

Summary of investigation

July to August 2024

Organisation or person investigated

Arden Strategies Limited (“Arden”)

Matter(s) investigated

Whether Arden conducted unregistered consultant lobbying prior to registration

Registrar’s decision

Based on information and assurances received Arden did not conduct unregistered consultant lobbying, prior to their registration, in relation to the matters under investigation.

Summary of rationale for decision

Based on substantive and unequivocal written information provided, Arden has not conducted unregistered consultant lobbying.

Under the Transparency of Lobbying, Non-Party Campaigning and Trade Union administration Act 2014 (“the Act”), a registrable communication is made by a VAT registered company or individual communicating with a Minister, Permanent Secretary (or equivalent) on behalf of a paying client.

Arden provided open, comprehensive and detailed information on the events conducted prior to registration, which demonstrated that they were open to the public and Arden did not use them to represent their clients. The communications with Ministers were therefore not on behalf of a paying client.

Chronology

Date	Action
31 July	Third party email regarding three events held by Arden, prior to their registration.
31 July	Formal letter from the Registrar giving background on the requirement for registering and asking if Arden’s activities fall within the criteria for registration with particular reference to, but not limited to, three events held in 2020-21.

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Date	Action
14 August	Fully comprehensive response from Arden regarding a series of 'in conversation with' events held by Arden during the COVID-19 pandemic. The events were attended by some clients but mainly by non-clients and Arden did not represent their clients as part of these events.
15 August	Letter from Registrar concluding the investigation.

15 August 2024

Office of the Registrar of Consultant Lobbyists

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