

# Office of the Registrar of Consultant Lobbyists

## Summary of investigation

August - October 2021

### Organisation or person investigated

Rt Hon David Cameron through the Office of David Cameron (“ODC”)

### Matter(s) investigated

Whether Mr Cameron through ODC acted as an unregistered consultant lobbyist, with particular reference to Illumina.

### Registrar’s decision

Based on detailed information that Mr Cameron provided about the business activities he conducts through ODC and on substantive assurances, I conclude that the incidental exception\* applies to four communications with Ministers that would otherwise have been registerable. As a result, Mr Cameron through ODC has not acted as an unregistered consultant lobbyist under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (“the Act”).

\* The incidental exception in schedule 1, part 1, section 1 of the Act 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.*

### Summary of rationale for decision

During the investigation I considered four communications by Mr Cameron in relation to Illumina, a client of ODC:

- Forwarding to the Secretary of State for Health and Social Care an invitation from Illumina to speak at the International Summit on Population Genomics (2019)
- Participation at the International Summit alongside the Executive Chairman of Illumina and the Secretary of State for Health and Social Care (2019)
- Text message to the Vaccines Minister referencing Illumina (2021)
- Follow-up meeting with the Vaccines Minister (2021)

I conclude that these communications would constitute registerable consultant lobbying unless the incidental exception applies.

Mr Cameron and ODC provided evidence of ODC’s wider work and as a result of this evidence and substantive assurances from Mr Cameron, I conclude that the incidental

exception applies to these communications and that Mr Cameron through ODC has not conducted unregistered consultant lobbying activity.

I note that the definition of lobbying applied by Mr Cameron and ODC appears to differ from the statutory definition and I have advised caution in this regard.

## Chronology

Date	Action
30 July	Media reports regarding Mr Cameron's work with Illumina and meeting with the Vaccines Minister, following publication of ministerial diaries.
2 August	Formal letter from the Registrar to Mr Cameron via ODC giving background on the requirement for registration; asking if his activities in general fall within the criteria to be registered; and in particular with reference to Illumina.
9 August	Response from Mr Cameron stating he did not lobby the UK Government on behalf of Illumina; giving information regarding the approval of his role from the Advisory Committee on Business Appointments (ACOBA) in 2017; background to his meeting with the Vaccines Minister and Illumina; giving his view that this meeting was not an act of consultant lobbying and was incidental to his work for Illumina; and sharing articles demonstrating his previous interest in the role of genomic sequencing in virus surveillance.
11 August	Letter from Mr Cameron, following an article in The Times regarding a genomics conference in 2019, reiterating that he was not lobbying for Illumina.
11 August	Letter from the Registrar, requesting further information regarding communications with Ministers and asking for Mr Cameron to consider his assertion that his lobbying is incidental, in light of the Registrar's guidance on incidental lobbying.
18 August	Letter from Mr Cameron responding to the questions posed on 11 August.
25 August	Email from the Registrar asking for further information regarding Mr Cameron's work for Illumina and his meeting with the Vaccines Minister.
27 August	Letter and supplementary information from Mr Cameron in response to questions posed on 25 August.
17 September	Letter from the Registrar setting out his preliminary conclusions and inviting Mr Cameron's response.
1 October	Letter from Mr Cameron providing detailed information, evidence and assurances about the volume and nature of the commercial activities that

Date	Action
	he conducts through ODC.
5 October	Further evidence from ODC.
19 October	<p>Letter from the Registrar to conclude the investigation and to advise that had the incidental exception not applied, Mr Cameron's four communications would have constituted consultant lobbying under the terms of the Act.</p> <p>The Registrar noted that the definition of lobbying applied by Mr Cameron and ODC appears to differ from the statutory definition which the Registrar applies in his decisions. The definition in the Act also differs from that applied by ACOBA.</p> <p>The Registrar advised that his decision that the incidental exception applied to the relevant communications was finely balanced in some respects and advised continuing caution in this regard.</p>

19 October 2021

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