

Office of the Registrar of Consultant Lobbyists

Summary of investigation

August to September 2021

Organisation or person investigated

Hod Hill Ltd ('Hod Hill').

Matter(s) investigated

Whether Hod Hill is an unregistered consultant lobbyist

Registrar's decision

Based on information provided and substantive assurances, I conclude that the company has not been engaging in consultant lobbying activity.

Summary of rationale for decision

This decision is based on information provided regarding services provided by Hod Hill and substantive assurances from Hod Hill that consultant lobbying is not undertaken. Further, Hod Hill has acknowledged issues with the distinction between Hod Hill and external roles and has taken steps to make this clearer.

Chronology

Date	Action
5 August	Article in The Times suggesting Hod Hill is involved in arranging access to senior people.
6 August	Formal letter from the Registrar to Hod Hill giving background on the requirement for registering; asking if their activities in general fall within the criteria to be registered; and in particular with reference to The Times report regarding Hod Hill's role in arranging access to Ministers.
18 August	Letter from Registrar to Hod Hill, requesting a response to his letter of 6 August.
18 August	Emails from Hod Hill to confirm receipt, that the original letter was not received and to state no such lobbying had taken place.
18 August	Email from ORCL on behalf of Registrar requiring a full written response by 24 August.

Date	Action
22 August	Letter from Hod Hill stating no consultant lobbying has been undertaken.
23 August	Email from the Registrar requiring a substantive response.
31 August	Letter from Hod Hill giving further detail and confirming that Hod Hill was set up in 2015 as the private office of Ben Elliot, that the Conservative Party is not a Hod Hill client and Hod Hill has not benefited financially from the Conservative Party
6 September	Letter from Registrar asking for further information about Hod Hill's clients, services and customers.
10 September	Letter from Hod Hill explaining their services and that political and lobbying services are not offered nor undertaken. A further explanation was given relating to media reports about a Hod Hill email address being used to communicate with Mr Widecki connected with support he provides to Mr Elliot's Conservative Party role outside of his Hod Hill role. He has since set up a new email address to make a clear distinction between roles.
14 September	Letter from Registrar to close the investigation and welcoming measures to make a clear distinction between roles.

14 September 2021

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office@orcl.gov.uk