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Summary

I investigated the allegation that the All Party Parliamentary Group on Boxing (the group) had acted in breach of the Guide to the Rules on APPGs. My inquiry concerned breaches to paragraphs 18 (d), 21 and 24 of the APPG rules.

- 5 Having corresponded with the Chair I found no evidence to uphold the complaint regarding paragraph 18 (d), concerning membership and voting rights.

10 However, I found the group had breached paragraphs 21, transparency applying to the publication of meeting minutes, and 24, failure to include a properly worded disclaimer on the group's website. The Chair acknowledged and apologised on behalf of the group for these breaches and took prompt action to have the omissions rectified.

While I identified two breaches of the rules for APPGs, I found they were at the less serious end of the spectrum and I concluded the matter using the rectification procedure available to me through Standing Order 150.

Mr Chris Evans MP: Resolution letter

Letter from the Commissioner to Mr Luigi Leo, 8 October 2019

5 I wrote to you on 24 July 2018, informing you I would begin an inquiry into your allegation that the All-Party Parliamentary Group on Boxing had not disclosed its minutes, as required in the Guide to the Rules for APPGs. In addition to the specific point you raised, I considered whether the APPG had acted in compliance with paragraphs 18, 21 and 24 of the APPG rules more generally.

I have now concluded my work and upheld the allegation of a breach of the rules by the APPG on Boxing.

10 After correspondence with Mr Chris Evans MP, the Chair and registered contact for the group, I have found that the group had acted in breach of the Guide to the APPG Rules.

15 Mr Evans accepted that the APPG on Boxing website did not meet the requirements for transparency, as outlined in the rules. This included a requirement to publish the minutes of previous meetings and AGMs, which were not available on the website at the time of your complaint. He also acknowledged that incorrect information had been communicated regarding membership and voting rights for the group.

20 In addition, the APPG on Boxing website should have included the disclaimer set out in paragraph 23 of the Guide to the Rules, or an equivalent. I welcome the fact that Mr Evans acted promptly to have this omission put right.

During my investigations I became aware that a book, written by Mr Evans, was featured in the news section of the APPG on Boxing website. This was inappropriate, and Mr Evans acted immediately to have references to the publication removed from the site.

25 While the APPG on Boxing, acted in breach of the APPG rules, I consider this breach to be at the less serious end of the spectrum and, given the steps the Chair has taken to put things right, I have concluded this matter through the rectification procedure. The rationale for my decision is contained in my letter of 19 September 2018 (item 7 in the written evidence pack).

30 I consider this to be an appropriate outcome and the matter is, therefore, now closed. I will notify the Committee on Standards of the outcome in due course. I will post the outcome of this inquiry on my webpages shortly.

8 October 2018

Written Evidence

1. Letter from Mr Luigi Leo to the Commissioner, 10 July 2018¹

5 I am writing to complain in the strongest possible terms and to bring your attention to what is almost certainly an abuse of Parliamentary process and a public interest matter that warrants further investigation

10 My complaint is in respect of the All Party Parliamentary Group on Boxing (APPGB) which is chaired by Chris Evans MP. Having attended a meeting last year, I was very concerned with what I heard which, in my opinion is not in the best interests to the sport of boxing. This complaint is being made because I am being refused a copy of the minutes of that meeting and denied information to which I am entitled under the Data Protection Act 2018.

Brief Background.

15 Last year I was invited to the APPG to deliver a “good news boxing story” to the Committee. I briefly explained how, (in a partnership with the Metropolitan Police and London Boxing Association), my charitable organisation, the Schools Amateur Boxing Association, (SABA) had introduced a successful boxing / educational initiative in Islington. It was a resounding success (and still is). The Group commended the initiative and Mr Evans MP made a point of asking me to attend the next APPGB meeting and to deliver a more detailed account of what we were doing.
20 This was minuted by [name redacted], who is the Secretary of the Group.

25 During the meeting England Boxing (NGB) shared their strategy with the Group. As a former Director of England Boxing I asked why a new strategy had been lodged when we have already prepared a strategy at a considerable cost to the taxpayer only 2 years earlier, (£35,000). England Boxing, (EB), did not respond. I asked that this was minuted. It was.

