst expectations to lobby more transparently and honestly stem from political institutions, we find individual lobbyists – acting as conduits – attempt to disseminate these expectations by setting limits that incite their clients to embrace what policymakers consider professional lobbying practice. Our study contributes to corporate political activity (CPA) scholarship by providing a professions-based understanding of ethical and responsible approaches to lobbying. We provide new insights into contextual and individual-level factors behind the emergence of such approaches, and elucidate implications of lobbying professionalism for business and EU governance.

Key words: Corporate political activity; Responsible lobbying; Professionalism; Work ethics; Transparency
Beginning in the late 1990s, scholars of business and society began exploring more principled and ethical forms of lobbying (e.g. Hamilton & Hoch, 1997). In this article, we use the term ‘lobbying’ in broad terms to cover firms’ corporate political activities, understood as the actions undertaken to shape political decisions in ways favourable to firms (Hillman et al., 2004). Recently, scholars have theorised on related notions including deliberative lobbying – understood as the alignment of firms’ political and social actions to resolve public issues (Lock & Seele, 2016) – and responsible lobbying – referring to ethically-acceptable political actions promoting the social good through public policy (Anastasiadis et al., 2018). This emerging literature makes a welcome contribution to corporate political activity (CPA) scholarship, which has tended to overlook ethical dimensions of its subject (Lawton et al., 2013). However, despite these recent advances, we need more substantive studies into ethical lobbying and its implications (Anastasiadis et al., 2018).

We note specifically that – whilst CPA research increasingly acknowledges individual lobbyists (e.g. Rudy & Johnson, 2019; Wilts, 2006) – studies into ethical and responsible lobbying continue to pay them little attention. Grounded primarily in a normative ethics perspective (Fischer, 2004), they prescribe theoretically how responsible lobbying should be conducted, without considering lobbyists’ own understandings of ethical or responsible practice. Lobbyists tend to be reduced to unquestioning individuals whose actions are influenced solely by corporate cultures and priorities (Anastasiadis, 2014). They are overlooked as important translators of systemic expectations regarding responsible lobbying in organisations they represent (e.g. Bauer, 2017).

In our view, lobbying practitioners should not be underestimated in the study of lobbying. They are not passive vessels of corporate will, nor mere executors of firms’ political preferences (Tyllström & Murray, 2019). We thus seek to place them at the centre of our analysis to stretch theoretical understandings of ethical and responsible lobbying. Embracing
a descriptive ethics perspective that foregrounds practitioners’ moral behaviour and beliefs (Fischer, 2004), we analyse data gathered over a 5-year period in Brussels to investigate what lobbyists personally consider to be professionalism in lobbying, including its ethical dimensions. We find that practitioners combine claims to specific values (chiefly, transparency and honesty) and expertise to enhance their personal reputations and improve their access to EU-level policymakers. Their value claims and expertise also serve to increase legitimacy within their firms and set limits on client and employer expectations regarding lobbying. We explain our findings using insights from the sociology of the professions – a theoretical approach emphasising the link between work ethics and expertise and the instrumental role of value and expertise claims for practitioners. In so doing, we respond to calls for more ‘academic research into the professional values held by lobbyists’ (McGrath, 2005, p.134). Drawing on institutions-based understandings of professionalism, we expose lobbyists as institutional conduits (Greif, 2006) who interpret policymakers’ expectations regarding transparency and honesty in lobbying, and transmit these to the organisations they represent.

Our article makes three contributions to CPA scholarship. First, we identify professionalism in lobbying as an alternative approach to understanding ethical and responsible lobbying. Extending insights into the rise of professional lobbying (e.g. Coen and Vannoni, 2019), we expose how lobbyists understand what being professional entails, especially in terms of transparency and honesty. Second, we highlight that lobbyists encourage organisations to embrace these values in their political actions. Instead of taking root automatically, professional lobbying practices based on transparency and honesty are disseminated by lobbyists who reproduce them in interactions with employers and clients. Our research thus builds on existing understandings about conditions that promote ethical and responsible lobbying (e.g. Bauer, 2017). Finally, we expose implications of professionalism in
lobbying. We confirm research (e.g. Doh et al., 2014) suggesting that responsible lobbying improves political access. Assuming increased transparency makes for better policymaking (e.g. Bunea & Gross, 2019), we suggest that lobbyists’ promotion of professional values may enhance the legitimacy of governance in the political systems where they operate.

We begin our article by reviewing existing research into ethical and responsible lobbying and establishing the theoretical basis of our study. Next, we describe our research context and methods used for collecting and analysing data. We then present key findings and discuss their contribution to prior research. We conclude by establishing our study’s limitations and highlighting future research opportunities.

**Lobbying: Instrumental and Ethical Perspectives**

Scholars typically adopt an instrumental view to evaluate firms’ political actions according to their private returns for organisations (Schuler, 2008). They have been charged with studying firms’ political actions as short-term, profit-generating activities while neglecting the ethical aspects of their subject (Alzola, 2013; Mantere et al., 2009). As explained below, ethical analyses emerged relatively slowly in lobbying research (Dahan et al, 2013).

**Ethical and Responsible Lobbying: Definitions and Outcomes**

Early research emphasised ethical lobbying, reflecting on appropriate lobbying practices and linking lobbying with businesses’ broader responsibility to respect human rights, the health and safety of their staff, or democratic institutions (Weber, 1997). Scholars proposed rules for managers to consider when evaluating the impact of firms’ political actions on the broader public good (Hamilton & Hoch, 1997; Keffer & Hill, 1977). They argued that ethical lobbying practice should be underpinned by businesses’ obligation to resolve conflicts of interests where public and private interests do not coincide (Oberman, 2004). Whilst not
considering business lobbying immoral, they suggested that society’s expectations regarding ethical lobbying behaviour were legitimate (Ostas, 2007).

Recently, scholars have proposed other concepts to study ethical dimensions of lobbying. Anastasiadis et al. (2018) theorise on responsible lobbying, defined as actions that promote social good through public policy and adhere to ethical standards acceptable to all parties involved in policymaking. For Bauer (e.g. 2017), responsible lobbying is an integrative approach which, akin to Den Hold et al. (2014), aligns firms’ lobbying and CSR activities. Lobbying is responsible if it links firms’ public policy positions to the long-term objectives and values of society. Similarly stressing alignment of firms’ political and social actions, Lock & Seele (2016) develop the concept of deliberative lobbying to encourage firms to resolve public issues through principles of discourse, transparency and accountability. Notions of ethical and responsible lobbying are also discernible in research into transparency in firms’ political actions (Greenwood, 2011; Holman & Luneburg, 2012), enabling society to better evaluate the sustainability impacts of firms’ policy positions (Lyon et al. 2018).

