

Summary of investigation

July to September 2022

Organisation or person investigated

Talbot Consulting Limited

Matter(s) investigated

Whether Talbot Consulting Limited (“Talbot”) is an unregistered consultant lobbyist.

Registrar’s decision

That Talbot, through The Earl of Shrewsbury, undertook unregistered consultant lobbying activities.

Summary of rationale for decision

Section 1(1) of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (“The Act”) states a person must not carry on the business of consultant lobbying unless entered in the Register of consultant lobbyists.

Section 2 of the Act defines consultant lobbying. An overview of this definition is UK VAT registered organisations and individuals who communicate personally with Government Ministers or Permanent Secretaries (and equivalents) on behalf of a third party and in return for payment.

Talbot Consulting Limited, through The Earl of Shrewsbury, undertook consultant lobbying activities for SpectrumX.

Talbot Consulting Limited does not appear on the Register of Consultant Lobbyists but conducted two communications that are registerable under the Act:

- The Earl of Shrewsbury’s letter to Baroness Barran, Parliamentary Under Secretary of State at the Department for Digital, Culture, Media and Sport, regarding SpectrumX which also requested a meeting to discuss their client’s products further. The letter is undated, but thought by Talbot to have been sent in February 2021.
- 13 October 2021 – The Earl of Shrewsbury’s email to Alex Burghart, Parliamentary Under-Secretary (Department for Education), regarding SpectrumX and inviting him to the formal opening ceremony of SpectrumX’s new manufacturing facility.

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Chronology

Date	Action
5 July	Formal letter from the Registrar to The Earl of Shrewsbury at Talbot, giving background on the requirement for registering and asking if its activities fall within the criteria for registration. In particular, but not limited to, communications for SpectrumX.
17 July	Response giving the view that Talbot has not undertaken relevant communications within the scope of the Act, including any communications which Talbot made to Ministers on behalf of SpectrumX.
2 August	Letter from the Registrar asking for further information regarding contracts with SpectrumX, copies of correspondence, communications with Ministers and claims made in an article in The Times on 19 June 2022.
16 August	Response from Talbot answering all questions from 2 August, with the exception of one item of correspondence that Talbot apologised for not being able to send that week.
22 August	Email from Talbot with the missing piece of correspondence.
30 August	Email from Office requesting a missing date from one of the pieces of correspondence
30 August	Email response confirming the letter is undated but believe that it was sent in February 2021.
2 September	Letter from the Registrar concluding the investigation and giving advice to ensure future compliance with the Act. Notice of Intention to issue a civil penalty issued.

2 September 2022

Office of the Registrar of Consultant Lobbyists

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