Written evidence

1. Daily Telegraph article, 8 September 2017

One of the Northern Irish MPs propping up Theresa May’s government accepted holidays worth £100,000 from a country he is now helping to secure a post-Brexit trade deal, the Telegraph can reveal.

Ian Paisley Jr, one of the Democratic Unionist Party’s most prominent MPs accepted two all-expenses-paid trips from the Sri Lankan government.

Documents seen by the Telegraph show that Mr Paisley took his wife and four children to the country.

They flew business class, stayed in the finest hotels and were provided with chauffeur-driven Mercedes, all paid for by the Sri Lankan government.

During discussions with officials, he offered to help the state broker an oil deal, saying he had "significant arrangements with national oil suppliers" in Oman and Nigeria.

The trips, which were never disclosed in the Commons register of interests, will raise serious questions about the influence and interests of the MP, who is one of 10 DUP members relied upon by Theresa May to ensure her government can continue to function after her snap election.

The Register of Members’ Financial Interests exists so that MPs can declare income, gifts or affiliations that could be construed as a potential conflict of interest with their parliamentary roles.

This week Mr Paisley posted a picture of himself alongside Amari Wijewardene, the Sri Lankan High Commissioner, outside the Houses of Parliament captioned: "With Sri Lanka High Commissioner to discuss NI-Sri Lanka trade deal after Brexit."

Two days after the meeting in Parliament, Mr Paisley posted a picture of himself alongside Liam Fox, the International Trade Secretary responsible for negotiating post-Brexit trade deals.

It was captioned: "With Liam Fox discussing our trade agreements post Brexit."

The Sri Lankan high commission in London said on Thursday that Mr Paisley was considered to be in a particularly good position to help the state "enhance trade relations between Sri Lanka and UK" given the DUP’s role supporting Mrs May’s Government.
The images have prompted concern that Mr Paisley is attempting to use his influence within Government to help negotiate a deal on behalf of the nation that provided his £100,000 holidays.

The trips, which took place in 2013, have also raised questions given Sri Lanka’s questionable human rights record. Later that year Conservative MPs were banned from accepting trips funded by the Sri Lankan government due to concern about the regime’s lobbying tactics.

According to documents seen by the Telegraph, Mr Paisley, a member of Parliament’s all-party group on Sri Lanka, had two holidays with his family in Sri Lanka in 2013.

In February 2013, the MP emailed an official saying he "wanted to follow up on your kind offer of a visit for myself and my family", before suggesting some dates.

The trips took place in March and July 2013. On the first he stayed for 10 days and took his entire family. On the second he stayed for seven days and took his wife, Fiona, and two of their children.

The Sri Lankan ministry of external affairs is understood to have paid for business class flights for the couple and their children, costing about £16,000, and arranged six hotels across the two trips, picking up the bill for their meals at the hotels.

The group was greeted by officials at the airport in Colombo and given access to the VIP lounge.

The government also paid for helicopters to shuttle Mr Paisley and his family around the country, at a cost of $15,000 (£11,400) for one of the trips, with its defence ministry clearing air space for them to land.

Shortly before the holidays Mr Paisley spoke in Parliament and suggested that the Queen could visit the country to aid the peace process there following years of civil war.

By failing to declare his trips Mr Paisley appears to be in breach of parliamentary rules, which state that funded trips that cost more than £300 must be declared.

On Thursday evening the DUP said that he had referred himself to Kathryn Hudson, the Parliamentary Standards Commissioner.

She has previously been criticised for her failure to reprimand MPs found guilty of breaking Commons rules.
On Thursday, Siobhan McDonagh, a Labour MP who is vice-chairman of the all-party parliamentary group on Tamils, said it appeared that Mr Paisley might be helping to broker a "back-door trade agreement" and described the revelations as "disturbing".

"Sri Lanka has a seriously bad human rights record. Why would anybody accept holidays for their family if they wanted to speak in defence of the regime? Surely they understand, and surely the regime understands, that it undermines the honesty and validity of the view they are expressing," she said.

Wes Streeting, the MP for Ilford North, added: "No MP ought to give the impression they are acting or speaking out on an issue because they have been on all-expenses paid trips to the country in question rather than thinking objectively about the issue at hand and acting in the UK's national interest."

During their stays they were taken to attractions including an elephant sanctuary, a national park and a Buddhist temple, with the costs of the excursions covered by the government.

During the first trip, in March and April 2013, Mr Paisley and his family were given a suite at the Hilton hotel in Colombo, before being accommodated in the five-star Heritance hotel near Galle, in the south of the country, and the Amethyst resort on its east coast.

Three months later Mr and Mrs Paisley returned with two of their children, again with business-class flights to Colombo covered by the Sri Lankan government.

After arriving in the capital on 2 July, they were scheduled to fly by helicopter to Kandalama in the country’s central province, where they stayed at another five-star Heritance hotel, with a pair of rooms costing $272 (£208) and $332 (£254) for two nights.

The hotel is nestled in a forest near the centre of the island. The website boasts that monkeys climb balcony pillars. The family’s itinerary in Kandalama included a visit to the Sigiriya rock fortress, where complimentary tickets were arranged along with an English-speaking guide.

They also arranged a 50-mile helicopter trip to the city of Kandy, where they were put up in the five-star Earl’s Regency Hotel and given free access to an elephant orphanage an hour from their hotel.

Later they flew back to Galle, where they checked back into the Heritance and had several "leisure days", choosing from excursions that include a turtle hatchery, a lake and a mask museum.
While Mr Paisley failed to declare the 2013 trips in his register of Members' interests he did declare a third trip to the country in November that year, costing around £3,400, and one in 2012 with a cross-party group of MPs.

Mr Paisley has been a vocal supporter of the Sri Lankan government in recent years, calling for "positive trading opportunities" between Britain and the island, as well as highlighting how human rights abuses may have been committed by Tamils as well as the government during the civil war.

In January 2013, a month before emailing officials to arrange his first family trip, he opposed calls for the Queen to avoid the Commonwealth Heads of Government meeting in Sri Lanka over fears her attendance "would be regarded as a vindication of the Sri Lankan Government's actions".

Mr Paisley said "I am startled by the view that if Her Majesty were to put her foot on the soil of Sri Lanka it would be an insult to democracy. We should stretch out our hand to Sri Lanka; we should not step on Sri Lanka."

In a Commons debate earlier this year, he argued against an international inquiry into historic war crimes in the country, saying: "The Government rightly resisted all calls to make the Bloody Sunday and Iraq inquires international in any way, because they were domestic inquiries into events that had an international impact."

During discussions about arranging the first trip, Mr Paisley wrote to one official: "We discussed a potential oil purchase. I have two significant arrangements with national oil suppliers in either Oman or Nigeria. I understand from our conversation you require a regular supply and are currently changing your filters on the refinery to take other than Iran oil."

"If you can let me know quantity and quality specifications of oil requirements I can certainly make this happen very quickly. As you know this is the most lucrative project you could be involved in and government-to-government arrangement will attract the most discount."

It is not clear what became of the proposal.

This week Mr Paisley declined to answer a series of questions about these discussions, his trips to Sri Lanka, and his subsequent discussions with the high commissioner regarding a post-Brexit trade deal.

Asked about the trips on Thursday, a diplomat at the high commission in London confirmed Mr Paisley’s 2012 trip to the country with a delegation of MPs, but said: "The High Commissioner is not in a position to disclose any information with regard to personal trips."
The diplomat added that the meeting with the High Commissioner was to discuss bilateral relations between Sri Lanka and UK in general and also to discuss about trade relations - how to enhance them, especially after Brexit.

Parties in Northern Ireland, unlike mainland parties, are allowed to keep the identities of their doors secret, due to the sensitivities of politics in the country following the Troubles."

[Profile: Ian Paisley Jr]¹

8 September 2017

2. Email from Mr Ian Paisley MP to the Commissioner, 8 September 2017

Further to my call this morning in relation to an article in the Daily Telegraph. I wish to refer myself for an investigation into these claims to your offices.²

I am available in London next week to meet and discuss this matter in full with you so as it can be quickly dealt with. Any information you require from me will of course be made available.

Thank you.

8 September 2017

3. Mr Paisley's tweet, 8 September 2017

Mr Paisley tweeted the following statement issued by his solicitor

My client totally denies the defamatory inferences arising from the article in today's Daily Telegraph including those relating to his registration obligations as an MP.

He has now referred this matter, and a full explanation, to the Parliamentary Commissioner for Standards.

4. Letter from the Commissioner to Mr Ian Paisley MP, 13 September 2017

You emailed me on Friday 8 September asking me to consider beginning an inquiry into the allegations which have recently appeared in the Telegraph about your financial interests. I am grateful to you for your early statement of willingness to provide any information I need. I am writing to you today to tell you that I have decided to begin a formal inquiry.

¹ Profile not reproduced
² Mr Paisley had telephoned the Commissioner’s office about how to make a self-referral
My Inquiry

In essence, my inquiry will consider whether the rules of the House required you to:

- register trips allegedly taken by you and your family to Sri Lanka during 2013 (in particular trips taken in March and July 2013 which were, allegedly, funded by the Sri Lankan government);

- make declarations of interest about any such trips in the relevant period; and

- whether you have complied with the rules regarding paid advocacy in connection with any such trips.

The Code of Conduct for Members


Paragraph 11 of the [2012] Code said:

“No Member shall act as a paid advocate in any proceeding of the House”

Paragraph 13 of the Code said:

“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 holder.

Both of these rules appear in the 2015 Code of Conduct, which has applied since May 2015.

The Guide – on registration

The main purpose of the Register of Members’ Financial Interests is “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 four weeks of each change occurring.

Paragraphs 19-71 of the relevant Guide to the Rules described the various registration categories. Category 6 concerns overseas visits. The definition was

“With certain specified exceptions, overseas visits made by the Member or the Member’s spouse or partner relating to or in any way arising out of Membership of the House where the cost of the visit exceeds one per cent of the current parliamentary salary and was not wholly borne by the Member or by United Kingdom public funds.”

The then parliamentary salary was about £66,000 as of April 2010.

Paragraph 46 of the Guide specified the information Members were required to provide to the Registrar. These included the name and address of the donor; the amount of the donation; the destination, date and purpose of the visit. Paragraph 47 of the Guide listed certain exemptions from the requirement to register.

The Guide – on declaration

Paragraphs 72 to 88 of the 2009 Guide to the Rules concerned the declaration of Members’ interests.

Paragraph 73 explained that:

“The rule relating to the declaration of interest is broader in scope than the rules relating to the registration of interests in three important respects. As well as current interests, Members [were (and are still)] required to declare both relevant past interest and relevant interests which they may be expecting to have. In practice, only interests held in the recent past, i.e. those current within the previous twelve months need normally be considered for declaration. Expected future interests, on the other hand, may be more significant. [...] In deciding when a possible future benefit is sufficiently tangible to necessitate declaration, the key word in the rule which the Member must bear in mind is “expecting”. Where a Member’s plans or degree of involvement in a project have passed beyond vague hopes and aspirations and have reached the stage where there is a reasonable expectation that a financial benefit will accrue, then a declaration should be made. Members are also required to declare relevant indirect interests, for instance those of a spouse or partner, and also non-registrable interests of a financial nature where these are affected by the proceedings in question....”

Paragraph 74 of the Guide explained the test of relevance:
“...The basic test of relevance should be the same for declaration as it is for registration of an interest; namely, that a financial interest should be declared if it might reasonably be thought by others to influence the speech, representation or communication in question. A declaration should be brief but should make specific reference to the nature of the Member’s interest.”

Paragraph 76 of the Guide said that:

“The House has endorsed the following advice on the occasions when such a declaration of interest should be made: “no difficulty should arise in any proceeding of the House or its Committees in which the Member has an opportunity to speak....”

Paragraph 86 explained further:

“The requirement to declare a relevant interest at the appropriate time covers almost every aspect of a Member’s parliamentary duties extending to correspondence and meetings with Ministers and public officials. Frankness with colleagues is also important. [...] Above all it should be disclosed when a Member is dealing with Ministers of the Crown and civil servants, and his obligation becomes of paramount importance when a foreign government is involved either directly or indirectly.”

There are some occasions when a Member is exempted from making a declaration. This was explained in paragraph 87 of the Guide to the Rules:

“In its application of the 1974 Resolution the House has always recognised that there are certain proceedings where declaration of interest is impracticable e.g. during oral Questions or when asking a question in response to ministerial statement on a matter of public policy or supplementary to an Urgent Question. (The Member asking the Question should, however, declare an interest; see paragraphs 78 to 81.) However, Members are advised to declare any relevant interest when such a declaration does not unduly impede the business of the House, for example in relation to a request for a debate made in response to a Business Question or statement.”

The Guide - on paid advocacy

On 6 November 1995 the House agreed a Resolution (amended on 14 May 2002) prohibiting paid advocacy. Paragraphs 89 to 102 of the Guide to the Rules dealt with “lobbying for reward or consideration”. If, during the course of my inquiry, matters concerning these rules arise, I will draw your attention to those which are relevant at that time.
The Register of Members' Financial Interests

You can see your own entries in the relevant Registers by navigating from this page on the Parliament website:


Next steps

In the first instance, I would welcome your account of the matters reported in The Telegraph on 8 September 2017.

In particular, it would be helpful to know:

- if and when you holidayed in Sri Lanka during 2013;
  - who funded those trips and the total value of the donation such trips represented on each separate occasion;
  - if you do not have the exact value of each donation, please provide estimate(s), with any supporting evidence you have and an explanation of how the estimated value has been arrived at;

- whether you have accepted any similar donations in kind from the Sri Lankan government which you consider now might have been registrable and, if so, the details of those donations;

- whether you had at any relevant time sought or received advice from the House authorities about the House’s rules on the registration and/or declaration of overseas visits;
  - if you have done so, please give the details of that advice;

- whether you have at any time considered registering any such visits in Category 6 of the Register;
  - if you did give the matter consideration, please describe the factors which led you to conclude that the House’s rules did not require registration;
• whether you considered making a declaration of interest in relation to any such visits in the period between when you were first expecting to visit Sri Lanka and the expiry of the twelve-month period after the visits; and

— if you did consider making (a) declaration(s), please describe the factors which led you to conclude that the House’s rules did not require you to do so.

• whether you have, at any time when the provisions of paragraphs 89 to 102 of the Guide to the Rules would have been relevant, had cause to consider whether your participation in any proceedings of the House might be affected by those rules.

— if you have, please describe the factors which led you to conclude that the House’s rules did not restrict your participation.

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

I enclose a copy of the Commissioner’s Information Note, which sets out the procedure I follow. I will shortly update my parliamentary web pages to show that I am conducting an inquiry into an allegation into this matter. My office will not comment further on any aspect of the inquiry. (They will, however, confirm that I have begun an inquiry if asked before this information is posted on my webpages and they will answer factual questions about the processes I follow and the standards system more generally.)

As you will be aware, my inquiries are conducted in private. This letter and any subsequent correspondence between us is protected by parliamentary privilege. The content of our correspondence should not be disclosed to any third party until after I have concluded my work and a decision has been published. (Any such publication will include all the relevant evidence, including our correspondence.) I would, therefore, ask that you respect that confidentiality.

As a matter of courtesy, I should say now that I may make enquiries of the Registrar and/or other of the House authorities in due course. If I do so, I will share that correspondence with you. 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.

http://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf
I would appreciate your help and co-operation and welcome your comments on the allegation, together with any evidence you feel may assist my investigation, as soon as possible and no later than 27 September 2017.

13 September 2017

5. Letter from Mr Ian Paisley MP to the Commissioner, 28 September 2017

Thank you for your letter of 13 September. Below is my initial response. I am currently attempting to gather more evidence to submit to support the case that I outline below.

At the outset, I categorically refute any claim that I have acted in any way as a paid advocate for the government of Sri Lanka in the proceedings of Parliament or in my conduct as a Member of Parliament.

Between 2010 and 2012, I made one speech on Sri Lanka and its peace process and asked a number of written questions on topics ranging from the independence of the judiciary, to the de-mining of militarised zones, to peace and reconciliation in the country following its 40-year conflict. In January 2013, I made a speech in a Westminster Hall debate about my views on the peace process. I shared my thoughts on the best way forward for the country politically and in trade and drew comparisons with Northern Ireland and its post-conflict process.