Extant research suggests a positive link between responsible and ethical approaches to lobbying and firms’ political and business performance. Aligning lobbying activities with CSR actions – although challenging – can safeguard firms’ reputations, stakeholder relationships and overall legitimacy (De Hond et al., 2014; Locke & Seele, 2016). Responsible lobbying can help avoid ethical transgressions that harm reputation and profitability (Barron & Stacey, 2020). It can establish credibility among policymakers and contribute to the overall legitimacy (Bauer, 2017). Promoting responsible lobbying through the alignment of CPA and CSR activities enables firms to influence political and social actors whose decisions can either facilitate or impede competitive success (Doh et al., 2014).
Enabling Conditions of Ethical and Responsible Lobbying

Scholars have also sought to expose conditions that favour or impede ethical and responsible lobbying. Contextual factors can shape lobbying practice, including its ethical dimensions. Levine (2009) highlights that, in the US, being polite and respectful towards policy actors and doing them favours helps lobbyists maintain access. Woll’s (2012) work on lobbying ‘styles’ emphasises how policymaking contexts in Brussels and Washington DC shape lobbyists’ communication practices with legislators. Such context-based accounts find an echo in ethical and responsible lobbying research. Political institutions can promote more responsible lobbying by sanctioning organisations engaged in unethical political behaviour (Lock & Seele, 2016). Responsible lobbying can be affected by government systems (parliamentary vs. presidential), lobbying systems (pluralist vs. corporatist), political cultures (informal vs. formal) and lobbying regulation (state vs. self-regulation) (Bauer, 2017). More transparent lobbying can be promoted through macro-level lobbying regulation (Holman & Luneberg, 2012; Greenwood, 2011). Others argue responsible lobbying may be encouraged at an organisational level through governance mechanisms or codes of ethics (e.g. Dahan et al., 2013; Ozer & Alakent, 2013). It may be promoted through structurally integrating CPA and CSR departments in firms to avoid strategic contradiction (Doh et al, 2014: Locke & Seele, 2016). Firms may also encourage responsible lobbying through organisation design by considering how they evaluate and reward lobbyists (Barron & Stacey, 2020).

The Under-Researched Role of the Individual Lobbyists in Ethical and Responsible Lobbying

Despite recent advances, understandings of ethical and responsible lobbying remain underdeveloped (Anastasiadis et al., 2018; Rival & Major, 2018). Research tends to adopt a normative ethics perspective – prescribing beliefs and values and determining what ought to be done (Fischer, 2004) – to theorise on how lobbyists should act. Such studies struggle to
agree on what constitutes ‘ethical’ or ‘responsible’ in relation to lobbying. Ethical or responsible lobbying feasibly relate to political actions that support policies to benefit society, do not undermine democracy, or result in better financial performance for firms. One way out of this impasse may be to adopt a more descriptive ethics perspective, and examine the beliefs or values that guide what is customarily done and provide empirical description and explanation of lobbyists’ moral behaviour (Fischer, 2004). Drawing on practitioners’ narratives that describe their views, concerns and principles guiding their work, such an approach would give voice to practicing lobbyists and empirically explore their own understandings of ethical and responsible lobbying (McGrath, 2005).

Focusing on individual lobbyists may also generate new understandings about conditions that enable the emergence of ethical and responsible approaches to lobbying. Scholars increasingly acknowledge that firms’ lobbying choices can be influenced by managers’ identities (Wilts, 2006) or other characteristics like tenure, age, functional or educational background (e.g. Rudy & Johnson, 2019). Coen and Vannoni (2018) focus on the background and demographic characteristics of lobbying practitioners in Brussels to understand how organisations staff government affairs’ departments. Despite these examples, research into ethical and responsible lobbying gives little attention to the behaviours of individual lobbyists. Anastasiadis (2014), for instance, makes no clear distinction between lobbyists and the firms they represent, suggesting responsible lobbying is driven by organisational factors alone. He thus reduces practitioners of responsible lobbying to unquestioning individuals whose actions are influenced solely by their firms’ cultures and priorities. As Tyllström and Murray (2019) argue, lobbyists may be more than passive actors and may actually possess agendas and ideological stances at odds with those of their clients.

Context-based accounts of responsible lobbying (Bauer, 2017) or lobbying transparency (Greenwood, 2011; Holman & Luneburg, 2012;) similarly neglect individual
lobbyists. Institutional pressures can influence firms’ behaviour, but may be ignored in the absence of concrete actors who activate them (Greif, 2006). Such pressures do not automatically trigger behavioural changes in firms (Kraatz & Zajac, 1996). They require specific actors to instil them in organisations (Czarniawska, 1997). Context-based research on ethical and responsible lobbying overlook the role lobbyists can play as these conduits of institutional pressure (Lee, 2011). As our findings will attest, lobbyists face pressures from both policymaking environments and organisations they represent. They must walk a fine line between the two: understanding, bringing together and – if necessary – reconciling expectations of both policymakers and their employers or clients. Drawing on the sociology of the professions, we highlight how lobbyists interpret policymakers’ expectations about lobbying conduct and translate them into ethical principles that guide firms’ political actions.

**Theoretical Background: Sociology of the Professions**

Scholars have already applied broad insights from the sociology of the professions to explore the professionalisation of lobbyists. Some argue that groups representing business interests are increasingly professionalised in Brussels (Klüver & Saurugger, 2013). Others counter that EU-level lobbyists have become a well-established occupation but fall short of having attained professional status (McGrath, 2005). Without necessarily drawing on sociological accounts of the professions, scholars increasingly talk about a general professionalisation of politics (Selling & Svallfors, 2019) or lobbying professionals (Coen & Vannoni, 2019) reflecting on the fact that politics and lobbying have developed into specialist activities. In this article, we apply the specific sociological concept of professionalism to generate new understandings of lobbying and its ethical dimensions.
The Concept of Professionalism

Professionalism is a distinctive logic of organising work and delivering services (Freidson, 2001). Emerging from the sociological study of professions in the early 20th century, it has been studied in a variety of settings and national contexts (Torstendahl & Burrage, 1990) using diverse approaches, such as neo-institutional theory (Muzio et al., 2013), neo-Marxism perspectives (Larson, 1977) and innovation or knowledge management in organisational studies (Alvesson, 1995). Professionalism can be understood as the norms and standards of workplace conduct (Vaidyanathan, 2012). It mandates professionals using their expertise to produce excellent outcomes.