30 EB asked Mr Evans MP if this Group could lobby the British Medical Association to ask them to consider ‘softening’ their stance on boxing. This was of considerable concern to [name redacted] and myself and we explained to the Group that one of the reasons why a new boxing organisation was formed was because EB passed a rule requiring boxers to compete without headguards. Mr Evans MP said he was not aware of a new organisation being created and I had to inform him that EB had lost nearly 20% of its boxers, coaches, officials and clubs yet continued to receive considerable and full funding. I further informed him that the new organisation had been created in November 2016 and was successfully competing with EB.

35 Mr Evans MP said he was not aware and I suggested that he should have been told. I also questioned why the national Governing Body had failed to inform him that its

¹ Original email sent to the Commissioner 4 July and reproduced as letter of complaint

organisation was the subject of corruption and incompetence allegations and an investigation by DCMS. Mr Evans invited [the President of London boxing] and myself to meet with him and discuss these issues outside of the meeting. He said [the group's Secretary would] make the necessary arrangements and ask[ed] him to
5 minute what was agreed.

At the end of the meeting Mr Evans MP pulled [the President] and myself aside and said he was concerned to hear what I had said and promised to take matters further and said he was inviting invite us to discuss the matter further. In fact, he 'urged' us to meet with him asap. We agreed and said we would wait for the invite. He said we
10 would also meet at the pre-Christmas drink / get together. At this point I suggested that Mr Evans MP familiarise himself with matters and consult with NAO, who I said were investigating EB. Mr Evans MP told us he sat on the NAO Board and would make enquiries. He did not.

[Text redacted as not relevant to the inquiry]

15 I made a FOI request for the minutes which [the group's secretary] advises that I am not entitled on the basis that the APPGB has no official status in Parliament. This is clearly misleading and suggests that the APPGB is abusing the Parliamentary process. After all, the APPGB 'implies' it has Parliamentary status on the basis that it uses the word 'Parliament' in its title. If, as [he] suggests, the Group has no 'official
20 status' in Parliament then they should drop the Parliamentary association as it is misleading and a mis-description of its function. If, as I believe to be the case, [the secretary] is misleading me then it appears to be the case that the APPGB is a lobbying group, led by [the secretary], and is using the Parliamentary name and status to further its aims (and when it suits them). The APPGB and its action may
25 have reputational consequences for Parliament.

I would very much like to receive a copy of the minutes and believe I am entitled to the same under the current Data Protection Act 2018. Subject to your enquiry, if I do not receive the same then I will refer this matter to the ICO on the basis that a 'rogue' group is operating within Parliamentary but not using Parliamentary processes (for
30 example, breaching Data Protection regulation.

[Text redacted as not relevant to the enquiry]

I am surprised that he has allowed a lobbyist (name redacted), to respond on his behalf (not even his staff) and to advise me that the APPGB operate under Chatham House Rules. This cannot be right. It suggests that a number of MP's are part of a
35 secretive lobbying Group operating within the confines of Parliament in an 'unofficial' capacity but clearly at a cost to the taxpayer. It further suggests that the APPGB is being run by a lobbyist from a private company who appears to have the power to refuse to comply with Parliamentary process and make decisions that are clearly not in the public interest. Can you please explain how someone can operate
40 and be unaccountable within Parliament.

I am therefore bringing this matter to your attention to respectfully ask that you undertake an investigation into:

[Text redacted as not relevant to the enquiry]

- 5 3. The activities of the APPGB and authority under which it operates within Parliament
4. The cost of the APPGB to the public purse
5. The role and remit of [the group's Secretary] and whether there is a conflict of interest with Parliamentary Rules
- 10 6. The breach of Data Protection Regulation by the Group, in particular [nominated public enquiry contact]

I will be grateful for the opportunity to attend and discuss these matters in person – in order to provide a clearer understanding and to clarify any points. I provide my telephone number below if you wish to contact me.

