

Office of the Registrar
of Consultant Lobbyists

Business Plan

2024 to 2025

Office of the Registrar of Consultant Lobbyists
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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 sets out how I intend to fulfil my statutory obligations in the year from April 2024 and includes a review of 2023-2024. This is the tenth annual business plan for the Office of the Registrar of Consultant Lobbyists.

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.

Transparent, ethical lobbying can contribute to effective public policy making; but this requires politicians and officials actively to consider a variety of policy inputs, not only those from the most organised or well-funded parties. The work of my Office supports this by putting the activities of consultant lobbyists into the public domain.

During 2024-2025, 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, in particular in relation to the general election. We will start to explore whether AI can usefully support our work with registrants and other stakeholders.

My preference is to support compliance and my Office works with registrants and potential registrants to actively provide information and advice. Alongside this, 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.

In July 2023 the government published *Strengthening Ethics and Integrity in Central Government*, its response to a number of reviews that touched on the operation of the Act and transparency in lobbying. In my subsequent [evidence](#) to the Parliamentary and Constitutional Affairs Committee (PACAC), I welcomed the proposed changes, but expressed my concern that the response missed significant opportunities to enable effective transparency in consultant lobbying:

- Make communications with special advisers registrable.
- Require registrants to declare who was lobbied, on what subject, when and by what medium.
- Address the unintended consequences of exemption from the requirements of the Act for those not registered for VAT.
- Clarify the poorly drafted exemption for 'incidental lobbying'.

Legislative time may be limited, but the first two changes can be achieved through secondary legislation. I encourage the government to make these improvements as a matter of urgency, particularly because these changes have almost universal support from the public affairs sector and experts in the UK and beyond.

A handwritten signature in black ink, appearing to read 'Harry Rich', with a long horizontal flourish extending to the right.

Harry Rich
Registrar of Consultant Lobbyists and Accounting Officer

Review of 2023 to 2024

This review of the year to 31 March 2024 is set against the objectives that I published for the Office of the Registrar in the 2023-24 business plan.

At 31 March 2024 the Register had 213 registrants, compared to 209 at the end of March 2023. The significant increase in registrants in recent years started to level off at the end of 2022. This followed more than a year of active awareness raising and may indicate that awareness is now high and stable. Awareness raising activity this year continued.

I updated my formal guidance in July 2023. The key changes were to reiterate that 'communications' means communications by any method; to increase clarity about foreign clients; to explain the impact of backdated VAT registration; and to be clear that a code of conduct must be addressed to external parties, rather than the registrant's employees. I updated my compliance guidance in March 2024 for clarity.

During the year I worked with the OECD's Working Party of Senior Public Integrity Officials and with the European Lobbying Registrars' Network, participating in two conferences to exchange information about international good practice in lobbying transparency. At the OECD, I joined an introductory forum of lobbying commissioners and registrars and met with counterparts from Canada and the Netherlands. I attended seminars on lobbying organised by the Committee for Standards in Public Life and by University College London.

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 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. Registrants with more than two consecutive quarterly nil returns contacted to check accuracy. Checks conducted on consistent naming of clients and code of conduct declarations, for accuracy.

Objective 1: Activity 3

Continue to improve user experience, minimise the administrative burden and monitor systems and feedback for potential improvements.

Update: Feedback survey sent to new registrants and a survey is open for everyone on the website for suggested system and website improvements. Ongoing monitoring of system and improvements working with service provider.

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 guidance to ensure clarity for registrants and others and consult on any significant proposed changes.

Update: Updated guidance in July 2023 to aid clarity. In particular, to reiterate that 'communications' mean communications through any means or method. Updated guidance on compliance in March 2024 to aid clarity.

Objective 2: Activity 2

Offer information and support 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 any post-legislative scrutiny outcomes following the initial response from government in July 2023.

Objective 2: Activity 3

Provide guidance to other stakeholders as necessary.

Update: Included information on our website for parliamentarians and former parliamentarians and wrote to all MPs who have announced they are standing down at the next general election.

Objective 3: Communicate and engage with stakeholders

Deliver 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: Communicated with PRCA regarding the Public Affairs Code.

Objective 3: Activity 2

Deliver regular induction and update seminars for new and existing registrants to support compliance with statutory duties.

Update: Delivered three well-attended webinars.