Professionalism prescribes that practitioners have technical skills to solve complex problems and address unpredictable situations (such as treating patients, representing defendants in courts and providing sound commercial advice). Underpinned by formal training, rationality and discretion, professional services in business settings are associated with added commercial value (Hodgson et al., 2015). Professionalism also involves a moral obligation to the person who receives professionals’ services, ranging from the health and wellbeing of individuals to the financial sustainability of businesses. Professionals are expected ‘to put clients first, to maintain confidentiality and not use their knowledge for fraudulent purposes’ (Evetts, 2013, p.780). The competence and skills associated with professionalism are thus inextricably linked to professional ethics. Professionalism also assumes a commitment to use expertise and create information to the benefit of society. For example, medical doctors have a duty both to patients and public health. Similarly, lawyers have an obligation towards clients but are also expected to serve the ideal of justice (Horobin, 1983).
Professionals are accountable both to their clients and the public interest and expected to balance tensions as they arise between the two (Dezalay, 1995; Freidson, 2001). Koehn (1994) explains how professionals can balance these tensions by setting limits on clients’ expectations. Whilst they need to promote their clients’ interests, professionals cannot unconditionally serve their clients’ whims. Doctors should not promote their patients’ health by compromising the health of others (such as by transplanting a kidney from a coerced donor to save a life). Auditors should not falsify the accounts of their clients. On the one hand, thus, professionalism is largely a normative concept (Koehn, 1994). On the other, it is grounded on empirical work and sociological analysis. Below, we briefly discuss how professionalism has been studied and theorised within the sociology of work, and present recent contributions shedding light on professional work through an institutional-theory lens.

**Evolution of the Concept of Professionalism**

Historical analyses considered traditional professionals like doctors, lawyers and accountants – given their expertise, moral duty to clients, and promotion of the broader good – to be the epitome of professionalism (Evetts, 2013). Analyses since the 1970s took a more critical turn, dismissing professionalism as an ideology (Johnson, 1972) used for market closure (Larson, 1977) and the promotion of occupational self-interests, including status, power and monopoly protection of occupational jurisdiction (Abbott, 1988). Throughout the 1990s, scholarly work increasingly depicted professionals as experts void of a service ethic (Brint, 1994). Studies into professions such as management consultants have revealed the emergence of ‘corporate’ or ‘organisational’ professionals who gained status based on a reputation for creating commercial value for clients without serving the wider social good (Ackroyd, 2016). These professions have been depicted as ‘hollow’ (Kipping, 2011) or subservient to client expectations (Anderson-Gough et al., 2000). Such studies into the continuity and change of professional values highlight on-going interest in the normative aspects of experts’ work that
lie at the centre of professionalism (Evetts, 2011). Exploring these issues further, scholars have begun studying professionalism through an institutional lens to examine the role of professionals in both the creation and dissemination of institutions, not least normative ones (see for example, Muzio et al., 2013; Shadnam & Lawrence, 2011).

Professions are supposedly ‘the preeminent institutional agents of our time’ (Scott, 2008, p. 219). Professionals can act as cognitive agents (providing conceptual tools that help to define and frame issues), normative agents (establishing norms and standards) and regulative agents (participating in the drafting of sanctionable rules) (Scott, 2008). In orchestrating such changes, professionals draw on various dynamics and mechanisms. For example, they can create new spaces for their expertise, or populate existing social spaces with new actors (Lefsrud and Suddaby, 2012; Suddaby & Viale, 2011). Even if professionals are not themselves the agents who actively create institutions, they can still act as institutional carriers who receive, interpret and diffuse pressures created by others (Scott, 2008). Suchman and Cahill (1996) show how business attorneys reproduce normative and cognitive understandings of financing processes in Silicon Valley. Hwang and Powell (2009) demonstrate how management consultants function as the carriers of rationalisation to non-profit organisations. Adler and Kwon (2013) highlight individual-level characteristics (including autonomy, expertise, values, identities and ties) and organisational-level factors (including strategy, structure and culture) that can either facilitate or impede the ability of medical practitioners to act as the carriers of clinical guidelines.

Professionalism is thus a powerful sociological concept useful for explaining how individuals can interpret and respond to cognitive, normative and regulative pressures – even when facing competing pressures from their employers or clients. Professionals can handle such conflicts by setting limits on the clients’/employers’ expectations of them (Koehn 1994) and by delivering excellent outcomes as long as these outcomes do not compromise other
actors’ wellbeing and do not cause harm to the broader good. Our findings will reveal that lobbyists largely have a shared normative understanding of what it means to practice in a professional manner. These understandings emerge largely from the wider policymaking environment. Whilst not portraying themselves as active institutional agents, our interviewees reflect on the challenges they face as institutional carriers as they attempt to diffuse professional lobbying practice in the organisations they represent.

Methods

Our project began in 2013 as a study of the working practices of lobbyists in Brussels. It developed into a 5-year project during which we undertook two rounds of intensive interviews and continued to develop a deep understanding of Brussels-based lobbying through archival data and regular conversations with practitioners.

Research Setting – Business Lobbying in Brussels

Our research focuses on the Brussels context, which provides a rich environment for studying lobbying. After Washington DC, Brussels has the second highest density of lobbyists in the world. Over 6,200 full-time business lobbyists working for firms, associations or consultancies regularly meet EU officials (Transparency International, 2015). Brussels is also interesting given changes in the lobbying landscape. As reported in our results, these changes have triggered shifts in how lobbyists and officials believe lobbying should be conducted.

Data Collection

We collected data from primary and secondary sources. Interviews, described below, were our principal data source. Secondary data provided triangulation and supplementary sources for understanding our research context and gaining additional perspectives on key issues (Jick, 1979; Miles & Huberman, 1994). E-mail exchanges and follow-up face-to-face conversations with lobbyists helped us obtain feedback on emerging findings.
We began by gathering articles and interviews published in the specialist EU press, including Politico and Euractiv, documentation on lobbying regulations issued by the EU institutions, and press releases issued by associations representing occupational interests of lobbyists working in Brussels. We also gathered information from websites of advocacy groups with an interest in lobbying (e.g., Transparency International, Alter-EU). Secondary data enabled us to identify developments – including increased policymaking complexity, and the launch of the European Transparency Register – with potential to affect lobbying practice.

We then conducted two rounds of interviews, first from October 2013 – April 2014, and then from May – August 2016. Initial interviews sought to understand how Brussels-based lobbyists work. They were based on a protocol, inspired by Hillman and Hitt (1999), comprising questions on lobbyists’ political objectives, relationships with policymakers, and tactics for shaping policy. Professionalism emerged as a strong theme in these first interviews. Second-round interviews focused on this issue. Inspired by existing work in the sociology of the professions, we aimed to uncover the forces behind lobbyists’ declared professionalism and understand its attraction to lobbyists. Questions encouraged interviewees to explain their career paths, describe changes in lobbying practice and consider triggers of such changes.

