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Summary

5 I opened an inquiry on 16 June 2022, after receiving a complaint about the Rt Hon. David Lammy MP's entry in the Register of Members' Financial Interests. It was alleged that Mr Lammy was involved in eight events between 7th October 2021 and 15th November 2021, which he failed to register within the 28-day deadline set by the House. Having received this complaint, I undertook a review of Mr Lammy's register entry and identified a further seven interests that had also been registered late. I informed Mr Lammy that my inquiry would include all 15 of these interests.

10 I sought comments from Mr Lammy who cooperated fully with my inquiry. He acknowledged and accepted he had registered the 15 interests late. He provided a full explanation for his late registrations and outlined additional measures he has now put in place to ensure the timely registration of his future interests.

15 Whilst my inquiry was coming to a close Mr Lammy brought to my attention an additional Category 4 interest, which he had failed to register within the 28-day deadline set by the House. He explained that, as a result of following the new processes introduced to his office to capture his financial interests, he had identified this further "single late declaration". As my inquiry had not been concluded, I decided to include this further late registration.

20 Based on the evidence of my investigation, I am satisfied there was no deliberate intention to mislead. However, I have concluded that as a result of inattention to detail, Mr Lammy breached paragraph 14 of the Code of Conduct for Members of Parliament by registering a total of 16 interests outside of the 28-day deadline set by the House.

25 When deciding the most appropriate way to conclude this matter, I took into account my previous inquiry into Mr Lammy's register entries in 2019.¹ I also considered the explanations provided by Mr Lammy, his updated office procedures and his unequivocal acknowledgement and apology for his breach.

30 My decision was finely balanced, but I have decided that the breaches were inadvertent. Therefore, a referral to the Standards Committee is not necessary, and that I can resolve these breaches of the rules through the rectification procedure available to me under Standing Order No. 150. I have asked the Registrar to arrange for the relevant entries in the Register of Members' Financial Interests to be placed in bold italics, so it will be clear they have been the subject of an inquiry.

¹ <https://www.parliament.uk/globalassets/documents/pcfs/rectifications/david-lammy-mp-final-version-of-decision.pdf>

The Rt Hon. David Lammy MP: Resolution Letter

Letter from the Commissioner to the complainant, 11 August 2022

5 I wrote to you on 16 June 2022, to inform you I had begun an inquiry into your allegation that The Rt Hon. David Lammy MP had breached paragraph 14 of the 2019 Code of Conduct for Members, by failing to register eight of his interests within the 28-day deadline set by the House. My inquiry also considered whether Mr Lammy had failed to register additional interests within the required time limit.

10 Mr Lammy has acknowledged and apologised for his breach of the rules and outlined the procedures he now has in place to prevent any reoccurrence.

Following serious consideration as to the most appropriate way of concluding this matter, I have decided my inquiry should be concluded through the rectification procedure, which is available to me through House of Commons' Standing Order No. 150.

15 The full rationale for my decision can be found in my letter to Mr Lammy, dated 12 July 2022 (item 6 in the written evidence pack), which you can access once the evidence pack has been published. I will publish my decision and the written evidence pack shortly on my webpage and I will report the outcome to the Standards Committee in due course.

20 Thank you for bringing this matter to my attention. I confirm that the matter is now closed.

11 August 2022

Written evidence

1. Email from the complainant to the Commissioner, 8 June 2022

From: [name redacted]

Sent: 08 June 2022 16:06

5 To: Standards Commissioner

Subject: David Lammy MP

I wish to raise an issue with regard to late registrations of earnings by David Lammy following the latest publication of the Register of Interests

10 Mr Lammy was involved in 8 events between 7th October 2021 and 15th November 2021

He received payments of £15,990 on 1st December 2021 and payments of £4,920 on 14th December 2021 for these 8 events. This totals £20,910

15 However, these payments were not registered until 26th May 2022 for 7 of these and on 27th May 2022 for 1 of these. These are between 164 and 178 days after the receipt of the payments and therefore well after the 28-day requirement

Here is a schedule of the events and when the payments were received and registered.

DATE PAID	DATE OF EVENT	DATE REGISTERED	EVENT	PAYMENT RECEIVED	DAYS FROM PAYMENT TO REGISTRATION
01/12/2021	07/10/2021	26/05/2022	GSK Black History Month	£2,460	177
01/12/2021	11/10/2021	26/05/2022	HSBC Proud to Remember War Heroes	£2,460	177
01/12/2021	28/10/2021	26/05/2022	Ropes & Grey LLP	£2,870	177
01/12/2021	28/10/2021	26/05/2022	Capital One's Black History Month	£2,460	177
01/12/2021	19/10/2021	27/05/2022	Canary Wharf Keynote Speech	£3,280	178
01/12/2021	14/10/2021	26/05/2022	Conversation and Q&A on Race Inclusion	£2,460	177
14/12/2021	05/11/2021	26/05/2022	Deloitte Speaking Event	£2,460	164
14/12/2021	15/11/2021	26/05/2022	EY conference on Social Mobility	£2,460	164
				£20,910	

I feel that this breach of the Code should be investigated

20 8 June 2022

2. Letter from the Commissioner to The Rt Hon. David Lammy MP, 16 June 2022

5 Following on from an allegation I have received from [name redacted], regarding your entry in the Register of Members' Financial Interests, I have decided to open a formal inquiry into your compliance with the Code of Conduct for Members of Parliament. I enclose a copy of [name redacted] email submission, dated 8 June 2022, for your information.

The scope of my inquiry

10 My inquiry will focus on whether, by failing to register your financial interests within the 28-day deadline set by the House, you have acted in breach of paragraph 14 of the House of Commons' Code of Conduct for Members of Parliament.

15 In his allegation the complainant has identified eight items on your entry in the Register of Members' Financial Interests, which appear to have been registered outside of the timeframe set by the House. I have placed brief details of the eight interests into the table below; the final column indicates the number of days over the 28-day deadline set by the House that each interest has been registered.