- 15 I look forward to hearing from you and will be grateful if you can acknowledge receipt.

10 July 2018

Enclosure: Copies of Mr Leo's email communications with the Secretariat TFA²

2. Letter from the Commissioner to Mr Chris Evans MP, 24 July 2018

- 20 I am writing to you as Chair of the APPG on Boxing to ask for your help with an inquiry which I have begun following a complaint from Mr Luigi Leo that the group did not disclose its minutes when requested to do so. I enclose the relevant parts of his correspondence. Having looked at this APPG's website, I am also concerned that the group may not have followed the House's rules on transparency more generally as well as the rules concerning voting rights.

- 25 My inquiry will consider whether the group has breached rules 18, 21 and 24 of the Guide to the Rules for All Party Parliamentary Groups (the Guide to the Rules).

Paragraph 3 of the Guide to the Rules says:

“Each group's Chair and Registered Contact, who must be a Member of the House of Commons, is responsible for ensuring that the group complies with the rules of the

² Series of seven emails covering dates 23 April 2018 - 3 May 2018

House, and that if any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with those rules.”

Paragraph 18 of the Guide to the Rules says;

“Groups must observe the following rules about membership:

5 ...

...

...

Groups may include non-parliamentarians as external members, and may charge them a subscription of membership fee, but they must not have voting rights.”

10 Paragraph 21 of the Guide to the Rules says:

“Groups must be transparent about their nature, membership and funding. In particular, they must avoid presenting themselves in a way which could lead to confusion with Select Committees. They must make full disclosures of any support received for their publications. An APPG must:

15 a) use the group’s full registered name, including the term “All-Party Parliamentary Group” in all its communications. This helps distinguish registered groups from unregistered groups and from other bodies such as Select Committees;

20 b) publish details of its formal meetings in advance, on the All-Party Notices, along with the names of any external speakers and details of a parliamentary contact;

c) publish on its website (or provide on request) the following information:

i) a list of active members (both parliamentary and external);

ii) dates of meetings, both past and future;

25 iii) minutes of past formal meetings (which should both record attendance and decisions;

iv) any reports or other publications issued;

v) income and expenditure statements (if required: see paragraphs 28 and 29 below).

This information must be retained in the group’s website (or retained so that it can be provided on request) for at least five years. There is no obligation to retain the records after that point unless an external body such as HMRC requires it.”

Paragraph 24 of the Guide to the Rules says;

- 5 “A group’s website and its social media feed (if any) must give the contact details for the group’s chair, and secretariat and/or public enquiry point (if it has one). All such websites and media feeds must carry a disclaimer as follows:

10 “This is not an official website [or feed] of the House of Commons or the House of Lords. It has not been approved by either House or its committees. All-Party Parliamentary Groups are informal groups of Members of both Houses with a common interest in particular issues. The views expressed in these webpages are those of the group.”

I would be grateful to have your comments on the allegation. In particular, please let me know:

- 15 (1) whether you were aware of the requirements in paragraphs 18, 21 and 24 above, as set out in the Guide to the Rules which was approved by the Standards Committee on 24 February 2015;
- (2) who approves the content and maintains the group’s website
- 20 (3) the steps you have taken to ensure that the secretariat is aware of and complies with the Guide to the Rules
- (4) why the complainant was told that “all membership applications need to be approved by [you] and all parliamentary and corporate members” [my emphasis]
- 25 (5) why the information listed in 21(c) does not appear on the APPG’s website;
- (6) if the information listed in c (i) to (iv) above is already in the public domain, where it can be found;
- (7) whether the disclaimer set out in paragraph 24 of the Guide to the Rules appears somewhere on the group’s website (I cannot find it);
- 30 (8) how it came about that the book Fearless Freddie is advertised on the group’s website (which bears the APPG crowned portcullis badge);

- (9) whether the group has considered or will consider an income and expenditure statement in respect of its most recent reporting year; and if so, where that statement can be (or will be) found.

5 It would be helpful to have evidence to support your responses. Please supply a copy of the minutes of the meeting of the APPG attended by Mr Leo.

