

Office of the Registrar  
of Consultant Lobbyists

# Business Plan

2023 to 2024

Office of the Registrar of Consultant Lobbyists  
1 Horse Guards Road (Room 3.26)  
London, SW1A 2HQ

020 7271 8827

[office@orcl.gov.uk](mailto:office@orcl.gov.uk)

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## The Registrar

The Registrar is an independent statutory office holder appointed under the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 ('the Act').

Under the Act, the Registrar is required to:

- establish and manage the UK Register of Consultant Lobbyists;
- develop and publish detailed guidance for consultant lobbyists on their duties under the Act;
- monitor and enforce compliance with the Act's legal requirements; and
- publish an annual statement of accounts.

The Act sets out two key obligations on consultant lobbyists as defined by the Act:

- register before conducting any consultant lobbying activity;
- submit details of clients they have lobbied for or been paid to lobby for each quarter.

The Registrar collects and accounts for all fees and pays them into the Consolidated Fund. More information about how the Registrar's budget is spent is available in the published Statement of Accounts.

Ministers set the fees for the Register and seek to ensure that the total paid in charges is sufficient to offset the total of the costs. The Cabinet Office meets the cost of seconded staff and shared services.

## Introduction

This business plan includes a review of 2022-2023 and sets out how I intend to fulfil my statutory obligations in the year from April 2023. This is the ninth annual business plan for the Office of the Registrar.

My role as Registrar is set out in the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 ('the Act'). The Registrar is independent of Government and the public affairs sector and I account to Parliament for implementation of the provisions of the Act. In September 2022, I was reappointed as Registrar for a second term.

Transparent, ethical lobbying can be an important part of effective public policy making. The work of my Office supports that process by putting the activities of consultant lobbyists into the public domain. To complement this, policy-makers have a responsibility to consider a variety of policy inputs, not only those from the most organised or well-funded parties.

During 2023-2024, with the support of my Office, I will continue to seek improvements to our processes and activities to aid compliance and minimise the burden on registrants. This will include a further review of my guidance and continued awareness raising communications.

I will enforce the requirements of the Act with clarity, using statutory penalties where necessary and investigate where there is reasonable information to suggest non-compliance.

I look forward to the government concluding its post legislative scrutiny of the Act and to implementing any resulting changes.



**Harry Rich**  
**Registrar of Consultant Lobbyists and Accounting Officer**

## Review of 2022 to 2023

This review of the year to 31 March 2023 is set against the objectives that I published for the Office of the Registrar in the 2022 – 2023 business plan.

At 31 March 2023 the Register had 209 registrants, compared to 194 at the end of March 2022. The previous increase in registrants, seen last year, started to level off at the end of 2022. This levelling off follows more than a year of awareness raising activity and may indicate that awareness is now high.

Following publication of my consultation response in April 2022, I published updated guidance in May 2022 with revisions to sections on the narrow exception for ‘incidental lobbying’; and for those providing secretariat services to All-Party Parliamentary Groups (APPGs). Following my guidance update, my awareness raising activities included writing to all APPG Chairs and to unregistered secretariats of APPGs.

I remained open to engage with the Cabinet Office on the Post Legislative Scrutiny of the Act which they launched in December 2020. I gave both written and oral evidence to the Public Administration and Constitutional Affairs Committee in response to their inquiry ‘Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters.’

I refreshed the website for clarity.

### Objective 1: Operate an accurate and accessible Register

*Maintain the accuracy and timeliness of information contained in the Register and ensure that systems are accessible and meet user needs.*

#### Objective 1: Activity 1

*Support new registrants and check data to ensure accurate and timely registration and compliance.*

**Update:** New registrants actively supported and registration information checked for accuracy. All new registrations published within four working days of complete registration application.

#### Objective 1: Activity 2

*Support and enforce the timely submission of Quarterly Information Returns and updating of registration and code of conduct data by registrants.*

**Update:** QIRs generally submitted on time and continued rigour in enforcement of compliance. Webinar induction sessions offered to registrants quarterly. Registrants with more than two consecutive quarterly nil returns contacted to check accuracy. Checks conducted on 2023 Register code of conduct declarations and consistent naming of clients, for accuracy.

