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## Summary

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I began an inquiry on my own initiative that a Member had breached paragraph 14 of the Code of Conduct through the late registration of remuneration from employment in the Register of Members' Financial Interests.

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During my inquiry, I established that the Member had made ten late registrations. The final one occurred after the Member received advice from the Registrar of the need to register his interests within 28 days.

10

I found that the Member had acted in breach of the rules. He has acknowledged the breach, apologised and taken to steps to prevent a recurrence.

I concluded the inquiry using the rectification procedure available to me under Standing Order no 150.

## Written evidence

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### 1. Letter from the Commissioner to Rt Hon David Lammy MP, 14 May 2019

I would welcome your help with an inquiry I have started concerning your compliance with the House of Commons' Code of Conduct for Members in connection with the registration of your financial interests (paragraph 14 of the Code). It concerns your following registrations.

8 May 2018, received £1,750 from Blackbird Communication, 22 Cairns Close, St Albans AL4 0EB, for a speaking on 22 February 2018. Hours: 2 hrs. (Registered 16 August 2018)

10 6 July 2018, received £2,000.00 from AIG Europe, The AIG Building, 58 Fenchurch Street, London, ECSM 4AB (Registered 16 August 2018)

31 October 2018, received £2,000 from Blackbridge Communications Ltd, Zetland House, 5-25 Scrutton Street, London EC2A 4HJ. Hours: 2 hrs. (Registered 11 February 2019)

15 5 November 2018, received £1,891 from Maximum Media, The Distillery Building, Court, Fumbally 8, Fumbally Ln, Merchants Quay, Dublin, Ireland. Hours: 4 hrs. (Registered 11 February 2019)

16 November 2018, received £2,500 from Mishcon De Reya LLP, Africa House, 70 Kingsway, London WC2B 6AH. Hours: 2 hrs. (Registered 11 February 2019)

20 16 November 2018, received £2,317.80 from Bournemouth University, Fern Barrow, Poole BH12 5BB. Hours: 2 hrs. (Registered 11 February 2019)

20 December 2018, received £2,000 from GovNet Communications, 10 Buckingham Place, Westminster, London SW1E 6HX. Hours: 2 hrs. (Registered 11 February 2019)

25 20 December 2018, received £2,500 from Heathrow Airport, The Compass Centre, Nelson Road, London Heathrow Airport Hounslow TW6 2GW. Hours: 2 hrs. (Registered 11 February 2019)

30 28 March 2019, received £1,640 from Kent University, Giles Ln, Canterbury CT2 7NZ, for speaking at the Kent Africa Summit on 16 March 2019. Hours: 1 hr 30 min. (Registered 07 May 2019)

The Registrar of Members' Financial Interests has drawn this matter to my attention as you have now made nine late registrations, the last being on 3 May 2019. This

happened after the Registrar having recently given you advice concerning the timely registration of your financial interests.

I have decided to begin an inquiry on my own initiative using the powers available to me under House of Commons' Standing Order No.150.

5 The Code of Conduct for Members

Paragraph 14 of the current Code of Conduct for Members states:

10 *"Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders."*

*The Guide to the Rules relating to the conduct of Members – on registration*

15 *The main purpose of the Register of Members' Financial Interests (the Register) is*

20 *"to provide information of any pecuniary interest or other material benefit which a Member receives which might reasonably be thought by others to influence his or her action, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament".*

After the publication of the first Register of a Parliament, it is the responsibility of Members to notify changes in their registrable interests within 28 days of each change occurring.

25 The detailed rules on the registration of financial interests are found in chapter 1 of the Guide to the Rules relating to the conduct of Members (copy enclosed).