I did not speak again in Parliament on Sri Lanka until 26 March 2014 in a brief PMQ, a general question about how attempts to internationalise the internal politics of a Sri Lanka would not be compatible with post-conflict Northern Ireland. Under the rules of the House, a Member should not impede the business of the House by referencing registered interests on such matters that are the subject of general questions. The next time I spoke on Sri Lanka was almost a year later in January 2015 after a change of regime from Rajapaksa. I did not speak about the country again until two years later in February 2017 when I was referring to human rights matters.

Under the rules I do not believe I would have been required to draw attention to the visits I made since a year had elapsed between them and my commentary. Furthermore, given that they were short questions and not speeches, a referral to registered interests would have only impeded the activities of the House. As I have no financial interests in the subject, I believe referring to any visits was unnecessary.

On the substantive point of the non-registration of two visits to Sri Lanka in 2013, I am deeply embarrassed by what is a complete oversight in registering an overseas visit by myself and my family, paid for by the Sri Lankan government. However, I do believe there is mitigation, and I certainly refute any claims that I made an intentional decision not to register, that it was a secret that I was in Sri Lanka, or, worse, that it impacted any comments or decisions I made then or now as a Parliamentarian. None of those claims can in any way be substantiated.
By way of background, I have a good record of registering foreign visits. Indeed, I have visited Sri Lanka before and registered those visits. My interests in the country are political, as its counter-insurgency and peace building correspond with comparable circumstances in Northern Ireland. The war against terrorism with the Tamil Tigers is a direct parallel to the 40-year war against IRA terrorism in Northern Ireland. As someone heavily involved in conflict resolution in my own country and in African states, I take a keen interest in the Sri Lanka conflict resolution. What is more, my public position against Tamil Tiger aggression and for stable democracy is longstanding and has remained unchanged and steadfast since before 2013, when I was hosted by the government.

On the two visits in question in 2013, I was invited by the government of Sri Lanka – specifically the High Commission and the Sri Lanka Foreign Office – to widen my knowledge of the entire country. This could only be done during recess, and I don’t prefer to travel for vast amounts of my recess time without the company of my family, if it can be avoided. I spend 50% of my time away from home as it is.

At the time in question, I publicised the fact that I had been in Sri Lanka in my local papers. I was photographed upon my return along with my family and my parents, and on Facebook, my family openly commented upon our visit. I have over 10000 followers on Facebook, so it was hardly something I was keeping quiet about. Later in 2013, I entered photographs that I had taken during that visit in the Parliamentary photographer of the year competition and won a runner up prize for photos I had taken in Sri Lanka of wildlife. Once again this was widely published and makes a complete mockery of any suggestion that the trip had been some secret visit masking paid advocacy for the country. More importantly, I wrote and published my views and have openly declared that the visits abroad were hosted by the government. The fact is that the UK hosts visitors from overseas countries, and they reciprocate. I have no doubt that my well-established knowledge of terrorism and post-conflict activities was of interest to the Sri Lanka government, as they could speak to someone with authority on the subject matter. I am invited to visit many countries including Sri Lanka every year on more than one occasion and have to decline due to my schedule. If I get the opportunity to visit and broaden my knowledge, I will certainly do so without any hesitation.

On the matter of a conflict of interest, I have long-held and well-established views on Sri Lanka. Those sympathetic to Tamils criticise me for such views, and some prominent members of the Labour Party criticise me for espousing them largely because they have a Tamil electorate in their constituencies. I have no such pressures; my views are not influenced in any way by any voting section in North Antrim. The fact is that I am much more objective on this subject than those who would seek to criticise me, given that I have no electoral or personal gain to make by expressing my opinions on Sri Lanka.

With regard to the mitigation for my non-registration in 2013, I have no hesitation whatsoever in registering that the visits took place even though it is now two Parliaments later. The recent defamation of my family is subject to legal action, as neither my wife nor my family had any registrable interests at that time but have
had their reputations damaged as a result of the public claims in the *Daily Telegraph*. What is more, the monetary value of the visit suggested in the article is complete nonsense and is potentially subject to legal challenge also.

Importantly as regarding mitigation, in 2013 my office staff was in a state of transition. My only Westminster assistant had been headhunted by an international company and was working his notice period for me between 31 March and 1 July, when he began his new job. He was in charge of the recruitment of his replacement, who did not start in Westminster until mid-August. Neither work for me anymore.

The process of registration was clearly established with my key worker, who had been with me since shortly after I was first elected. It was straightforward. After overseas visits he had a responsibility to ascertain the costs and to draft me a submission that I would check and then email onto [the Registrar] in the registration office. I registered the information that the key worker assembled by email. Any amendments would come back by email or phone call and would be agreed by that process. The information was gathered by the staff member, and I would sign it off.

I have checked with my former member of staff. He tells me that I did ask for this to be done at the time. Apparently, he had gathered some of the information and had left instructions for the new staffer to complete this work. Clearly the task was not completed. It is also clear that the summer recess got into the mix, and the matter fell down and off the list of priorities. I accept my responsibility in this, but I believe this change of staffing arrangements helps to explain what would otherwise have been a simple matter. After the summer of 2013, I had other serious personal family issues to deal with.

I travel widely as an MP, as an officer of the IPU and the CPU, on trade missions, and as part of APPG groups. I was also a rapporteur for a post-conflict process in Guinea Bissau in West Africa throughout this period. I accept ultimate responsibility for failure to register but do not believe it had a single impact on my conduct, actions, viewpoints, or activities as a Member of Parliament. I believe it would be impossible to demonstrate the contrary. Further to that, my constant pressing for trade deals and agreements wherever I go is something I take pride in as an advocate of Northern Ireland and U.K. business interests. I am a leading spokesman for Brexit, so that is obviously a key motivating factor. It seems the only person surprised by this is the author of an inaccurate and scurrilous report in the *Daily Telegraph*, which appears to be motivated by hatred of my political party and support for a terror organisation – the Tamil Tigers.

I am content to register this matter, late as it would be, from two Parliaments ago. But I cannot substantiate the erroneous amount quoted in the newspaper article. In fact, I believe the cost would be a fifth of that amount. I am trying to trace airline the tickets that show I travelled business class and was upgraded on the flight at no extra cost. Those tickets from my recollection were less than £1600 per person. Given the defamatory inferences in the *Daily Telegraph* article and the gross exaggeration and innuendo, I suspect that its source, potentially inspired by Tamil sympathies, intended to damage both the reputation of the previous regime in Sri
Lanka and cross-party U.K. interests in the nation going forward. I will extrapolate a value over the next couple of weeks that I believe is in line with the visit costs. I have sought costs from the current regime, but it appears unable to help. Previous government accounts are not all available following the change of regime in 2015.

My two previous members of staff are both willing to be interviewed by you as part of your investigation, and I can make their names and contact details available to you if necessary.

Thank you for taking the time to read this, and I hope it helps your investigation.

28 September 2017

6. Letter from the Commissioner to the Daily Telegraph, 2 October 2017

I am writing to seek your assistance with an inquiry I am conducting into the conduct of Mr Ian Paisley MP. My inquiry focuses on whether Mr Paisley has breached paragraph 13 of the Code of Conduct for Members.

On 8 September 2017 the Telegraph published an article concerning two trips allegedly taken by Mr Paisley and his family to Sri Lanka during 2013. The detail in the Telegraph article suggests that your colleagues have seen, and the newspaper perhaps has in its possession, a considerable body of evidence relating to the trips the Paisley family is reported to have taken.

The original article asserts that the two trips were of approximately £100,000 in value and that Mr Paisley was accompanied by his wife and four children on one occasion and by his wife and two of his children on the other. The article also refers to:

- an email from Mr Paisley to “an official” (presumably in the Sri Lankan government)
- business class flights costing approximately £16,000
- helicopter flights
- security arrangements
- details of the hotel where the family stayed and the composition of the hotel bills met by the Sri Lankan government; and
- entertainment and other costs.

It would be very helpful if you would send me a copy of any evidence the newspaper has relating to these trips and any associated costs met by the Sri Lankan...
government. It would also be helpful to have any notes of conversations and/or of correspondence you or your reporters have had with Mr Paisley and his representatives during the preparation of the article and after its publication.

It may be helpful to underline that my inquiry is concerned solely with whether Mr Paisley has acted in breach of the Code of Conduct for Members.

Any material provided to me would be confidential to my inquiry but I would expect to show it to Mr Paisley during the inquiry process. The material is likely to be published on the Parliament website once my inquiry is concluded. I do not routinely publish the details of third parties, except where their identities are material to the decisions I reach or where such information is already in the public domain. The content of any report which I might publish at the end of my inquiry will be a matter for me alone but I would be willing to consider representations about the redaction of any personal details if that were relevant.

Since I am seeking your help as a witness in this inquiry, I enclose a note which sets out the procedure I follow. My inquiries are subject to parliamentary privilege and that means you must not disclose this letter, or your response, to others except in so far as it is necessary for you to do so in order to respond to my request. Should it be necessary so to disclose the contents of this letter, those with whom it is shared will be similarly bound and you should ensure that they understand these confidentiality provisions.

I would be grateful for your help on this matter. If you would let me have any such material by 23 October 2017, that would be most helpful. If that is not possible, I would appreciate an early estimation of the time it will take to produce the material. If you have any questions about this request or think you will need more time to collate the material, please contact my Complaints Manager, [redacted], in the first instance. You can reach her on [redacted] or via [further contact details redacted].

2 October 2017

7. Letter from the Commissioner to Mr Ian Paisley MP, 2 October 2017

Thank you for your email of 28 September 2017. The information you have provided is helpful. However, I will need some further information and supporting evidence before I can consider how to resolve this matter.

Your clear statement that you are content to make a registration in the Register of Members’ Financial Interests to put right the original omission of the information about your two trips to Sri Lanka is helpful. It is evident from the information you have provided so far that the visits should both have been registered in the Register of Members’ Financial Interests in 2013. In each case, the failure to do so within the prescribed timeframe was a breach of the rules and of paragraph 13 of the Code of Conduct.
The value of the donations

I appreciate that it may take you a little time to trace evidence to support your assessment of the value of each donation and to gather any other information necessary to fulfil the registration requirements. I would be grateful if you could do this as soon as possible and no later than 23 October 2017.

In the meantime, I have asked The Telegraph to release to me any relevant material that they hold. I enclose a copy of my letter to the Editorial Legal Director, making that request. I will share with you any material I receive in due course.

Other information concerning the two trips

As you will be aware, the rules required (and still require) that Members register a number of details about any overseas visits where the cost is not borne by the Member or by United Kingdom public funds. These include the dates and purpose of any such trips.

It would, therefore, be helpful if you would give the precise dates of these two visits to Sri Lanka.

The Telegraph article describes the two trips as family holidays. Your email of 28 September appears to suggest that they may have had other purposes. You say that you were invited “to widen your knowledge of the entire country.” You add that “I have no doubt that my well-established knowledge of terrorism and post conflict activities was of interest to the Sri Lanka government as they could speak to someone with authority on the subject matter. I am invited to visit many countries including Sri Lanka every year on more than one occasion and have to decline due to my schedule. If I get the opportunity to visit and broaden my knowledge, I will certainly do so without hesitation.” It would be helpful to have a clear statement of the purpose of each trip, and an explanation of the extent to which your activities in Sri Lanka were anything other than those of a family holiday.

If the trips involved only family holiday activities, it would be helpful to have any information you can provide about your understanding of why the Sri Lanka government offered to fund them.

For the avoidance of any confusion, it would be helpful if you could give an explicit response to my question about whether you have accepted any similar donations in kind from the Sri Lanka government which you consider now might have been registrable and, if so, to have details of those donations.

As you will be aware, each time a Member provides information for the Register, the Registration team format and update the Member’s current entry, and send a copy of the draft updated entry so that the Member may check accuracy before its inclusion in the official record. You registered other overseas visits in 2013, on 11 April, 6 June, and 18 November. It would be helpful to have your observations on
how the omission of the two visits which are reported as taking place in March and July 2013, were not rectified.

Declarations of interest

Thank you for the information you have provided about the occasions you have spoken during parliamentary proceedings on the subject of Sri Lanka. I will consider carefully each of the points you have raised.

For completeness, it would be helpful to know whether any of the other circumstances in which declarations are required arose during the period when you either expected the donations or had received them within the preceding 12-month period. Paragraph 86 of the then Code said:

“The requirement to declare a relevant interest at the appropriate time covers almost every aspect of a Member’s parliamentary duties extending to correspondence and meetings with Ministers and public officials. Frankness with colleagues is also important [...]. Above all it should be disclosed when a Member is dealing with Ministers of the Crown and civil servants, and his obligation becomes of paramount importance when a foreign government is involved either directly or indirectly.”

It would be helpful if you could state in terms whether you had any meetings, correspondence or any other contacts with any relevant public office holders/public officials about matters concerning Sri Lanka during the relevant period. Please include in that list any relevant All-Party Parliamentary Group meetings. (Providing the dates of your trips, as requested above, will enable me to be clear about the period of time when declaration might have been required.)

Next steps

Any other points you may wish to make to help me with this inquiry would be most welcome. I will contact you again when I have received a reply from The Telegraph.

2 October 2017

8. Letter from the Daily Telegraph to the Commissioner, 24 October 2017

Further to your letter of 2 October 2017, I now enclose with this letter a bundle containing documents relating to the two trips to Sri Lanka taken by Mr Paisley and his family in 2013.

As the index shows the bundle is divided into: Telegraph correspondence with Mr Paisley; documents relating to the March 2013 trip; documents relating to the July trip.
As I am sure you will understand, there are issues pertaining to the confidentiality of sources and we have therefore redacted some material which is indicated by the yellow markings on the documents. The material we have redacted is as follows:

- letter references which lead to the identification of an individual(s)
- handwritten notes
- handwritten telephone numbers

If we can be of further assistance please do not hesitate to contact us.

24 October 2017

Documents relating to March 2013 trip

Email from Mr Ian Paisley MP to [Official A] 1 February 2013

Many thanks for your hospitality on Wednesday evening. I had a wonderful time and my colleague [name] appreciated your hospitality and enjoyed the company of new friends. It was great to meet with your brother and all your colleagues and to really feel part of a new family of friends. We have a lot in common as a people. You will know that my interest in your nation is genuine and our meeting and friendship has become an extra bonus. I wanted to catch up on a couple of matters that we discussed.

1. VISIT

I wanted to follow up on your kind offer of a visit for myself and my family. Given family commitments and school holidays would it be possible to visit between 30 March returning 6 April. I trust this would be possible. If so I can send you passport details.

2. OIL

At dinner we discussed a potential oil purchase. I have two significant arrangements with national oil suppliers in either Oman or Nigeria. I understand from our conversation you require a regular supply and are currently changing your filters on the refinery to take other than Iran oil.

If you can let me know quantity and quality specifications of oil requirements I can certainly make this happen very quickly. [Name] and I have a meeting in Africa in a week or so with the individual we discussed and we could progress this immediately. Let me know your requirements, as you know this is the most lucrative

---

4 I have omitted material which is not relevant (for example, Mr Paisley’s correspondence with the newspaper about the publication of their article)
project you could be involved in and government to government arrangement will attract the most discount.

Let me know your requirements as soon as you can, I trust we can meet again soon.

Email from [Official B] to Mr Ian Paisley MP, 16 February 2013

The dates are fine and we can go ahead with those dates.

As for Nigeria please kindly propose 2 sets of dates in order to coordinate the travel accordingly.

Regret the delay to respond.

Email from Mr Ian Paisley MP to [Official B], 23 February 2013

1. Attached are my family passport details. Please advise how you wish to proceed on flights and accommodation. We can leave the UK anytime on Fri/Sat 29/30 March and depart Sri Lanka Thu/Fri 4 or 5 April.

2. I will send [redacted name]'s passport on a separate email.

3. Oil, I will forward some dates to you at the beginning of the week to coordinate travel plans to Africa.

Ministry of External Affairs to Sri Lankan Airlines, date not available

Issuance of air tickets

Hon Ian Paisley, Member of Parliament, United Kingdom and his family, 30 March to 5 April 2013

It would be appreciated if you could kindly make arrangements to issue return Business Class air tickets (London/Colombo/London) for Hon Ian Paisley, Member of Parliament, United Kingdom and his family as per the following itinerary:

<table>
<thead>
<tr>
<th>Arrival</th>
<th>30 March 2013</th>
<th>Flight No UL504</th>
<th>Time 1305 hrs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Departure</td>
<td>5 April 2013</td>
<td>Flight No UL503</td>
<td>Time 13.05 hrs</td>
</tr>
</tbody>
</table>

Their names and passport numbers are as follows:

[6 names redacted]

---

5 A third party, not part of Mr Paisley's family
The bills in this connection should be sent to Secretary/External Affairs for settlement. Your assistance in this regard is highly appreciated.

