

## Summary of investigation

August to September 2021

### Organisation or person investigated

Lord Hammond of Runnymede ('Lord Hammond') and Matrix Partners Limited ('Matrix').

### Matter(s) investigated

Whether Lord Hammond is an unregistered consultant lobbyist, with particular reference to OakNorth Bank PLC ('OakNorth').

### Registrar's decision

Based on detailed information that Lord Hammond provided about his business activities and on substantive assurances from him, I conclude that he has not been engaged in consultant lobbying activity, either independently or through Matrix.

### Summary of rationale for decision

Lord Hammond and Matrix demonstrated that his email of 24 July 2020 to Charles Roxburgh, Second Permanent Secretary at HMT, in relation to OakNorth fell within the exception in schedule 1, part 1 of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 ('the Act') ('the incidental exception') which provides (in part):

A person does not, by reason of making a communication, carry on the business of consultant lobbying if (a) the person carries on a business which consists mainly of non-lobbying activities, and (b) the making of the communication is incidental to the carrying on of those activities.

Had the incidental exception not applied, the email of 24 July 2020 would have been an act of consultant lobbying and therefore a registrable communication.

### Chronology

Date	Action
8 August	Media report regarding Lord Hammond emailing the second permanent secretary of the Treasury on behalf of OakNorth.
10 August	Formal letter from the Registrar to Lord Hammond 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 OakNorth.

Date	Action
10 August	Email from Lord Hammond assuring the Registrar that his business activity does not include consultant lobbying.
11 August	Letter from Registrar asking for further information.
17 August	Email from Lord Hammond responding to the further information request on 11 August and giving rationale for the communication to fall within the incidental exception.
18 August	Email from Registrar requesting Lord Hammond's letter of agreement with OakNorth.
19 August	Email from Lord Hammond attaching letter of appointment from OakNorth.
23 August	Email from Registrar asking in what terms Lord Hammond's intention not to lobby on behalf of OakNorth was made clear.
23 August	Email from Lord Hammond providing further information in response to the Registrar's email earlier the same day.
8 September	Letter from Registrar requesting further information regarding the volume and value of OakNorth work in relation to his and Matrix's activities.
8 September	Email from Lord Hammond providing further information in response to the Registrar's email earlier the same day.
10 September	Letter from Registrar to conclude the investigation and to advise that, had the incidental exception not applied, Lord Hammond's email to Charles Roxburgh would have been consultant lobbying under the definitions provided in the Act. This is irrespective of the terms of the agreement with the client and whether or not the offer contained in the email was pro-bono. The Registrar drew Lord Hammond's attention to the difference between the requirements of the Act and those of ACOBA, in particular in respect of what constitutes 'consultant lobbying' and 'lobbying'.

10 September 2021  
Office of the Registrar of Consultant Lobbyists  
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