Paragraph 6 states

*"Category 1: Employment and earnings*

*Threshold for registration*

30 *Members must register, subject to the paragraphs below, individual payments of more than £100 which they receive for any employment outside the House. They must also register individual payments of £100*

*or less once they have received a total of over £300 in payments of whatever size from the same source in a calendar year."*

Paragraph 7 – 13 sets out the rules concerning employment and earnings Paragraph 7 states

5 *"Under this category Members must register*

*Any of the following received as a director or employee or earned in any other capacity:*

*a) Salaries, fees and payments in kind; gifts received in recognition of services performed;*

10 *b) Taxable expenses, allowances and benefits such as company cars;*

*c) Redundancy and ex gratia payments;*

*d) Income as a member of Lloyd's.*

*e) Payments for opinion surveys (unless they fall below the registration threshold)."*

15 Next steps

It would be helpful if you would answer the following questions.

(1) Please explain why there have been nine late registrations.

(2) Are you now satisfied that your current register entry is up-to-date in all respects?

20 (3) Please describe the steps you have taken to satisfy yourself of this.

(4) If it is not, please contact the Registrar now to bring it up to date.

(5) What steps will you now take to ensure that you prevent any further late registrations?

25 Any other points you may wish to make to help me with this inquiry would be most welcome.

Important information

As you know, my inquiries are conducted in private and I no longer publish the fact that I am conducting an inquiry into an allegation into an alleged breach of the Code of Conduct. My office will not comment on any aspect of the inquiry to third parties. They will answer direct factual questions about the processes I follow and the standards system more generally but will neither confirm nor deny that I have  
5 begun an inquiry.

#### Procedure

You can see a copy of the Commissioner's Information Note, which sets out the procedure for inquiries via this link:

10 <https://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf> Please note that this has not yet been updated to reflect the changes flowing from the House's decision of 19 July 2018.

This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential  
15 until the outcome of my inquiry is published. All the relevant evidence, including our correspondence, will be published when I have concluded my work.

While I do not, at this stage, know whether it will be necessary to interview you about this matter, it would be open to you to be accompanied at any such interview. I am, of course, very happy to meet with you at any stage if you would  
20 find that helpful.

#### Action

I would be grateful to have your response to this letter as soon as possible and no  
25 later than 21 May 2019.

*14 May 2019*

#### **Enclosures with letter of 14 May 2019: Email exchanges between Rt Hon David Lammy MP and the Registrar's office**

30

#### **Email from office of Rt Hon David Lammy MP to the Registrar, 8 February 2019**

Please can I register for Rt Hon David Lammy

35 1) Payment of: £2,254.00

From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from SSAT (The Schools Network) Ltd, 5th Floor, Central House, 142 Central Street LONDON. EC1V 8AR

For: Speaking engagement of 2 hours work

I received payment on 04/02/2019

2) Payment of: £2,500.00

5 From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from Heathrow Airport, The Compass Centre, Nelson Road, London Heathrow Airport Hounslow TW6 2GW

For: Speaking engagement on diversity and inclusion of 2 hours work

I received payment on 20/12/2018

3) Payment of: £2,000.00

10 From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from GovNet Communications, 10 Buckingham Place, Westminster, London SW1E 6HX

For: Speaking engagement of 2 hours work

I received payment on 20/12/2018

15 Payment of: £2,317.80

From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from Bournemouth University, Fern Barrow, Poole, Dorset, BH12 5BB, United Kingdom

For: Speaking engagement of 2 hours work

20 I received payment on 16/11/2018

5) Payment of: £2,500.00

From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from Mishcon De Reya LLP, Africa House, 70 Kingsway, London, WC2B 6AH

25 For: Speaking engagement of 2 hours work

I received payment on 16/11/2018

6) Payment of: £1,891.00

From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from Maximum Media, The Distillery Building, Court, Fumbally 8, Fumbally Ln, Merchants Quay, Dublin, Ireland

5 For: Speaking engagement of 4 hours work

I received payment on 05/11/2018

7) Payment of: £2,000.00

10 From: received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL from Blackbridge Communications Limited, Zetland House, 5-25 Scrutton Street, London EC2A 4HJ

For: Speaking engagement of 2 hours work

I received payment on 31/10/2018

David would also like to register:

15 8. Share options in Pomeroon Trading Inc, which I am a unremunerated advisor below registered value, no dividends received.

I apologise for the delay in some of the payment declarations, completely my own personal fault with confusion around bank account payments.