For both interview rounds, we used the EU’s Transparency Register to identify potential interviewees. We contacted over one hundred lobbyists in each round of data collection. As is common in research on EU lobbying (e.g. Chalmers, 2014), few agreed to participate. Our final sample of 39 informants, reported in Table 1, is nonetheless suitable for exploratory research (Robson, 2011). In it, in-house lobbyists outnumber consultants by a ratio of 1:6, which is close to the ratio 1:5 documented in the TR register.

(Insert Table 1 here)
Table 1 also indicates interviewees are not necessarily newcomers to Brussels lobbying. On average, they have 8.4 years’ experience. We suggest our interviewees are thus able to identify temporal changes in EU lobbying. Interviewees’ past experiences can help establish a baseline for comparing changes in lobbying practice over time. Concerned that our lobbying respondents may tend to portray themselves in a positive light, we sought to increase the validity of our data by interviewing officials in the EU institutions and representatives of NGOs focused on lobbying in Brussels. Finally, we contacted interviewees again whenever we needed clarification on points made during interviews. We also used these informal exchanges as a sounding board to discuss emerging patterns in the data. Table 2 summarises our data sources and their use in our analysis.

(Data Analysis)

We immersed ourselves in the material to develop a feel for the data as a whole. Following Nag et al. (2007) and Nag and Gioia (2012), we coded interviews using informants’ in vivo expressions, following theme analyses and categorization techniques suggested by Miles & Huberman (1994). This helped identify initial first-order concepts in the data. Next, we engaged in axial coding, collapsing recurring concepts into themes, i.e. researcher-induced concepts representing emergent theoretical concepts (Nag & Gioia, 2012). Finally, we assembled themes into aggregate dimensions. Figure 1 presents our final data structure.

(Data Analysis)

To increase the confidence in our analysis, we followed the guidelines of Lincoln and Guba (1985). We triangulated data sources, and – when necessary – gathered additional material for confirmatory purposes. We presented our emerging model to industry
participants. Our different backgrounds (CPA on the one hand, and the sociology of work on the other) provided a combination of ‘insider’ and ‘outsider’ authors, enabling intimacy with local settings whilst providing potential for distancing (Langley et al., 2013).

Results

Contextual Background Information – Developments in Brussels Lobbying

Our data expose contextual changes affecting lobbying practice in Brussels. One relates to increased complexity. The process of European integration throughout the 1990s and into the 21st century introduced new rules on political decision-making. Progressive treaty changes, introduced to deal with an enlarging EU, created a multi-venue decision-making environment that interviewees describe as increasingly complicated. Their work more and more involves “understanding the different institutions, and recognising for which legal, economic and political aspects of EU policy they are responsible” (Interviewee 1). Complexity poses practical challenges. It is difficult, for instance, to know which EU institution is the most appropriate to approach when addressing specific dossiers (Interviewee 8).

A second contextual change is a ‘transparency turn’ in EU policymaking. Country-proponents of transparency – including the Scandinavian states – have since the 1990s promoted a desire for openness in EU governance and an agenda of more visible policymaking (Gronbeck-Jensen, 1998). A key development is the European Transparency Initiative (ETI) of 2005. This assumes transparency is a pre-condition for popular legitimacy. Core ETI components cover the ethical behaviour of EU officials and lobby regulation. The ETI also created the European Transparency Register (ETR) – a database reporting who represents which interests in Brussels, and with what budgets. These two contextual changes coincided with the creation of associations representing Brussels-based lobbyists. The Society of European Affairs Professionals (SEAP), representing in-house corporate lobbyists was
founded in 1992 in response to the launch of the European Single Market (Interviewee 24). It had just over 300 members at the time of our research. The European Public Affairs Consultancies’ Association (EPACA), representing 42 lobbying consultancies, was created following the ETI (Interviewee 28).

Norms and Guiding Principles in Professional Lobbying Practice
The contextual background sketched out above shapes lobbyists' work practices. Interviewees’ depictions of their work reveal a shared normative understanding of what it means to lobby professionally. They consider the technical complexity and normative ramifications of their activities to be inextricably linked. As developed below, our informants share the view that professional competence in EU lobbying involves navigating the complex system of EU governance, and effectively communicating political and sectoral knowledge with clients. However, they also believe their competence can only be effectively mobilised if they are transparent and honest with policymakers. The values of transparency and honesty are in effect central to lobbyists' professional moral compass, which (together with their competence) helps them secure political access and create value for their clients without jeopardising the broader good.

**Competence of professional lobbyists: technical expertise and skills.** Informants’ understandings of lobbying professionalism are imbued with references to their competence (see Table 3). They consciously portray themselves as experts in EU policymaking who know the intricacies of an increasingly complex political environment, the best routes for accessing policymakers in different institutions, and the appropriateness of lobbying alone or collectively. Professional lobbyists stress their political knowledge is complemented by technical expertise. They claim traditional lobbyists rely on the specialist expertise of colleagues or clients and avoid engaging in technical policy discussions themselves. Professional lobbyists, by contrast, are keen to underscore their specialisms. For instance:
“I’ve been involved in a wide range of EU regulatory issues, affecting a variety of areas including innovation, telecoms, education, tourism, the circular economy and health.” (Interviewee 26)

They also distinguish themselves from traditional lobbyists through their skills. They consider traditional lobbyists have relational skills which – although useful in the past – may prevent fostering meaningful relationships today. As one explains, lobbyists adhering to older practices “seem most interested in sending Christmas cards to the right people” in prominent political positions (Interviewee 3). By contrast, professional lobbyists stress the utility of their communication skills, highlighting their ability to craft policy arguments from technical information, or “translate business objectives into political priorities” (Interviewee 21).

(Insert Table 3 here)

**Work ethics of professional lobbyists: transparency and honesty.** Possessing technical expertise and skills is only one component of lobbyists’ professionalism. Strongly intertwined with their expertise is an espousal of specific work ethics. The promotion of these ethics is apparent in SEAP and EPACA codes of conduct. However, it also manifests itself in the shared language of individual informants who, whilst not members of these associations, still advocate professional lobbying. Policy officials, too, sense a shared attachment to work ethics. For example:

“Lobbyists have developed a moral compass to guide their relations with European institutions.” (Interviewee 38)
“People like me are based here for the long-term. We have a value system which is neither German, French, Italian – whatever. We’ve developed a shared understanding of what to do, and what not to do.” (Interviewee 14)

Table 4 identifies specific values that lie at the core of professional lobbyists’ work ethics and infuse the language they use to describe their working practices. Below, we show how informants consider their competence and work ethics to be inextricably linked: being a professional lobbyist involves delivering technical expertise transparently and honestly to policymakers.