**Invoice from Sri Lankan Airlines issued to Ministry of External Affairs, 25 March 2013**

Being the invoice against the sale of the following document/s [ref numbers redacted]

Route London/Colombo/London

Class Business

Fare (Nett) LKR 510,012.00

LKR 3,250.00 LK

LKR 32,754.00 GB

LKR 7,843.00 UB

LKR 29,596.00 YQ

LKR 1,580.00 YR

Total LKR 585,035.00 (per passenger)

Number of passengers 6

Invoice total rupees 3,510,210.00

[Settlement details redacted]

**Ministry of Foreign Affairs: Programme for visit of Hon Ian Paisley, Member of Parliament, United Kingdom, 30 March to 5 April 2013**

21 March 2013

Programme for Visit of Hon Ian Paisley, Member of Parliament, United Kingdom, 30th March to 5 April 2013

1. Hon Ian Paisley, Member of Parliament, United Kingdom is scheduled to visit Sri Lanka with his family (spouse and four children) from 30 March to 5 April 2013. The tentative programme is attached herewith for your perusal.

2. It would be appreciated if you would kindly approve the following:
• Provide air transportation from London-Colombo-London. Cost for air transportation is Sri Lankan Rupees 585,035.00 per passenger

• Provide a Mercedes Benz and a Luxury van for the delegation throughout their stay in Sri Lanka

• Provide hotel accommodation in accordance with the programme
  — Colombo - Hotel "Hilton" 30 March to 5 April 2013
  — Passikudah - Hotel "Amethyst" 31 March to 3 April 2013
  — Galle - hotel "Fortress Resort and Spa" 4 April 2013

  Please note that the protocol division is in contact with the hotels to obtain accommodation on gratis basis or at a special rate.

• Provide domestic air travel by helicopter (Bell 212) as per programme

<table>
<thead>
<tr>
<th>Date</th>
<th>From</th>
<th>to</th>
</tr>
</thead>
<tbody>
<tr>
<td>31.03.2013</td>
<td>Colombo</td>
<td>Passikudah</td>
</tr>
<tr>
<td>04.04.2013</td>
<td>Passikudah</td>
<td>Galle</td>
</tr>
<tr>
<td>05.04.2013</td>
<td>Galle</td>
<td>Colombo</td>
</tr>
</tbody>
</table>

Total cost for air transportation is 8000 US dollars

3. Provide ground transportation in Passikudah, Galle using Ministry vehicles/Hotel vehicles.

From Ministry of External Affairs to Hilton Hotel Colombo, 27 March 2013

Reservation of rooms for Hon Ian Paisley, Member of Parliament, United Kingdom and his family

With reference to the letter of even number dated 25 March 2013.

According to the new programme, Hon Ian Paisley, Member of Parliament of United Kingdom will be visiting Sri Lanka with his family from 31 March to 5 April 2013.

Therefore, it would be appreciated if you could reserve three double rooms (bed and breakfast) for 2 nights on 31 March 2013 and 4 April 2013 for the above VIP and his family (spouse and four children...).
In addition please reserve one single room for the protocol officer assigned for the above visit on complementary basis.

As the VIP and his family are planning to go out of Colombo from 1 April, they will check out on the same day and check in again on 4 April 2013.

Kindly fax the confirmation of the reservation including room no to the attention of [redacted], Protocol Officer to the fax number [redacted].

All the bills in this connection with the above reservation excluding liquor, mini bar, tobacco, laundry, IDD calls, transport, Business Center. Internet and spa etc should be sent to Secretary/External Affairs (attn: Chief of Protocol) on credit basis for early settlement. Extras should be borne by the delegates.

**Ministry of External Affairs, internal memorandum, 1 April 2013**

Programme for visit of Hon Ian Paisley, Member of Parliament, United Kingdom, 31 March to 5 April 2013

1. With reference to the minute dated 21 March 2013 on the above visit. (Please see annex I) 

2. It would be appreciated if you would kindly approve the following in accordance with the changes in the programme:

   - Total cost for air transportation has been changed to 8866.66 USD as per programme includes three days night stop. (Please see the voucher sent by Sri Lanka/Air Force Helitours - Annex II)

   - The hotel accommodation in Galle has been changed from Hotel Fortress Resort and Spa to Hotel Heritance, Ahungalle as there were no rooms at Hotel Fortress Resort and Spa during the needed period.

**From Ministry of External Affairs to Aitken Spence Hotel Management, 25 March 2013**

Reservation of rooms for Hon Ian Paisley, Member of Parliament, United Kingdom and his family, 31 March 2013 to 5 April 2013

Hon Ian Paisley, Member of Parliament of United Kingdom will be visiting Sri Lanka with his family from 31 March to 5 April 2013.

---

6 Annexes not reproduced
It would be appreciated if you could reserve one suite and two double rooms (bed and breakfast) for 1 night on 4 April 2013 for the above VIP and his family (spouse and four children...) at Hotel Heritance - Ahungalla at a special rate.

In addition please reserve one single room for the protocol officer assigned for the above visit on complementary basis.

Kindly fax the confirmation of the reservation including room no to the attention of [redacted], Protocol Officer to the fax number [redacted].

All the bills in this connection with the above reservation excluding liquor, mini bar, tobacco, laundry, IDD calls, transport, Business Center. Internet and spa etc should be sent to Secretary/External Affairs (attn: Chief of Protocol) on credit basis for early settlement. Extras should be borne by the delegates.

**Tentative programme for visit of Hon Ian Paisley, Member of Parliament, United Kingdom, 31 March 2013 to 5 April 2013**

Day 1: Saturday 30 March 2013

1800 hrs: Departure from London

Day 2: Sunday 31 March 2013

13.05 hrs: Arrival at the Bandaranaike International Airport (BIA)

Transfer to the VIP Lounge "Laksiri"

Leave for Hotel Hilton

Arrive at Hotel Hilton

Shopping in Colombo

Night at Hotel

Day 3: 1 April 2013

Breakfast at Hotel

Leave Hotel for Passikudah (by flight)

Arrive at Hotel "Amethyst"

Dinner at Hotel
Night at Hotel

Day 4: Tuesday 2 April 2013

Breakfast at Hotel

Leave Hotel for Minneriya National Park (by road)

Arrive at Minneriya National Park

Visit to Minneriya National Park

Leave for Hotel "Amethyst"

Hotel Dinner at the Hotel

Night at Hotel

Day 5: Wednesday 3 April 2013

Breakfast at Hotel

Leave Hotel for Galle (by flight)

Arrive at Hotel "Heritance" Ahungalla - Galle

Dinner at Hotel

Night at Hotel

Day 6: Thursday 4 April 2013

Breakfast at Hotel

Leave for Colombo (by flight)

Arrive at Hotel Hilton

Dinner at Hotel

Night at Hotel

Day 7: 5 April 2013
Breakfast at Hotel

Leave from Hotel to the Airport

1305hrs  Departure at the Bandaranaike International Airport (BIA)

Selected documents relating to July 2013 trip

Email from Mr Ian Paisley MP to [Official B], 13 June 2013

Good morning. Good to talk with you. We were hoping to travel London-Sri Lanka on Tuesday 2 July and return to London Wed/Thu 10/11 July. I will be accompanied with [redacted] (wife), [redacted] (two children). Once again we look forward to seeing your beautiful country. I look forward to hearing from you.

Invoice from Sri Lankan Airlines issued to Ministry of External Affairs, 17 June 2013

We are pleased to offer the following quote as per your request dated 17 June 2013

Route  London/Colombo/London

Class  Business

Fare (Nett)  LKR  389,763.00
            LKR  3,250.00  LK
            LKR  34,409.00  GB
            LKR  8,240.00  UB
            LKR  1,660.00  YR
            LKR  31,100.00  YQ

Total  LKR  468,422.00 (per passenger)

[Other details redacted]

Email from Helitours to Protocol Division, Ministry of External Affairs, 17 June 2013

Rates for the Bell 212 helicopter

---

7 I have omitted material which is not relevant (for example, copies of visa application forms)
2 June 2013 - Colombo (Bandaranaike International Airport) - Kandalama = 3950 USD

4 July 2013 - Kandalama - Kandy = 3950 USD

6 July 2013 - Pinnawala - Galle (Samanala Ground) = 3650 USD

11 July 2013 - Galle - Colombo (Bandaranaike International Airport) = 3200 USD

Email from "Protocol Division" to [Official B], 28 June 2013

Visit of Hon Ian Paisley, Member of Parliament, The United Kingdom, 1 to 11 July 2013

The approval for the above visit has been given by S/EA and Hon. M/EA.

The following has been arranged for Hon Ian Paisley and family:

- A triple suite at Heritance, Kandalama, Earls Regency, Kandy and Heritance, Ahungalle.
- "E" class Benz when landing in Kandalama, Kandy and Galle
- Domestic transportation by flight (helicopter) to Kandalama, Kandy and Galle
- Visits to Sigiriya Fortress, Dalada Maligawa, Pinnawala Elephant Orphanage,
- Hanifa will see off and receive delegation at Heathrow Airport

Sir, for your information. If there are any other arrangements, please inform.

Presentation of credentials - 3 July 2013

Sir, the two High Commissioners-Designate will meet you on the following times on 2 July 2013.

The Indian High Commissioner - at 2.30pm
The Canadian High Commissioner - at 3.00pm
9. Letter from Mr Ian Paisley MP to the Commissioner, 30 October 2017

Thank you for your letter of 2 October and for the questions therein. Below is a detailed response which I hope is helpful to your inquiry.

1. The dates of the Sri Lanka visits and their value

From my investigations, I believe I departed the UK on 29 March and returned seven days later on or around 5 April (not ten days later as reported in the press). I gave a speech at a public event on 6 April in my constituency that was recorded in the local press.

I believe the total cost of the six flights for myself and family was approximately £5,000 in total. I know I flew Sri Lanka Airlines. Economy flights on this airline are approximately £400 today. There is no first class cabin, so a business class ticket begins at £800 per person. Given that the airline is government-owned, the real price is possibly much lower. I know that I was upgraded to a business ticket on or around the time of travelling, and I believe this was possibly more to do with available cabin space on the day.

The dates for the July visit are less certain. I know from memory that it was a shorter visit of five or six days. It was crammed in between other matters including political activity at home in July. I believe from my diary that I travelled on 2 July and was back in the UK on 8 July. I have searched my office papers for flight details but have no records of them. Once again, I would put the costs at approximately £4,000 in total given the time of travel and current costs.

2. The purpose of the visits

I made these visits to gain a wider knowledge of the political and social situation on the ground in Sri Lanka. They enabled me to gather information and allowed me to meet locally with government officials and politicians. There is no doubt that I enjoyed some free time as well. My family accompanied me throughout the visit, though I had some meetings at the places I stayed, and my family did not attend those meetings. Suggestions that the meetings were about general or specific trade deals are total nonsense. My family certainly had leisure time whilst accompanying me.

3. The Sri Lankan government's purpose in having me there

I have no doubt that the government has a political outreach programme to inform overseas politicians about the situation on the ground. I am sure my knowledge and experience of post-conflict resolution added a dimension to its desire to properly inform me about issues there. I do not believe for one moment that the government did this as a gift to me solely because it liked me. That would be preposterous. However, as I made clear in my previous correspondence, if others want to inform me during times I have set aside for my family and can accommodate my family, I
will certainly ensure that my family travels with me rather than being separated longer than necessary. I certainly will not give all of my time to such causes at the expense of my family time.

4. Allegations of misconduct

I have received no gift or support - financial or otherwise - in any way or kind from the Sri Lankan government as a result of my interest in the country. I have been objective and open about my views. Sri Lanka has not benefited from my visit either directly or indirectly other than in having a well-informed parliamentarian who knows something of what is happening on the ground rather than taking information from informed or misinformed sources in the media. I do not believe I have any matters financial or otherwise, that require registration because of my knowledge of or visits to Sri Lanka.

5. The matter of non-registration

I have spoken to my previous employees and asked why the discrepancy and omission occurred in the registration. They have told me they are willing to be interviewed by you if necessary and explain the oversight from their perspective. I believe some information was readily available before and after certain visits and some was not. Added to the change in personnel, the non-registration occurred.

6. Parliamentary question and letter to the PM

I have taken some time to conduct a thorough search on correspondence regarding Sri Lanka at this time. I have enclosed one letter to the PM that was written approximately one year after the March visit. The letter, which coincides with a parliamentary question I asked about human rights, was answered by a letter from the FCO. The reply acknowledges my interest in the subject matter, and I believe similar letters from other MPs were sent at the same time.

I cannot trace any other correspondence in or around this time regarding Sri Lanka. My only other public activity was the photo exhibition that I participated in at Parliament a year or so after the visit. Once again, if I was trying to conceal my interest or visit, would I have submitted photographs for public display?

I trust this is helpful to your investigation.

30 October 2017

10. Letter from Mr Ian Paisley MP and others to the Prime Minister, 19 March 2014

We the undersigned note with alarm the decision by HMG to internationalize the internal affairs of Sri Lanka, and its post conflict process.
We express concern that such an approach could have the reverse effect of encouraging Sri Lanka to address past issues.

You will know that the UK has correctly and steadfastly opposed the internationalization of the conflict in Northern Ireland. This will only be resolved by internally democratically elected politicians working together when they have had time to come to terms with the past. So too we must as a nation be consistent with Sri Lanka.

Sri Lanka has been a friend of the UK for decades. Its people fought shoulder to shoulder with us in two world wars. The Government supported the UK in its defence of the Falklands and we should tread more consistently with them.

They have emerged from 40 years of conflict. They must be given space to come to terms with the past and encouraged to pursue conflict resolution not brow beaten as appears to be the UN way.

We are travelling to Sri Lanka later this year to meet with both Tamil and Sinhalese groups and individuals in order to hear at first hand the views of relevant people who live there. We believe locals are best placed to take this country forward politically. We appeal to you not to support the UN resolution internationalizing this dispute.

19 March 2014

11. Letter from the Minister of State, Foreign and Commonwealth Office, to Mr Paisley, 19 May 2014

Thank you for your letter of 19 March to the Prime Minister about Sri Lanka. I am replying as Minister responsible for our relations with Sri Lanka.

You raise concerns about the internationalisation of the post conflict process in Sri Lanka through the United Nations (UN) and need for time and space to come to terms with the past. The British Government recognises that the process of reconciliation following decades of conflict will take time. Since the end of the military conflict in Sri Lanka, we have consistently called on the Sri Lankan government to take domestic measures to implement the recommendations of the Lessons Learnt and Reconciliation Commission and hold credible, independent and transparent investigations into allegations of violations and abuses of international law on both sides of the conflict. Regrettably, as UN High Commissioner for Human Rights (UNHCHR), Navi Pillay reported on 24 February, the Sri Lankan government has failed to do that. This is despite the urging of both the UN and a range of states including the UK and offers of technical assistance from the international community. As a result of this failure, we supported the recommendation of the UNHCHR Pillay for an international investigation which will uncover the truth about alleged violations on both sides of the conflict.
On 27 March, the UN Human Rights Council came together in support of a renewed resolution on Sri Lanka which established an international investigation into the allegations, and calls for the Sri Lankan government to make progress on human rights and accountability and to implement the recommendations made by Sri Lanka’s own Lessons Learnt and Reconciliation Commissioner which include reaching a political settlement on the devolution of power, which we believe will positively contribute to the reconciliation process.

The British Government worked intensively in support of the resolution to secure this result. The Prime Minister, the Foreign Secretary and I, together with Ministerial colleagues, led the UK’s effort in support of the resolution, and we welcome the news that these extensive efforts have secured a strong text that will help to deliver the truth about past violations. During our visit to Sri Lanka the last year, the Prime Minister, Foreign Secretary and I met some of those directly affected by the conflict it is vital that family members know what happened to their loved ones. As the Prime Minister said in his statement following the vote, "this is a victory for the people of Sri Lanka who need to know the truth about what happened during those terrible years of conflict so that they can move forward."

We hope that the Sri Lankan government will not take this opportunity to work alongside the international community to address the grievances of the past in the spirit of lasting peace and reconciliation. Addressing the legitimate concerns of all of Sri Lanka’s Communities will help pave the way for enduring peace and reconciliation, and help ensure Sri Lanka reaches its enormous potential as a strong and prosperous nation.