*8 February 2019*

20 **Email from the Registrar to the office of Rt Hon David Lammy MP,  
11 February 2019**

Thank you for this

The Speaking Office

25 I have added to the draft Register the payments you received for speeches. These are set out below, as they will appear in the next published Register, to be dated 18 February.

[details about an unrelated registration redacted]

Late registration



Finally, I thank you for [name] account of how these six payments came to be registered late. It is a Member's personal responsibility to register their interests promptly. Please let us have Mr Lammy's account of what happened, so that I can reassure the Parliamentary Commissioner for Standards.

- 5 Please continue to register your interests within 28 days of any changes.

[Name] Registrar of Members' Financial Interests

Lammy, Mr David (Tottenham)

1. Employment and earnings

- 10 Payments received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL, for speaking engagements:

16 March 2018, received £2,295 from the University of the West of England, Coldharbour Lane, Stoke Gifford, Bristol BS16 1QY. Hours: 2 hrs. (Registered 19 March 2018)

- 15 8 May 2018, received £1,750 from Blackbird Communication, 22 Cairns Close, St Albans AL4 0EB, for a speaking on 22 February 2018. Hours: 2 hrs. (Registered 16 August 2018)

6 July 2018, received £2,000.00 from AIG Europe, The AIG Building, 58 Fenchurch Street, London EC3M 4AB. Hours: 2 hrs. (Registered 16 August 2018)

- 20 31 October 2018, received £2,000 from Blackbridge Communications Ltd, Zetland House, 5-25 Scrutton Street, London EC2A 4HJ. Hours: 2 hrs. (Registered 11 February 2019)

- 25 5 November 2018, received £1,891 from Maximum Media, The Distillery Building, Court, Fumbally 8, Fumbally Ln, Merchants Quay, Dublin, Ireland. Hours: 4 hrs. (Registered 11 February 2019)

16 November 2018, received £2,500 from Mishcon De Reya LLP, Africa House, 70 Kingsway, London WC2B 6AH. Hours: 2 hrs. (Registered 11 February 2019)

16 November 2018, received £2,317.80 from Bournemouth University, Fern Barrow Poole, BH125BB. Hours: 2 hrs. (Registered 11 February 2019)

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20 December 2018, received £2,000 from Gov Net Communications, 10 Buckingham Place, Westminster, London SW1E 6HX. Hours: 2 hrs. (Registered 11 February 2019)

20 December 2018, received £2,500 from Heathrow Airport, The Compass Centre, Nelson Road, London Heathrow Airport Hounslow TW6 2GW. Hours: 2 hrs. (Registered 11 February 2019)

5 4 February 2019 received £2,254.00 from SSAT (The Schools Network) Ltd, 5th Floor, Central House, 142 Central Street, London EC1V 8AR. Hours: 2 hrs. (Registered 11 February 2019)

16 March 2018, received £500 from Knowledge Quarter, British Library, 96 Euston Road, London NW1 2DB, for a speaking engagement on 12 February 2018. Hours: 1 hr. (Registered 19 March 2018)

10 Payment of £2,000 plus VAT and expenses expected from Target Jobs, the Fountain Building, Howbery Park, Benson Lane, Wallingford OX10 8BA, for a speaking engagement on 14 March 2018. Hours: 1 hr. (Registered 19 March 2018)

15 17 July 2018, received £1,847.48 from the Institute of Chartered Accountants of the Caribbean, 6 Lockett Ave, Kingston 4, Jamaica, W.I., for a speaking engagement on 21 June 2018. Hours: 2 hrs. Flights and accommodation also provided by the payer, estimated value £1,500. (Registered 16 August 2018; updated 14 November 2018)

6. Land and property portfolio: (i) value over £100,000 and/or (ii) giving rental income of over £10,000 a year

Residential property in Tottenham: (i) and (ii).

20 8. Miscellaneous

Barrister (non-practising).

*11 February 2019*

25 **Email from office of Rt Hon David Lammy MP to the Registrar, 3 May 2019**

On behalf of Mr Lammy, please find below entry of financial interest for the register. Please kindly confirm receipt.

