

# Summary of investigation

October 2024 – February 2025

## Organisation or person investigated

Global Counsel Limited (“GCL”)

## Matter(s) investigated

Whether GCL submitted an inaccurate Quarterly Information Return (“QIR”) to the Registrar.

## Registrar’s decision

GCL did not submit inaccurate QIRs in relation to the matter under investigation.

## Summary of rationale for decision

Based on substantive and unequivocal written information provided, GCL has not submitted inaccurate QIRs in relation to the matter under investigation.

Under the Transparency of Lobbying Non-Party Campaigning and Trade Union Administration Act (“The Act”), registrants must submit a QIR to the Registrar every quarter giving client information in relation to consultant lobbying, or a nil return.

In January, March and June 2023, Global Counsel met with a minister and this was not declared in GCL’s QIRs. Based on assurances from GCL, the Qatari Freezone Authority (“QFZA”) was a client of Global Counsel MENA, not of GCL. Global Counsel MENA is a subsidiary of GCL and a separate legal entity. It cannot register as a consultant lobbyist as it is not UK VAT registered. Based on assurances provided, GCL did not receive any payments from QFZA, directly or indirectly, for the periods investigated. Under 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.

## Chronology

Date	Action
25/01/23	Meeting between Minister of State, Department for International Trade and Global Counsel.

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Date	Action
22/03/23	Meeting between the Minister of State, Department for Business and Trade and Global Counsel.
13/06/23	Meeting between the Minister of State, Department for Business and Trade the Qatari Freezone Authority ("QFZA"). The briefing states that this was an introductory meeting requested by Global Counsel. The meeting was attended by Global Counsel MENA Regional Director.
17/10/24	Letter from Spotlight on Corruption, to the Registrar, calling for an investigation and providing background and a link to a press report.
21/10/24	Formal letter from the Registrar giving background on the requirement for QIRs and asking if GCL declared their clients appropriately with particular reference to, but not limited to, QFZA.
29/10/24	Letter from GCL to the Registrar stating that QFZA is a client of Global Counsel MENA, a non-UK subsidiary of GCL and therefore not UK VAT registered.
12/11/24	Letter from the Registrar to GCL with additional questions.
15/11/24	Letter from GCL to the Registrar providing responses.
26/11/24	Letter from the Registrar stating he is considering the response and requesting information regarding a further potential inaccuracy regarding SHEIN, reported in The Guardian.
26/11/24	Letter from GCL to the Registrar responding that no registrable communications were made for SHEIN.
21/02/25	Letter from the Registrar to GCL, concluding the investigation and providing advice on transparency regarding which legal entity is being represented in communications.

21 February 2025

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