(Insert Table 4 here)

Transparency – or, as informants put it, being open about the interests they represent – is a key value of professional lobbyists. For example: “As a lobbyist, you want to be seen as someone who engages openly and who doesn't have a secret agenda” (Interviewee 30). For our informants, traditional lobbyists often “associate openness with voyeurism – they think anything to do with fees charged by consultancies to their clients is a private matter” (Interviewee 32) whilst professional lobbyists favour “setting the bar low for financial disclosure as lobbying needs to stand up to full public scrutiny” (ibid). Convinced lobbyists should be open, one informant (Interviewee 29) proudly shares that his consultancy was one of the first to sign the ETR, and is happy disclosing the names and income generated from clients. It is noteworthy that most interviewees see the ETI as an opportunity, not a threat. It is a chance to encourage clients publicly to disclose information on their political actions in Brussels. For example: “The Transparency Initiative is a good thing, it casts lights onto our profession, and eliminates what you might call dark lobbying” (Interviewee 29). Comparing
the transparency of their own activities with those who endorse traditional lobbying, in-house informants share that certain lobbyists often choose to represent their firm’s interests through intermediaries. “I would never hide behind third parties” says one (Interviewee 4) adding “we can only be represented by our own people.” Another explains that traditional lobbyists may give external consultants fake business cards, allowing them to masquerade as company employees. They question the openness of such practices: “In the interests of transparency, the miner at the political coal face has got to be a company employee.” (Interviewee 39).

A second value espoused by our informants is honesty, or – in their words – being truthful and accurate in statements made to EU policymakers. Honesty permeates the descriptions of many informants’ activities. For example: “I want to be perceived by those I seek to influence that I am the right person to talk to - demonstrating that I am honest is the right thing to do” (Interviewee 28). Most interviewees note how dishonesty underpins poor lobbying practice, and endorse actions taken against it. Many supported Friends of the Earth for triggering a complaint in 2009 that suspended an association of European chemicals firms from the ETR for inaccurately reporting its lobbying budget. They discuss how others’ dishonesty can prevent them doing their jobs. For instance, informants (Interviewees 26, 30 and 33) express annoyance at Sunday Times journalists who, posing as lobbyists, adopted deceitful means to access European parliamentarians, and ultimately incited the European Parliament to restrict meetings between businesses and policymakers. Whilst honesty is not a new value per se, it gains increased importance in information-orientated lobbying where technical knowledge is key to accessing policymakers. Informants note that the networking approach to lobbying in the past was less demanding in terms of credibility compared to sharing technical knowledge, where information has to be supported by reliable sources. As such, honesty is inextricably linked with providing information to policymakers. Indeed:
“Only 20% of my time is spent lobbying. For 80% of my time, I'm preparing for lobbying. By the time I get round to spending 20 minutes with a policymaker, I've spent 5 hours going through what I want to say and challenging my own messages: Are they believable? Are they true? Are they honest?” (Interviewee 30)

Implications of Lobbying Professionalism

As illustrated above, lobbyists in Brussels use professionalism to signal work ethics (transparency and honesty) and competence (political and technical expertise, and communication skills). But why do they want to portray themselves as knowledgeable and skilled individuals attached to specific work ethics? We find an answer in Table 5, which reports how they consider the external and internal implications of their professionalism.

(Insert Table 5 here)

External implications of professionalism: improving reputations, gaining access.

Lobbyists emphasise how professionalism improves their personal reputations. Presenting themselves as transparent, honest and competent sets them apart from – and gives them an advantage over – rivals in an increasingly crowded policymaking environment. A reputation based on ethics and competence is considered essential for securing political access. As lobbyists, they wish to participate in on-going policy discussions. Whilst relatively easy to secure first meetings with policymakers, being seen as transparent, honest and competent is judged crucial for engaging in continuous dialogue. For example:

“Politicians are only going to talk to you again if you have valuable information they can use to make decisions. Your information needs to be correct, not falsified, or altered, or tilted. Plus you need to be open about where your numbers come from and how your research was financed.” (Interviewee 33)
If securing access requires delivering valid information, then work ethics matter in delivering useful information and maintaining access. Informants assume doors to policymakers would swiftly close for lobbyists with less developed work ethics.

“It would be a killer to say anything dishonest to officials. They will kill your reputation. They share lobbying experiences amongst colleagues. That would prevent you from doing your job in future.” (Interviewee 30)

**Internal implications of professionalism: setting ethical limits, gaining legitimacy.**

When working with colleagues or clients, lobbyists use professional values to balance conflicts of interests. Professionalism helps them resolve dilemmas when under pressure to engage in practices they consider dubious. On such occasions, lobbyists deploy professional values to set limits on the expectations of clients or employers. For example, one consultant shares how she deals with clients who wish to deliver dishonest information to policymakers:

“Why would you pass on wrong information? You should have the courage to say that’s not what lobbying is about. I charge you for my time, how I look at stuff, how I analyse it, what advice I give. Lobbying is about ‘saying no’ from time to time.” (EPACA, 2016)

An in-house lobbyist discusses how he reacts whenever he is asked to cross the line and offer politicians more than technical information:

“I get approached by colleagues to invite policymakers to Formula 1 races. I wave the SEAP code of conduct at them, saying I’m not allowed to do so.”

(Interviewee 39)

This setting of limits is driven by the institutional context of EU policymaking and reinforced by lobbyists’ understanding of compliance to institutional expectations as the
cornerstone of maintaining access. In many ways, lobbyists are the conduits of policymakers’ expectations regarding appropriate lobbying. These expectations become the guiding principles of their work. However, translating institutional pressures into lobbying choices at the micro-level can lead to tension or require major effort. Discussing attempts to persuade colleagues to accept the ETR, one in-house lobbying states:

“My most difficult lobbying exercise involved convincing internal partners to be transparent and disclose even marginal client confidentiality. In the end, it took me over three years to do so.” (Interviewee 30)

Lobbyists also suggest that increased competence associated with lobbying professionalism increases their legitimacy in their organisations. This legitimacy, in turn, helps them transmit policymakers’ expectations about appropriate lobbying behaviour. Especially in continental European firms, the utility of lobbyists’ work has historically been underestimated (Interviewee 6 and 20). Today, however:

“The recognition [of lobbying, through the ETR] is good for in-house lobbyists. It’s a way of having their work acknowledged inside their companies.”

(Interviewee 29)

One (Interviewee 39) explains how establishing a cross-functional ‘European Affairs’ team helped him showcase his EU knowledge and political skills and convince sceptical R&D engineers that his professional lobbying approach could benefit the firm. Another reveals that she visited her firm's sites to explain to colleagues how her professional knowledge and skills could create value (Interviewee 24). Whilst such efforts at using professionalism to build legitimacy take time, they can ultimately bear fruit. For example:
“I still have to explain to colleagues what I do and why it’s important. But with time, it gets easier. I have lots of knowledge and success stories to show what my professional role can do.” (Interviewee 30)

**Discussion**

As EU policymaking becomes more complex and EU institutions have higher expectations about transparency, lobbyists in Brussels have to demonstrate competence, openness and honesty. Figure 2 presents the model of professional lobbying practice derived from our data and highlights implications of lobbying professionalism for business and society. Below, we discuss how our study contributes to existing CPA research in three ways.