19 May 2014

12. Letter from the Commissioner to Mr Ian Paisley MP, 13 November 2017

Thank you for your letter of 30 October 2017. I said in my email of 31 October that I had received information from the Daily Telegraph. A copy of the material they have provided is enclosed.

As you can see, they have been able to provide a considerable volume of evidence about the arrangements made for your trips to Sri Lanka in 2013, some of which is different from the information you have given me. I would, therefore, be grateful if you would examine the enclosed material carefully and let me have any comments you wish to make by 28 November 2017.

In particular, it would be helpful to understand more about the context for your comments under heading “2 Oil” in your email of 1 February 2013 to [Official A].

It would also be helpful if you would either confirm the accuracy of the dates given in the emails for your visits to Sri Lanka, i.e., 30 March to 5 April 2013; and 1 to 11 July 2013, or say more about the basis for your recollection that the second visit was shorter.
In your letter to me, you said that the flights your family took in March were booked in economy class and upgraded later, possibly because of the limited availability of cabin space on the day. The emails provided by the Daily Telegraph suggest the Sri Lankan Ministry of External Affairs approved the booking of business-class air tickets on 25 March, ahead of your journey.

I would be grateful for your comments on the above and any additional evidence you wish to submit to assist my inquiry as soon as possible and no later than 28 November.

13 November 2017

13. Letter from Mr Ian Paisley MP to the Commissioner, 27 November 2017

Thank you for your letter of 13 November 2017 and for the enclosed documentation I have had the opportunity to consider. Below I have set out a detailed response that I hope you find helpful.

Once again I reiterate that I don’t believe that I have breached any rules regarding suggestions of paid advocacy or done anything that has had an impact on my activities as a Member of Parliament. I state again that my oversight in registering an overseas visit is something I believe can be resolved and I am more than happy to resolve by way of a late registration and I believe that the documentation supplied by the Daily Telegraph may help in clarifying the value of what should be registered. Once again to be clear I received no other donation in payment or kind or support from the Sri Lankan administration. My interests in Sri Lanka are those as expressed in earlier correspondence of ensuring there is good understanding of a post conflict situation and how we as a nation should respond to that and build relationships with a nation that was previously very close to us and who could continue to be so in the future. For the avoidance of doubt I continue to build my relationships on a personal and political level with numerous nations around the world as I believe that is good for our political understanding of the development of world affairs.

With regards to the April 2013 visit in my letter of 30 October 2017 there is a typo on page 1 paragraph 3, the paragraph should read after the word, in total,

"I know I flew Sri Lanka airlines business flights on the airline. Economy flights today are approximately £400 per person. There is no first class cabin so first class tickets begin at £800 per person...".

This is in line with my earlier comments in my letter to you dated 28 September 2017 in paragraph 7 where I say

"I am trying to trace airline tickets that show I travelled business class and was upgraded on the flight at no extra cost. These tickets from my recollection were less than £1,600 per person".
My recollection of the upgrading could only have come from the experience on the business class flight. As you know business class cabins usually come behind the first-class cabin on a flight and Sri Lanka cabins are laid out very differently with the business class cabin taking up where the first class cabin would normally be. That would have left an impression with me that we had moved from a business class cabin. So, my perception that I was upgraded possibly came about as a result of the actual experience of getting on the flight and there appearing to be a first-class cabin which was not the case.

With regards to the dates that I have put to you in my letter of 28 September 2017 there is no reason for me to believe that the dates I cited are wrong. I was definitely in my constituency on 5 April as I attended [a family celebration] and I was back in Northern Ireland in or around 8/9 July 2013 according to my diary. The fact the Daily Telegraph has submitted documentation with different travel dates and with an itinerary that is a mystery to me possibly indicates either the material they have supplied is inaccurate or that the itinerary and the travel times changed from the time when the Sri Lankan protocol office made the original booking. The latter certainly is easily explainable given that the protocol office bills "invoices" appear to be issued several weeks before any travel took place and therefore are obviously subjected to significant change, so much so that in fact the itinerary as outlined by the Daily Telegraph is in my view completely wrong.

You also raised the issue of the 1 February 2013 email, the Daily Telegraph have supplied with referenced discussion about oil and alleged travel plans to Africa, my email dated 8 September 2017 to the Daily Telegraph, states very clearly that:

"I can categorically state I have never brokered any oil deal for any gentleman or anyone else and I never met him or any of his colleagues in Africa."

The Daily Telegraph appears to conflate information they have misinterpreted on an email that they have illegally obtained. I was more than happy to introduce two businesses that I knew to the Sri Lankan authorities. That suggestion was made and was not taken up and was made, out of courtesy on my part, and probably refused out of courtesy on their part. I note the Daily Telegraph have not shared with you other emails regarding the same story that they sent to Sri Lanka. I have attached this email to [name] of the Daily Telegraph from [official A]. In that email he stated:

"As my memory Mr Paisley and I never met in Africa. I have most certainly met him in London and in Columbia as on oil transactions etc I wish to categorically state that no commercial matter or transactions were entered into with association of Mr Paisley. Furthermore for your information Sri Lanka does not purchase any oil etc from any African country to date and has never purchased as well. I however cannot recall whether Mr Paisley was in Uganda during the CHOMG held there as I also there as per my memory I do not recall meeting him in Africa."
As you can see from the attached email his comments go on to clearly state that he works with a cross party number of MPs with a view that it was to keep good international community informed about developments in Sri Lanka pertaining to Human Rights Reconciliation and Economic Development and that he has such a relationship not only with me but other MPs in many parties. It is fairly clear that the Daily Telegraph have put one and one together and come up with many multiples of that number in their assumptions that some sort of illicit trade deal was carried out between myself and [a Sri Lankan official], this is total fabrication and nonsense and the inference contained therein is highly offensive and libellous of me and others.

The fact the Daily Telegraph decided not to share with you other emails once again highlights their own particular, jaundiced view on this matter.

I wish to now turn to the details of the so-called evidence supplied by the Daily Telegraph. The evidence they have supplied does not align with what they have claimed in the newspaper article published that has led to this investigation. As you know they printed a front-page headline claiming that I had received over £100,000 worth of free holidays from the Sri Lankan Government. They have managed to scrape together and supply you with figures that amount to approximately £42,31.60, I think it would be useful to understand where is the rest of their so-called evidence substantiating their £100,000 price tag or is it a question of think of a number and double it journalism? Why if their story was good that a Member of Parliament had availed of £40,000 worth of free holidays without registering them did they not go with that story but instead decided to add an extra £60,000 to the total?

In my correspondence with you on 28 September 2017 I said I was surprised by the amounts claimed by the Telegraph and that I would guess them to be about a fifth of the total the Telegraph had claimed. Indeed the evidence they have produced provokes the questions of why did they make such a gross exaggeration out of what would have been a perfectly good story. Why would they do this, what was their agenda for doing this?

The details that the Telegraph have supplied you with show that according to the invoices provided the total cost of the March/April visit was £23,157.60 and the total cost of the July visit was £19,156 raising a total of £42,313.60 for both visits. The claimed costs of £23,157.60 per person for the March/April visit I believe is a major exaggeration and I hold to my view that the true cost of the airline tickets was probably nearer half that amount, The change in costs between the July invoices for flights saw a reduction of £400 per person highlights that at the peak demand time the tickets for some reason were cheaper on the invoices The Telegraph has provided than the invoices show in March/April. Why would that be the case other than the figures are inaccurate? Now the Telegraph may argue that they have not calculated for hotels and hospitality.

However, the details they have provided for hotels and hospitality were on a significantly reduced rather given the hotels and the hospitality was by the
government, it is understandable that the significantly reduced rather and the use of government hotels would mean that significantly does mean significantly. If you follow the logic of the Daily Telegraph evidence £58,000 was spent on hotel accommodation and hospitality. This is of course just nonsense.

Finally, I dispute the figures that the Telegraph cites in their article and I believe that pricing a visit today the cost of tickets would be less than £1,600 per person. In the invoice for helicopters, which is priced in US dollars and given the price in sterling in 2013 this would significantly reduce the cost of the flights. However, I do not recall four helicopter flights in fact I do recall driving from Columbo to Kandalama and not taking helicopter rides, Given that these invoices were all raised before the visit, no account is given for the fact that once again they may not be accurate accounts of what actually occurred.

The Daily Telegraph have also provided what I can only describe as a false account of the itinerary or travel programme for the 31 March to 5 April visit. This travel programme bears no resemblance to the visit that I took. It appears the Daily Telegraph have managed to produce a story based on half-truths, innuendo and false assertions.

Thank you for providing me with this material, I have provided it to my solicitor who is advising me in relation to my legal redress against the Daily Telegraph. I have found this documentation to be very helpful for this action.

27 November 2017

Extract from the email enclosed with letter of 27 November 2017

From Official A to the Daily Telegraph, dated 8 September 2017

"As per my memory Mr Paisley and I never met in Africa. I have most certainly met him in London and in Colombo. As on the oil transactions etc I wish to categorically state that no commercial matters and or transactions were entered into with or with the association of Mr Ian Paisley. Further for your information, Sri Lanka does not purchase any oil etc from any African country to date and has never purchased as well. I however cannot recall whether Mr Paisley was in Uganda during CHOGM held there” as I was also there. As per my memory I do not recall meeting him in Africa."

14. Letter from the Commissioner to Mr Ian Paisley MP, 30 November 2017

Thank you for your letter of 27 November 2017. I have not yet had an opportunity to consider the detail of the information you have provided. I will write to you again as soon as I have completed my consideration.
However, in the meantime, I must draw to your attention the penultimate paragraph of the fourth page of my letter to you dated 13 September 2017. I said

“As you will be aware, my enquiries are conducted in private. This letter and any subsequent correspondence between us is protected by parliamentary privilege. The content of our correspondence should not be disclosed to any third party until after I have concluded my work and a decision has been published. (Any such publication will include all the relevant evidence, including our correspondence.) I would, therefore, ask that you respect that confidentiality.”

In light of that, I was surprised to read the final paragraph of your letter in which you say you have passed the material I shared with you “to my solicitor who is advising in relation to my legal redress against the Daily Telegraph. I have found this documentation to be very helpful for this action”.

While it would be acceptable to share material with an adviser for the purposes of responding to my inquiry, it is not appropriate for you to share information provided in confidence with any third party for any other purpose. I am disappointed that you have done so.

My work is carried out under House of Commons Standing Order No 150 and, as such is protected by parliamentary privilege. Your lawyers will wish to note that this would affect its admissibility in any legal proceedings.

30 November 2017

15. Letter from the Commissioner to Mr Ian Paisley MP, 19 December 2017

When I wrote to you on 30 November, I said I would consider carefully the information and documents you had sent to me in your letter of 27 November. I have now completed that work. While the background material you have provided is helpful, I do need clarification on some points.

Thank you for the clear statement that you have not received any other donation in payment or in kind from the Sri Lankan administration.

Flights

I have noted the “typo” you identify on page 1, paragraph 3, of your letter to me of 30 October and that the corrected version has the words “business flights on the airline” inserted at the end of the first sentence.

Dates of travel – First trip
As you will know the House requires that Members register the dates of overseas visits where the costs are covered by a donor. It is therefore important that I try to establish as precisely as possible the dates of your two trips to Sri Lanka in 2013.

You told me in your letter of 30 October that you believe your family departed the UK on 29 March 2013, and some of the documents provided by the Daily Telegraph support that recollection. (The Ministry of External Affairs document entitled “Issuance of air tickets” with an arrival date of 30 March and the Ministry of Foreign Affairs programme for the visit, which commences with a stay at the Colombo Hilton on that date). Other documents suggest you took a flight on 30 March and arrived on 31 March.

The Sri Lankan Foreign Affairs’ itinerary for the visit (and the other supporting documents) all point to a departure at 13.05 from Sri Lanka on 5 April 2013. With a five-and-a-half-hour time difference and a flight of approximately 11 hours, this would have resulted in you landing in London in the early evening of 5 April.

Dates of travel – second trip

Please confirm whether I have understood correctly that you believe the family travelled to Sri Lanka on 1 July 2013.

You have suggested that the date of your return from your second trip was not 11 July and that you were back in Northern Ireland on or around 8/9 July. As you have noted, some of the documents the Daily Telegraph have provided were prepared ahead of your visit and it is possible that the trip did not go ahead on the dates planned. However, several days after your arrive, on 4 July 2013, the Ministry of External Affairs appear to have been working on the basis that you would remain in Sri Lanka until 11 July 2013.

Oil

Thank you for the information you have provided. As you will appreciate, I am trying to understand the significance – if any – of the emails of 1 February 2013; 16 February 2013; and 23 February 2013.

In the first of those emails, you said that you have “significant arrangements with national oil suppliers in either Oman or Nigeria”, that you “understand from [your] conversation [a Sri Lankan official] require[s] a regular supply” and you offer to “progress” this immediately. In the email of 16 February, [official B] asks you to propose two sets of dates “in order to coordinate travel accordingly” and you respond a week later “Oil, I will forward some dates to you at the beginning of the week to coordinate travel plans to Africa.” In the absence of some further explanation, these emails do not appear consistent with a courtesy offer and similar refusal. Although the additional evidence you have provided includes [the Sri Lankan official’s] rejection of the allegations the Daily Telegraph put to him, it does not fully explain the emails quoted above.
I would be grateful for any further clarification of the chain of events that you are able to provide, including a fuller explanation of the "significant arrangements" mentioned in the email of 1 February 2013.

The registrable values of your trips to Sri Lanka

I should first emphasise the registrable value of any donation in kind is the market value of the donated goods and services. Any reductions from the usual commercial rates are not relevant.

I appreciate that you have questions about the way the Daily Telegraph have assessed the value of the donations your family’s trips to Sri Lanka represent but those questions are not for me to attempt to answer. I do, however, need to establish with your co-operation the registrable value of the various elements of travel and hospitality provided to you by the Sri Lankan government.

As you have already acknowledged, your failure to register these two visits to Sri Lanka within the timeframe required by the House has put you in breach of the rules and paragraph 15 of the Code of Conduct. I am grateful to you for your explicit commitment to put right the breach by making the late registrations. However, it is important that the register entries, when made, are as accurate as possible.

Next steps

Given the significant differences between your recollection of the extent and nature of the hospitality arrangements during your stay in Sri Lanka and the evidence provided by the Daily Telegraph, it seems to me that the most straightforward way of resolving the differences would be to make an approach direct to the Sri Lankan High Commission. In order to avoid unnecessary delay, I would be grateful if you would forward the enclosed letter to the High Commissioner with a covering letter from you, confirming your agreement to the release of all the relevant data.

In the meantime, I would be happy to receive from you the evidence on which you drew when to draft your letter of 27 November. For example, supporting evidence relating to:

- the date of [the family celebration];
- your engagements between 8 and 11 July 2013; and
- the basis for your calculations of the registrable values of the two donations.

As you may be aware, my term of office comes to an end on 31 December 2017. My successor, Kathryn Stone, takes up post on [1 January]. In the meantime, I would be
grateful to have your response to the above, and confirmation that you have forwarded the letter to the Sri Lankan High Commission, as soon as possible.

19 December 2017

16. Letter from the Commissioner to the Sri Lankan High Commissioner, 19 December 2017

I am writing to seek your assistance with an inquiry I am conducting into the conduct of Mr Ian Paisley MP. I am sending my request via Mr Paisley so that he can see the information I am seeking and confirm direct to you that he is content for it to be provided.

Before explaining the detail, I hope it will be helpful to provide a little background information.

Members of the House of Commons are required to adhere to the House’s Code of Conduct for Members (copy enclosed). As Parliamentary Commissioner for Standards, I am tasked with investigating alleged breaches of that Code.

Among other things, the Code requires Members to register their financial interests in accordance with the chapter 1 of the Guide to the Rules relating to the conduct of Members (which is appended to the Code). Members must register their financial interests including any visits to destinations outside the UK where the cost is over £300 if that cost is not wholly borne by the Member or by UK public funds. (I enclose a copy of the relevant extract from the Guide to the Rules.) Where a Member has acted in breach of the rules, (s)he must generally take steps to rectify the breach.

