



HOUSE OF LORDS

Report from the Commissioner for Standards

The conduct of Lord Stevens of Kirkwhelpington

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Commissioner for Standards

The independent Commissioner for Standards is responsible for considering any alleged breaches of the Codes of Conduct.

Address: The Commissioner for Standards, House of Lords, London SW1A 0PW

Email: lordsstandards@parliament.uk

Telephone: 020 7219 7152

Website: www.parliament.uk/hl-standards

Code of Conduct for Members, Guide to the Code of Conduct and Code of Conduct for Members' Staff

The present Code of Conduct for Members of the House of Lords was agreed on 30 November 2009. Amendments to it were agreed by the House on 30 March 2010, 12 June 2014, 25 February 2016, 9 February 2017, 3 April 2017, 30 April 2019 and 18 July 2019.

The Guide to the Code of Conduct was proposed by the Committee for Privileges (2nd Report, Session 2009–10, HL Paper 81) and agreed by the House on 16 March 2010. The Guide was amended on 9 November 2011, 6 March 2014, 13 May 2014, 24 March 2015, 25 February 2016, 9 February 2017, 3 April 2017, 30 April 2019 and 18 July 2019.

The Code of Conduct for House of Lords Members' Staff was agreed on 13 May 2014. Amendments to it were agreed on 24 March 2015, 30 April 2019 and 18 July 2019.

The Codes and Guide are kept under review by the Conduct Committee.

Advice

The Registrar of Lords' Interests advises members of the House and their staff on their obligations under the Codes of Conduct.

Address: Registrar of Lords' Interests, House of Lords, London SW1A 0PW

Email: lordsregistrar@parliament.uk

Telephone: 020 7219 3112/3120

Registers of Interests

A list of interests of members and their staff can be found online: www.parliament.uk/hlregister

Parliamentary helplines

Independent Bullying & Harassment Reporting Helpline: 0800 028 2439 or disclosure@healthassured.co.uk

Independent Sexual Misconduct Advisory Service: 0800 1124 318 or isma@solacchub.org

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The conduct of Lord Stevens of Kirkwhelpington

Summary of complaint and investigation

1. On 8 January 2020 I received an email from a member of the public, Dr Alex May (see Appendix 1). The email alleged that Lord Stevens of Kirkwhelpington had breached the Code of Conduct in two respects:
 - that Lord Stevens’ entry under category 2, “Stevens Consultancy”, did not indicate the nature of the consultancy or advice given as required by paragraph 53 of the *Guide to the Code of Conduct*; and
 - that Lord Stevens’ position as a person with significant control in relation to Quest Global Holdings Limited was not registered, as required by paragraph 60 of the *Guide to the Code of Conduct*.
2. Having confirmed that Dr May’s summary of Lord Stevens’ entries in the Register of Lords’ Interests was accurate, I wrote to Lord Stevens on 10 January to inform him that I had completed my preliminary assessment and considered an investigation appropriate, and asked him for a written response to the allegations (see Appendix 2).

Relevant aspects of the Code

Registration of category 2 interests

3. Paragraphs 52–59 of the *Guide to the Code of Conduct* provide details of remunerated employment that must be registered—category 2 interests. This category includes “paid posts as consultants or advisers”. Where members have such employment they must “indicate the nature of the consultancy or advice given, for example “management consultant”, “legal adviser” or “public affairs consultant”.”

Registration of category 3 interests

4. Paragraph 60 of the *Guide to the Code of Conduct* requires that members must register “if they are on the central Register of People with Significant Control of a company, which is maintained by Companies House. A statement to that effect should be registered, along with the name of the company or organisation in question, within one month of the member’s name appearing on the Companies House register”.

Lord Stevens’ response to the complaint

5. On 22 January Lord Stevens provided me with a detailed written response (see Appendix 3). In his response he agreed that he had failed to make proper entries in the Register as described by Dr May. He also explained the steps he had taken following my letter to rectify the matter and to correct certain other omissions.
6. Lord Stevens also wrote on 24 January to provide assurance that none of those entries omitted from the Register had been relevant to his activity in the House of Lords (see Appendix 4).