(Insert Figure 2 here)

*Professionalism as the Essence of Ethical Lobbying*

We shed new light onto what constitutes ethical or responsible in relation to CPA. Existing studies grounded primarily in a normative ethics perspective (Fischer, 2004) are theoretically sophisticated (Anastasiadis, 2014; Bauer, 2017; Hamilton & Hoch, 1997; Keffer & Hill, 1997; Oberman, 2004; Ostas, 2007). However, they lack conceptual clarity around what ethical or responsible forms of lobbying entail. We remedy this issue by adopting a descriptive ethics perspective (Fischer, 2004) which engages with the narratives of lobbying practitioners and how they describe the principles guiding their work. Our analysis – informed by rich qualitative data – reveals that being ethical and being responsible are associated with professionalism, a multi-dimensional concept which combines work ethics and competence.

Prior research (e.g. Coen & Vannoni, 2018; McGrath, 2005; Rival & Major, 2018) acknowledges the rise of professional government affairs, but remains silent about what it
means for lobbyists to be professional. Our study responds to this limitation by applying insights from the long theoretical tradition of the sociology of the professions to unpack how being professional is understood by lobbying practitioners themselves. We suggest that, in the context of EU lobbying, being professional implies (i) promoting values of transparency and honesty and (ii) developing technical and political competence, and combining these two cornerstones of professionalism in order to be able to (iii) create value for clients without engaging in potentially dubious lobbying practice and (iv) develop a personal reputation to obtain and maintain political access by creating value for policy officials.

Our finding that lobbying professionalism involves competence echoes prior research (e.g. Bouwen, 2004; Coen & Vannoni, 2018; Taminia & Wilts, 2006) demonstrating that EU-level lobbying has developed into a specialist activity requiring high levels of technical and industry expertise. More novel, we believe, is our finding that being professional also involves being transparent and honest about the interests lobbyists represent. Ultimately, technical information, honesty and transparency are interlinked and are manifested in professional conduct, which relies not only on adding value to employers and clients but also on doing so under conditions largely set by policymakers’ expectations.

Enabling Conditions of Lobbying Professionalism: Institutional Factors Activated by Individual Actors

Our research also contributes to research examining factors that shape different approaches to lobbying. Lobbying in general (e.g. Woll, 2012) as well as deliberative (Locke & Seele, 2016) and more responsible (e.g. Bauer, 2017) or transparent (e.g. Greenwood, 2011) forms of lobbying can be determined by the context in which they are practiced. Our study stretches such understandings by suggesting that the promotion of any approach to lobbying cannot be explained by macro-level institutional factors alone. Instead, individual lobbyists can be
important actors who activate institutional pressures (Greif, 2006) by interpreting and transmitting institutional meaning (Czarniawska, 1997) to clients or employers.

Our study points to the concept of professionalism as a key construct, at the individual level, depicting how institutional environments shape the guiding principles of practitioners and how practitioners can put these principles in action. Like other professionals, individual lobbyists can act as carriers (e.g. Muzio et al., 2013) of institutional pressures to adopt specific behaviours. On the one hand, our informants interpret increased complexity and the ‘transparency turn’ in EU-level policymaking as a need to lobby professionally (indeed, more responsibly or ethically) by providing technical expertise in a transparent and honest manner. On the other, being an institutional carrier can also involve reproducing these guiding principles in organisations by setting limits on client and employer expectations. Acting as institutional carriers, at the end of the day, allows practitioners of professional lobbying to serve private interests in ways that do not compromise EU governance.

The qualitative nature of our study prevents us from measuring the extent to which lobbyists enact these guiding principles. It does enable us, however, to document the (often contested) translation of institutional pressures into lobbying choices by individual lobbyists at the micro-level. Our research points to intra-organisational tensions (such as between institutional requirements and corporate cultures) that this behavioural adaptation may involve. It suggests that individual lobbyists face dual pressures stemming from both the policymaking arena and the organisations they represent. They have to walk a fine line between the two: understanding, bringing together and – if necessary – reconciling institutional and organisational expectations. Although individual lobbyists need to promote their clients’ interests, they may not do so unconditionally. Our findings that they say no to clients’ requests to transmit inaccurate information to policymakers, or refuse colleagues’ demands to invite elected officials to sports events, suggests that individual lobbyists – like
other professionals (Koehn, 1994) – can and often do handle these potential tensions by mobilising value and competence claims to set limits on their clients’ and employers’ expectations.

*Implications of Lobbying Professionalism for Business and Society*

Finally, our research builds on CPA scholarship by sketching out the implications of professionalism in lobbying for business and broader society. For businesses, our study echoes existing research (e.g. Doh et al., 2014) suggesting that more responsible approaches to lobbying are important for gaining and maintaining political access (Wilts 2006) and developing long-term relationships with legislators (Fouirnaies & Hall 2014). Building on these studies, we explore what it takes to maintain political access and identify the main actors engaged in such activities. Our research suggests that those individuals involved in delivering firms’ political strategies on a day-to-day basis at the political frontline are most often those who strive to secure political access. We suggest firms may enhance their political access by recruiting in-house or hired lobbyists who enjoy a reputation amongst policymakers for being ‘professional’ and, thus, offering in an honest and transparent way technical expertise which is valuable when making political decisions.

Our study also points to broader societal implications of lobbying professionalism. Lobbyists have potential to make significant differences for policy, either causing harm or improving governance in the systems where they operate (Tyllström & Murray, 2019). In an era marked by a professionalisation of politics where an ability to navigate political systems makes policy actors – including lobbyists – employable across a variety of organisations (Selling & Syllfors, 2019), our informants’ espousal of professionalism may be considered self-interested: being politically skilled and competent is ultimately important for their career progression. However, if increased transparency is assumed to be a good thing for the democratic legitimacy of the European policy making (e.g. Bunea & Gross, 2019), then
lobbyists’ attachment to professional values and their attempts at instilling them amongst their firms or clients enhances the legitimacy of EU governance.

**Concluding Remarks**

Our study aimed to investigate how individual lobbyists understand their work and what they personally consider professionalism implies for their day-to-day work. We explore how practitioners understand the ethical dimensions of their work, trace the origins of these understandings, and expose how they act as guiding principles in their professional life. Our descriptive ethics approach exposes professionalism in lobbying – based on delivering technical competence to policymakers in a transparent and honest way – as an alternative but complementary approach to responsible (Anastasiadis et al., 2018; Bauer, 2017) or deliberative lobbying (Locke & Seele, 2016). It can be difficult to articulate what it means to be ethical or responsible when lobbying. By contrast, our research – drawing on the rich sociological tradition of professions-based research – usefully indicates what it means to be professional (technically competent, transparent and honest) and how lobbyists are expected to behave in this way towards clients, political audiences and democratic processes.