#### Objective 1: Activity 3

*Continue to improve user experience, ease of access, minimise the administrative burden and seek feedback from registrants on potential improvements.*

**Update:** Feedback survey sent to new registrants and quarterly to all registrants, for suggested system improvements. Office will now receive automated alerts if system goes down. All-Party Parliamentary Group secretariat declarations simplified, to coincide with the Registrar's May 2022 guidance update.

**Objective 1: Activity 4**

*Provide access to download the Register with registrant and client data quarterly.*

**Update:** Register now available to download quarterly.

**Objective 1: Activity 5**

*Work with our suppliers to monitor and maintain cyber security.*

**Update:** Regular contact and updates maintained.

**Objective 1: Activity 6**

*Respond to the outcomes of the December 2020 post legislative scrutiny of the Act when these are published by Ministers.*

**Update:** Initial engagement late 2020 and await outcomes from Cabinet Office. Gave written and oral evidence to Public Administration and Constitutional Affairs Committee in response to inquiry 'Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters.' Informed registrants of this.

**Objective 2: Provide clear, accessible guidance**

*Keep published guidance under review and take account of feedback from registrants and other stakeholders.*

**Objective 2: Activity 1**

*Review and update guidance as necessary to provide clarity for registrants and others, in particular taking account of the responses to the consultation carried out in March 2022.*

**Update:** Following March 2022 consultation, updated guidance on registration published May 2022.

**Objective 2: Activity 2**

*Following post-legislative scrutiny outcomes, provide guidance to the Private Offices of Ministers and Permanent Secretaries (and equivalents) to aid their understanding of the statutory obligations on consultant lobbyists they engage with.*

**Update:** Not done. Awaiting post-legislative scrutiny outcomes.

**Objective 2: Activity 3**

*Provide guidance to other stakeholders as necessary.*

**Update:** Wrote to All-Party Parliamentary Group (APPG) Chairs and unregistered APPG secretariats following guidance update. Offered webinar for registered secretariats following quarterly information return changes that supported guidance update.

### **Objective 3: Communicate and engage with stakeholders**

*Undertake a programme of communication and engagement with registrants, potential registrants, representative bodies and other stakeholders.*

#### **Objective 3: Activity 1**

*Work with public affairs businesses and their representative bodies to understand them and support awareness and compliance by registrants and those who may engage in consultant lobbying in the future.*

**Update:** Wrote to Public Relations and Communications Association (PRCA) and met Chartered Institute of Public Relations (CIPR) regarding their respective codes of conduct. Participated in online CIPR event for interview and Q&A from attendees.

#### **Objective 3: Activity 2**

*Deliver regular induction and update seminars for new and existing registrants*

**Update:** Delivered well-attended webinars quarterly.

#### **Objective 3: Activity 3**

*Refresh and deliver our programme of stakeholder engagement to gain audience insight and to support wider awareness and compliance by registrants and those who may engage in consultant lobbying in the future.*

**Update:** Delivered refreshed activities to increase awareness of statutory duties. Wrote to companies in public affairs, legal, accountancy and management consultancy sectors, who may engage in consultant lobbying in the future. Some of those receiving an awareness letter joined within the financial year.

#### **Objective 3: Activity 4**

*Disseminate information about the Register to relevant audiences.*

**Update:** Information and updates are provided directly to registrants. Awareness activities identify and target those who may engage in consultant lobbying.

### **Objective 4: Ensure compliance**

*Ensure that all those who ought to register do so and that the Register is complete and accurate.*

#### **Objective 4: Activity 1**

*Enforce compliance, making use of statutory penalties where appropriate.*

**Update:** 18 notices of intention to issue a civil penalty issued during the year (2021-22: nine), the bulk of which resulted in a penalty being issued. Four information notices issued (2021-22: four).

#### Objective 4: Activity 2

*Review the published diaries of Ministers and Permanent Secretaries against declarations on the Register.*

**Update:** Ministers' and Permanent Secretaries' diaries reviewed, resulting in requests to Private Offices for further information, slow and mixed responses received.

