

Office of the Registrar of Consultant Lobbyists

Summary of investigation

November 2020 to January 2021

Organisation or person investigated: Portland PR Limited

Matter(s) investigated: Whether Portland PR Limited submitted accurate QIRs, particularly non-inclusion of Boston Consulting Group (BCG) in their QIR for April to June 2020; and whether George Pascoe-Watson's discussions with Lord Bethell included undeclared lobbying. This investigation followed a Sunday Times article on 15 November 2020.

Registrar's decision: The QIR for April to June 2020 is accurate, based on assurances from Portland PR Limited and further enquiries with the Department of Health and Social Care (DHSC). However, in reviewing all QIR data, Portland PR Limited discovered that clients were omitted from their July to September 2020 QIR, for which I will issue a Notice of Intention to impose a civil penalty.

Summary of rationale for decision: On the two specific questions, assurances have been given by Portland PR: that they had no involvement in the meeting with Lord O'Shaughnessy, DHSC and BCG; nor were they connected with Mr Pascoe's-Watson's role at DHSC. I accept the evidence and assurances given, that both were acting in an independent capacity. As part of Portland PR Limited's full review, they have declared omitted clients from their July to September 2020 QIR. A civil penalty is appropriate for this omission.

Chronology:

15.11.2020	Sunday Times article regarding potential undeclared lobbying.
16.11.2020	Formal letter from Registrar to Portland PR Limited regarding accuracy of QIRs, particularly non-inclusion of Boston Consulting Group (BCG) in their QIR for April to June 2020; and whether George Pascoe-Watson's discussions with Lord Bethell included undeclared lobbying. Response required by 17:00 on 23 November.
23.11.2020	Letter from Portland PR Limited, stating they need more time to review all QIRs for comprehensive assurance.
24.11.2020	Letter from Registrar to Portland PR Limited extending deadline for full response to 1 December 17:00.
1.12.2020	Letter from Portland PR Limited requesting further time to complete the process of QIR verification for comprehensive

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	assurance.
4.12.2020	Email from ORCL office requiring response to the two specific issues raised in the Registrar's letter of 16 November by 17:00; and the fuller response by 17:00 on 15 December.
4.12.2020	Call and email from Portland PR Limited apologising for delay; confirming discrepancies in their QIR July to September 2020; confirming no consultant lobbying for BCG in April to June 2020; and Mr Pascoe's-Watson's role at DHSC was in a personal capacity and did not involve lobbying for Portland PR Limited clients.
7.12.2020	Email from ORCL office for further clarification on dates of meetings with Lord O'Shaughnessy, DHSC and BCG and who initiated.
8.12.2020	Email from Portland PR Limited confirming no involvement with the meeting and suggesting follow up with DHSC.
14.12.2020	Formal letter from Registrar to DHSC, requesting further information about meetings with Lord O'Shaughnessy, DHSC and BCG and who initiated.
15.12.2020	Full response from Portland PR Limited, confirming response of 4 December; identifying and apologising for three omitted clients from the July to September 2020 return, following a full review; and providing assurance that this was not as a result of a systems issue.
16.12.2020	Email from ORCL office requesting further information on reason for omissions and basis for assurance that it's not systematic.
18.12.2020	Email from Portland PR Limited, giving further information on reporting systems and omission.
23.12.2020	Email from DHSC, confirming no involvement from Portland PR Limited in meeting with Lord O'Shaughnessy, DHSC and BCG.