Category	Interests	Value	Date accepted	Date registered	Days over 28-day deadline
1	Speaking engagement, GSK's Black History Month event	£2,460	01/12/2021	26/06/2022	149
1	Speaking engagement, HSBC's Proud to Remember our War Heroes	£2,460	01/12/2021	26/06/2022	149
1	Speaking engagement for Ropes & Gray LLP	£2,870	01/12/2021	26/06/2022	149
1	Speaking engagement, Capital One's Black	£2,460	01/12/2021	26/06/2022	149

	History Month event and Q&A				
1	Keynote speech followed by Q&A for Canary Warf Group	£3,280	01/12/2021	27/06/2022	150
1	Taking part in a conversation and Q&A on race inclusion for LexisNexis	£2,460	01/12/2021	26/06/2022	149
1	Speaking event for Deloitte	£2,460	14/12/2021	26/06/2022	136
1	Speaking at a conference on social mobility, for EY	£2,460	14/12/2021	26/06/2022	136

In preparation for opening this inquiry and in line with my usual practices, I undertook a review of your most recent entry in the Register of Members' Financial Interests, which was published on 15 June 2022 (copy enclosed below for ease of reference).² As a result, I have identified a further seven interests that also appear to have been registered outside of the 28-days set by the House.

Category	Interests	Value	Date accepted	Date registered	Days over 28-day deadline
1	Taking part in session on diversity inclusion & race, Champions (Dataiku)	£3,895	15/10/2021	12/11/2021	1

² See appendix 1 for a copy of the [register entry published on 15/06/2022](#)

1	Presenting shows on LBC on 1, 2, 8, 15, 22 and 29 January 2022	£4,165	03/03/2022	31/03/2022	1
3	Accepted two tickets with hospitality for the NFL match at Tottenham Hotspur Stadium between Miami Dolphins and Jacksonville Jaguars.	£1,598	17/10/2021	18/11/2021	5
3	Accepted ticket and hospitality for the boxing match between Anthony Joshua and Oleksandr Usyk at Tottenham Hotspur Stadium	£1,500	25/09/2021	19/11/2021	28
4	Visit to Tufts University USA to present a speech on Ukraine situation as part of Shadow Foreign Secretary role.	£3,726.88	03/04/2022	13/06/2022	44
8	Envoy Extraordinaire of the University of Guyana	N/A	21/02/2020	30/09/2020	195
8	Associate Tenant, Doughty Street Chambers	N/A	01/06/2020	30/09/2020	94

Therefore, my inquiry will include all of the 15 interests identified in the two tables above. If the scope of my inquiry changes, I will update you in writing.

As you will remember, between May and June 2019, I conducted an inquiry into your compliance with the rules on Registration.³ This earlier inquiry concluded that your failure to register financial interests within the 28-day deadline set by the House, was a breach of Paragraph 14 of the Code of Conduct. As part of the rectification procedure of that inquiry you acknowledged and apologised for the breach. In your letter to me of 21 May 2019, you explained the measures you had put in place to ensure no recurrence of this error. I am, therefore, disappointed to be writing to you again regarding your compliance with the rules on registration.

The relevant rules of the House

10 The overarching rules are found in the House of Commons' Code of Conduct for Members.⁴ Paragraph 14 of the Code states:⁵

15 “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.”

20 The Guide to the rules relating to the conduct of Members (the Guide), which is appended to the Code, contains more detail about registration. Chapter 1, paragraph 2 states:⁶

Requirements of the House

25 2. The House requires new Members, within one month of their election, to register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election. **After that, Members are required to register within 28 days any change in those registrable interests.** Such a change includes both the acquisition of a new interest and the ceasing of any registered interest, for example because an employment has ceased or because a holding has reduced in value or
30 been sold. [**My emphasis**]

³ <https://www.parliament.uk/globalassets/documents/pdfs/rectifications/david-lammy-mp-final-version-of-decision.pdf>

⁴ <https://www.parliament.uk/business/publications/commons/hoc-code-of-conduct/>

⁵ https://publications.parliament.uk/pa/cm201719/cmcode/1882/188202.htm#_idTextAnchor007

⁶ https://publications.parliament.uk/pa/cm201719/cmcode/1882/188204.htm#_idTextAnchor017

Next steps

I would welcome your comments on the allegation that your alleged actions have amounted to a breach of paragraph 14 of the Code of Conduct for Members. I would also be grateful for your answers to the following specific questions:

- 5 1. Please explain why you have not registered the 15 interests identified above within the 28-day timeframe set by the House?
2. Describe the steps you currently have in place to ensure that your interests are registered in line with the timeframe set by the House.
- 10 3. Are you satisfied that your current entry in the Register of Members' Financial Interests is complete and up to date?
- a) If it is not, please contact the Registrar now to bring it up to date.
4. Please detail the steps you will now put in place to prevent any further late registrations.

15 It would be helpful to receive any evidence to support your responses when you reply to this letter. Any other points you wish to make to help me with this inquiry would also be welcome.

Important information

20 My inquiries are conducted in private. However, following the decision taken by the House on 21 April 2021, I will shortly publish on my webpages the fact that I am conducting an inquiry about your alleged breach of the Code of Conduct. If contacted, my office will not comment on any aspect of this specific inquiry to third parties. They will answer direct factual questions about the processes I follow, and the standards system more generally, but will not provide any comment or details about the particulars of this inquiry.

25 This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published. The same requirement extends to [name redacted].

30 The Members' Services Team (MST) can support and signpost you and/or your staff to appropriate support services. You can contact them confidentially on [details redacted] for a range of issues, including support with handling the impact of media attention.

Procedure

I enclose a copy of the Commissioner's Information Note,⁷ which sets out the procedure for inquiries. Please note that this has not yet been updated to reflect the changes flowing from the decision of 19 July 2018.

5 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 find that helpful.

10 I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry. If I do so, I will share that correspondence with you.

Information provided to me during the course of my inquiry will be retained, and disposed of, in accordance with the House of Commons' Authorised Records Disposal Policy.

Potential outcomes

15 Inquiries are generally concluded in one of three ways. If the evidence does not substantiate the allegation, it will not be upheld. If the evidence demonstrates a breach of the rules, I may, in circumstances defined by Standing Order No. 150, uphold the allegation and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards. Where an allegation is
20 not upheld or is rectified, the investigation material, including our correspondence, will be published on the Parliament website.

If I uphold the allegation, and it is either unsuitable for the rectification procedure, or you do not accept my decision, I must make a referral to the Committee on Standards. My memorandum to the Committee will be published as an appendix to
25 the Committee's own Report.

