

## Written evidence submitted by Harry Rich, Registrar of Consultant Lobbyists

### Introduction

1. As Registrar of Consultant Lobbyists, I am an independent statutory office holder appointed under the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014 ('the Act').
2. I am responsible for publishing and maintaining the register of consultant lobbyists in order to ensure that there is transparency in the work of consultant lobbyists in their engagement with Ministers and Permanent Secretaries on behalf of clients.
3. My role includes providing guidance and ensuring compliance.

### APPGs and their support providers

4. The obligations of the Act are the same for all organisations that fall within its definitions. Full guidance is on the [website](#), but in broad terms, an organisation is engaging in consultant lobbying if they communicate on behalf of a paying client with a government minister, permanent secretary or their equivalents.
5. This means that some support providers for APPGs need to register as consultant lobbyists.
6. Support providers are not a special category and have the same obligation as others to comply with the legislation if their activities constitute consultant lobbying, whether or not they consider themselves to be lobbyists. It is important to note that registration must take place before any consultant lobbying activity is conducted.
7. My [published guidance](#) includes a section aimed at aiding compliance by think tanks and APPG support providers. My Office is always happy to advise support providers as to whether their proposed activities would require registration under the Act.

### The role of the APPG in compliance

8. The legal obligation to comply with the Act rests with the consultant lobbyist (in this case potentially the support provider), rather than the client (in this case the APPG).
9. However, I am concerned that lack of awareness by APPG support providers of their obligations under the Act could lead to breaches of the law by them and to significant reputational damage to the APPGs they work with.
10. Whilst recognising that the legal obligation rests with the support provider I would welcome the active engagement of all APPGs in ensuring that their support provider complies with the Act. Perhaps this could be included as a part of the APPG's own compliance requirements.

**Funding and clarity of roles**

11. One of the tests as to whether registerable consultant lobbying activity is taking place is the source and purpose of payments to the support provider. Compliance with the Act would be supported by greater clarity around the funding of APPGs and their support providers.
  
12. It is sometimes unclear as to whether communications and events originate from the APPG or their support provider. Greater clarity and conscious separation of roles would aid compliance with the Act.

*8 December 2020*