



HOUSE OF LORDS

Report from the Commissioner for Standards

The conduct of Lord Botham

Commissioner for Standards

The independent Commissioners for Standards are responsible for considering any alleged breaches of the Codes of Conduct.

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Registrar of Lords' Interests

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

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Registers of Interests

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

Independent Complaints and Grievance Scheme Helpline

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The conduct of Lord Botham

Summary of complaint

1. On 14 November 2022, my office received a complaint from a member of the public, Dr Alex May, regarding the conduct of Lord Botham.¹
2. Dr May alleged that Lord Botham had been late in registering his interest in Caduceus and may not have registered an interest in a company named Beefy Finance; and was therefore in breach of the Code of Conduct for Members of the House of Lords.

Relevant aspect of the Code

3. Paragraph 12(a) of the Code of Conduct says: “In order to assist in openness and accountability members shall ... register in the Register of Lords’ Interests all relevant interests, in order to make clear what are the interests that might reasonably be thought to influence their parliamentary actions.” The Guide to the Code of Conduct sets out what constitutes a relevant interest.
4. Paragraph 40 of the Guide to the Code of Conduct says “It is the responsibility of members to keep their entry up-to-date by notifying changes in their registrable interests within one month of each change occurring. Failure to do so breaches the Code of Conduct.”

Preliminary assessment

5. I received confirmation from the Registrar of Lords’ Interests that Lord Botham had registered his interest in Caduceus on 21 October, which was published on 2 November. I also verified that Lord Botham had publicly announced his partnership with Caduceus on 24 July.²

Summary of investigation

6. I wrote to Lord Botham on 17 November to provide him with a copy of the complaint and inform him that I had launched an investigation. I invited him to submit a full written response to the allegations.
7. Lord Botham and his assistant responded to my letter on 1 December. They told me:

“The contract with Caduceus was signed in March 2022 in Lord Botham’s absence, while he was in Australia.

On October 21st 2022 an email was sent to [the Assistant Registrar of Lords’ Interests] to register the new contracts Lord Botham has with both Caduceus and Ethica. [The Assistant Registrar] replied to us on 2nd November 2022 to apologise for the delay in his response, he had been seeking advice about the contracts. He confirmed that it had all been registered.

To date not a penny has been received from either contract.

1 The investigation and report were completed by Martin Jelley QPM.

2 This was announced by Lord Botham on his Twitter account: <https://twitter.com/beefybotham/status/1551110360450703362?s=46&t=SZMcWwmzIDDAx3N53LeEHw>

There is no connection between Lord Botham and Beefy Finance. The print article on August 24th mentioned Beefy Finance, this was an error on the papers part, they got the tag line wrong. An apology was sent from the Daily Mail office when the error was flagged up by Caduceus Foundation.”

8. I asked Lord Botham to explain why he did not register his interest in Caduceus until October. Lord Botham told me:

“In March 2022 I was in Australia, in June I returned in my position as Trade Envoy and there is no other explanation rather than I simply forgot. It was an oversight and as soon as I realised this [redacted] informed [the Assistant Registrar of Lords’ Interests] of all my new interests. That was in October. For your information I have received not a penny from either company up to this day.”

Finding

9. **I conclude that by registering his interest in Caduceus seven months after signing a contract with the company in question, Lord Botham is in breach of paragraph 12 of the Code of Conduct.**
10. **I accept Lord Botham’s explanation that he has no connection to Beefy Finance.**
11. **I consider this to be a minor breach of the Code of Conduct and one for which remedial action is an appropriate outcome. I proposed that a letter of apology from Lord Botham to Baroness Manningham-Buller, Chair of the Conduct Committee would be sufficient remedial action in this case. Lord Botham has since written to Baroness Manningham-Buller (see Appendix 1).**
12. **I note that this is Lord Botham’s second breach of the registration requirements under the Code of Conduct, although his first breach was found to be minor and inadvertent and settled by remedial action.³ It is important for public confidence in the House of Lords that all members, including Lord Botham, register their interests in a timely and accurate fashion.**
13. I am grateful to Lord Botham for his cooperation in this matter.

3 <https://www.parliament.uk/contentassets/b800fc500b2c48aba59378f7552566c8/report-on-lord-botham-17-05-21.pdf>

**APPENDIX 1: LETTER FROM LORD BOTHAM TO BARONESS
MANNINGHAM-BULLER, CHAIR OF THE CONDUCT COMMITTEE**

Dear Baroness Manningham-Buller,

I am writing to you today to offer my apology to you for my breach of conduct by not registering my interest in a company I am currently contracted to within the time period given.

I will endeavour to keep to the code of conduct at all times to avoid such circumstances again.

I wish you a very happy New Year and hope you can accept my sincere apology,

Yours faithfully,

Lord Botham