Finding

7. **As Lord Stevens did not contest the allegations made, it is clear that the Code has been breached.**
8. However, I do not believe that Lord Stevens intended to mislead the House or intentionally withhold information from the Register.
9. In the light of this, I considered that the case could be resolved by remedial action. Remedial action usually involves “putting the record straight”, for example by amending the Register of Lords’ Interests, and the member making a formal apology to the Chairman of the Conduct Committee.
10. Lord Stevens has already taken steps to update his entry the Register and has written to Lord Mance, the Chairman of the Committee (see Appendix 5).
11. The case was therefore resolved by remedial action. I am grateful to Lord Stevens for his cooperation with this matter.

Lucy Scott-Moncrieff, CBE
Commissioner for Standards

APPENDIX 1: EMAIL FROM DR ALEX MAY, 8 JANUARY 2020

1. I'm writing to you to complain about the conduct of Lord Stevens of Kirkwhelpington.
2. Disclosure: I write a blog at dralexmay.wordpress.com.
3. He appears to have committed two breaches in relation to his disclosures on the register of lords' interests.
4. First, on the register the peer simply states "Stevens Consultancy" under "category 2" of registrable interest, "Remunerated employment, office, profession etc." Nevertheless the registration form at "category 2" quotes para 53 of the "Guide to the Code of Conduct": "Members who have paid posts as consultants or advisers should indicate the nature of the consultancy or advice given, for example 'management consultant', 'legal adviser' or 'public affairs consultant'." Thus it appears Lord Stevens is in breach of this requirement: he fails to state the nature of the consultancy.
5. Second, Lord Stevens omits to disclose a relevant interest under "category 3", "Person with significant control of a company (PSC)". Companies House records show he's a PSC of Quest Global Holdings Limited, the parent ("holding") company of Quest Global Limited. Yet the peer hasn't registered the interest—or any other—under "category 3".

**APPENDIX 2: LETTER FROM THE COMMISSIONER FOR
STANDARDS TO LORD STEVENS OF KIRKWHELPINGTON, 10
JANUARY 2020**

I am writing because I have received a complaint from Dr Alex May alleging that you have breached the House of Lords Code of Conduct.

The complaint relates to two aspects of your entry in the Register of Lords' Interests:

- That the entry under category 2, "Stevens Consultancy", does not indicate the nature of the consultancy or advice given as required by paragraph 53 of the Guide to the Code of Conduct; and
- That your position as a person with significant control in relation to Quest Global Holdings Limited is not registered, as required by paragraph 60 of the Guide to the Code of Conduct.

A copy of the complaint is enclosed.

I have carried out a preliminary assessment of the complaints. I have decided that there is sufficient prima facie evidence to investigate whether the House of Lords Code of Conduct may have been breached.

I also draw your attention to the seven general principles of conduct identified by the Committee on Standards in Public Life and incorporated into the Code of Conduct.

I invite you to respond in writing with a full and accurate account of the matters in question; this response may be by email or letter and to whatever length you feel necessary. A response by 23 January would greatly assist me in investigating this matter in a timely fashion.

Without limiting what you may wish to include in your response to the complaint, it would be useful if you could include details of the nature of the work carried out by Stevens Consultancy.

I would also wish to draw your attention to paragraph 136 of The Guide to the Code of Conduct:

"From the point that the Commissioner decides to undertake an investigation all evidence and correspondence relating directly to the inquiry is covered by parliamentary privilege. It must remain confidential unless and until it is published. If such evidence or correspondence were to be published or disclosed to anyone else without the agreement of the Conduct Committee or the Commissioner, this would be a contempt of the House. An attempt to obstruct an investigation is a contempt of the House."

In accordance with paragraph 125 of the Guide to the Code of Conduct a webpage on the parliamentary website will include basic information about the case.

APPENDIX 3: LETTER FROM LORD STEVENS OF KIRKWHELPINGTON TO THE COMMISSIONER FOR STANDARDS, 22 JANUARY 2020

Thank you for your letter of 10 January 2020 concerning a complaint that I have breached the House of Lords Code of Conduct.

The complaint concerns two aspects of my entry in the Register of Lords' Interests:

- That the entry under category 2, "Stevens Consultancy", does not indicate the nature of the consultancy or advice given as required by paragraph 53 of the Guide to the Code of Conduct; ("Category 2 entry") and
- That my position as a person with significant control in relation to Quest Global Holdings Limited is not registered, as required by paragraph 60 of the Guide to the Code of Conduct ("Category 3 entry").