Regardless of the outcome of my inquiry, I must emphasise that all the relevant evidence, including our correspondence, will be published when this inquiry is concluded. I routinely redact the personal data of third parties unless it is relevant to my decision(s). Please tell me if you provide sensitive material that you think I
30 should redact. I will consider carefully any such request.

Action

I would be grateful to have your response to this letter as soon as possible and no later than Thursday 30 June 2022. Please let me know before that date if you require
35 more time to respond. If you would prefer me to communicate with you by email, or via a different postal address, please give the details when you reply to this letter.

⁷ <https://www.parliament.uk/globalassets/documents/pcfs/pcs-information-note.pdf>

It would also be helpful if you were willing to provide a telephone number through which I might contact you.

Due to hybrid working arrangements I would be grateful if you could send your response electronically to; standardscommissioner@parliament.uk

5 Thank you for your cooperation with this matter.

16 June 2022

3. Letter from The Rt Hon. David Lammy MP to the Commissioner, 29 June 2022

10 Thank you for your letter of 16 June in relation to my entries on the Register of Members' Financial Interests.

Please accept my sincere apologies without reservation for the late submission of the interests that you outline in your letter. I accept that the fifteen items in question were declared later than as required under Paragraph 14 of the Code of Conduct for Members.

15 I now set out in detail below my explanation in answer to your specific questions following your headings.

1) Why the 15 interests were not registered within the deadlines

20 All the breaches in question were genuine oversights resulting from administrative errors on my behalf. I have always been open, transparent and honest, and sought to make declarations for all my financial interests as soon as it was possible for me to do so. For the breaches in question, it was during the process of doing my tax returns that I uncovered the oversights and as soon as I was made aware, I brought this to the immediate attention of the Registrar.

25 For context, (but not as an excuse) the initial 8 submissions in question in respect of accepted dates 01/12/2021(6) and 14/12/2021(2) were due towards the end of December 2021.

30 During this time, the Leader of the Opposition made a surprise reshuffle of his shadow cabinet on 29 November 2021. I was appointed Shadow Foreign Secretary and immediately thrown into urgent briefings on the impending Russia-Ukraine situation which was developing at pace. This was also at the time of increasing coronavirus cases as a result of the Omicron variant which led to workers being encouraged to work from home.

My office was extremely busy dealing with the fallout from the pandemic situation in my constituency of Tottenham. Furthermore, my office manager, who usually has

responsibility for such submissions, was on [details redacted] leave. As a result other staff in the office acted up to cover. This meant we were short staffed and extremely busy. This is why the submissions were overlooked and delayed. On receipt of your letter they were all then registered on the 26/06/2022.

- 5 As matters settled down within my office, you will note that from January 2022 onwards my entries have been made within time and continue to be so with the exception of the three below.

10 With respect of the three entries 15/10/2021, 31/03/2022 and 7/10/2021, you will note that all two were 1 day late and a third 5 days late. I of course accept that even a day late is not within the code and therefore a breach.

15 The two submissions in category 3, 17/10/2021 & 25/09/2021 refer to two major international events that took place, in my constituency, at the newly built Tottenham Hotspur Stadium. As these were the first events that took place in the stadium, outside of football, it took some work to ascertain the true value of the tickets. Similarly, in category 4, 03/04/2022 it took some time to obtain costs and values for all sections of the Tufts University USA visit as well as converting the value from US dollars to sterling.

20 The two interests declared in category 8, 21/02/2020 & 01/06/2020 were predominantly late because my staff and I were adjusting to the first wave of the coronavirus pandemic which contributed to a busier caseload than my office is used to. As you will note, the country went into lockdown on 23/03/2020. My office and I were adjusting to remote working. As soon as these were captured, they were registered at the same time.

25 I am thoroughly embarrassed by these accidental breaches. I am acutely aware of the public scrutiny I am under, even more so in the light of my current role, and the need to comply with the rules. I would certainly never breach the rules knowingly. I can assure you that I am committed to ensuring that this will not happen again.

2) Office procedures

30 I believe that the system I have in place to keep the register up to date was generally reliable. The bulk of my declarations come via LBC and the system in place whereby my head of office and I are copied into notifications on when payments are made works very well. However, the work I do via The Speaking Company occurs on a more ad hoc basis and not all notifications of payments copied in the relevant staff members.

35 Due to the combination of circumstance I have outlined above in section 1 – something I had not previously foreseen – the systems proved to be insufficient in these cases.

It is therefore incumbent on me to modify them immediately and strengthen them in the ways outlined under question 4 below.

3) My current entry in the register of interests

5 I am satisfied that my current entry on the register of interests is correct and I am committed to ensuring this always remains the case.

4) Next steps and rectification

I will ensure that if key staff are absent in future – for example [details redacted] – that those then acting receive the appropriate level and degree of training on how to maintain the register to ensure that all my entries are made in time.

10 My team has expanded since I took on my current role and I am working to ensure that they are all familiar with the process and the necessity to keep on top of this vital task.

15 I have added in additional checks to my office procedures. The “Register of Interests” will now be a standing item at my office team meetings, ensuring that on a regular basis we, including myself, look back at recent engagements or events to identify anything that needs to be declared and therefore fulfil this obligation in a timely manner.

I will ascertain the value of ticketed events at the time of accepting their invitations.

20 Furthermore, I will set up reminders in my team calendar to further establish the need to regularly check and submit standard returns.

Can I again apologise for the unfortunate sequence of events and trust that you will take into consideration the explanations I have set out in this response.

25 I would very much welcome and find it helpful if you were able meet with me at your earliest convenience so that I can establish that the rectification steps I propose are satisfactory.

29 June 2022

4. Letter from the Commissioner to The Rt Hon. David Lammy MP, 1 July 2022

Thank you for your letter dated 29 June 2022, and for the information you provided.

30 Although your letter sets out detailed information about the increased workload in your office in late November and throughout December 2021, there are several points that are not entirely clear. I am writing today to request further clarification.

In explaining the reasons why eight interests received in December 2021 were registered late, you state on page 2 paragraph 1, *“On receipt of your letter they were all then registered on the 26/06/2022.”*

- 5
- As these interests were registered on 26 and 27 May 2022, and my letter to you was sent on 16 June 2022, it is unclear what this date refers to.

Similarly on page 2, paragraph 3, your letter highlights three register entries, identified only by their dates. It is unclear whether you have quoted the date of acceptance, the date of registration, or whether there is an error in one of the dates for these interests.

