

Summary of investigation

February – April 2023

Organisation or person investigated

Bradshaw Advisory Ltd (“Bradshaw”)

Matter(s) investigated

Whether Bradshaw conducted unregistered consultant lobbying activities

Registrar’s proposed decision

That Bradshaw carried out consultant lobbying activity while not registered.

Summary of rationale for proposed decision

The Registrar is satisfied that that Bradshaw’s email of 7 February 2023 was a registerable communication in that:

- The communication was made on behalf of a paying client
- To a Minister of the Crown
- Bradshaw is UK VAT-registered.

The failure of Bradshaw to register before carrying out consultant lobbying, as required by 1(1) of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (“the Act”), is an offence under 12(1) of the Act.

Chronology

Date	Action
01/01/23	Bradshaw’s registration expires, following non-payment of the statutory registration fee.
26/02/23	Article in the Guardian regarding lobbying for the Global Britain Commission (“GBC”).
28/02/23	Bradshaw re-registers.
28/02/23	Formal letter from the Registrar giving background on the requirement for registering and asking if Bradshaw’s activities fall within the criteria for registration. In particular, but not limited to, Bradshaw’s work for the GBC.
09/03/23	Letter from Bradshaw regarding their registration and work for the GBC.
14/03/23	Letter from the Registrar requesting information on Bradshaw’s involvement with the GBC letter on 7 February to the Prime Minister; and funding of

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Date	Action
	Bradshaw's secretariat work for GBC.
20/03/23	Letter from Bradshaw disclosing their email to the Prime Minister on 7 February 2023, attaching the GBC letter.
27/03/23	Letter from the Registrar giving the reasons he is minded to conclude that the 7 February email was a registerable communication and asking Bradshaw to respond to the matters of fact.
03/04/23	Letter from Bradshaw, setting out reasons they felt the communication was not registerable.
05/04/23	Letter from the Registrar giving advice to ensure future compliance with the Act. Notice of Intention to issue a civil penalty is issued.
16/05/23	Civil Penalty issued.

16/05/23

Office of the Registrar of Consultant Lobbyists
office@orcl.gov.uk