Objective 3: Activity 3

Implement cycles of stakeholder engagement to support wider awareness and compliance by registrants and those who may engage in consultant lobbying in the future.

Update: Continued activities to increase awareness of statutory duties. Wrote to companies who may engage in consultant lobbying in the future and have not been written to previously. Started writing awareness letters to those corresponding with the Advisory Committee on Appointments (ACOPA), if roles could lead to consultant lobbying.

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 3: Activity 5

Update registrants and stakeholders on any impacts of December 2020 post-legislative scrutiny of the Act when published by Ministers.

Update: Published links on the website for the government's 'Strengthening ethics and integrity in central government' in July; and Registrar's further evidence to the Public Administration and Parliamentary Affairs Committee in September 2023.

Objective 3: Activity 6

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.

Update: I worked with the OECD's Working Party of Senior Public Integrity Officials attending two conferences and a working party.

Objective 4: Ensure compliance

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

Objective 4: Activity 1

Enforce compliance, making use of statutory penalties where appropriate.

Update: 19 notices of intention to issue a civil penalty issued during the year (2022-23: 18), the bulk of which resulted in a penalty being issued. Three information notices issued (2022-23: four).

Objective 4: Activity 2

Review departmental transparency data in relation to Ministers and Permanent Secretaries against declarations on the Register.

Update: Ministers' and Permanent Secretaries' meetings and hospitality data reviewed, resulting in requests to Private Offices for further information including a Freedom of Information request.

Objective 4: Activity 3

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

Update: Registrar initiated or continued 18 formal investigations (2022-23: 17) and published summaries of findings of 15 concluded investigations (2022-23: 15). Engaged with His Majesty's Revenue and Customs regarding principles for provision of VAT data, under the Act; and with the Parliamentary and Health Service Commissioner regarding their oversight and added information to our website.

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 proportionate risk management and corporate governance to ensure effective administration of the Office.

Update: The Registrar reviews strategic risks each quarter 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) summaries of investigations and a gifts and hospitality register.

Update: All published on website of the Office of the Registrar.

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, including meeting Alex Burghart MP, Parliamentary Secretary for the Cabinet Office.

Objective 5: Activity 5

Report to Parliament as required.

Update: The Registrar's annual report and accounts for year to 31 March 2023 was laid before Parliament 19 July 2023 and a copy sent to Public Administration and Constitutional Affairs Committee (PACAC). The 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.

Objective 5: Activity 9

Work with our suppliers to monitor and maintain cyber security.

Update: We work with suppliers for development and security of the Register and website.

Purpose and 2024 to 2025 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 2024-25:

- 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 2024 to 2025

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 use it easily.

We will:

- Support new registrants and check their data to ensure accurate and timely registration and compliance.
- Support and enforce timely submission of accurate 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 the Registrar's formal 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. This action will be post-election and following post legislative scrutiny changes.
- 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.
- Review engagement activities to respond to potential new consultant lobbyists following the election.
- Deliver regular induction and update seminars for new and existing registrants to support compliance with statutory duties.
- Disseminate information about the Register to relevant audiences.
- Update registrants and stakeholders on any impacts of the December 2020 post-legislative scrutiny of the Act when implemented by the government.
- Work with and share good practice with other bodies such as the European Lobbying Registrars' Network, the Advisory Committee on Business Appointments (ACOBA) and the Organisation for Economic Cooperation and Development (OECD).

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 and update by November 2024.
- Operate 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.
- Start to explore whether and how Artificial Intelligence might support our work.
- Support and encourage ORCL team learning and development with the Cabinet Office.

Budget 2024 – 2025

Resource	2024 to 2025 budget	2023 to 2024 budget
Registrar's fees and expenses	£28,000	£30,000
Register and website	£78,000	£61,000
Other costs (legal and enforcement, communication, travel, training)	£60,000	£57,000
Audit fee	£19,000	£11,000
Programme costs	£185,000	£159,000
Seconded staff payroll costs	£190,000	£178,000
Cabinet Office shared services (including finance, IT, accommodation)	£38,000	£43,000
Resource expenditure financed by Grant in Aid from the Cabinet Office	£413,000	£380,000
Income	-£213,000	-£210,000
Resource Departmental Spending Limit (RDEL)	£200,000	£170,000

Notes

Costs are offset by income from registration fees, estimated to be £213,000, 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.