

Summary of investigation

November 2022 – April 2023

Organisation or person investigated

Anna Turley (“Ms Turley”)

Matter(s) investigated

Whether Ms Turley conducted unregistered consultant lobbying

Registrar’s decision

Based on detailed information and supporting evidence provided, Ms Turley is not an unregistered consultant lobbyist.

Summary of rationale for decision

Under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act (“the Act”) there is an exception for those with a business consisting mainly of non-lobbying activities; and where the communication is incidental to this business (“the incidental exception”).

I apply the incidental exception within narrow parameters, as set out in my [guidance](#). Ms Turley provided detailed responses to my queries, which helped me to ascertain that:

- Her business was mainly non-lobbying activities.
- On balance, they do not appear significant by volume, value, significance to client offering or contribution to non-lobbying activities.

I have provided advice to Ms Turley regarding registration in future, if needed.

Chronology

Date	Action
30/10/22	Query from journalist whether Protect & Connect should be registered.
1/11/22	Formal letter from the Registrar giving background on the requirement for registering and asking if Protect & Connect’s activities fall within the criteria for registration. In particular, but not limited to, Protect & Connect’s meeting with a DCMS Minister on 1 February 2022 and Ms Turley’s evidence to the Product Security and Telecommunications Infrastructure Bill Committee.

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Date	Action
22/11/22	Letter from Ms Turley, giving further information on Protect & Connect, her role as Chair, her communications for Protect & Connect and her VAT registration.
7/12/2022	Letter from the Registrar with a further query regarding VAT registration.
7/12/2022	Email from Ms Turley giving an update on her VAT registration
4/1/2023	Letter from the Registrar stating he is minded-to conclude that some of Ms Turley's communications for Protect & Connect were consultant lobbying and inviting representations.
25/1/23	Letter from Bates Wells, Ms Turley's representative, with representations regarding the role; the representative organisation exception; the incidental exception; and VAT registration, which was backdated after the communications.
9/3/23	Letter from the Registrar asking for detailed information on Protect & Connect and on Ms Turley's wider work beyond the Protect & Connect campaign.
5/4/23	Letter from Bates Wells giving a detailed response to the questions asked on 9 March.
14/4/23	Letter from the Registrar concluding investigation and giving advice to ensure future compliance with the Act.

14 April 2023

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