I have explained to Mr Leo that, while the inquiries I am initiating today are directed to you as the responsible officer for the group, my inquiry is about an alleged breach of the rules by the APPG. It is not an inquiry into an alleged breach of the Code of Conduct for Members. I have also explained that an APPG is an informal group of
10 Members of both Houses with a common interest in particular issues, and that it is for the group to decide who to admit as an external member and what policies it wishes to support.

I will, as far as possible, follow my usual procedures, which are set out in the enclosed Commissioner's Information Note. While my inquiry is in progress, this
15 matter is protected by parliamentary privilege. Please regard this correspondence as private and confidential, and do not share it with anyone other than those with whom it is strictly necessary in order to answer my questions.

Please note that, following the approval by the House of the Independent Complaints and Grievance Scheme Delivery Report, I no longer routinely publish a
20 list of current inquiries. The references in paragraphs 58 and 61 of Commissioner's Information Note to the disclosure of the name of the Member and All-Party Parliamentary Group no longer apply. The outcome of the inquiry and all the related evidence (including all correspondence) will, however, be published when the inquiry is concluded.

25 I would be grateful to have your response to this letter by 31 August 2018

24 July 2018

3. Letter from Mr Chris Evans MP to the Commissioner, 25 July 2018

Thank you for contacting me as Chair of the All Party Parliamentary Group (APPG) Boxing following a complaint by Mr Luigi Leo.

30 I can confirm I am aware of the rules governing APPGs and have shared those with Tristan Fitzgerald Associates (TFA) who provide secretariat services for the group. In terms of the website for the group I have taken a look and agree there are several areas which need to be updated to bring it into compliance.

I have spoken to TFA, who manage the website on behalf of the group who I
35 understand have made the necessary changes as of 25th July. It is my belief these were simply an oversight and have now been addressed. All minutes of the group have been published on the website consistently alongside meetings.

5 In terms of the book 'Fearless Freddie' it was never the intention to advertise and was simply displayed under the news section of the group as a link to an external website to an article about my chairmanship of the group. I can see why there is a misunderstanding and have specifically requested that this and all other references to the book have been removed again effective of 25th July.

In terms of voting rights to the group, it has always been made clear that voting is restricted to parliamentarians. The income and expenditure has been registered with the House authorities following the Annual General Meeting earlier this month.

10 I have read through the enclosed information following Mr Leo's complaint, I disagree with his version of events. At the said meeting I was called away for a vote, afterwards I received several complaints about his behaviour and that of his organisation. He has not attended a meeting since and through TFA I am told he has made several threats to report the group to you.

15 I can provide evidence of the complaints against Mr Leo. I have offered to meet with him on several occasions to discuss his issues but he has consistently refused to meet with me.

Thank you for bringing these matters to my attention. I hope the actions that have been taken will be satisfactory to you. Should you require any further information then I would be more than happy to meet with you at a convenient date and time.

20 *25 July 2018*

4. Letter from the Commissioner's office to Mr Chris Evans MP, 17 August 2018

Thank you for your letter dated 25 July and the information that this provided. There are a few points that I would like to clarify with you and some further information that would be useful to have at this time.

25 I think the Commissioner would find it helpful if you are able provide the following;

- copies of any communications between your office and TFA, which demonstrate that you have discussed the requirements as set out in the Guide to Rules;
- 30 • details of any agreed procedure for approval of any new content, which is due to be added to the website;

35 In your letter you state that the minutes of the group's meetings have been published on the APPG's website. I have been able to locate summary notes for the APPG's meeting on 24 April 2018 and the AGM on 10 July 2018. Unfortunately, I have not been able to locate the minutes for either of these meetings nor for any meetings that took place in 2017, including the meeting attended by Mr Leo.

It would be helpful if you would indicate where minutes for previous APPG meetings are available.

5 It would also be useful for the Commissioner to have a copy of each set of minutes, including those for the meeting that Mr Leo attended.