You have indicated that you intend to investigate whether the Code of Conduct may have been breached.

At the outset, I would like to confirm that you have raised two errors in my entry. I offer you my wholehearted apologies and thank you for bringing the errors to my attention. I provide a full and accurate account of the matters in question below.

Please note that on 16 January 2020, since receiving your letter, my personal assistant separately received an email from Nick Cross, from the Registrar of Lords' Interests, enquiring into whether I have any updates to make to the Register of Lords' Interests. I assume that this is part of an annual check and not related to your own inquiry. In response to his enquiry, I have therefore already taken steps to rectify the omissions.

In reviewing the errors brought to my attention by your letter, I have uncovered one further inaccuracy, which is explained below and has been already rectified.

Background

Since my retirement as Commissioner of Metropolitan Police Service in 2005, I have worked in a range of consultancy roles that focus mainly on security issues. From 2007 to 2011, I accepted a number of political appointments. I served as Senior Advisor on International Security Issues under Prime Minister Gordon Brown in 2007. David Cameron appointed me as Chair of the Borders Policing Committee in 2007. In 2011, I was appointed by Yvette Cooper MP, then Shadow Secretary of State for Home Affairs to Chair an Independent Commission into the Future of Policing in England and Wales.

In 2014, I became Chairman of Quest, a global advisory firm that advises on a range of security and integrity issues. I am a Director of Quest Global Holdings Limited and its other entities that include Quest Sports Limited, Quest Technology Limited, Quest Investigations Limited, Quest Qatar Limited, and Quest Global Limited. I am also a majority shareholder in Quest Global Holdings Limited which is the parent company for the other entities. The vast majority of our business is conducted through Quest Global Limited.

I hold positions at a number of other security consultancy companies, all of which are properly and accurately recorded on the Register of Lords' Interests. I am a Director at Mercer Street Security Systems Limited (since 2006), Executive

Chairman and Director at Axiom International Limited (since 2010), Chairman and Director The Protector Group Limited (since 2008), Executive Chairman at Forensic Axis Limited (since 2014).

Any work that I do for Quest, Mercer Street Security Systems Limited, Axiom International Limited, The Protector Group Limited and Forensic Axis Limited is invoiced through Stevens Consultancy. I operate through Stevens Consultancy as a sole trader; it does not exist as a separate entity.

In addition, I am Chairman and Founder of North East Flight Academy. Based at Newcastle International Airport, it offers professional flight training. It was incorporated on 1 October 2018. Since 24 May 2019, I have been a person with significant control and since 31 December 2019, I am the sole director of the company.

I also have a number of non-financial interests that are properly recorded in the Register. I am the Chairman of the Sport Integrity Global Alliance Ethics Committee, a Non-executive Director at the International Centre for Sport Security, Chairman of Newcastle Cathedral Appeal & Lay Canon Emeritus and President of Aircraft Owners and Pilots Association UK (AOPA UK).

Complaint relating to my Category 2 entry

The complaint in relation to my entry under Category 2, “Stevens Consultancy”, is that I have not indicated the nature of the consultancy or advice given as required by paragraph 53 of the House of Lords Code of Conduct. You have additionally asked me to include details of the nature of the work carried out by Stevens Consultancy.

As set out above, my consultancy work is carried out for the limited companies that are listed on the Register. I invoice for my work through Stevens Consultancy. As with all my consultancy work, I draw upon my experience in the Metropolitan Police Service and that which I have gained from working internationally, to provide advice on, for example, private investigative services for individual and corporate clients. I also provide security advice to sporting organisations. In addition I advise on issues around institutional risk assessment, law enforcement, international security and good governance. I have a range of clients that include individuals, private companies and government bodies.

I am unable to identify my clients by name due to strict conditions of client confidentiality. I am of course aware and highly sensitive to my duties under the Code. I always declare an interest at the time or, if owing to client confidentiality I could not, I would not participate in any proceedings or correspond with ministers or officials regarding matters potentially affecting one of my clients.

