

Office of the Registrar of Consultant Lobbyists

Summary of investigation.

November 2020

Organisation or person investigated: Tulchan Communications LLP ('Tulchan')

Matter(s) investigated: Whether Tulchan submitted an inaccurate Quarterly Information Return under the terms of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 ('the Act'), in particular whether they omitted a client from their return for the period April to June 2020.

Registrar's decision: Based on the information provided, and no evidence to the contrary, Tulchan did not conduct undeclared consultant lobbying as defined by the Act in the period under enquiry.

Summary of rationale for decision: Tulchan provided a timeline of the activities of its Managing Partner, Lord Feldman, in relation to Tulchan, the Department for Health & Social Care ('DHSC') and Oxford Nanopore Technologies Limited ('Oxford Nanopore') from March 2020 to June 2020. Irrespective of Lord Feldman's status with Tulchan in this period, the Registrar has no evidence of activity that constituted consultant lobbying within the definition in section 2 of the Act (i.e. communication by the consultant with a Minister, Permanent Secretary or equivalent, on behalf of a paying client).

Oxford Nanopore was not a client of Tulchan in the period of Lord Feldman's association with DHSC. They subsequently became a client of Tulchan and the Registrar has received a comprehensive assurance dated 18 November 2020 that no consultant lobbying had been conducted by Tulchan on behalf of Oxford Nanopore as at that date.

Chronology:

16 November 2020	Query from a journalist to ORCL following reports that Lord Feldman, Tulchan Managing Partner, met with ministers and Oxford Nanopore on 1 April and on 13 May 2020. The journalist asked why Oxford Nanopore was not listed as a Tulchan client in their Quarterly Information Return.
16 November 2020	Formal letter from Registrar to Tulchan to enquire whether an inaccurate Quarterly Information Return had been submitted.
18 November 2020	Response from Tulchan providing a comprehensive assurance about the accuracy of its Quarterly Information Returns and setting out a timeline of the activities of Lord Feldman in relation to Tulchan, the Department for Health & Social Care ('DHSC') and Oxford Nanopore from March 2020 to June 2020.