Mr Paisley and his family visited Sri Lanka twice in 2013 at the hospitality of the Sri Lankan government and, for reasons he has explained to me, he did not register those visits within the 28-day timeframe required by the House of Commons. I have been in correspondence with Mr Paisley about this matter and, not surprisingly, he no longer has sufficient evidence to hand to be able to answer my detailed questions about the duration of his visits and the value of the hospitality he and his family enjoyed.

I am, therefore, writing to seek your assistance in obtaining the information which Mr Paisley would have needed to provide to the Registrar in 2013. I appreciate that a considerable period of time has now elapsed and that this may result in rather more administrative work than would have been necessary if the information had been requested sooner, but I would be very grateful for the co-operation of the High Commission in this matter.

8 https://publications.parliament.uk/pa/cm201516/cmcode/1076/107601.htm
As you can see from the enclosed extract from the rules, Members have to register:

- the amount of any payment, and/or the nature and value of any donation in kind such as flights or accommodation;

- the destination of the visit;

- the dates of the visit; and

- the purpose of the visit.

The registrable value of any donation in kind (for example hotel accommodation provided) is the market value of the donation. If, as I believe happened, the provider gave the donor a discounted price, the registrable amount would be the full market value before the discount was applied.

Mr Paisley, his wife and four children visited at government expense in March/April 2013, and again in July 2013. I would be grateful for as much relevant information as possible about the travel, accommodation and other hospitality provided to them – including any activities or visits to attractions for which a charge was payable. It would also be enormously helpful if the High Commission would either give the necessary information in sterling or provide the official exchange rate at the end of each visit. While it would be helpful to have a list of the items included in the calculation, I need only a total figure for the value of each of the two trips.

Given that it may take a little time to gather this information, I would be grateful if you would, in the first instance, write to let me know if you are able to help with this request and to give me an approximate date for when the information might be available.

My own term of office comes to an end on 31 December 2017 and I will be succeeded by Kathryn Stone, who will continue the work on this inquiry.

19 December 2017

17. Letter from Mr Ian Paisley MP to the Commissioner, 19 January 2018

Thank you for your letter of 19 December 2017. I wish you (Kathryn Hudson) well in your departure from office and thank you for your work, and I look forward to working with you (Kathryn Stone) in concluding this inquiry.

Last week I spoke on the telephone with your office to confirm formally that on Tuesday 9 January 2018 at 10am I met with and personally delivered your correspondence to the Sri Lankan High Commissioner as requested. They promised me that they would respond as quickly as possible but that I had to bear in mind that they have to take instructions from Columbo.
Dates of travel - first trip

I can confirm I was in my constituency on Saturday 6 April 2013, I have the record in my diary and I drove 126 miles on 6 April and was at a friends and family's [event] at a place called [ ... ] on the evening of the 6th. As I have a copy of the entry in my diary I am satisfied that this is accurate. I do not disagree that I returned from Sri Lanka sometime early on 5 April in order to be at home for the 6 April engagements.

Dates of travel - second trip

My diary for July is less clear on the dates of travelling in question but I have recorded that I departed the UK sometime on 1 July 2013. My diary is blank for the next week but from memory I believe the itinerary was chopped and changed on numerous occasions as I was home for our annual 12 July parades where celebrations commence on 11 July with various bonfires. My diary shows I was in New York city from 13 July 2013 departing Northern Ireland sometime on the 12th and the UK on the 13th. I attended one such bonfire in my constituency. Frankly, I would not have arrived home from Sri Lanka on the 11th or 12th and departed the same day for New York city, whilst physically it may be possible I would not have done that. So, as I have suggested in my earlier correspondence to you the itinerary provided by the Daily Telegraph is wrong and that I would have come home sometime on 8 or 9 July. I am sure you appreciate that it is not unusual for itineraries on such visits to change radically and numerous and when the rubber actually hits the road, so to speak, things can change on the ground. I have no doubt that the visit was planned and re-planned as until it was put into operation. For a whole host of other reasons I try not to tie down my scheduling in such a precise manner as I do not want too many people getting a hold of my daily engagements and movements for security reasons and that is even more pronounced when I travel abroad where I have even less control over such matters as personal security. This is something I am always acutely aware of and which does not appear to register on other people's antennae as they may not have been subject to security threats, I have and therefore I try not to have a very fixed routine no matter where I go.

Oil

You say you are "trying to understand the significance, if any, of my emails of 1 February, 16 February and 23 February, inclusive". The private emails that The Daily Telegraph have received are a conversation between myself on my private email account and a third party. They are not in any way an official communication between two Government agencies, for example. I certainly did propose to share my contacts if useful. I can confirm:

(1) no conflict of interest has occurred;

(2) no contact information was exchanged;

(3) no trading occurred; and
that no travel arrangements resulted from my emails.

My "significant arrangements" comment is in my view quite clear. I am making my contact aware of what I think is significant, obviously he had a different view of its significance and chose to ignore it. I re-iterate that in my view I believed that the information could be significant to them (the Sri Lankans) in making a more practical trading agreement than they presently had, that was my uneducated view of circumstances as I looked upon them and was more than happy to put them in touch with my contacts whom I thought might be able to help. The fact that nothing arose from that indicates that they had a different view of what was or was not significant. I do not think I can be clearer than that. This was a developing conversation of viewpoints and nothing else. For the Daily Telegraph to have read in a different inference or conflict of interests is in my view totally and absolutely preposterous and which is dismissed as you know by other communications you have seen.

I hope this information is helpful to you and that the Sri Lankan High Commission will respond expeditiously to the request you have made of them.

19 January 2018

18. Letter from the Commissioner to Mr Ian Paisley MP, 24 January 2018

Thank you for your letter of 19 January, which you hand-delivered to my office yesterday. I will review the inquiry file carefully while I wait for the High Commissioner's response to Mrs Hudson's letter of 19 December.

As you will appreciate, there is little that I can do in the meantime. However, I hope to make significant progress once I have the High Commissioner's response. I will write to you again as soon as possible.

24 January 2018

19. Letter from the Commissioner to the Sri Lankan High Commissioner, 21 February 2018

My predecessor, Kathryn Hudson, wrote to you on 19 December 2017, sending her letter via Mr Ian Paisley MP. (I enclose a copy of the letter of 19 December for ease of reference.) I understand Mr Paisley hand-delivered the letter to you on 9 January 2018.

I am writing to introduce myself, having succeeded Kathryn at the end of her term of office as Parliamentary Commissioner for Standards.

I appreciate that it may take some time to collate the data we are seeking but wonder if you might now give me some indication how long that process might take. As I am
sure you will understand, I am keen to progress the inquiry and am unable to do so until I have an answer to Kathryn’s letter.

I am copying this letter to Mr Paisley.

21 February 2018

20. Letter from the Sri Lankan High Commissioner to the Commissioner, 2 March 2018

This refers to your letter [reference numbers] of 19 December and of 21 [February] regarding the above matter.

Please accept my apology for not being able to provide the data in time that you have asked for, which may possibly delay the progress of your inquiry.

You may wish to note that all the information you have requested is not to be found in the High Commission’s archive, I have already asked the Ministry of Foreign Affairs, Sri Lanka to provide [the information].

Further, I have sent a reminder to the Ministry today. A reply is yet to be received.

I will keep you informed.

2 March 2018

21. Letter from the Sri Lankan High Commissioner to the Commissioner, hand-delivered by Mr Paisley’s office on 29 March 2018

This refers to your letter of 19 December 2017 and of 21[February] 2018 and further to my previous letter regarding the above matter.

Thank you for your patience awaiting a reply. I have made contact with the Ministry of Foreign Affairs, Sri Lanka, to obtain the required details. They have not given me any records or statements. I assume that since this visit by Mr Paisley took place such a long time ago, the records could be written off or no records were kept in the archive.

I can confirm that at the High Commission in London, we do not have any records of Mr Paisley’s official visit to Sri Lanka in 2013. He told me he was there so I do not think that is in dispute. He is regarded as a friend of Sri Lanka and his knowledge of post-conflict society in Sri Lanka is very good and helpful.

We welcome many visitors from many countries to Sri Lanka including from the UK to learn about our country. We do not pay anyone to come here for such purposes.
Mr Ian Paisley is a very honourable gentleman and highly regarded by all sides in Sri Lanka.

29 March 2018

22. Letter from the Commissioner to Mr Ian Paisley MP, 18 April 2018

Thank you for coming to my office yesterday. I hope it will be helpful to summarise the main points of the interview and the next steps in the inquiry. If you identify any inaccuracies or significant omissions in this summary, please do let me know.

Background

The inquiry was begun in September 2017 by the then Commissioner, Kathryn Hudson, following an article in the Daily Telegraph and your self-referral in September 2017. At the time, your solicitor had issued a statement, saying that you “totally denie[d] the defamatory inferences... including those relating to [your] registration obligations.”

Some six months have now passed. In that time, you have explained your perspective and the Sri Lankan authorities have told me they are not able to provide any relevant evidence. There are some points on which we can agree but there are significant points on which I do not yet have sufficient clarity.

As I am sure you would agree, I need to bring the inquiry to a conclusion. I want to give you another opportunity to provide any relevant evidence before I do so.

Points of agreement

We agreed that your failure to register the two visits you and your family made to Sri Lanka in 2013 at the expense of the Sri Lankan Government have put you in breach of paragraph 13 of the Code of Conduct for Members. You have acknowledged and apologised for that.

A late registration is required and you need to provide the following information about each of those visits so that the Registrar may include them in the Register of Members’ Financial Interest.

Donor details
Nature and value of the donations
Dates of each visit
Purpose of each visit

There is no dispute about the donor nor about the destination for each of the trips. You agree that the first of the two visits was from 30 March to 5 April 2013.
Evidence

You have seen the evidence supplied to me by the Daily Telegraph about the advance arrangements for the two visits by the Sri Lankan authorities. That evidence includes emails setting out the planned dates; the costs of various elements of the planned hospitality; the dates and charges for flights to and from Sri Lanka and internal travel arrangements. You do not agree the dates of your second visit; you agree on the date of your departure (2 July) but not the date of your return. You say you returned earlier than the planned date of 11 July. You do not agree with the Daily Telegraph’s estimate that the value of the two trips was approximately £100,000, nor do you accept as accurate the evidence in the emails about the value of various elements of the hospitality provided.

You said yesterday that the plans would have gone through several iterations and that your hosts had been very flexible and willing to make changes as the visits were in progress.

I explained that your recollections and assertions are not, in themselves, sufficient to lead me to discount the evidence I have received via the Daily Telegraph and that I need to have some confidence that, when you do correct your previous omissions by updating your register entry, the information is as accurate as possible. As you know, hospitality provided by non-UK donors can be a sensitive issue and it is also a matter in which the Electoral Commission may have an interest.

I asked you to provide:

- The evidence on which you based your estimates of the value of the two visits
- Details of the costs you/your family had to meet during each of the visits (it would be helpful to provide any supporting evidence you have)
- A clear statement of how many helicopter trips you recall having taken during each visit

We discussed what might constitute evidence. I recognise that with the passage of time, the evidence which you might have relied on to register these interests at the relevant time may not now be available. I suggested you might find other supporting evidence in, for example:

- Bank statements or other documents which demonstrate your presence in the UK between 8 July 2013 and 11 July 2013
- Dated photographs for the relevant time
• Newspaper reports or other photographic evidence of your presence at 11 July commemorative events in 2013

• records of security provided during the relevant period – by PSNI or by any other security detail in the UK or in Sri Lanka

You showed me your current pocket diary, explaining that you have always relied on a paper diary. You suggested sharing with me an extract from that for the relevant dates. You also suggested that your passport might contain some evidence to corroborate the dates you were in Sri Lanka. I agreed that sight of the originals of these documents might be helpful.

On reflection, I think it would also be helpful if you were to provide a list of the meetings you had with “government officials and politicians”.

I would also find it helpful if, in light of your further research, you would set out (your best estimate of) the information required for the Register for each of these visits.

Other issues

Declaration: I asked you whether, on reflection, you considered the rules required you to declare a relevant interest when writing to the Prime Minister of 19 March 2014 about matters connected with Sri Lanka, given you had accepted hospitality from the Sri Lankan government in March/April and July of 2013. You told me that you did not because of the amount of time that had elapsed by the time you wrote to the Prime Minister. You also mentioned that Minister who replied to your letter (on 17 May) referred to your “continuing interest in this”.

Oil: We spoke about the emails you exchanged with [officials A & B] about “a potential oil purchase”. You told me that this was a ‘casual’ offer to put officials in Sri Lanka in touch with people whom you have met in the oil industry and that the offer was not followed up, notwithstanding the email of 23 February 2103 in which you suggested forwarding dates to [official B] “to co-ordinate travel plans to Africa”.

Follow-up questions

Having reflected on our conversation, I should draw to your attention paragraph 4 of chapter 2 of the Guide to the Rules relating to the conduct of Members. This says:

“Members are required, subject to the paragraphs below, to declare any financial interests which satisfy the test of relevance, including:

3 Your letter of 30 October 2017
Past financial interests (normally limited to those active within the last twelve months) ...."

I am not convinced that the manuscript comment on the Minister’s letter of 17 May 2014 means that he was aware of your financial interest and, in any case, you could not have relied on any such knowledge when writing to the Prime Minister on 19 March 2014. I would, therefore, be grateful if you would consider again whether – in light of chapter 2 of the Guide to the Rules - you should have declared a relevant interest in your letter to the Prime Minister.

I would also be grateful if you would:

- tell me the names of the companies to which you referred in your email of 1 February 2013 to [official A]; and

- describe the “significant arrangements” that you have with them – if possible providing some supporting evidence.

I appreciate that it may take a little while to collate the available material and to draw together your responses to all the questions I have raised. I would be grateful to receive your response as soon as possible and no later than 10 May 2018.

18 April 2018

23. Letter from the Commissioner to Mr Ian Paisley MP, 16 May 2018

When I wrote to you on 18 April 2018, I asked for a response to my letter by 10 May to allow you sufficient time to collate the material relevant to my inquiry and to answer the questions I had raised at our meeting on 17 April.

I am very disappointed that almost a month after we met and almost a week past the deadline of 10 May I have not received a reply from you. You stated when we met that you had a diary or diaries for the relevant year which might support a better understanding of your whereabouts and that you would produce this for me. I have yet to see it.

As I have previously explained, I need to have some confidence that when you do update your entry in the Register of Members’ Financial Interests to correct the omissions identified, the information is as accurate as possible. Your recollections and assertions are not, in themselves sufficient to lead me to discount the evidence I have received via the Daily Telegraph and I do, therefore, need some further evidence from you before I can conclude my inquiry.

I would be grateful to have an answer to my letter as soon as possible and no later than 23 May 2018.
16 May 2018

24. Letter from Mr Ian Paisley MP to the Commissioner, 23 May 2018

Thank you for your letter of 18 April. I apologise for the length of time it has taken me to reply but I had to try to recover a number of matters that you requested I try to retrieve and this took longer than expected. In fact, the last piece of material I recovered on 21 May. I hope this has not proved too much of an inconvenience, as I said to you when we briefly met in [Portcullis House] “I hadn’t forgotten and would be in contact soon”. Your helpful reminder of 16 May is appreciated.

Thank you for the summary of where we have points of agreement. I accept that I have a late registration to make. I would refer to my case of mitigation as to how this was overlooked and note that you have the opportunity, if you so wish, to speak to two former members of staff for clarification of those statements.

I acknowledged that a late registration will have to contain the donor details, which is "the Government of Sri Lanka". And the purpose of each visit "to enhance my knowledge of and exposure to Sri Lanka as it emerges from conflict to post-conflict". The date of each visit; I believe we agree that one set of dates is correct but the second visit in July is not as precise as it could be. (I will attempt to address this below.) Nature and value of the donations. The [Daily Telegraph] has submitted documents, some unspecified, detailing total value of the two visits below £47,000 and significantly less than the claim they made of £100,000 cost. I cannot be certain of the costs as they were not sent to me at the time, and the Government of Sri Lanka has confirmed they have no record of the same. However, comparing the travel arrangements with other previous and subsequent visits - that are registered - I believe that value to be less than that suggested by the [Daily Telegraph] but I am happy to register what is a proper amount. If it is as much as was claimed, I would have no hesitation in registering that. I just do not accept that it is, and importantly there is no evidence to support that amount. The documents that the [Daily Telegraph] has submitted has not been tested in any way for their accuracy.

I agree that the date for the first visit was 30 March to 5 April and have diary evidence to support that date.

