

# Office of the Registrar of Consultant Lobbyists

## Summary of investigation

July 2019 to November 2019

**Organisation or person investigated:** CTF Partners Limited (“CTF Partners”)

**Matter(s) investigated:** compliance by CTF Partners with the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 (‘the Act’).

**Registrar’s decision:** CTF Partners has robust compliance procedures in place and is not engaging in activities that would require registration under the Act.

**Summary of rationale for decision:** In response to enquiries, CTF Partners has provided satisfactory clarification and explicit assurance as to the particular services it does (and does not) offer to clients, as well as full details of compliance training and monitoring materials it has used since the Act came into force.

### Chronology:

Summer 2019	Media reporting of association of members of CTF Partners with senior politicians who were and/or subsequently became Government Ministers. In view of the Registrar, in this context, CTF Partners’ consultancy services offer to prospective clients raised a heightened risk of possible consultant lobbying activity, which would be in breach of the Act.
8 July 2019	Letter from Registrar to CTF Partners. Explained remit of Registrar, legislation and guidance on consultant lobbying, and asked for a response, including comprehensive assurance if no consultant lobbying activity is undertaken.
10 July 2019	Reply from CTF Partners, stating that it did not provide services within the scope of the Act.
12 July 2019	Further letter from Registrar to CTF Partners detailing some particular concerns and asking for a more detailed response to these.
19 July 2019	Reply from CTF Partners, giving clarification on the nature of the services offered to its clients in relation to Government.
7 August 2019	Email on behalf of Registrar to CTF Partners, seeking details of relevant compliance training and monitoring within CTF Partners.
20 September 2019	Reply from CTF Partners repeats content of its letter of 19 July, without providing the additional information requested.
30 September 2019	Registrar issues statutory Information Notice, to require provision of the information requested on 7 August.

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24 October 2019	CTF Partners response to Information Notice, providing copies of compliance materials requested, together with further relevant details in cover letter.
30 October 2019	Registrar seeks (by email) clarification from CTF Partners in relation to one item of the compliance documentation.
4 November 2019	CTF Partners provide clarification requested.
5 November 2019	Following consideration of all materials, Registrar makes decision, and notification of that is sent to CTF Partners.