

Summary of investigation

April to July 2025

Organisation or person investigated

Mark Higton and Higton Associates Limited

Matter(s) investigated

Whether Mark Higton or Higton Associates Limited conducted unregistered consultant lobbying.

Registrar's decision

Based on information and assurances provided, Mark Higton has not conducted unregistered consultant lobbying either personally or through Higton Associates Limited in relation to the matter under investigation.

Summary of rationale for decision

Based on substantive and unequivocal written information provided, neither Mark Higton nor Higton Associates Limited received payment from Luxe Lifestyle or its subsidiaries. The communication made to the Minister of State for Trade Policy in the Department for International Trade on behalf of Luxe Lifestyle was therefore not registrable.

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.

Chronology

Date	Action
14/04/25	Formal letter from the Registrar to Mark Higton and Higton Associates Limited giving background on the requirement for registering and asking if activities, whether individually or through a company, fall within the criteria to be registered with particular reference to, but not limited to, communications with the Minister of State for Trade Policy in the Department for International Trade on behalf of Luxe Lifestyle.

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Date	Action
30/04/25	Information Notice issued by the Registrar to Higton Associates Limited and Mark Higton due to no response to the letter of 14 April addressed to the company's registered office.
30/05/25	Email asserting that the incidental exemption applies and that there was no benefit from the communication.
04/06/25	Letter to Higton Associates Limited officers, seeking response to Information Notice.
04/06/25	Email from Mark Higton to the Office stating he had responded on 30 May.
05/06/25	Email from the Office to Mark Higton confirming receipt of email of 30 May and apologising that the email had not been seen due to a technical email issue.
12/06/25	Letter from the Registrar to Mr Higton asking why he considered that the incidental exception applied, with reference to the Registrar's guidance ; and asking for clarification on no benefit being received, specifically if any payment was received at any time from Luxe Lifestyle or its subsidiaries, whether as an individual or through a company.
12/06/25	Email from Mark Higton to the Registrar giving further information about the communication and that he was not paid for making the communication.
13/06/25	Letter from the Registrar to Mark Higton reminding him that the question asked was "Did you receive any payment at any time from Luxe Lifestyle or its subsidiaries, whether as an individual or through a company?"
08/07/25	Information Notice issued by the Registrar to Higton Associates Limited and Mark Higton due to no response.
08/07/25	Email from Mark Higton to the Registrar referring back to his responses of 30 May and 12 June in answer to the question of 12 June.
09/07/25	Letter from the Registrar to Mark Higton explaining the question of 12 June asks about payment, without the qualifications in the answers of 30 May and 12 June.
09/07/25	Email from Mark Higton to the Registrar stating no payment was received.
10/07/25	Email from Mark Higton confirming that by 'no benefit' he meant no benefit at all.
15/07/25	Letter from the Registrar concluding investigation.

15 July 2025

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