Whilst pressures to adopt a more transparent and honest approach to lobbying stem from the European institutions, our research illuminates the key role that individual lobbyists can play in the broader dissemination of such lobbying practices, which have potential to benefit both business and society or, at least, be considered largely conducive to democratic processes. Prior research focuses on the influence of individuals on the formulation and delivery of outward-facing strategies designed to mobilise political support for firms’ interests (e.g. Coen & Vannoni, 2018; Rudy & Johnson, 2019; Tyllström & Murray, 2019; Wilts, 2006). Interestingly, our own study brings into focus the role of individual lobbyists in inward-facing activities conducted to ensure firms’ compliance with societal expectations.
Like all studies, ours is not without its limitations. Our empirical focus on the Brussels context prevents us from generalising whether lobbyists working in other institutional settings similarly associate their work with professionalism. If they do, then professionalism may be underlined by values other than transparency and honesty and associated with different limits that professionals need to impose on employers or clients if they are to enact this professionalism. Further studies, focused on other policymaking arenas, are necessary to enhance our understandings of the professional dimensions in lobbyists’ work. Moreover, efforts to promote more political transparency in Brussels are relatively recent. Future longitudinal studies will be needed to ascertain the extent to which Brussels-based lobbyists’ claims to openness and honesty are broadly enacted, and evaluate whether they have longer-term impact, not only on firms' political actions, but also on transparency in the processes of EU governance.

Our research elucidates the key role that lobbyists can play as they interpret institutional expectations regarding appropriate lobbying behaviour, and transmit these expectations to the organisations whose interests they represent. Further research could explore this role in more detail by investigating more closely the mechanisms that lobbyists use to instil principles of transparency and honesty amongst clients or employers. In exploring these enactment activities, scholars could follow the example of Tyllström & Murray (2019) to determine whether lobbyists actively, reactively or proactively subscribe to professionalism, and consider how their level of attachment influences their motivation and ability to disseminate professional lobbying practices in organisations.

Future research could also further explore the effectiveness of lobbying professionalism. Our informants believe that transparency, honesty and technical expertise are crucial for lobbying success. It would be interesting to explore in more detail how public officials perceive such an approach. Further studies are required to ascertain whether lobbyists
who act with professional behaviours achieve superior policy outcomes to those who may have other behaviours.

Acknowledgements

We would like to thank the anonymous reviewers and Associate Editor Douglas Schuler for their extremely helpful and constructive guidance during the development of this article. We are also indebted to colleagues at the EGOS Colloquium in Tallinn in 2018 and the IABS Annual Conference in San Diego in 2019 for insights and comments on earlier versions of our manuscript.

References


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**Appendix**

**Figure 1: Data structure**

<table>
<thead>
<tr>
<th>First-order codes and representative quotes</th>
<th>Second-order themes</th>
<th>Aggregate dimensions</th>
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<tbody>
<tr>
<td><strong>Institutional complexity:</strong> “It’s increasingly difficult to understand the different institutions, and recognize for which legal, economic or political aspects of the EU they’re responsible” (In-house lobbyist, October 2013)</td>
<td>Institutional pressures</td>
<td>Enabling conditions of professionalism</td>
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<td><strong>‘Transparency turn’ in policymaking:</strong> “The EU institutions now have their own codes of conduct. If lobbyists want to connect with us, this is how we expect them to behave […] Our codes have had an educational effect.” (Policy actor, May 2016)</td>
<td>Competence</td>
<td>Professionalism</td>
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<td><strong>Political expertise:</strong> “Lobbyists today need to understand the different institutions, and recognize for which different legal, economic and political aspects of the EU they are responsible” (In-house lobbyist, October 2013).</td>
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<td><strong>Technical expertise:</strong> “There’s no other way for lobbyists to survive today unless […] they can provide institutions with the technical expertise requested from them.” (Policy official, May 2015)</td>
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<tr>
<td><strong>Communication skills:</strong> “You have to have a very detailed understanding of issues and be able to convey these to a wide variety of different people at different levels of hierarchy in different institutions” (Consultant, May 2016).</td>
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<tr>
<td><strong>Transparency:</strong> “As a lobbyist, you want to be seen as someone who engages openly and who doesn’t have a secret agenda” (In-house lobbyist, May 2016)</td>
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<tr>
<td><strong>Honesty:</strong> “I go through what I want to say and challenge my own messages: Are they believable? Are they serious? Are they true? Are they honest?” (In-house lobbyist, May 2016)</td>
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<tr>
<td><strong>Image:</strong> “We’re trying to create a better image of European affairs specialists in the eyes of the institutions” (Consultant, April 2014)</td>
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<td><strong>Trust:</strong> “Trust is the key currency for a lobbyist. You can only earn trust by being incredibly professional” (In-house lobbyist, May 2016).</td>
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<td><strong>Open doors:</strong> “The door is always open for anybody who engages seriously with policy actors” (In-house lobbyist, May 2016)</td>
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<td><strong>Continuous dialogue:</strong> “Politicians are only interested to talk to you again if you have valuable information” (In-house lobbyist, June 2016)</td>
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<td><strong>Conflicts with clients:</strong> “Lobbying is about saying no to clients from time to time” (Consultant, June 2016)</td>
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<td><strong>Conflicts with employers:</strong> “My colleagues have a strong focus on confidentiality and don’t want to disclose everything we do in Brussels.” (In-house lobbyists, May 2016)</td>
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<td><strong>Recognition:</strong> “The ETI is a way of having lobbyists’ work acknowledged inside their companies” (Consultant, May 2016)</td>
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<td><strong>Discretion:</strong> “I use my expertise to demonstrate to colleagues how I can create value for the firm” (In-house lobbyist, August 2016)</td>
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</table>

**Implications of professionalism**

- **Build personal reputation with policy makers**
- **Secure and maintain access to policy makers**
- **Manage conflicts of interests**
- **Build legitimacy with internal colleagues**
Figure 2: A model of professional lobbying in Brussels
Table 1: Description of sample

<table>
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1 European Commission
**Table 2: Data sources and use**