- 10
- Please could you check through your letter and correct any inconsistencies or mistakes.

It would be helpful to have your reply to this letter as soon as possible and no later than Friday 8 July 2022. In the meantime, this matter remains protected by parliamentary privilege and should continue to be kept confidential.

15 *1 July 2022*

5. Letter from The Rt Hon. David Lammy MP to the Commissioner, 4 July 2022

I acknowledge receipt of your letter of 1 July 2022 seeking further clarification in my letter to you of 29 June 2022.

20 In my letter to you, I meant to say, I was up to date as well as emphasise the point I made in the first paragraph under the heading, **Why the 15 interests were not registered within deadlines**, that as soon as I was made aware of the oversight in my declarations, I immediately brought this matter to the attention of the Registrar and I did this prior to your letter to me of 16 June.

25 In reference to the three register entries on page 2, paragraph 3, please find full details for these interests set out in the table below:

30

CATEGORY	DATE ACCEPTED	INTEREST	VALUE	DATE REGISTERED
1	Payment received 15/10/21	Taking part in Champions UK (Dataiku) session on diversity, inclusion & race on 9 September 2021	£3,895	12/11/21
3	17/10/21	Accepted two tickets with hospitality for the NFL match at Tottenham Hotspur Stadium between Miami Dolphins and Jacksonville Jaguars	£1,598	18/11/21
1	Payment received 03/03/22	Presenting shows on LBC on 1,2,8,15,22 and 29 January 2022	£4,165	31/03/22

I hope this letter clarifies your queries.

4 July 2022

6. Letter from the Commissioner to The Rt Hon. David Lammy MP, 12 July 2022

5

Thank you for your letter dated 4 July 2022, which I received on 6 July 2022, and the clarification provided. Having carefully considered the evidence, I now have sufficient information to make a decision on the allegation that you have breached paragraph 14 of the Code of Conduct for Members of Parliament.

10 My decision

15 In reaching my decision I have considered all of our correspondence and the published rules on registration of Members' financial interests. I have concluded that in registering 15 interests outside of the 28-day deadline set by the House, you breached paragraph 14 of the Code of Conduct for Members of Parliament. However, for the reasons outlined in the rationale below, I do not intend to refer this matter to the Committee on Standards for their consideration. Instead, I have decided to conclude this matter using the rectification procedure available to me under Standing Order No. 150.

The House of Commons Code of Conduct and Guidance

Paragraph 14 of the Code of Conduct states:

5 *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.*

Rationale

10 My investigation considered the allegation that you had registered eight interests outside of the 28-day deadline set by the House. In line with my usual practices, ahead of opening my inquiry I undertook a review of your entry in the Register of Members' Financial Interests, (published on 15 June 2022⁸). My review identified an additional seven interests that had been registered outside of the 28-day
15 deadline. For completeness, I broadened my investigation to include all 15 registered interests.

In your letter dated 29 June 2022, you said, *"...I accept that the fifteen items in question were declared later than as required under Paragraph 14 of the Code of Conduct for Members."* You also offered *"...my sincere apologies without reservation..."*. You explained that *"All the breaches in question were genuine oversights resulting from administrative errors on my behalf."* Your letter went on to detail various challenging circumstances, including staff shortages, which led to an increased workload for you and your office team at the end of 2021 and beginning
20 of 2022.

25 Paragraph 1 of the Introduction to the Guide to the Rules relating to the Conduct of Members provides the following guidance:

30 *"The Code of Conduct provides a set of rules to which Members must adhere. Members are personally responsible for their adherence to the Code, including when breaches may have been caused by the actions of a staff member."*

Although I was satisfied to receive your prompt acknowledgement and your apology for all your late registrations, I was concerned that your letter included some inaccuracies. I was surprised by your comment stating, *"...you will note that from January 2022 onwards my entries have been made within time and continue to be so*
35 **with the exception of the three below.**" [my emphasis]. You then went on to detail three interests, two of which were accepted and registered in 2021. You

⁸ [register entry published on 15/06/2022](#)

stated, "You will note that all two were 1 day late and a third 5 days late. I of course accept that even a day late is not within the code and therefore a breach."

5 Since the start of 2022, your entry in the Register of Members' Financial interests shows that you have accepted and registered two interests outside of the 28-days set by the House:

Category 1: Received £4,165 for presenting shows on LBC on 1, 2, 8, 15, 22 and 29 January 2022. Accepted on 03/03/2022, registered in 31/03/2022 = **1 day late**

10 Category 4: Estimated value of £3,726.88 for visit to Tufts University USA to present a speech on Ukraine situation as part of Shadow Foreign Secretary role. Accepted on 03/04/2022, registered on 13/06/2022 = **44 days late**

I wrote to you again on 1 July 2022, requesting additional clarification on the contents of your earlier letter, and you replied on 4 July 2022.

15 Based on the evidence of my investigation; I do not believe there has been a deliberate intention to deceive. However, based on this same evidence, I have concluded that the 15 breaches to the Code of Conduct for Members occurred as a result of inattention to detail.

20 Bearing in mind my previous investigation in 2019, into the late registration of interests, and the assurances you gave me at the time that the error would not reoccur, my decision on how to conclude this investigation has been finely balanced.

25 After reviewing the details in your letter of 29 June 2022, setting out how your office procedures have been updated, as well as your unequivocal acknowledgement and apology for all of the breaches, I have decided to conclude this matter using the rectification procedure available to me under Standing Order No. 150.

However, I want to make it clear that if further allegations about your interests being registered outside of the 28-days set by the House are brought to my attention, I will refer the matter directly to the Committee on Standards.

Next Steps

30 As explained above, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification procedure, rather than by making a referral to the Committee on Standards. To do so, the Committee would generally expect the Member to provide the following:

- a) Confirmation you have accepted my decision;

- b) A clear acknowledgement that you have breached the rules;
- c) An apology for the breach; and
- d) Information about the steps you have taken to rectify the breach and to ensure there is no recurrence of the breach.

5 Rectification would also require the interests identified above to be amended to bold italic type in your Register entry and include an appropriate explanatory note. The amended entries would remain on the Register for a period of one year.

