

Summary of investigation

March 2022 – May 2024

Organisation or person investigated

Baroness Michelle Mone (“Baroness Mone”)

Matter(s) investigated

Whether Baroness Mone conducted unregistered consultant lobbying.

Registrar’s decision

Based on a witness statement, supported by a statement of truth, from Baroness Mone, she has not conducted unregistered consultant lobbying in relation to the matter under investigation.

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 that 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. A summary 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.

All conditions in section 2(1) of the Act have to be met to satisfy the definition of consultant lobbying. Baroness Mone communicated to Ministers regarding PPE Medpro in respect of matters covered by section 2(3) of the Act. PPE Medpro was not a paying client, if it had been, it is likely this would have been consultant lobbying and therefore registrable. However, as it was not, Baroness Mone’s communications with Ministers were not in return for payment and did not satisfy section 2(1)(a) of the Act and so were not registrable.

Chronology

Date	Action
24-03-22	Article in The Guardian including details of an email sent by Baroness Mone to a Cabinet Office Minister regarding personal protective equipment (“PPE”).

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Date	Action
29-03-22	Formal letter from the Registrar to Baroness Mone giving background on the requirement for registering and asking if her activities fall within the criteria to be registered, with particular reference to, but not limited to, PPE Medpro.
04-04-22	Email from Baroness Mone requesting the Registrar to provide reasonable grounds for his enquiry.
06-04-22	Letter from the Registrar explaining that the reasonable grounds for his enquiry are provided by The Guardian article of 24 March 2022 and providing assurance that no conclusions have been reached at this stage.
14-04-22	Statutory Information Notice issued to Baroness Mone for a response to the Registrar's letter of 29 March 2022.
09-05-22	H C Legal Consulting, representing Baroness Mone, submits appeal to the First-tier Tribunal (General Regulatory Chamber) ("GRC") against the Information Notice of 14 April 2022. ¹
05-06-22	Case Management Directions from the GRC, following a request by the appellant to stay the appeal.
14-06-22	Response to appeal filed by the Government Legal Department ("GLD"), representing the Registrar.
18-11-22	GRC remote Case Management Hearing.
18-11-22	GRC directions regarding case management, <i>inter alia</i> , granting a stay on the appeal.
04-07-23	GRC order vacating the case management hearing scheduled for 11 July 2023, and, <i>inter alia</i> , continuing the stay of the appeal.
09-01-24 to 01-05-24	Letters between GLD (on behalf of the Registrar) and Grosvenor Law (on behalf of Baroness Mone) in respect, <i>inter alia</i> , of possible provision of evidence by her to the Registrar.
18-01-24	GRC directions, <i>inter alia</i> , continuing the stay of the appeal.
31-01-24	Registrar request to HMRC (as permitted under section 23(3) of the Act and regulation 6 of the Registration of Consultant Lobbyists Regulations 2015 (SI 2015/379) regarding whether Baroness Mone was VAT registered at the time of the communications.
01-05-24	Witness statement and statement of truth provided by Baroness Mone, via Grosvenor Law, setting out why the communications, subject to investigation

¹ Statutory Information Notices issued by the Registrar can be appealed to the GRC.

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Date	Action
	were not made in the course of business nor in return for payment. The Registrar considers that this information fulfilled the purpose of the Information Notice of 14 April 2022.
21-05-24	Letter from the Registrar to Grosvenor Law concluding his investigation.

21 May 2024

Office of the Registrar of Consultant Lobbyists

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