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<th>Data source</th>
<th>Type of data</th>
<th>Use of data in analysis</th>
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<td>25 in-house corporate lobbyists</td>
<td>Understand development of lobbying as an occupation in Brussels</td>
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<td>Gain deep understanding of changes in work practices of Brussels-based lobbyists</td>
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<td>Identify knowledge, skills and values involved in Brussels-based lobbying</td>
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<td>Understand importance of professionalism for Brussels-based lobbyists</td>
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<td></td>
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<td>Archival</td>
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<td><strong>On-going data collection (2013-2018)</strong></td>
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<td>Informal conversations</td>
<td>Regular, informal conversations with lobbying practitioners in Brussels</td>
<td>Share initial findings and obtain feedback</td>
</tr>
<tr>
<td>Archival</td>
<td>Specialist press articles on European lobbying and the Transparency Initiative</td>
<td>Gain deep understanding of changes in work practices</td>
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Table 3: The competence of lobbyists – representative quotes

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<th>Technical expertise</th>
<th>Communication skills</th>
<th>Distancing from traditional lobbyists through competence claims</th>
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<td>“[Lobbyists today need to] understand the different institutions, and recognise for which different legal, economic and political aspects of the EU they are responsible” (In-house lobbyist, October 2013).</td>
<td>“Being a good EU lobbyist means I have to be well connected in my firm to get access to the specialist information I need to participate in increasingly technical policy debates” (In-house lobbyist, October 2013).</td>
<td>“I’ve attended meetings where lobbyists launch into stuff and completely confuse the person they’re talking to because they’re not using the right language skills and not explaining themselves well because they are too in-depth” (Consultant, June 2016).</td>
<td>“[There is] a difference between what I’d call an old school and a new school lobbying. Old school lobbying was about wining and dining, about networking, about being an ambassador for your organisation. New school lobbying is a more regulatory approach, dealing with actual content, trying to add value and improving the bottom line.” (In-house lobbyist, October 2013)</td>
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<td>“A good lobbyist knows people in the room [where political decisions are made], has already spoken to them – even two years before the meeting takes place.” (In-house lobbyist, June 2016)</td>
<td>“A good lobbyist can always bring to the table something that policymakers cannot obtain anywhere else. So, you come with unique information which is also evidence-based and you can prove what you are saying.” (In-house lobbyist, June 2016)</td>
<td>“I personally spend more time reading the documents, identifying topics that are important for my colleagues, and explaining their importance in a language they’ll understand” (In-house lobbyist, April 2016).</td>
<td>“I personally spend more time [than my predecessor] reading the documents, identifying topics that are important for my colleagues, and explaining their importance in a language they’ll understand” (In-house lobbyist, April 2016).</td>
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<td>“[Lobbyists today] really need to know the most appropriate route for accessing EU policymakers. You need to judge when it’s best to contact a policy official alone, in a business association, or as part of an ad hoc coalition” (In-house lobbyists, November 2013)</td>
<td>“There’s no other way for lobbyists to survive today unless they are at the top of their competencies and abilities, and if they can provide institutions with the technical expertise requested from them.” (Policy official, May 2015)</td>
<td>“You have to have a very detailed understanding of issues and be able to convey these to a wide variety of different people at different levels of hierarchy in different institutions” (Consultant, May 2016).</td>
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Table 4: The work ethics of lobbyists – representative quotes

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<tr>
<th>Transparency</th>
<th>Honesty</th>
<th>Distancing from traditional lobbyists through value claims</th>
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<td>“As a lobbyist, you want to be seen as someone who engages openly and who doesn’t have a secret agenda” (In-house lobbyist, May 2016)</td>
<td>“As good lobbyists, we wish to be perceived in a good light. If we can demonstrate that we are ethical and the right people to speak to and honest and trustworthy by having a code of ethics, then that’s the right thing to do.” (Consultant, May 2016)</td>
<td>“[Traditional lobbyists] often associate openness with voyeurism – they think, for example, that anything to do with fees charged by consultancies to their clients is a private matter. [My approach favours] setting the bar very low for financial disclosure as lobbying needs to stand up to full public scrutiny.” (In-house lobbyist, October 2013)</td>
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<td>“I really doubt that there are lobbyists or corporations offering money to parliamentarians to make an amendment. But you know what, it’s because it’s not actually needed. You approach officials with arguments.” (In-house lobbyist, June 2016)</td>
<td>“Only 20% of my time is spent lobbying. For 80% of my time, I'm preparing for lobbying. So, by the time I get round to spending 20 minutes with an MEP, I've spent at least five hours preparing for the meeting. In those five hours, I go through what I want to say and challenge my own messages: Are they believable? Are they serious? Are they true? Are they honest?” (In-house lobbying, May 2016)</td>
<td>“Lobbyists today are really well educated in terms of work ethics. They are also very well trained on ethical issues. The moral aspects of lobbying work are important to lobbyists today.” (Consultant, May 2016)</td>
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<td>“Authenticity is key, surely? I’m fine with externalising the acquisition of data, or even the setting up meetings with stakeholders. But, in the interests of transparency, the miner at the coal face has got to be a company employee.” (In-house lobbying, May 2016).</td>
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<td>“Lobbyists have a moral compass to guide their relations with the European institutions. (Policy official, May 2016)</td>
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Table 5: Implications of lobbying professionalism

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<th>External implications: Improving reputation and gaining political access</th>
<th>Internal implications: Gaining legitimacy and setting ethical limits</th>
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<tr>
<td>Competence</td>
<td>Values</td>
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<td>“To be a successful lobbyist, you really have to provide useful information - early, and often. You always need to send legislators or regulators some additional information after meetings. Do a bit of homework. Give them more useful information. That’s always welcome. The door always remains open for anybody who engages seriously in this way.” (In-house lobbyist, May 2016).</td>
<td>“It would be completely a killer to do or say anything dishonest to officials. They will kill your reputation. They share their lobbying experiences amongst colleagues. That would prevent you from doing your job in the future” (In-house lobbyist, June 2016).</td>
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<td>“If you stop providing useful information, there's no way of going back [...]” (In-house lobbyist, May 2016)</td>
<td>“If I lied and cheated I wouldn't get the trust I need to do my job. You are found out. You would burn your reputation very quickly. For me, trust is the key currency for a lobbyist. You earn policy-makers’ trust by being incredibly professional” (In-house lobbyist, May 2016).</td>
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<td>“What we are doing is creating a continuous dialogue with officials to make sure we are part of a discussion. I think if you do it badly the first time you meet, policy makers are not going to invite you to continue the discussion. I always tell my clients that it’s fairly easy to get your first meeting; the trick is to get your second” (Consultant, April 2014)</td>
<td>“Getting caught not telling the truth would have a huge impact on your lobbying activities here in Brussels” (In-house lobbyist, May 2016)</td>
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<td>“Your information needs to be correct, not falsified, or altered, or tilted or anything like that. And you need to be open about where your numbers come from and how the research was financed” (In-house lobbyist, June 2016).</td>
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