

# Provisional Summary of investigation

July to August 2025

## Organisation or person investigated

Devo Agency Limited ("Devo Agency")

## Matter(s) investigated

Whether Devo Agency is an unregistered consultant lobbyist.

## Registrar's proposed decision

Provisional decision that Devo Agency carried on the business of consultant lobbying while not being registered.

Note: The Registrar's proposed decision and the rationale for it set out below remain subject to any written representations made by Devo Agency in response to the Registrar's Notice of Intention and the Registrar may change his provisional decision in light of such representations.

## Summary of rationale for proposed 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 ("the Register").

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) concerning specified matters on behalf of a third party and in return for payment.

Devo Agency made two direct communications to the Minister for Local Government and English Devolution between 13 May 2025 and June 2025, before registering as a consultant lobbyist on 1 August 2025. The communications were in relation to their clients Greater Manchester; Liverpool; and North East All-Party Parliamentary Groups. Devo Agency was VAT registered at the time of the communications.

The Registrar provisionally considers that the two communications were registerable.

# Office of the Registrar of Consultant Lobbyists

## Chronology

Date	Action
9 and 14 July	Emails sent to the Office of the Registrar of Consultant Lobbyists with evidence of potential consultant lobbying.
16 July	Formal letter from the Registrar to Devo Agency 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 ministers regarding the northern powerhouse education, employment and skills summit 2025; and any communications with the Minister for Local Government and English Devolution on behalf of the Greater Manchester and Liverpool All-Party Parliamentary Groups or their sponsors.
30 July	Email from Devo Agency to the Registrar giving background on the company and an event in June and a cancelled event in July.
1 Aug	Devo Agency joins the Register.
12 Aug	Letter from the Registrar to Devo Agency requesting further information regarding communications at or before the event in June.
13 Aug	Email from Devo Agency to the Registrar regarding the event in June.
20 Aug	Letter from the Registrar to Devo Agency requesting further information about the communications and the paying clients for the June event.
3 Sept	Email from Devo Agency to the Registrar providing further information about communications relating to the pan-Northern meeting with the Minister for Local Government and English Devolution on behalf Devo Agency's clients: Greater Manchester; Liverpool; and North East All-Party Parliamentary Groups.
10 Sept	Letter from the Registrar giving advice to ensure future compliance with the Act. Notice of Intention to issue a civil penalty is issued.

10 September 2025

Office of the Registrar of Consultant Lobbyists

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