For the purposes of the Register of Lords’ Interests, and having regard to paragraph 53 of the Guide to the House of Lords Code of Conduct, my role is best described as “Security Advisor” and the work of Stevens Consultancy as “investigations, security and integrity consulting services”. I confirm that I notified the Registrar of these updates.

Complaint relating to my Category 3 entry

The complaint in relation to Category 3 is that my position as a person with significant control in relation to Quest Global Holdings Limited is not registered, as required by paragraph 60 of the Guide to the Code of Conduct.

It is correct that I am a person with significant control of Quest Global Holdings Limited and that this was missing from my entry under Category 3 of the Register. This omission was an administrative error which arises from the fact that it is a parent company that does not trade.

It has been added to the Register of Lords' Interests as a Category 3 entry.

In reviewing my entry as part of this exercise, I have become aware that my controlling stake in North East Flight Academy was not registered as a Category 3 interest. I have taken urgent steps to rectify this.

Furthermore, having also sought advice from my accountant I was able verify which of my company shareholdings need to be registered under Category 4, and have taken steps to update this entry as well.

Summary

I am grateful to you for taking steps to notify me of my errors in the Register of Lords' Interests. My background as a public servant means that I take an extremely cautious approach to any behaviour that might be an actual or perceived breach of the Code of Conduct. I am accordingly always conscientious of my duties under the Code and sensitive to the general principles of conduct identified by the Committee on Standards in Public Life. I took immediate steps to deal with the issues raised in your letter, including instructing my legal and financial advisors to review the complete entry, in order to ensure the matter was dealt with swiftly and comprehensively.

I offer you my wholehearted apologies for the errors that existed. I would ask that in circumstances where I have taken urgent steps to ensure compliance with my duties under the Code, you consider that no further action or sanction is appropriate.

I hope that I have addressed all the matters relevant to the complaints which have been made. Please let me know if there is anything which you would like me to address in more detail or in relation to which you would like me to provide further information.

I shall of course be happy to discuss these matters further with you and will make myself available if you would like us to meet.

**APPENDIX 4: LETTER FROM LORD STEVENS OF
KIRKWHELPINGTON TO THE COMMISSIONER FOR STANDARDS,
24 JANUARY 2020**

As an addendum to my letter dated 22nd January 2020, I wish to emphasise that there has never been any occasion where the interests which I either omitted or misclassified in the Register of Interests have been relevant to my activity within the House of Lords.

APPENDIX 5: LETTER FROM LORD STEVENS OF KIRKWHELPINGTON TO LORD MANCE, CHAIRMAN OF THE CONDUCT COMMITTEE, 30 JANUARY 2020

I write to you to offer a formal and wholehearted apology in relation to omissions in my entry in the Register of Lords' Interests.

I became aware of the omissions following an investigation by the House of Lords Commissioner for Standards into my entry in the Register of Interests. The Commissioner notified me of her inquiry on 10th January 2020.

The complaint concerned two aspects of my entry in the Register of Lords' Interests:

- That the entry under category 2, "Stevens Consultancy", did not indicate the nature of the consultancy or advice given as required by paragraph 53 of the Guide to the Code of Conduct; and
- That my position as a person with significant control in relation to Quest Global Holdings Limited was not registered under category 3, as required by paragraph 60 of the Guide to the Code of Conduct.

It was apparent to me that I had failed to make the proper entries in the Register. I urgently instructed my solicitors to carry out a full review of my entry. During this review I became aware of a small number of other omissions and a misclassification. I took immediate steps to rectify these and provided a detailed explanation to the Commissioner on 22nd January 2020.

I think it is essential that I make absolutely clear that there has never been any occasion where the interests I omitted in the Register of Interests have been relevant to my activity in the House of Lords.

The Commissioner notified me on 28th January 2020 that the Code had been breached, but that it was her belief that I did not intend to mislead the House or intentionally withhold information from the Register. In light of this, the Commissioner considered that the case could be resolved by remedial action.

I am extremely grateful to the Commissioner for bringing the errors to my attention. As a former public servant, I am scrupulous in my adherence to my duties under the House of Lords Code of Conduct.

I offer you my sincere apologies for the omissions that existed in the Register of Interests. Please do not hesitate to let me know if you would like me to provide further information.