10 You have already acknowledged and apologised for your breach of the rules and provided detailed information about the steps now in place to ensure no recurrence of that breach. Therefore, in order to progress this through rectification, I will require the following from you:

- a) Carefully review my decision and confirmation in writing that you accept it;
- 15 b) Include with your response an undertaking that future registrations of financial interests will be made in line with the requirements of the Guide to the Rules;

If you are content for me to conclude the inquiry in this way, please write to me with the above information by return, and no later than Tuesday 19 July 2022.

20 If you agree to my proposal, I will share a copy of the draft written evidence pack with you, so that you can check its factual accuracy before publication. I will report the outcome to the Committee on Standards in due course as a matter of routine. I will also ask the Registrar to arrange to annotate the relevant information in the Register.

25 If you do not accept my decision, you should tell me the reasons for that by reply. After which, I will prepare a Memorandum to the Committee on Standards, so that they may consider the matter. I would give you the opportunity to see and comment on a draft of the Memorandum, but the content of it would, in the final analysis, be for me alone.

30 In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

As you know, due to the current pandemic, my team are currently working from home only, so I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk

12 July 2022

7. Letter from The Rt Hon. David Lammy MP to the Commissioner, 13 July 2022

Thank you for your letter dated 12 July 2022.

5 I confirm that I understand and accept your decision to using the rectification procedure to complete your inquiry into my compliance with the Code of Conduct for Members of Parliament. I would also like to provide assurance that all future registrations of financial interests made by me will be in line with the requirements of the Guide to the Rules.

10 I trust the information I have provided to you formally allows you to conclude your investigations into this inquiry and if you require further information, please do not hesitate in contacting me.

13 July 2022

8. Letter from the Commissioner to The Rt Hon. David Lammy MP, 14 July 2022

15 Thank you for your letter dated 13 July 2022, agreeing to my proposal to conclude my inquiry by way of the rectification procedure.

20 I enclose a draft copy of the written evidence pack, which includes the correspondence exchanged during my investigation. In this pack you will find a draft copy of the letter I plan to send to the complainant; it is the first item in the pack, after the summary. While the content of the letter is a matter for me alone, I would welcome any comments on the factual accuracy of this and the draft written evidence pack. The complainant's name has been redacted from the draft pack; please let me know if there are any further redactions you think should be made, and I will consider your request.

25 I would be pleased to receive any comments you wish to make on these items as soon as possible, and no later than 21 July 2022.

Once I have any comments you wish to make, I will finalise the pack, which will then be published on my webpages. I will notify you of the publication of the pack. I will also notify the Committee on Standards of the outcome of my inquiry in due course.

30 In the meantime, our correspondence about this inquiry remains protected by parliamentary privilege and you should continue to keep this matter strictly confidential.

14 July 2022

9. Letter from The Rt Hon. David Lammy MP to the Commissioner, 20 July 2022

5 In our recent correspondence regarding my Register of Members' Financial Interests, and specifically in my letter to you of 29 June 2022, I stated that my register of interests was up to date. I wish to declare that this was incorrect, as I will set out below.

As noted in my last correspondence, I have recently introduced an improved new system in my office to capture financial interests and ensure they are reported and recorded as soon as possible. To reiterate, these include:

- 10 • "Register of Interests" will feature on the agenda of weekly team meetings
- My Head of Office and Executive Assistant will have a separate weekly catch up on this issue
- Reminders set in the team calendar to check and submit standard returns
- 15 • Ascertain the value of ticketed events at the time of accepting their invitations
- In the absence of key staff, those acting up to receive full training on how to maintain the register accurately and speedily

20 This week, as part of this process, my team and I have reviewed all potential interests which would require a declaration. Through this complete audit, we identified a single late declaration. This entry was immediately filed on 19 July to the Registrar. The declaration applies under Category 4 of the requirements for registration under the Rules relating to the Conduct of Members.

I am immediately writing to you to draw your attention to this sole example in the interests of full transparency and openness.

25 Whilst I regret the error, I am satisfied that my new system has demonstrated that it can work in identifying these interests at an early stage and ensuring that this was flagged to you at the earliest possible time. This gives me confidence that there will be no further errors in future as the new system is bedded in and in full use.

If helpful, I would be happy to meet you to discuss this issue further.

30 *20 July 2022*

10. Letter from the Office of the Parliamentary Commissioner for Standards to The Rt Hon. David Lammy MP, 21 July 2022

5 Further to my acknowledgement email sent earlier this morning, it would be helpful for the Commissioner to have the full details of the Category 4 interest referenced in your letter dated 20 July 2022. This will give her the opportunity to consider all of the information together and, if appropriate, amend her decision to ensure this new information is reflected.

10 Please could you provide by return the full details of your additional late Category 4 interest, including the dates of the visit, the name of the person or organisation who funded the visit and its value, and the destination and purpose of the visit. It would also be helpful to include a copy of your recent correspondence with the Registrar's office and any replies you have received.

Once the Commissioner has this information, she will write to you again regarding her next steps.

15 *21 July 2021*

11. Email from The Rt Hon. David Lammy MP to the Office of the Parliamentary Commissioner for Standards, 27 July 2022

Please find below full details of the Category 4 interest referenced in my letter to the Commissioner of 20 July 2022.

20 **Date of visit:** 2 – 5 June 2022

Name of Donor: Newbridge Advisory, Mermaid House, 2 Puddle Dock, London EC4V 3DS

25 **Value:** I was reimbursed £5,669.57 for flights and accommodation by Newbridge Advisory and estimate a value of £536.58 for airport transfers and meals provided by Bilderberg Association for all attendees.

Destination of visit: Washington D.C

Purpose of visit: Attendance at the Bilderberg Meeting 2022

I also attach a copy of related correspondence my Head of Office has had with the Registrar's office on this declaration.⁹

30 *27 July 2022*

⁹ Given the volume of emails provided, only relevant parts have been summarised in Appendix 2 below.

12. Letter from the Commissioner to The Rt Hon. David Lammy MP, 3 August 2022

Thank you for your letter dated 20 July 2022 notifying me that your entry in the Register of Members' Financial Interests was incorrect, and for your further email, received by my office on 27 July 2022, providing further details of this interest. You said that, as a consequence of the new measures that you had implemented, you had identified an additional interest that had not been registered. You said that although you registered the interest as soon as you found it, on 19 July 2022, it was registered outside of the 28-day deadline set by the House.

As I had not formally concluded my inquiry, started 20 June 2022, I decided to include this interest, as set out below, as part of my investigation.

