

16 December 2015

Dear Sir/Madam

Letter to think tank leaders

For some time, I have been specifically considering the potential for the work of think tanks to require registration under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014. In the course of this work, I have met a number of think tank executives, undertaken considerable desk research and given careful consideration to the work they do.

As a result, I am now in a position to provide further guidance about the circumstances when think tanks will need to join the Register:

- The think tank is registered for VAT;
- Funding is provided for a specific project (a generic donation is not registrable), where the expectation of the funder is that the end product (for example, a report or an event) will be used to directly communicate with a Minister or Permanent Secretary about Government policy (a precise definition of this may be found [here](#)).
- “Direct communications” may be written, oral or electronic. Please note that “lobbying” does not need to be referenced at any stage;
- The funder is able to exercise control over the outcome of the project. If there is an independence clause in the funding agreement/contract, it is unlikely that the think tank would be required to register;
- If the think tank is a registered charity, and all the above criteria apply, registration would be required.

In circumstances where most (but not all) of the above criteria were met, in deciding if think tanks needed to join the Register, I would also have regard to the wider public interest.

enquiries@orcl.gov.uk

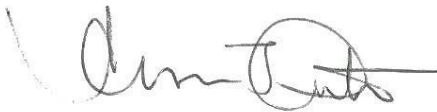
I therefore wish to draw your attention to my recently updated registration guidance, which may be accessed [here](#).

If after having read this letter and my registration guidance, you remain unsure about whether you need to register, please contact my Office [enquiries@orcl.gov.uk; 020 7271 8827]-I am happy to engage in clarifying the individual circumstances of any organisation.

Finally, I wish to draw your attention to my guidance on [compliance](#). I have the power to serve Information Notices on any unregistered organisation which I believe to be conducting the business of consultant lobbying. I continue to conduct investigations to ensure that all those that are required to register, do so.

In the event that you require a meeting or further discussion, please contact my Office to organise a mutually convenient date.

Yours sincerely,



ALISON J WHITE
Registrar of Consultant Lobbyists

Office of the Registrar of Consultant Lobbyists
35 Great Smith Street, SW1P 3BQ

enquiries@orcl.gov.uk