The second date is more problematic as I cannot be sure that what has been suggested by the [Daily Telegraph] is accurate, and after some research neither my passport, my diary or my bank account verifies this. However, I can agree a second visit did take place but the lack of clarity, in my view, throws doubt on accusations around the visit.

On the details of the second visit I have uncovered some evidence casting doubt on both the start date and finish date. Going from my diary alone (copy supplied) I had marked out the days from Monday 1 July through to Thursday 11 July. However, I have only written “Sri Lanka” over the dates commencing 5 July and have scored out

10 Verified
"Sri Lanka" on 11 July. Checking against my bank statement I note that I had made a purchase at home in [Northern Ireland] on 2 July and 3 July a number of purchases, including one in Regent Street in London. Then on 5 July I topped up my Oyster card.

I believe this gives credence to my view stated in earlier correspondence that I did not recognise the itinerary provided to you by the Daily Telegraph and it is wrong. Going by this I could not have been in Sri Lanka until [at] the very earliest, evening 5 July. I travelled to [New York City] at 8.30 am on BA 117 on 13 July 2013. My passport confirms this.

As you will be aware I indicated in earlier correspondence that I returned home before travelling to the USA and to participate in annual celebrations in [Northern Ireland]. I have tried to find something that places me at the bonfire celebrations on 11 July and I believe I have been able to find something that helps. I recall attending a local celebration and having my photo taken at an ice-cream truck called "Robinsons". A local person asking for a selfie at this joking that the truck was named after my party leader. I managed to track that person down and they have sent me a photo they had on their computer from that occasion. It was taken at 22.13 hours but given our clear nights it is fairly obvious we were celebrating. Whilst I have no other record of this I believe it is fair to conclude that I must have travelled home sometime between 9/10 July to be there, meaning my second visit was as I had originally suggested a short follow-up visit and that the itinerary identified was clearly dramatically changed from earlier drafts that the [Daily Telegraph] relied upon. Further to this I have checked my passport and I have no stamps for entering or leaving Sri Lanka in July 2013.

I think the above throws doubt on the accuracy of the Telegraph account. I can understand that being sent documents by their source they believed they had a scoop but upon closer examination they have been sent a number of documents, some that may be true and some that are clearly erroneous. I am not surprised as the politics and agendas in Sri Lanka are as myriad as some of those in [Northern Ireland].

I would ask you to consider in terms of value the other trips to Sri Lanka and its neighbouring states that I made and registered. The locations were either the same or similar and the costs can be extrapolated from those costs both in terms of flights, transport and locations. There is no evidence to suggest that the price of the same venues in 2012 or later in 2013, when I visited are significantly different given that they are organised state visits by the then government. Frankly, I cannot recount with any degree of certainty the precise number of helicopter lifts made, however

11 Verified
12 See letter from the Commissioner, dated 30 May 2018, at WE25
13 Verified: passport contains US Homeland Security/US Customs and Border Protection stamp, with date of entry of "July 13 2013"
14 Timed but undated image seen
15 Description verified
doubt is now cast on their veracity given that the dates no longer match my dates. I contend that the internal security and transport arrangements were provided by the Sri Lanka government for my security and for the convenience of those travelling with me, namely government officials who were participating in the visit.

Declaration

You asked me specifically about the letter to the [Prime Minister] in March 2014 and if I should have been specific about my declaration of interests then. In previous correspondence I suggested that sufficient time had lapsed between this visit and he knew of my interest anyway. However, I believe there is even stronger evidence for this. I travelled again to Sri Lanka with members of [the] Government to attend the CHOGM meetings. I was with a trade delegation, this was registered on 18 November 2013 and importantly I met the Prime Minister whilst in Sri Lanka socially at a number of state occasions and the matters in the letter pertained to matters around that visit. I believe I am justified in believing that was more than sufficient declaration. I make it clear I never once tried to conceal away the fact that I had travelled to Sri Lanka as the High Commissioner stated in her evidence letter to you "he is highly regarded by all sides in Sri Lanka". I publicised the fact I was there, I entered photos I had taken in a competition and I wrote about the subject. So, I have made no secret of the matter. I think my record on this is good and open and that I have accepted this was an error for which I outlined mitigating circumstances.

On the matter to do with trying to help with requests for information regarding contacts dealing with oil I believe they can be read at face value. No so-called deals were made I was being helpful. No other arrangements were made or exist. The officials in other companies referred to Government contacts in the countries we were discussing whom I had met in my travels and was willing to share openly with them. I believed the introduction would be helpful. It was not taken up.

You asked me which officials I met during my visits. I recall meeting the Foreign Minister and introducing him to my family. He met me at his residence where I was taken by the security people. I met with the Minister for Infrastructure at his offices in Colombo. I met with the Minister for Defence - the President’s brother. I was to meet the President but he was unable to meet as he was elsewhere. (I had met him on a number of other occasions.) I believe I may have met his son who was a local politician but I cannot be certain about that.

Thank you for suggesting I explore these areas as I trust it has been helpful.

I know that this has taken considerable time to collate and you have asked me to identify my best guess at what I registration will look like. I will attempt to put this together and submit separately. I have supporting documentation and would like the opportunity to meet and go through this with you.

23 May 2018
**Enclosures with letter of 23 May 2018** (Originals seen)

Bank statement, selfie and passport not reproduced - see letter of 27 June 2018

**Mr Paisley's Diary for week commencing 25 March 2013**

<table>
<thead>
<tr>
<th>2013 March</th>
<th>March 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>25 MONDAY</td>
<td>Details not relevant</td>
</tr>
<tr>
<td>Details not relevant</td>
<td></td>
</tr>
<tr>
<td>26 TUESDAY</td>
<td>Manuscript entry - SRIL papers</td>
</tr>
<tr>
<td>Manuscript entry - SRIL &amp; diagonal line struck through</td>
<td></td>
</tr>
<tr>
<td>27 WEDNESDAY</td>
<td>Details not relevant</td>
</tr>
<tr>
<td>28 THURSDAY</td>
<td>Manuscript entry - Collect passports</td>
</tr>
</tbody>
</table>

**Mr Paisley's diary for week commencing 1 April 2013**

<table>
<thead>
<tr>
<th>2013 April</th>
<th>April 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 MONDAY</td>
<td>Manuscript entry - SRIL</td>
</tr>
<tr>
<td>Manuscript entry - SRIL</td>
<td></td>
</tr>
<tr>
<td>2 TUESDAY</td>
<td>Manuscript entry - SRIL</td>
</tr>
<tr>
<td>Manuscript entry - SRIL</td>
<td></td>
</tr>
<tr>
<td>3 WEDNESDAY</td>
<td>Manuscript entry - SRIL</td>
</tr>
<tr>
<td>4 THURSDAY</td>
<td>Manuscript entry - SRIL</td>
</tr>
</tbody>
</table>

**Mr Paisley's diary for week commencing 1 July 2013**

<table>
<thead>
<tr>
<th>2013 July</th>
<th>July 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manuscript entry - SRI LANKA</td>
<td></td>
</tr>
</tbody>
</table>
Mr Paisley's diary for week commencing 8 July 2013

<table>
<thead>
<tr>
<th>2013 July</th>
<th>July 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 MONDAY</td>
<td>FRIDAY 12</td>
</tr>
<tr>
<td>Day struck through</td>
<td>Day struck through</td>
</tr>
<tr>
<td>9 TUESDAY</td>
<td>SATURDAY 13</td>
</tr>
<tr>
<td>Day struck through</td>
<td>Manuscript entry- 5.25 am taxi [firm], 8.30 depart NY, BA117</td>
</tr>
<tr>
<td>10 WEDNESDAY</td>
<td>SUNDAY 14</td>
</tr>
<tr>
<td>Day struck through</td>
<td>Manuscript entry - NY Other entries not relevant</td>
</tr>
<tr>
<td>11 THURSDAY</td>
<td>MEMORANDA</td>
</tr>
</tbody>
</table>

25. Letter from the Commissioner to Mr Ian Paisley MP, 30 May 2018

Thank you for hand-delivering your letter of 23 May 2018 last Wednesday and allowing me sight of your passport and diary so that I could confirm the veracity of the photocopies enclosed with your letter. You also very helpfully provided a copy of your bank statement for July 2013 and a photograph provided by a third party, which you told me was taken at an 11 July bonfire.

I appreciate the steps you have taken to try to locate evidence which would confirm your recollection of the relevant events in 2013. However, there are still some outstanding issues. You said that, by 11 June 2018, you would try to establish whether the person who took the photograph is able to provide any evidence to show that it was taken on 11 July 2013. You also agreed to provide as accurate an estimate as you can of the value of the hospitality provided by the Sri Lankan Government to you and to your family in March/April and July of 2013.

My initial review of the enclosures with your letter

In the meantime, I hope it will be helpful to tell you about my initial review of the documents you left with me.
There is no dispute about the dates of your first trip to Sri Lanka; we had agreed that you travelled there on 30 March and returned on 5 April. This is supported by the documents: your diary entries show that you were in Sri Lanka on those dates; and your passport contains a visa valid for three months from 25 March 2013, with an entry stamp for 31 March 2013.

You told me that although you had previously accepted that you and your family went to Sri Lanka again on 1 July 2013 (your letter of 19 January 2018), you now believe that you could not have been in Sri Lanka before the evening of 5 July 2013. And, as you have previously explained, you believe you returned home sometime between 9/10 July, rather than on the 11th. You base this on the evidence contained in your bank statement for July 2013 which has several transactions dated between 2 and 5 July, with payments to shops in Northern Ireland and in Regent Street London and an Oyster-card top-up on 5 July. These payments appear to have been made using two different cards on the same account.

On reflection, I think the dates shown on the bank statements are those on which the transactions were processed through the banking system, rather than the dates the purchases were made. I have reached this conclusion because your passport shows that you entered the United States on 13 July 2013; your diary shows that you stayed for nine days; and your bank statements show cash withdrawals made (using the same cards as those used between 2 and 5 July) at Westminster ATMs on 15 July, after you had left for the States. I do not, therefore, think that the bank statement provides evidence that you were present in the UK between 1 and 5 July 2013.

If I have interpreted the statement correctly, the only transactions between 8 and 11 July are automated transfers, which do not signify anything about your presence in the UK between those dates.

Next steps

I appreciate that you sought out the bank statement at my suggestion but it does not provide clear evidence of your presence in the UK either between 1 and 5 July, nor between 8 and 11 July. I do not know what information your mobile phone provider might be able to provide but, if the other avenues suggested in my letter of 18 April have not been productive, perhaps you might contact them.

I thought it would be helpful to explain the difficulties I have identified in the evidence you have provided as soon as possible, to give you one further opportunity to gather any relevant evidence.

As you know, I am concerned that when you register the hospitality you and your family received from the Sri Lankan government in 2013 it should be as accurate as possible. However, I now recognise that it may not be possible for you provide exact figures. It would be most helpful if, when preparing your estimates, you could say clearly what you have included in respect of each visit. For example, when we spoke, you confirmed that the reference to a trip to an elephant orphanage was correct. It
would also be helpful to say which, if any of the items covered in the evidence my predecessor sent to you on 13 November you have excluded from the estimate and why.

Thank you for your assurance that you too are keen to have this matter resolved and to have the requisite information included in the Register of Members’ Financial Interests.

I am grateful for the information you have helpful provided so far and I hope that when you next write to me you will be able to provide the information about the dates, nature and value of the visits for the late registrations to be included in the Register.

30 May 2018

26. Letter from the Commissioner to the Registrar of Members' Financial Interests, 4 June 2018

I would like to ask for your advice on a matter concerning Mr Ian Paisley MP and the declaration of his financial interests.

The allegation I am investigating is primarily concerned with the registration of Mr Paisley's financial interests in 2013. Mr Paisley visited Sri Lanka on two occasions in 2013 (between 30 March and 5 April and in the early part of July) at the expense of the Sri Lankan Government. Mr Paisley agrees with me that this hospitality should have been registered in the Register of Members’ Financial Interests at the time, and that late register entries should now be made. I am currently in correspondence with Mr Paisley about the information required to enable the registration.

I am also considering whether the rules of the House would have required Mr Paisley to declare these interests when relevant to matters at hand. When asked about potentially relevant occasions, Mr Paisley provided a copy of a letter he had sent to the Prime Minister on 19 March 2014. Mr Paisley did not make a declaration of interest in that letter. He has told me that he had previously travelled to Sri Lanka in connection with a Commonwealth Heads of Government Meeting and that the Prime Minister would, therefore, have been aware of his interest.

I would be grateful if you would tell me how you would have advised Mr Paisley, had he sought your advice about the need to make a declaration when writing to the Prime Minister. I enclose a copy of Mr Paisley's letter and the reply he received from the Foreign and Commonwealth Office.

Any other comments you may wish to make would be most welcome. It would be very helpful to have your response to this letter within the next two weeks.

Thank you for your assistance.
4 June 2018

27. Letter from the Commissioner to Mr Ian Paisley MP, 4 June 2018

When Kathryn Hudson began this inquiry in September 2017, she said that she might make enquiries of the Registrar in due course.

I am writing today to let you know that I have written to the Registrar to ask for her about the advice she would have given if you had consulted her then about the need to declare an interest when writing to the Prime Minister on 19 March 2014.

I enclose a copy of my letter to [the Registrar] for information and I will share her response with you in due course.

4 June 2018

28. Email from Mr Ian Paisley MP to the Commissioner, 11 June 2018

Thank you for your letter 4 June regarding information you sent to the Registrar regarding any need by me to declare an interest, in a letter I sent to the [Prime Minister] in March 2014.

At our last meeting I informed you that I had updated the register in November 2013 to take account of a visit in the autumn of 2013 to Sri Lanka, principally around the issue of the Commonwealth Heads of government and a trade mission. This was fully declared. It was at that time that I met both the PM and other UK government ministers at informal sessions of meetings there.

In your letter to the Registrar of 4 June you say in the second paragraph “he told me that he had previously travelled to Sri Lanka in connection with...”. I need to make clear that this “previous” visit was registered in November 2013. The previous visit you are referring to is the autumn visit of 2013 and would have been publicly registered at the time that I wrote to the PM in March 2014 (It would have been my most recent visit to the country at that time.) I feel I need to make that clear in case there is confusion about the visits you are referring to.

I believe that my registration at that time that I wrote to the PM was accurate for any purposes he would have been replying to me about. In the reply I received, the Foreign Office Minister confirmed that he was aware of my interests. I had actually met that minister in question in Sri Lanka at the meetings I am referring to above.

I hope this is helpful to your deliberations and I have cc a copy of this note to the Registrar also.

11 June 2018
29. Letter from the Registrar to the Commissioner, 12 June 2018

Thank you for your letter of 4 June.

You ask how I would have advised Mr Paisley had he approached me about the possible need to make a declaration when he wrote to the Prime Minister about Sri Lanka on 19 March 2014.

You tell me that Mr Paisley had made two trips to Sri Lanka in the year previous to his letter. I would therefore have advised him to declare these benefits in his letter. In doing so I would have been guided by paragraph 86 of the Guide to the Rules approved by the House on 9 February 2009. That says:

86. The requirement to declare a relevant interest at the appropriate time covers almost every aspect of a Member’s parliamentary duties extending to correspondence and meetings with Ministers and public officials. Frankness with colleagues is also important. In 1975 the House agreed to the report of the Select Committee on Members’ Interests (Declaration) which contained these words: “it should be a matter of honour that a financial interest is declared not only, as at present, in debate in the House and its Committees but also whenever a Member is attempting to influence his fellow Members, whether in unofficial committees and gatherings or at any kind of sponsored occasion, with or without entertainment, or simply in correspondence or conversation. Above all it should be disclosed when a Member is dealing with Ministers of the Crown and civil servants, and his obligation becomes of paramount importance when a foreign government is involved either directly or indirectly”.

Mr Paisley’s 19 March letter to the Prime Minister shows that he and his co-signatories (who are not named) were also planning to visit to Sri Lanka later in 2014. MPs were expected to declare planned future benefits if, in accordance with paragraph 73 of the 2009 Guide, those plans for the future had “passed beyond vague hopes and aspirations and reached the stage where there [was] a reasonable expectation that a financial benefit [would] accrue”. The letter does not say whether the Sri Lankan government, or another party, was to fund this planned visit. But if someone else might reasonably have considered it to influence Mr Paisley’s letter, then I would have advised him to amplify his declaration and to declare this planned visit as well.