Category 4. Visits outside the UK

Date of visit: 2 – 5 June 2022

Name of Donor: Newbridge Advisory, Mermaid House, 2 Puddle Dock, London EC4V 3DS

Value: I was reimbursed £5,669.57 for flights and accommodation by Newbridge Advisory and estimate a value of £536.58 for airport transfers and meals provided by Bilderberg Association for all attendees.

Destination of visit: Washington D.C

Purpose of visit: Attendance at the Bilderberg Meeting 2022

My Decision

I have considered our correspondence and the published rules and guidance. I have decided that, by not registering the interest outlined above in accordance with the Rules, you have breached paragraph 14 of the Code of Conduct for Members. However, for the reasons outlined below, I do not intend to refer this matter to the Committee on Standards for consideration. Instead, I have decided to conclude this matter using the rectification process provided by Standing Order No. 150.

The House of Commons Code of Conduct and Guidance

Paragraph 14 of the Code of Conduct states:

“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.”

5 The Guide to the Rules states that Members are required to register any new registrable interests within 28-days. Chapter 1, Category 4 states that Members should register any visits to destinations outside the UK where the cost is over £300 if that cost is not wholly borne by the Member.

Rationale

10 On 20 July 2022, you wrote to me explaining that having implemented measures to ensure the timely registration of future interests, you identified an interest that required registration. In response to my request for additional information, you provided the details, including copies of your correspondence with the office of the Registrar of Members’ Financial Interests.

15 You contacted the Registrar of Members’ Financial Interests about the matter on 19 July 2022, explaining that you had been reimbursed for the flights and accommodation for an overseas trip, and the remaining costs were estimated. In your letter to me dated 20 July 2022, you said that the interest had been missed, but added that its identification demonstrated the effectiveness of the measures you had put in place to prevent future late registrations.

20 Having considered the information available to me, it is my view that you have failed to register this interest within the 28-day deadline set by the House, and breached paragraph 14 of the Code of Conduct for Members. As with the findings outlined in my letter dated 12 July 2022, I have seen nothing in the evidence available to me to suggest an intention to deceive. Furthermore, given the value and lateness of the
25 registration, I have determined that it is a minor breach of the Code of Conduct for Members.

Next Steps

30 I have given careful consideration to this additional late registration. My decision about the best way to conclude this matter has been finely balanced and took into account the fact that the processes you recently introduced to your office helped to identify this interest, that you brought this additional late registration to my attention as soon as you became aware of the error, and that this error was identified before I had fully concluded my inquiry.

35 As I have previously explained, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification procedure, rather than by making a referral to the Committee on Standards. Rectification requires the entry in the current Register to be amended to bold italic type and include an appropriate explanatory note. The amended entry will remain on the Register for a period of one year.

You have already acknowledged this additional breach of the rules, for which I would like to thank you. In order to progress this through rectification, I will require the following from you:

- a) Confirmation you have accepted my decision;
 - 5 b) A clear acknowledgement that with this further late registration you have breached the rules;
 - c) An apology for this additional breach; and
 - d) Confirmation that your current entry in the Register of Members' Financial Interests is now complete and up to date.
- 10 I should remind you that the rectification procedure would also require all 16 of the interests identified by this inquiry, to be amended to bold italic type in your Register entry and include an appropriate explanatory note. The amended entries would remain on the Register for a period of one year.

15 If you agree to my proposal to include this further breach as part of the ongoing rectification procedure, please write to me with your reply as soon as possible, including your response to the requirements set out above, no later than 8 August 2022.

20 I will include your reply in the attached draft written evidence pack, which I have included to enable you to carry out a factual accuracy check. Please let me know if there are any redactions you think should be made, and I will consider your request.

Once I have received your response, a final version of this pack will be shared with you ahead of publication on my website.

3 August 2022

25 **13. Letter from The Rt Hon. David Lammy MP to the Commissioner, 4 August 2022**

Thank you for your letter dated 3 August 2022 in response to my letter to you of 20 July 2022 about the registration of a late entry to my Register of Members' Financial Interests. I apologise for this breach.

30 I understand your decision to exercise Standing Order No.150 and in return, please find below responses to the information you require to progress the rectification procedure:

- a) I acknowledge your decision to use the rectification procedure to conclude your inquiry
- b) I fully understand that this further late registration is a breach of paragraph 14 of the Code of Conduct for Members
- 5 c) I unreservedly apologise for this breach
- d) I believe my Register of Members' Financial Interests is now complete and up to date

I hope the information in my responses answers to the requirements set out in your letter.

10 *4 August 2022*

14. Letter from the Commissioner to The Rt Hon. David Lammy MP, 9 August 2022

15 Thank you for your letter dated 4 August 2022, apologising for your further breach of the Rules and agreeing to my proposal to include this additional late registration into my offer of rectification.

20 Please see enclosed a copy of the revised draft written evidence pack, which includes the correspondence exchanged during my investigation. In this pack you will find a draft copy of the letter I plan to send to the complainant; it is the first item in the pack after the revised summary. While the content of the letter and the summary are both matters for me alone, I would welcome any comments on the factual accuracy of these items, as well as the written evidence pack. The complainant's name will be redacted from the published pack; please let me know if there are any further redactions you think should be made, and I will consider your request.

25 I would be pleased to receive any comments you wish to make on these items as soon as possible, and no later than Monday 15 August 2022.

Once I have any comments you wish to make, I will finalise the pack, which will then be published on my webpages. I will notify you of the publication of the pack. I will also notify the Committee on Standards of the outcome of my inquiry in due course.

30 In the meantime, our correspondence continues to be protected by parliamentary privilege. Until I send you and the complainant letters concluding the inquiry, this matter should remain confidential.