#### Objective 4: Activity 3

*Undertake formal investigations where there is reasonable information suggesting non-compliance.*

**Update:** Registrar concluded 15 formal investigations and published summaries of findings (2021-22: 17).

### Objective 5: Ensure administrative effectiveness and transparency

*Operate the Office effectively and transparently to deliver against statutory purposes, serving all stakeholders and achieving value for money.*

#### Objective 5: Activity 1

*Deliver a proportionate risk management approach and corporate governance arrangements to ensure effective administration of the Office.*

**Update:** Registrar formally reviews strategic risk and takes responsibility for governance.

#### Objective 5: Activity 2

*Fulfil statutory and legal obligations in relation to data protection and freedom of information.*

**Update:** Complied with freedom of information duties and compliant with data protection legislation, working with Cabinet Office as joint data controller.

#### Objective 5: Activity 3

*Publish details of the Registrar's formal correspondence and meetings, statutory information notices, notices of intention to impose penalties (and their conclusion) and summaries of investigations.*

**Update:** All published on website of the Office of the Registrar and now includes gifts and hospitality register.

#### Objective 5: Activity 4

*Update Ministers on the work of the Office through business planning and financial reporting systems.*

**Update:** Registrar updated Cabinet Office officials and sponsor Minister at Cabinet Office as required.



#### Objective 5: Activity 5

*Report to Parliament as required.*

**Update:** The Registrar's annual report and accounts for year to 31 March 2022 laid before Parliament 17 October 2022 and copy sent to Public Administration and Constitutional Affairs Committee (PACAC). Registrar gave evidence to PACAC's inquiry 'Lobbying and Influence: post-legislative scrutiny of the Lobbying Act 2014 and related matters.'

#### Objective 5: Activity 6

*Comply with the Memorandum of Understanding with the Cabinet Office.*

**Update:** Memorandum provisions adhered to.

#### Objective 5: Activity 7

*Monitor the Office's financial management systems (including those operated for us by the Cabinet Office), to ensure proportionality, accuracy, effectiveness and value for money.*

**Update:** Worked with Cabinet Office finance team to manage budget, forecasting and monitoring. Minimised costs and optimised value for money, while delivering statutory duties.

#### Objective 5: Activity 8

*Ensure that Business Continuity Plans are understood and reviewed.*

**Update:** Business Continuity Plan in place and reviewed.

## **Purpose and 2023 to 2024 objectives**

The purpose of the Office of the Registrar of Consultant Lobbyists is to ensure that there is transparency in the engagement of consultant lobbyists with Ministers and Permanent Secretaries (and equivalents) on behalf of their clients, in accordance with the requirements of the Act.

In line with my statutory obligations, I have set these objectives for 2023-24:

- 1.** Operate an accurate and accessible Register
- 2.** Provide clear, accessible guidance
- 3.** Communicate and engage with stakeholders
- 4.** Ensure compliance
- 5.** Ensure administrative effectiveness and transparency.

The activities that will deliver against these objectives are set out on the following pages.

## Activity 2023 to 2024

### Objective 1: Operate an accurate and accessible Register

Maintain the accuracy and timeliness of the information in the Register and ensure that systems are accessible and meet user needs.

#### Why this matters:

Data integrity and accessibility are vital for the credibility of the Registration system: stakeholders must have confidence that information is accurate and must be able to access and engage with it easily.

#### We will:

- Support new registrants and check data to ensure accurate and timely registration and compliance.
- Support and enforce timely submission of Quarterly Information Returns and updating of registration and code of conduct data by registrants.
- Continue to improve user experience, minimise the administrative burden and monitor systems and feedback for potential improvements.

### Objective 2: Provide clear, accessible guidance

Keep published guidance under review and take account of feedback from registrants and other stakeholders.

#### Why this matters:

Clear guidance on the requirements of the Act helps registrants to understand their legal obligations and to comply more easily. It also helps other stakeholders to understand and support the registration system.

#### We will:

- Review guidance to ensure clarity for registrants and others and consult on any significant proposed changes.
- Offer information and support to Private Offices of Ministers and Permanent Secretaries (and equivalents) to aid their understanding of the statutory obligations on consultant lobbyists they engage with.
- Provide information to other stakeholders as necessary.