12 June 2018

30. Email from Mr Ian Paisley MP to the Commissioner, 12 June 2018

I had hoped to have a full reply to you today regarding the above but due to House business, I have been delayed. I intend to have a full reply to your letter of 30 May by close of play tomorrow.
12 June 2018

31. Email from Mr Ian Paisley MP to the Commissioner, 14 June 2018

Further to my letter on Monday. I have completed my reply and will be posting it from [Northern Ireland] this evening with enclosures. Apologies for the delay but I am sure you understand the very turbulent week.

14 June 2018

32. Letter from Mr Ian Paisley MP to the Commissioner, dated 13 June 2018 and hand-delivered on 19 June 2018

Thank you for your letter summarising our meeting 23 May 2018.

Bank statement

I have asked my bank to confirm when I made the actual Oyster card purchase. They have now confirmed that the Oyster card purchase recorded on 5 July 2013 statement would have been made on 3 July, placing me in London on that date. This has a significant impact on the claims regarding nights stayed and helicopter trips taken. I believe that has a significant bearing on the submission provided by the Daily Telegraph as they claim I took helicopter flights and stayed in Colombo on dates when I was using my Oyster card in London. The attached letter from my bank makes this clear.

11 July photograph

I have enclosed a copy of an email from the photographer confirming the date and time of the photograph.

I have below detailed the value of the visits I took to Sri Lanka as a guest of the government.

Nature of visit to Sri Lanka

The visits made were "official visits", at the request of the government and in my capacity as an MP. In the "evidence" that the Daily Telegraph has provided the documents confirm that the visits were "official". All of the documentation they have supplied demonstrates that they were arranged by the Sri Lankan Foreign Ministry. I do not dispute that. The only reason why I was there was in my capacity as an MP with a particular knowledge of post-conflict society and the rebuilding efforts after the conflict. My registration would therefore be that I and my family were official guests of the Sri Lanka Foreign Ministry who arranged and coordinated each aspect of the visit.
I was accompanied at all times by Sri Lanka Foreign Ministry officials. They were passengers with me and my family in all the transport taken. Throughout the visit I received briefings about the different parts of the country I visited; examining both post conflict issues and how the country had survived and rebuilt after the tsunami that impacted on the south and east of the island. One of the visits was to a location that had to be completely rebuilt after the tsunami. There, I met with local community people who had survived that catastrophe. Another part of the visit was to a region that was rebuilding after the conflict. Throughout the visits I met with officials of the government as well as Ministers. Some whom I visited at their locations and others who met me at the locations where I stayed. All this supports the fact that the visits were official in nature and activity.

Calculation of the costs of the visits to Sri Lanka

In terms of the costs. The Daily Telegraph has published figures of over £100,000. In the documents they have supplied to you, the value of the visits is approximately half of that amount, the rest they are guessing. They provide documentation that, when transferred into the then exchange rates are well below the claim that they made. That is indisputable! In the official documents the Foreign Ministry has made arrangements for my accommodation at "government rates" that are lower than the rates guessed by the Daily Telegraph.

I have provided below my own calculation of the costs. Remember at the time when this should have been registered (two Parliaments ago) my office sought costs then. I have based my calculations on the duration of stay provided by the Daily Telegraph, even though I dispute a couple of days travel. My calculation below is on a longer not shorter stay so as I have no personal advantage in this calculation. The calculations I have set out show the combined visits would, using a high-end tour company, taking account of a car and driver hire, and at least 7 helicopter lifts and an excursion come to a combined total of £51,441.

The comparison I have used is Kuoni high end travel, basing my calculation on the most expensive 5-star hotels and adding on all meals (breakfast, lunch, dinner) and have priced direct flights, business class with Sri Lanka Air. The price for trip one is £18,990 (breakfast, lunch, dinner; including private transfers) and the price for trip two is £16,928 on the same basis. For helicopter transfers these vary between $3,487 and $2,090 for the trips of the length I would have taken. The average cost is $2,788 or £2,080 (although the majority of the trips claimed in the newspaper article were shorter in duration. Also, these trips included personnel from the Foreign Ministry who accompanied me. I dispute that I would normally have to register costs that were necessitated by the trip organiser and not at my request. However, for the sake of a calculation, I have used a well-known modern luxury helicopter operator to price these lifts and have based it on a total of seven trips even though the evidence I have provided shows that on at least one of the days claimed for the trip I was not even in the country. The total comes to GDP £14,560.

The rent of a micro-coach including a driver operated by an operator such as Kuoni is £97 per day and a supplement of £24 per day for a guide. [It is] fair to assume
admission costs are £50 per person, bringing the total costs of such a visit to a resort to £963.

I would therefore propose the following is an honest registration proposal

<table>
<thead>
<tr>
<th>Date of visit</th>
<th>30 March - 5 April 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose of visit</td>
<td>Official visit to examine the political, economic and tourism developments in Sri Lanka and to meet with political and public figures</td>
</tr>
<tr>
<td>Host</td>
<td>Foreign Ministry, Sri Lanka, Colombo</td>
</tr>
<tr>
<td>Cost for MP including flights, transfers and hospitality</td>
<td>£4,205</td>
</tr>
<tr>
<td>Cost for MP guests, spouse and family (5 guests)</td>
<td>£21,025</td>
</tr>
<tr>
<td>Total</td>
<td>£25,230</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date of visit</th>
<th>11 days in July 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose of visit</td>
<td>Official visit to examine the political, economic and tourism developments in Sri Lanka and to meet with political and public figures</td>
</tr>
<tr>
<td>Host</td>
<td>Foreign Ministry, Sri Lanka, Colombo</td>
</tr>
<tr>
<td>Cost for MP including flights, transfers, and hospitality</td>
<td>£6,553</td>
</tr>
<tr>
<td>Cost of MP guests, spouse, and family (3 people)</td>
<td>£19,658</td>
</tr>
<tr>
<td>total</td>
<td>£26,211</td>
</tr>
</tbody>
</table>

**Elephant Orphanage**

In terms of the visit to the elephant orphanage. This is a significant project that Sri Lanka is very proud of. My visit there was official. I had a detailed briefing with the manager of the orphanage and a behind the scenes visit to meet with the vets and staff. This was an insight that they give to officials and would not have been available to tourists who are taken to lookout posts for photo opportunities. It was very much a working visit. In terms of the costs of such a visit I don’t believe this would require registration. However, for the sake of argument I have made the following price assumptions regarding its cost and included them above. To rent a micro coach, including a driver by an operator such as Kuoni is £97 per day and a supplement of
£24 per day for a guide. It is fair to assume that admission costs are £50 per person bringing the total costs of such a visit to a resort to £963. However, I was taken to this location as part of a visit to witness a project the government was supporting I do not believe it would normally be registered. (It is included in calculations above.)

I have a report scrutinising these figures by a reputable accountant who has signed them off in a private report for me that I can share with you.

I hope this response is helpful to bring your investigation to a swift conclusion.

13 June 2018

Enclosures with letter of 13 June 2018:

Extract from exchange between Mr Paisley and Danske Bank

"In relation to card transactions when you present your card at retailer and they process the bank will approve transaction right away. The funds are approved and set aside on your account and taken off your balance. The transaction will then show on your account after this it can take a few days to post to your account - my understanding it is when the retailer finalises transactions. By having funds reserved it gives retailers ability to cancel transactions if no longer needed, i.e. checking into hotel.

If you are having issues with a particular transaction give me the details of and I can give you the information required."

"Thanks. A transaction on 5/7 2013 came up as Oyster auto pop. I am assuming it was for my oyster top up card and therefore instantaneous or a day or so in advance. It’s a pain but could you check"

"Yes, this transaction relates to Oyster Top Up card and would have been processed a couple of days before."

Email from unidentified email account to Mr Paisley, Sunday 10 June 2018

I have sent you a photograph you requested of us at an event on 11 July 2013. I hope you’re well and I have many other photos of us at that event if you need them.

33. Letter from the Commissioner to Mr Ian Paisley MP, 20 June 2018

Thank you for hand-delivering your letter, dated 13 June, yesterday and for later providing the emails you have exchanged with the accountants. As I explained, I will need to go through the material very carefully to make sure that I have all the necessary information but, on the basis of what you told me, I do hope to be in a position to draft a report soon.
In the meantime, I can share with you the Registrar’s advice. I enclose a copy of the Registrar’s reply to my letter of 4 June 2018, setting out the advice she would have given had you consulted her about the need to make a declaration of interest.

I agree with the Registrar that the rules of the House required a declaration of interest in respect of the hospitality received from the Sri Lankan Government during the preceding twelve months when writing to the Prime Minister on 19 March 2014. I consider the failure to make such a declaration is a further breach of paragraph 13 of the Code of Conduct.

You will see that the Registrar would also have advised you to make a declaration in respect of any planned visits funded by the Sri Lankan government. A brief internet search has revealed a media report of a planned trip which was cancelled “at the eleventh hour” in April 2014. I enclose a copy of one such report for ease of reference.

It would be helpful to know:

- Who was to fund the April 2014 visit
- How far preparations for the April 2014 visit had reached on 19 March 2014
- Whether, on reflection, you think that planned visit should also have been declared in your letter to the Prime Minister.
- If you do not think a declaration would have been necessary, please explain the reasons for that view.

Next steps

At an early stage in this inquiry you acknowledged and apologised for the breaches of paragraph 13 of the Code of Conduct arising from your failure to register within 28 days the two visits made at the expense of the Sri Lankan Government in 2013. I have explained above that I consider the failure to make a declaration of interest in the letter of 19 March 2014 to be a further breach of paragraph 13 and I have asked you to comment on the possibility of a fourth breach (see above).

I expect to conclude my inquiry by way of a formal report to the Committee on Standards. My Memorandum will set out the facts established during my inquiry and explain why I have found your conduct to be in breach of the Code of Conduct for Members. It will be for the Committee to decide the outcome.

I will give you an opportunity to comment on the factual accuracy of a draft before I submit the Memorandum to the Committee on Standards. If there is any further evidence which you think might be relevant to my considerations, please let me
know immediately so that we can agree a date for its submission. I will write to you again once I have analysed the material you provided yesterday.

In the meantime, this matter remains protected by parliamentary privilege and the contents of our correspondence should not be disclosed to any third parties.

20 June 2018

34. Email from Mr Ian Paisley MP to the Commissioner's Office, 21 June 2018

Please find attached a detailed commissioning note from the consultant and his details.

21 June 2018

From: [name of management consultant]

Subject: Sri Lanka Analysis

Thank you for the email below detailing the trips to Sri Lanka. Following our two detailed conversations about this, I can confirm that I am available to do some analysis on the cost of the Sri Lanka trips.

Scope of Analysis: You have set out the base parameters of the trips as per the attached email below, although it is noted that there is some discrepancy in the dates of the second trip and that there seems to be evidence to suggest it was much shorter than suggested. However, you have been adamant that the analysis should be robust and ‘offering you no advantage’ in the analysis, i.e. we should err on the side of more expensive, and for the maximum suggested length of stay.

Methodology: The premise of my analysis is that a member of the public should be able to buy trips equivalent to the trips that you undertook. We will use reputable and high-end tour companies, and limit the search to ‘luxury’. It should be noted that the cost could be significantly reduced by using alternative airlines and having a lay-over in a Middle Eastern country, however we will not consider this despite the cost saving as we want the analysis to be as ‘like for like’ as possible. Also, a number of your excursions would not be available to the public, such as ‘behind the scenes’ briefings and viewings by Sri Lankan officials, but we have sought to suggest a fair comparison by including a driver and guide.

As a final check and balance, I will have an independent chartered accountant (who is not involved in this analysis) review the findings to ensure they are reasonable and accurate.

Credentials: I have been a Management Consultant for 20 years holding Partner, Vice President and other Senior Leadership positions in large (10,000+ staff) companies...
such as [names of four firms redacted]. During the course of my career, I have advised some of the largest and most complex organisations on strategy, transformation & change and performance improvement. These include [names redacted] to name a few clients. In undertaking this engagement, I am very familiar with gathering and analysing data. In particular, over the last 10 years, I have averaged over 100 flights per year to far flung places and am very used to organising my own complex travel requirements.

I look forward to discussing this with you further

**Email from Mr Paisley**

Sri Lanka visit details Two visits

First one with [Mrs Paisley], Ian and four children.

Second visit Fiona Ian and two children.

I am going to set out the DT allegations and their dates and if you could scope and price them versus my own dates that remove just a couple of days in total. 30 March 2013 to 5 April 2013, 2 July to 11 July 2013.

use of Mercedes car, helicopter rides, flights London-Colombo-London

Rupees 585035.00 pp

Hotel Colombo: Hilton 30 March & 5 April

Passikudah Hotel Amethyst 31 March-3 April

Galle Hotel Fortress Resort 4 April

Helicopter 31 March from Colombo to Passikudah

4 April from Passikudah to Galle

5 April Galle to Colombo

Suggest cost is $8000 [US dollars]

July triple suite at Kandalama Earls Regency Kandy

Visit to Sigiriya Fortress Dalada Malligawa Pinnawala Elephant Orphanage
Helicopter trips 2,4,6,11 July Colombo – Kandalama Kandalama -Kandy Pinnawala-Galle, Galle-Colombo

Hotels 2-3 July Heritance Kandalama

4-5 July Earls Regency

6-10 July Heritance Ahungalle

(for your reference the July visit is problematic as I have provided evidence I was in NI 2 July and London on 5 July and back in NI 10/11 July, so visit was possibly only 4 days but price this up as it stands.)

35. Email from Mr Ian Paisley MP to the Commissioner, 25 June 2018

With reference to your letter 20 June please find my comments below. I emailed your office on Friday past with details of my note to a consultant and his details. I attached a printed copy for convenience.

You have asked me for comments in relation to a cancelled visit to Sri Lanka that was apparently to take place in April 2014.

a. Who was to fund the visit?

This was a cancelled visit. I have reread the news reports that you provided that has not jolted my memory beyond what was published at the time. I have no reason to take issue with the facts of the report as it stands. A visit was planned for the period of the Easter recess 2014. It was being sponsored or funded by the cricketer Matthias Muralitharan or Murali. He runs a peace charity, or did so at the time, that focused on reconciliation between the divided community of Sri Lanka. According to the reports it is not a government supported charity. The report makes clear that the conservative MPs who planned to attend could only do so if the sponsor was non-government. The report makes clear that this private host was approved by that party’s central office. You will see from my previous registrations in 2012 that I visited Sri Lanka I was hosted by both private businesses and later by the government. I had no such restrictions placed on my by any central office.

b. How far preparations had reached on 19 March 2014?

Frankly I don’t know. I most certainly would have been asked if I was available and could I make a contribution on such a visit. I was not party to any organisational meetings or discussions. Other than being available at that time and a willingness to participate that would be it. I should point out that planned visits to Sri Lanka are notorious for collapsing and not going ahead. A mixture of members hectic schedules combined with a very last-minute approach by Sri Lanka hosts to organising events does not help to deliver certainty that such visits would ever materialise. A case in point here, where it collapsed because of political argument
between other parties. I would say it is certain that I knew of the possibility of a future visit at the time that I wrote but nothing more than a possibility. No requests about my views or what I should express to others has ever been asked of me.

c & d. Whether, that planned visit should have been declared in my letter to the PM?

No. I had already a formal declaration made of a visit on 11-15 November 2013. I had met with and spoken to the PM there. That was a visit sponsored by the Sri Lanka High Commission - a government visit. I wrote to the PM about matters to do with the Commonwealth and Sri Lanka peace process, matters I have had a long term fixed view on. In the reply the Minister even acknowledged that he was aware of my interests in the country. Indicating in a letter that I may or may not be visiting again in the future, and that a charity may or may not be sponsoring such a visit, would have made no material change to my representations or to the response. In the event the visit did not proceed, so I would have been declaring something that did not happen. However, I do accept that in future any correspondence should contain, where relevant, a reference to the register and my interests. I believe in the instance you have put to me that I could not have been expected to even think that this would have a bearing on my representations and believe it would be harsh to determine that I had breached the rules on this matter. I believe given the uncertain nature of Sri Lanka visits, that when I wrote to the PM in March 2014, the planned visit was nothing more than another potential visit that could occur rather than a hard and fast commitment, with exact timetabling. All I had done at the point of writing my letter was indicated a willingness and availability to attend.

I hope the above and the attachments are of further assistance in finalising the inquiry.