9 August 2022

Appendix 1: Register Entry for The Rt Hon. David Lammy MP

Copy of Register entry, dated 13/06/2022 and published 15/06/2022

The Register of Members' Financial Interests As at 13 June 2022

Lammy, Mr David (Tottenham)

1. Employment and earnings

Payments received via the Speaking Office, Unit 31 Highbury Studios, 10 Hornsey Street, London N7 8EL, for speaking engagements. (Updated 15 April 2021)

30 June 2021, received £1,640 from We Are Creative Equals, 93 Chatterton Road, Bromley BR2 9QQ, for speaking at an event on 13 May 2021. Hours 2.5 hrs including preparation. (Registered 30 June 2021; updated 19 July 2021)

30 June 2021, received £4,100 from Deloitte, 2 New Street Square, London EC4A 3BZ, for speaking at two events on 19 and 26 May 2021. Hours 4.5 hrs including preparation. (Registered 30 June 2021; updated 19 July 2021)

30 June 2021, received £2,870 from Facebook, 10 Brock Street Regent's Place, London NW1 3FG, for speaking at an event on 22 June 2021. Hours: 2.5 hrs including preparation. (Registered 30 June 2021; updated 19 July 2021)

15 October 2021, received £3,895 from Champions (Dataiku), 123 Pentonville Road, London N1 9LZ, for taking part in a session on diversity inclusion and race on 9 September 2021. Hours: 3 hrs including preparation. (Registered 12 November 2021)

29 April 2022, received £3,280 from J.P. Morgan Chase Bank, N.A., Hong Kong Branch, Chater House, 8 Connaught Road, Central, Hong Kong, for speaking at JP Morgan's BOLD APAC Speaker Series on 3 March 2022. Hours: 4.5 hrs including preparation. (Registered 26 May 2022)

29 April 2022, received £1,545 from Loyola University Chicago 1032 W. Sheridan Rd, Chicago, IL 60660 for giving a speech on 15 March 2022. Hours: 3.5 hrs including preparation. (Registered 26 May 2022)

1 December 2021, received £2,460 from Champions, Barrington House, Leake Road, Costock, Loughborough LE12 6XA, for speaking at GSK's Black History Month event on 7 October 2021. Hours: 3 hrs including preparation. (Registered 26 May 2022)

1 December 2021, received £2,460 from Candex Solutions, Kemp House 152-160, City Road, London EC1V 2NX, for speaking at HSBC's Proud to Remember our War Heroes event on 11 October 2021. Hours: 4 hrs including preparation. (Registered 26 May 2022)

1 December 2021, received £2,870 via NMP Live, 8 Blenheim Court, Brook Way, Leatherhead KT22 7NA, for speaking at an event for Ropes & Gray LLP, 60 Ludgate Hill, London EC4M 7AW, on 28 October 2021. Hours: 4.5 hrs including preparation. (Registered 26 May 2022)

Payments from Global Radio, 30 Leicester Square, London WC2H 7LA:

25 June 2021, received £3,910 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting six shows on LBC on 3, 8, 15, 22, 29 and 31 May 2021. Hours: 27 hrs in total including preparation time (4.5 hrs per show). (Registered 29 June 2021)

23 July 2021, received £1,785 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting three shows on LBC on 12, 19 and 26 June 2021. Hours: 13.5 hrs in total including preparation time (4.5 hrs per show). (Registered 29 July 2021)

31 August 2021, received £2,875 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting five shows on LBC on 3, 10, 17, 24 and 31 July 2021. Hours: 22.5 hrs in total including preparation time (4.5 hrs per show). (Registered 06 September 2021)

24 September 2021, received £5,015 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting five shows on LBC on 7, 14, 15, 16, 17, 19 and 20 August 2021. Hours: 21.5 hrs in total including preparation time (4.5 hrs per show). (Registered 01 October 2021)

26 October 2021, received £1,785 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for guest presenting a radio show on LBC on 11, 18 and 25 September 2021. Hours: 13.5 hrs in total including preparation time (4.5 hrs per show). (Registered 29 October 2021)

23 November 2021, received £2,975 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 2, 9, 16, 23 and 30 October 2021. Hours: 22.5 hrs in total including preparation time (4.5 hrs per show). (Registered 29 November 2021)

5 January 2022, received £2,890 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 6, 13, 20 and 27 November 2021. Hours: 18 hrs in total including preparation time (4.5 hrs per show). (Registered 06 January 2022)

28 January 2022, received £6,927.50 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 4, 11, 25, 26, 27, 28, 29, 30 and 3 December 2021. Hours: 40.5 hrs in total including preparation time (4.5 hrs per show). (Registered 01 February 2022)

3 March 2022, received £4,165 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 1, 2, 8, 15, 22 and 29 January 2022. Hours: 27 hrs in total including preparation time (4.5 hrs per show). (Registered 31 March 2022)

29 March 2022, received £6,587.50 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 5, 12, 13, 14, 15, 16, 17, 19 and 26 February 2022. Hours: 40.5 hrs in total including preparation time (4.5 hrs per show). (Registered 31 March 2022)

29 April 2022, received £1,912.50 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 5, 12 and 26 March 2022. Hours: 13.5 hrs in total including preparation time (4.5 hrs per show). (Registered 13 May 2022)

18 May 2022, received £3,200 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting four shows on LBC on 2, 7, 14 and 21 May 2022. Hours: 18 hrs in total including preparation time (4.5 hrs per show). (Registered 09 June 2022)

1 June 2022, received £4,972.50 via Independent Talent Group, 40 Whitfield Street, Bloomsbury, London W1T 2RH, for presenting shows on LBC on 2, 13, 15, 18, 19, 23 and 30 April 2022. Hours: 31.5 hrs in total including preparation time (4.5 hrs per show). (Registered 13 May 2022; updated 13 June 2022)

Payments received via Speakers Corner, Unit 31 Highbury Studios, 10 Hornsey Street, London N7 8EL:

14 July 2021, received £2,469 from Trainline, 3rd floor, 120 Holborn, London EC1N 2TD, for taking part in a session on diversity inclusion and race on 1 June 2021. Hours: 2.5 hrs including preparation. (Registered 14 July 2021)

1 December 2021, received £2,460 from Capital One, Trent House, Station Street, Nottingham NG2 3HX, for speaking at Capital One's Black History Month event on 28 October 2021, followed by a Q&A. Hours: 4 hrs including preparation. (Registered 26 May 2022)

1 December 2021, received £3,280 from Canary Wharf Group, One Canada Square, Canary Wharf, London E14 5AB, for giving a keynote speech followed by Q&A on 19 October 2021. Hours: 4.5 hrs including preparation. (Registered 27 May 2022)

Payments received via JLA, 14 Berners Street, London W1T 3LJ:

1 December 2021 received £2,460 from LexisNexis, The Quadrant, Sutton SM2 5AS, for taking part in a conversation and Q&A on race inclusion on 14 October 2021. Hours: 3 hrs including preparation. (Registered 26 May 2022)