### **Objective 3: Communicate and engage with stakeholders**

Deliver a programme of communication and engagement with registrants, potential registrants, representative bodies and other stakeholders.

#### **Why this matters:**

Engagement, two-way communication and information supports compliance by registrants and awareness and understanding by all stakeholders.

#### **We will:**

- Work with public affairs businesses and their representative bodies to understand them and support awareness and compliance by registrants and those who may engage in consultant lobbying in the future.
- Deliver regular induction and update seminars for new and existing registrants to support compliance with statutory duties.
- Implement cycles of stakeholder engagement to support wider awareness and compliance by registrants and those who may engage in consultant lobbying in the future.
- Disseminate information about the Register to relevant audiences.
- Update registrants and stakeholders on any impacts of December 2020 post-legislative scrutiny of the Act when published by Ministers.
- Work with other bodies such as the European Lobbying Registrars' Network, the Advisory Committee on Business Appointments and the Organisation for Economic Cooperation and Development.

### **Objective 4: Ensure compliance**

Ensure that all those who ought to register do so and that quarterly information returns are monitored.

#### **Why this matters:**

The credibility of the registration system depends on the public and industry having confidence in the completeness and accuracy of the Register.

#### **We will:**

- Enforce compliance, making use of statutory penalties where appropriate.
- Review departmental transparency data in relation to Ministers and Permanent Secretaries against declarations on the Register.
- Undertake formal investigations where there is reasonable information suggesting non-compliance.

## **Objective 5: Ensure administrative effectiveness and transparency**

Operate the Office effectively and transparently to deliver against statutory purposes, serving all stakeholders and achieving value for money.

### **Why this matters:**

Our administrative arrangements must support effective delivery of the Registrar's statutory duties with proper levels of transparency and accountability, whilst keeping the administrative and financial burden on registrants as low as possible.

### **We will:**

- Deliver proportionate risk management and corporate governance to ensure effective administration of the Office.
- Fulfil statutory and legal obligations in relation to data protection and freedom of information.
- Publish details of the Registrar's formal correspondence and meetings, statutory information notices, notices of intention to impose penalties (and their conclusion) summaries of investigations and a gifts and hospitality register.
- Update Ministers on the work of the Office through business planning and financial reporting systems.
- Report to Parliament as required.
- Comply with the Memorandum of Understanding with the Cabinet Office.
- Monitor the Office's financial management systems (including those operated for us by the Cabinet Office), to ensure proportionality, accuracy, effectiveness and value for money.
- Ensure that Business Continuity Plans are understood and reviewed.
- Work with our suppliers to monitor and maintain cyber security.

## Budget 2023 – 2024

Resource	2023 to 2024 budget	2022 to 2023 budget
Registrar's fees and expenses	£30,000	£22,300
Register and website	£61,000	£74,900
Other costs (legal and enforcement, communication, travel, training)	£57,000	£26,400
Audit fee	£11,000	£10,000
<b>Programme costs</b>	<b>£159,000</b>	<b>£133,600</b>
Seconded staff payroll costs	£178,000	£173,000
Cabinet Office shared services (including finance, IT, accommodation)	£43,000	£51,400
<b>Resource expenditure financed by Grant in Aid from the Cabinet Office</b>	<b>£380,000</b>	<b>£358,000</b>

### Notes

Costs are offset by income from registration fees, estimated to be £210,000, which is remitted to the Consolidated Fund.

In accordance with the Act and the Memorandum of Understanding, payroll cost of staff seconded to the Office and shared services costs are absorbed by the Cabinet Office. These costs will be partially offset by fee income.

The Cabinet Office shared services costs are not confirmed until year end and legal costs, which include a charge from HM Courts & Tribunals Service for appeals, vary from year to year and are difficult to predict.

Shared services and audit costs are determined by Cabinet Office and NAO respectively.

### Registration fees

Registration fees are set by Ministers and in 2016 they announced that the fee of £1000 per annum would be held for the spending review period to 2020. Ministers are currently reviewing fee levels and estimated fee income for 2023-2024 is based on £1,000 per annum.