25 June 2018

36. Letter from the Commissioner to Mr Ian Paisley MP, 27 June 2018

I said I would write to you when I had had an opportunity to consider carefully the contents of your letter of 13 June 2018 and the supporting material you provided at the same time. I have now done that and am writing to update you.

Registration - the estimated value of your trips to Sri Lanka in 2013

I appreciate the efforts you have made to provide reasonable estimates of the value of the two visits you and your family made to Sri Lanka as guests of the Sri Lankan government in 2013.

I accept that you still have reservations about the accuracy of the dates quoted by the Daily Telegraph for the second visit. I note that in your letter say you have based your estimates on the dates they used. I am grateful to you for your willingness to adopt this pragmatic approach and, in light of that, I do not see any value in treating
either your bank statement or the photograph you provided as relevant evidence. I therefore have no further questions about those documents.

I note that the table setting out the costs in relation to the second trip assumes a five-day stay between 3 and 10 July. This does not reflect the narrative “I have based my calculations on the duration of the stay provided by the Daily Telegraph” of 1-11 July 2013, nor does it reflect the management consultant’s description of your brief “we should err on the side of more expensive, and for the maximum suggested length of stay”. I would be grateful if you would review the table for trip 2 and let me know how this should be corrected. I do not expect this to make any material difference to the outcome of my inquiry, but this discrepancy should be resolved before I submit my memorandum to the Committee. It would be helpful if you would provide some further explanation from [the management consultant] about how he calculated the hotel element of each visit. For example, the number and type of room assumed; the assumed cost per room per night; and the number of nights included in each calculation.

You describe the two trips as “official visits” made “at the request of the government and in [your] capacity as an MP”. But the fact that you were visiting at the invitation of the Sri Lankan government and were accompanied by Sri Lankan government officials and Ministers would not have any bearing on the value of the visits which should have been registered at the time.

As has previously been explained, the rules required you to register these visits based on the market value of the hospitality provided, rather than any discounted rate available to your hosts. I note that the evidence you have provided is, in any case, based on estimated market rates for business class flights, 5-star hotel accommodation; private transfers; helicopter transport; a “micro-coach” and driver; a tour-guide; and breakfast, lunch and dinner every day. I also note that the estimate was prepared by a management consultant and tested by a firm of chartered accountants, who have confirmed as “reasonable and realistic” estimates of the cost of similar trips made by a “regular” member of the public.

I said in my letter of 30 May 2018 that I recognised that it might not be possible to provide exact values for the benefits you received and it is now clear that that is, indeed, the case. You have consistently disputed the Daily Telegraph’s estimate that the combined value of the two trips was approximately £100,000 and, as you know, the material they provided was not fully costed. In the absence of other evidence and subject to the resolution of the discrepancy noted above, the assumptions on which you have based your estimates are not obviously inconsistent with the evidence provided by the Daily Telegraph.

Bearing in mind that in 2013 the registration threshold was one per cent of the then current parliamentary salary,¹⁶ I do not think this inquiry would be usefully served by trying to reconcile the difference between your estimates and those of the Daily Telegraph. as you have accepted since 28 September 2017, these trips were very

¹⁶ £65,738 April 2012 – April 2013; and £66,396 April 2013 - April 2014
significantly in excess of the registration threshold. Failure to make those registrations has put you in breach of the Code.

Declaration

I have considered carefully your email of 25 June 2018 and concluded that you did not need to make a declaration about a planned visit funded by a private individual when writing to the Prime Minister about the UK government’s policy on Sri Lanka. However, I should clarify three points.

If relevant to the matter at hand, planned visits should be declared. The rules are clear that if a future interest is *expected*, it should be disclosed. The possibility that it may not materialise does not remove the requirement for disclosure.

Declarations are required in a wide range of circumstances, not just when writing to Ministers or other public officials.

It is not sufficient to refer to your entry in the Register of Members’ Financial Interests; you may be required to disclose interests that are not in the Register and do not need to be registered; and you should, in any case, make clear the nature of the interest without requiring others to consult the Register.

However, when writing to the Prime Minister on 19 March 2014, you should have made a declaration in respect of the hospitality you and your family had received from the Sri Lankan government within the previous 12 months. Not doing so has put you in breach of the Code.

I would strongly recommend that you review chapters 1 and 2 of the current Code of Conduct for Members to ensure that you have a full understanding of the House’s requirements for both registration and declarations.

Paid advocacy

Paragraph 11 of the 2012 Code of Conduct prohibited Members from lobbying for an exclusive benefit for a body or an individual from whom the Member had received a financial benefit. Chapter 3 of the 2009 Guide to the rules amplified that rule, and said that it applied, in respect of one-off benefits, for a period of 12 months from the date of registration.

On 19 March 2014 you wrote to the Prime Minister urging the government to change its position on a UN motion to the benefit of Sri Lanka. You had received financial benefits from the Sri Lankan government in the previous 12 months. That was a breach of the rule against paid advocacy.

My draft Memorandum
I enclose a draft of the Memorandum I intend to send to the Committee on Standards, together with the written evidence on which I have relied.

This is in accordance with the arrangements agreed with the Committee on Standards and outlined in the Commissioner’s Information Note, a copy of which I sent to you when I began this inquiry.

There are two things I should explain about the draft report. The first is, as I am sure you are aware, that the content of my report is a matter for me alone. However, I would welcome your comments on its factual accuracy. As you can see, I have included a heading under which any other comments you wish to make might be included. Secondly, while I have included my draft analysis, I should emphasise that this might change in the light of any comments you make on the factual accuracy of the report.

You will see that I have redacted some third-party information. If you think other redactions should be made, please tell me when you reply to this letter. I will give careful consideration to any such requests but I cannot guarantee the outcome in advance.

Next steps

I would be grateful to have your comments as soon as. If you find, on reading the detail of my report that you need more time to comment properly, please let me know by 2 July 2018.

Subject to any such comments, I would hope to submit my memorandum to the Committee shortly after that, at which time your name would be removed from the list of current inquiries and the matter would be shown as referred to the Committee for their consideration.

The Clerk would then let you know when a date has been arranged for the Committee to consider the report and he will send you a copy of the final text shortly before the Committee meeting. The Clerk will also offer you the opportunity to submit written comments or to address the Committee should you wish to do so before it reaches a conclusion.

In the meantime, our correspondence about this inquiry remains protected by parliamentary privilege and should not be disclosed to any third parties.

Finally, I should add that financial support provided by a foreign government in the form of hospitality is potentially of interest to the Electoral Commission. Although it will be for the Committee on Standards to decide whether a late registration should be made in the Register of Members’ Interests, you might wish to draw the facts of the visits to the attention of the Electoral Commission now.
Thank you for your letter and for sight of your report.

Once again, for the record, I apologise for failing to register two official trips that I took in 2013. As I stated at the time I am deeply embarrassed by this and I do not seek to pass the responsibility to anyone else but myself. You will know that when the matter of failure to register two visits was brought to my attention I immediately reported myself and accepted that I had failed to make a registration in 2013 of these visits. I apologised to your predecessor then and accept that was a failure on my part. I appreciate that you accept that I did that immediately and that my dispute, like yours, has been over detail.

The fact, for me is the Daily Telegraph article is a defamation of me and contains significant exaggeration of costs. Remember the headline ran “The MP, the £100k gifts & the Brexit trade deal.”

I am pleased that you have accepted from me an independent consultant and accountants report that the figures are 50% less than those originally claimed by the Daily Telegraph headline. I have said the Daily Telegraph exaggerated and I believe this is born out by this fact.

I am pleased that you have found that I would not have been expected to declare a planned trip in a letter I wrote to the then PM in 2014; And that I would not have been expected to make a declaration for a speech I made in Parliament in 2013.

I appreciate that the claims and counter claims about my private email exchange about business meetings and oil consignments is of no further interest to you.

I accept that this investigation process has certainly given me a far greater appreciation of the rules and code that I suspect many members are possibly not aware of.

As you have said in your report I accepted immediately that these two visits needed to be registered and I remain willing to do so, especially now when the details of the costs are more clear than first suggested. However, I appreciate the point you made to me that two parliaments have lapsed and there may be little value in registering them now.

You have explained to me your view about a breach to the rule of paid advocacy that you say has arisen because I did not make a declaration when apparently seeking a benefit for Sri Lanka in my March 2014 letter. My understanding from you is that subsequently to 2014 this rule has changed. That being said, I understand that you must consider this through the lenses of 2014.

The then rule stopped members advocating for a matter that is for the “exclusive benefit” of the host. The example stated in the rule amplifies this. However,
nothing would prevent a Member stating their experience in a foreign country, or giving an insight into a foreign country.

My letter to the PM, if acted upon, would not have conferred an “exclusive benefit” on Sri Lanka. In fact, the beneficiary would have been the U.K. government who would not have had to pay for the internationalisation of the internal political affairs of another country through the auspices of the UN.

There would have been no financial assistance or punishment for that matter, to Sri Lanka as a result of my suggestions. In fact, the financial burden was on the U.K. More importantly, the matter I was drawing attention to was for the U.K. to hold to its well founded position and expertise that it developed in NI. I believe I was stating my own experience that was of material benefit to the then U.K. government.

I understand the rule allows a member to refer to a country specifically. When we met you suggested that if my letter had been about south east Asia generally it would have been sufficient to have avoided coming under the ambit of the rule. However, the rule states clearly that “they could raise matters relating to the problems of the country generally”. I believe my letter of March 2014 meets that test. It made a request about a named country, drawn from my own wide experience in dealing with a peace process at home and abroad. The benefactor would have been the U.K., as Sri Lanka was already subject to international scrutiny. The rule makes it clear that there is “value” having knowledge brought by a Member. Crossing the line is when a Member actively lobbies for a financial or other benefit for the county concerned that they would not otherwise obtain. I believe that the interpretation of this rule under these circumstances is a harsh judgement of me; and indeed helps explain why the rule was subsequently changed to a six month not 12 month time limit.

I have no dispute with the facts, as you outline them, in your report. I would highlight just two matters.

1. the use of my Oyster card top up had to take place on 3 July. The most up-to-date note from my bank manager makes that point. This is important in respect of the details over dates travelled. For the calculation of costs it makes no difference.

2. Your commentary could be interpreted as suggesting that I was “foot dragging” in my responses. I do not believe that is fair. All, except one, of my replies was made according to the timeframe outlined in the letters from the Commissioners office to me. My impression from your predecessor was that in December 2017 she was ready to report, subject to a response from Sri Lanka. I could not envisage the time it took for the High Commission to respond. Also, I was told in all my communication that I could not refer these communications to third parties. I avoided doing that and was only encouraged by you, after my interview, that I could in fact extract evidence from other sources by using the material your office had shared with me. I believe, therefore, that the delays in getting to this conclusion cannot be placed at my feet alone. I think the report would benefit from your clarification that you are not suggesting that I was delaying my response for
some ulterior motive. Frankly, the longer this matter has dragged on the bigger disadvantage I face. 17

3. The table on your report on page 85 stating “date of visit” should read “11 days in July 2013”.
   As requested I’ve already forwarded an updated note from the management consultant answering the questions you posed to me in your letter 27 June.

Finally, for completeness, I think you should include in the report in an Annex a copy of my letter to the PM and the reply I received.

Once again I reiterate that I have no hesitation in apologising for my mistake of failing to register. There was no malice, or plan, on my part that was of any benefit to me not to register this. I have dutifully registered all other visits before and after and clearly made a mistake on this occasion in March and July in 2013.

2 July 2018

38. Email from management consultant to Mr Ian Paisley MP, 1 July 2018

Following our conversation today, let me provide you with the following clarifications:

(i) I have based Trip 1 on 8 days (see screenshot below showing 18 Sept to 26 Sept)
(ii) I have based Trip 2 on 11 days (see screenshot below showing 11 Sept to 22 Sept)
(iii) Both trips are ‘Full Board’ ie include all meals
(iv) On trip 1 with 6 family members it is based on 3 rooms in the five star hotel, including an upgrade from the standard deluxe fortress room for each room booked
(v) On trip 2 with 4 family members it is based on 2 rooms in the five star hotel, including an upgrade from the standard deluxe fortress room for each room booked
(vi) It is not possible to easily unbundle the flights and hotel costs as these are provided by the travel company as a bundled amount. However, both the accountant and I are happy that the data used in pricing is based on the correct number of people, no more than 2 people per room, and for correct duration.

I trust these clarifications are useful, please do not hesitate to contact you if more details are required.

1 July 2018

17 The dates of communications between the Commissioner’s office and Mr Paisley are set out at WE 39
## 39. Dates of correspondence between the Commissioner and Mr Ian Paisley MP

<table>
<thead>
<tr>
<th>Subject</th>
<th>From</th>
<th>To</th>
<th>Expected date</th>
<th>Sent date</th>
<th>Received date</th>
<th>Late?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opening inquiry. Response expected 27/09/17.</td>
<td>Kathryn Hudson</td>
<td>Mr Paisley</td>
<td></td>
<td>13/09/17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Email response to 13/09/17 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Hudson</td>
<td>27/09/17</td>
<td>28/09/17</td>
<td>28/09/17 Email, 29/09/17 letter</td>
<td>1 day late and response incomplete</td>
</tr>
<tr>
<td>Letter requesting full information of costs as a response to incomplete letter of 28/09/17. Need info by 23/10/17.</td>
<td>Kathryn Hudson</td>
<td>Mr Paisley</td>
<td></td>
<td>02/10/17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response to 02/10/17 letter requesting information missing from 28/09/17 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Hudson</td>
<td>23/10/17</td>
<td>30/10/17</td>
<td>31/10/17 by email 1/11/17 hand delivered</td>
<td>7 days late</td>
</tr>
<tr>
<td>Discrepancies between evidence from Sri-Lankan government and evidence provided by Mr Paisley</td>
<td>Kathryn Hudson</td>
<td>Mr Paisley</td>
<td></td>
<td>13/11/17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response to KH letter dated 13/11/17</td>
<td>Mr Paisley</td>
<td>Kathryn Hudson</td>
<td>28/11/17</td>
<td>27/11/17</td>
<td>28/11/17</td>
<td></td>
</tr>
<tr>
<td>Reminder that all correspondence private and confidential and protected by</td>
<td>Kathryn Hudson</td>
<td>Mr Paisley</td>
<td></td>
<td>30/11/17</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>From</td>
<td>To</td>
<td>Subject</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>---------------</td>
<td>---------------</td>
<td>-------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19/12/17</td>
<td>Kathryn Hudson</td>
<td>Mr Paisley</td>
<td>Clarification needed on points in Mr Paisley’s letters including; flights, dates, oil, registerable values.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19/01/18</td>
<td>Ian Paisley</td>
<td>Kathryn Hudson/Kathryn Stone</td>
<td>Response to 19/12/17 letter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24/01/17</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>Acknowledgement of receipt of letter 19/01/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21/02/18</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>KS written to High Commissioner of Sri-Lanka</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18/04/18</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>Summary of meeting on 17/04/18. Response expected by 10/05/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16/05/18</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>Follow up – no reply received to 18/04/18 letter, deadline passed by one week. New deadline 23/05/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10/05/18</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>Response to 18/04/18 letter</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23/05/18</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>Response to 23/05/18 letter. Response expected 11/06/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30/05/18</td>
<td>Complaints Manager</td>
<td>Mr Paisley</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>Recipient</td>
<td>Sender</td>
<td>Date</td>
<td>Date</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------------------------</td>
<td>--------------------</td>
<td>-----------------</td>
<td>---------</td>
<td>-----------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Courtesy email with copy of letter to Registrar of Members’ Financial Interests</td>
<td>Kathryn Stone</td>
<td>Ian Paisley</td>
<td>04/06/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response to letter of 04/06/18</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>11/06/18</td>
<td>11/06/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Explaining delay in sending response to 30/05/18 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>12/06/18</td>
<td>12/06/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Explaining delay in sending response to 30/05/18 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>14/06/18</td>
<td>14/06/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response to 30/05/18 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>11/06/18</td>
<td>13/06/18</td>
<td>Unknown</td>
<td>2-3 days late</td>
</tr>
<tr>
<td>Responding to 13/06/18</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>20/06/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commissioning note from consultant about Sri-Lanka costs</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>21/06/18</td>
<td>21/06/18</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response to 20/06 letter</td>
<td>Mr Paisley</td>
<td>Kathryn Stone</td>
<td>25/06/18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Letter with Memorandum to Committee. Response expected 2 July.</td>
<td>Kathryn Stone</td>
<td>Mr Paisley</td>
<td>27/06/18</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>