

Summary of investigation

September to October 2023

Organisation or person investigated

Newbridge Advisory Limited (“Newbridge Advisory”)

Matter(s) investigated

Whether Newbridge Advisory conducted unregistered consultant lobbying

Registrar’s decision

Based on assurances given and evidence provided, Newbridge Advisory has not conducted unregistered consultant lobbying as defined in the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act (“the Act”).

Summary of rationale for decision

Under the Act, there is an exception for those with a business consisting mainly of non-lobbying activities; and where the communication is incidental to this business (“the incidental exception”).

I apply the incidental exception within narrow parameters, as set out in my [guidance](#). Newbridge Advisory provided unequivocal and complete assurances to my queries, which helped me to ascertain that there was one communication to consider and:

- The business consists of mainly non-lobbying activities.
- The communication does not appear significant by volume, value, significance to client offering or contribution to non-lobbying activities.

Chronology

Date	Action
4 Sept	Article in openDemocracy regarding meeting between Palantir and the Cabinet Office.
6 Sept	Formal letter from the Registrar to Newbridge Advisory giving background on the requirement for registering and asking if its activities fall within the criteria to be registered with particular reference to, but not limited to, any communications made on behalf of Palantir.

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Date	Action
18 Sept	Detailed response from Newbridge Advisory
26 Sept	Letter from Registrar requesting contractual information.
4 Oct	Response from Newbridge Advisory regarding contract with Palantir.
20 Oct	Letter from Registrar concluding his investigation.

20 October 2023

Office of the Registrar of Consultant Lobbyists

office@orcl.gov.uk