30 Payments received via The Speaking Office, 25-27 Horsell Road, Highbury & Islington, London N5 1XL, for speaking engagements:

28th March 2019, received £1,640 from Kent University, Giles Ln, Canterbury CT2 7NZ for speaking on 16th March 2019 Kent: Africa Summit: Hours: 1hr 30min

35 *3 May 2019*

**2. Letter from Rt Hon David Lammy MP to the Commissioner, 21 May 2019**

Thank you for your letter dated 14 May which was received by my office on 20 May, in reference to my registration of financial interests.

5 I take full responsibility, and wish to apologise, for the late submission of the nine registrations outlined in your letter. This is not something I wish to repeat.

I wish to give some context as to why this situation arose. [Details about third party absence redacted.] I accept full responsibility for the fact that I did not identify and resolve this earlier, causing delays of several weeks. I am confident that these issues have been resolved and this will not be a problem going forward.

10 To compound this problem, my office has also experienced an unprecedented stream of enquires and requests for help following the Windrush Scandal. I received correspondence from hundreds of individuals far beyond my constituency, which of each had to be read and responded to in full.

15 Furthermore, we also had to deal with a tragic incident of a young girl who was shot and killed in gang related activity in Tottenham which generated a lot of public concern, media enquiries and outreach work to address the local crime epidemic that ensued.

20 These unforeseeable factors have combined to create an extremely high workload, the likes of which my office has never before experienced during my time as an MP. I regret that they have meant some important tasks were missed and unfortunately this included submission of my financial interests.

I can confirm that, as of the date of this letter, my entries are now up to date and complete.

25 I have also completed a full inventory and can confirm that I have not received any monies, or remunerations for events, in recent months.

Whilst my [member of staff] remains on [extended leave], I have hired two new members of staff. I am working closely with them to ensure that all records are kept up to date, and all submissions are made promptly. I can confidently state that there has consequently been a recent improvement in performance in this area.

30 I hope this letter has been sufficient in addressing your concerns.

*21 May 2019*

**3. Letter from the Commissioner to Rt Hon David Lammy MP, 5 June 2019**

Thank you for your prompt response to my letter 14 May 2019, acknowledging and apologising for your breach of the registration rules. The background information

you have provided is helpful, although as you readily acknowledge, compliance with the rules is a personal responsibility of the Member. Thank you also for confirmation that your register entry is now up-to-date, and for explaining the steps that you have taken to ensure your future compliance with the rules.

5 My decision

Since May 2018 you have failed to register ten (of fourteen) payments received within 28 days, as required by the House. In my letter dated 14 May 2019 I referred to nine. However, the payment from the Institute of Chartered Accountants of the Caribbean paid on 17 July 2018 and registered on the 16 August 2018 was also late.  
10 It is clear from the pattern of registration that the question of registration has been considered only periodically, rather than on a rolling basis. This has led to your breach of paragraph 14 of the Code of Conduct.

Standing Order No 150 makes provision for me to conclude an inquiry without making a referral to the Committee on Standards in certain circumstances. The  
15 Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach. As you have already met the first two requirements, all that remains is for me to ask the Registrar to arrange for the relevant entries to be italicised in the Register of Members' Financial Interests to indicate that they have  
20 been the subject of an inquiry and rectification.

Next steps

If you are content for me to conclude the inquiry in this way, I would publish the enclosed evidence pack – subject to any comments you wish to make on its factual accuracy. You will see that I have redacted some of the details about your member  
25 of staff's absence (item 2 in the pack). Please confirm that you are content with the proposed wording and that their privacy has been respected.

The material, once agreed, would be published on my webpages, here: [hyperlink]. I would also report the outcome to the Committee on Standards in due course.

I note that you have recently hired new staff. It may be helpful to say that the  
30 Registrar periodically runs workshops for Members' staff on the registration of Members' financial interests. If any of your staff would find it helpful to attend, or they might contact my PA, [details redacted].

Please let me have a response to this letter by 11 June 2019. In the meantime, our  
35 correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

*5 June 2019*