14 December 2021, received £2,460 from Deloitte, 2 New Street Square, London EC4A 3BZ, for speaking at event on 5 November 2021. Hours: 4.5 hrs including preparation. (Registered 26 May 2022)

14 December 2021, received £2,460 from EY, 1 More London Place, London SE1 2AF, for speaking at a conference on social mobility on 15 November 2021. Hours: 4 hrs including preparation. (Registered 26 May 2022)

2. (b) Any other support not included in Category 2(a)

Name of donor: George Brown

Address of donor: private

Amount of donation or nature and value if donation in kind: £25,000 towards paying for an additional member of staff for my office

Date received: 7 October 2021

Date accepted: 8 October 2021

Donor status: individual

(Registered 04 November 2021)

Name of donor: Jeanne Marie Davies

Address of donor: private

Amount of donation or nature and value if donation in kind: £25,000 towards paying for an additional member of staff for my office

Date received: 1 November 2021

Date accepted: 1 November 2021

Donor status: individual

(Registered 04 November 2021)

Name of donor: Jonathan Michael Lever Stone

Address of donor: private

Amount of donation or nature and value if donation in kind: £5,000 towards paying for an additional member of staff for my office

Date received: 31 January 2022

Date accepted: 31 January 2022
 Donor status: individual
 (Registered 02 February 2022)

3. Gifts, benefits and hospitality from UK sources

Name of donor: Jacksonville Jaguars (Union Jax LLC)
 Address of donor: Fulham FC Training Ground, Motspur Park, New Malden KT3 6PT
 Amount of donation or nature and value if donation in kind: Two tickets with hospitality for the NFL match at Tottenham Hotspur Stadium between Miami Dolphins and Jacksonville Jaguars, total value £1,598

Date received: 17 October 2021
 Date accepted: 17 October 2021
 Donor status: company, registration 5209624
 (Registered 18 November 2021)

Name of donor: Tottenham Hotspur Ltd
 Address of donor: Lilywhite House, 782 High Road, London, N17 0BX
 Amount of donation or nature and value if donation in kind: Ticket and hospitality in my capacity as the local MP for the boxing match between Anthony Joshua and Oleksandr Usyk at Tottenham Hotspur Stadium, value approx. £1,500

Date received: 25 September 2021
 Date accepted: 25 September 2021
 Donor status: company, registration 01706358
 (Registered 19 November 2021)

4. Visits outside the UK

Name of donor: Tufts University
 Address of donor: 419 Boston Avenue, Medford, MA 02155, United States
 Estimate of the probable value (or amount of any donation): Flights £2,828.12; hotel £332.93; transfers/car/driver £427.44; meals £138.39, total value £3,726.88
 Destination of visit: United States
 Dates of visit: 29 March - 3 April 2022
 Purpose of visit: Present speech on Ukraine situation as part of my Shadow Foreign Secretary role.
 (Registered 13 June 2022)

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).

8. Miscellaneous

Barrister (non-practising).

From January 2019, unpaid adviser to Pomeroon Trading Inc, an environmentally sustainable company that grows and exports coconuts and agricultural produce. I provide advice on Guyana, the Caribbean and on the company's community development fund. I hold share options below the level for registration under the category for Shareholdings. (Registered 18 February 2019)

From 21 February 2020, Envoy Extraordinaire of the University of Guyana. This is an unpaid role. (Registered 30 September 2020)

From 1 June 2020, Associate Tenant, Doughty Street Chambers. This is an unpaid role. (Registered 30 September 2020)

From 7 September 2020 to 6 September 2023, Visiting Professor in Practice at the London School of Economics and Political Science. This is an unpaid role. (Registered 30 September 2020)

From 28 July 2021 to 27 August 2024, Professor of Practice at SOAS, University of London. This is an unpaid role. (Registered 09 August 2021)

On 12 May 2022, I accepted two tickets with hospitality from Tottenham Hotspur for their match against Arsenal. The total value was below the registrable threshold. (Registered 30 May 2022)

Appendix 2: Summary of emails between the Office of Mr David Lammy MP and the Office of the Registrar of Members' Financial Interests, 19-26 July 2022

- 5 Mr Lammy's office emailed the Registrar about a new registerable interest at 17:21 on 19 July 2022 and provided the following information:

On 2 – 5 June 2022, Mr Lammy attended the Bilderberg Meeting in Washington D.C, United States. Mr Lammy was invited to partake in the Bilderberg Meeting 2022 on invitation by the organisation. On 8

June he was reimbursed £5,669.57 for the flights and accommodation by Newbridge Advisory, Mermaid House, 2 Puddle Dock, London EC4V 3DS. He estimates the value of airport transfers at £160 and meals approximately £376.58. Total value, £6,206.15

5

At 11:57 on 21 July 2022, the Registrar's Office replied and requested the following confirmation:

10

I have added the visit to the Register, see below. If Mr Lammy has not already done so, he should alert the Commissioner to its delayed registration. And have I understood correctly that Newbridge Advisory directly covered the transfers £160 and meals, but reimbursed Mr Lammy for the flights and accommodation.

And at 16:37 the same day Mr Lammy's office responded:

15

...we believe that the transfers and meal were covered by the Bilderberg Association, 2 St. James' Place, London SW1A 1NP and we have asked them to clarify but in the meantime it is possible to declare with the information we have?

Following up on this question, at 12:22 on 22 July 2022, the Registrar's office explained the following,

20

Thank you for the further information and attached update, and for confirming that Mr Lammy has already told the Commissioner about the delayed registration of the Washington D.C. visit... [details redacted as they are not relevant]. The Registrar is not in the office today. I have deleted the Washington D.C. visit from the Register until I can discuss with him whether we can include only the details provided to date or,

25

now that we are aware that some of it is missing, will need to wait until we have all of the information for the visit before we can re-add it.

At 16:40 the same day your office replied, stating:

30

Mr Lammy can confirm that the Bilderberg Association paid for the transfers and meals during the visit. Would you be able to include the Washington visit in his register of interests with the estimates provided please?

At 13:81 on 26 July 2022, the Registrar confirmed the following:

I have discussed this with the Registrar, and we agree that the Bildeberg Association's contribution should be treated as an update to an existing entry.

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This visit will also be included in the online version of the Register dated 8 August 2022.

As we have added a number of interests to his entry, please could you confirm that Mr Lammy is content that his full entry is now correct and up to date?

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