

Office of the Registrar of Consultant Lobbyists

Summary of investigation

March 2021

Organisation or person investigated: Rt Hon David Cameron (“Mr Cameron”)

Matter(s) investigated: Whether Mr Cameron acted as an unregistered consultant lobbyist, with particular reference to Greensill Capital (UK) Limited, Greensill Capital Management (UK) Limited and associated companies (collectively referred to as ‘Greensill’).

Registrar’s decision: Based on detailed information and assurances provided, Mr Cameron’s activities do not fall within the criteria that require registration on the Register of Consultant Lobbyists.

Summary of rationale for decision: Mr Cameron provided information about the terms of his employment by Greensill and comprehensive assurances that:

- any contact that he had with any Government Minister or Permanent Secretary on behalf of Greensill was made as an employee of Greensill; and
- neither he nor any company of which he is a director, shareholder or employee received any payment from Greensill, other than remuneration received by him as an employee of Greensill.

Under the terms of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014, employees are not required to register lobbying activity conducted on behalf of their employer.

Mr Cameron provided information about his pro bono activities for charities and public bodies, which are not registrable as they are unpaid. Mr Cameron provided comprehensive assurance that lobbying is not included in any of the contractual agreements he has entered into in relation to his other business interests.

Chronology:

22 March 2021	Media reports in relation to Mr Cameron’s lobbying activity on behalf of Greensill.
22 March 2021	ORCL request to The Office of David Cameron for an email address to send a formal letter.
23 March 2021	Formal letter from the Registrar to Mr Cameron via the Office of David Cameron giving background on the requirement for registering; asking if his activities in general fall within the criteria to be registered; and in particular with reference to Greensill.
24 March 2021	Letter from Mr Cameron confirming he was employed by

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	Greensill in a personal capacity and as an employee of the firm, the issue of registration does not apply.
25 March 2021	Letter from the Registrar requesting: further details of the nature of contacts with any Government Minister or Permanent Secretary; further details of Mr Cameron's employment by Greensill; and requesting a response as to whether his wider activities fall within the criteria to be registered.
25 March 2021	Letter from Mr Cameron giving details of the terms of his employment by Greensill and stating that the only remuneration from Greensill was as an employee.
25 March 2021	Email from ORCL to the Office of David Cameron asking for a response on whether David Cameron's wider activities fall within the criteria to be registered.
25 March 2021	Letter from David Cameron, giving an overview of his other activities and confirming that he has read the guidance on registration and does not believe that his work meets the criteria for registration.
26 March 2021	Letter from the Registrar confirming the outcome of his investigation.