

# Summary of investigation

July to October 2025

## Organisation or person investigated

George Freeman MP ("Mr Freeman")

## Matter(s) investigated

Whether George Freeman conducted unregistered consultant lobbying

## Registrar's decision

Based on information and advice provided, Mr Freeman has not conducted unregistered consultant lobbying in relation to the matter under investigation.

## Summary of rationale for decision

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.

While the Act can apply to MPs where they make registrable communications, it does not apply to the usual activities of an MP for which they are paid a Parliamentary salary and the Act does not extend to the regulation of Parliamentary questions tabled by an MP in the ordinary course of Parliamentary business.

## Chronology

Date	Action
28 June	<a href="#">Article</a> in The Guardian referencing Mr Freeman's work for GHGSat.
4 July	Formal letter from the Registrar to Mr Freeman giving background on the requirement for registering and asking if his activities fall within the criteria to be registered with particular reference to, but not limited to, communications for GHGSat referenced in The Guardian on 28 June.
18 July	Letter from Mr Freeman to the Registrar stating that he does not believe that his work is registrable and that he had sought advice from the House of Commons.

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Date	Action
11 August	Letter from the Registrar to Mr Freeman setting out the published communications with GHGSat and the subsequent questions put to Ministers in parliament and asking why he considers these not to be communications to Ministers on behalf of a paying client.
12 August	Letter from Mr Freeman saying he is taking advice from the Clerk of Journals of the House of Commons and will be able to respond after 1 September.
18 August	Letter from the Registrar to Mr Freeman extending the deadline for response to 10 September.
11 Sept	Registrar issues statutory information notice to Mr Freeman to respond to the questions in the 4 July letter.
12 Sept	Email from Mr Freeman's office acknowledging receipt and that of the House authorities would provide advice on why the communications do not fall under the jurisdiction of the Registrar.
12 Sept	Letter from the House of Commons advising that any proceeding in the House of Commons is protected by Article IX of the Bill of Rights 1689.
6 October	Letter from the Registrar concluding the investigation, cancelling the Information Notice and providing advice on continued compliance.

6 October 2025

Office of the Registrar of Consultant Lobbyists

[office@orcl.gov.uk](mailto:office@orcl.gov.uk)