10 Your letter states that you have always made it clear that voting on APPGs is restricted to Parliamentarians. To avoid any misunderstanding, I think it would be helpful to the Commissioner to know whether TFA accept Mr Leo's statement, that he was told, "all membership applications need to be approved by [you] and all parliamentary and corporate members" and, if so, why he was told that.

The Commissioner will return to the office on 3 September 2018. If you are unable to send a full reply by this date, please could you let me know.

17 August 2018

15 **5. Letter from Mr Chris Evans MP to the Commissioner's Office, 23 August 2018**

Thank you for your further correspondence of the 17th August relating to a complaint about the All Party Parliamentary Group (APPG) for Boxing.

20 I have checked the website again on the 22nd August and have found the minutes of each meeting, since I took over as Chair, under the individual titles 'summary notes' including the meeting of 31st October 2017 which Mr Leo attended.

In order to make sure that they are easier to find in the future I have instructed Tristan Fitzgerald Associates (TFA) to create a specific page called 'Meetings and Minutes'.

25 The link can be found at <https://www.appg-boxing.org/meetings-minutes/>. Please be aware that I took over as Chair on the 18th July 2017. I cannot account for the beginning of 2017 as I was not the Chair of the APPG. The previous Chair was [name redacted] who is no longer an MP.

30 At the Annual General Meeting on the 18th July 2017 a discussion took place about setting up a website. All further conversations regarding the rules governing the running of APPGs were discussed verbally.

35 As requested I enclose a copy of the procedure agreed with TFA for approving content on the website. You will also find an email from TFA dated 22nd August 2018, which I received after discussing the contents of your letter, confirming that the rules were discussed.

The website was set up as a way of promoting the work of the APPG to non-members. By its very nature we hope to increase the openness and transparency of the group and encourage wider support for the good work its doing. I would be appreciative of any guidance the commissioner can give to ensure the website remains compliant in the future as I believe that to take it down would have the exact opposite effect.

I again re-iterate the point that only Parliamentarians have voting rights. I agree the wording of the phrase 'all membership applications need to be approved by (me) and all parliamentary and corporate members' is wrong.

Mr Leo has never been a member of the APPG. He attended one meeting on 31st October 2017, to which he was not invited. Following that meeting TFA received two written complaints, along with a number of verbal ones, about Mr Leo's conduct at the meeting from external members. He has not attended a single meeting since.

It is my understanding that over six months later Mr Leo wrote a series of emails to [name redacted] director of TFA, some of which were aggressive in tone. It was felt that, in light of the previous complaints and Mr Leo's open hostility towards the group, should Mr Leo wish to attend any future meetings then it should be discussed with members. At no time was a vote to be taken on his potential membership. I have spoken to [name redacted] of TFA who accepts the wording was incorrect. He is happy to meet with you to discuss this matter. [Name and address redacted].

Thank you once again for contacting me. As I said in my last letter I would welcome an opportunity to meet with the Commissioner in the hope this matter can be brought to a swift conclusion.

23 August 2018

Enclosure: Copy of website content approval and email from Secretariat³

6. Letter from Commissioners office to Mr Chris Evans MP, 10 September 2018

Thank you for your letter dated 23 August and for the information that this provided. I would also like to confirm receipt of a copy of the website content approval procedure for the APPG Boxing, as well as a copy of an email from your Secretariat confirming their understanding of the Guide to Rules.

The Commissioner will take all the information received into consideration as part of her inquiry and I will contact you regarding the next steps as soon as possible.

10 September 2018

³ Single sheet copy of the approval procedure for APPG Boxing website content and also copy of an email from the Secretariat confirming a discussion of the Guide to Rules.

7. Letter from the Commissioner to Mr Chris Evans MP, 19 September 2018

Thank you for your letter of 23 August 2018. I have considered very carefully all the correspondence you have sent to my office and I believe I now have sufficient evidence on which to base a decision.

5 My decision

While I am satisfied that there was no deliberate attempt to mislead, I find that the APPG on Boxing (the group) has acted in breach of the Guide to the APPG Rules.

10 As you know, I was considering potential breaches of three of the rules. I address each of those rules in turn below.

Paragraph 18 of the rules (voting rights)

15 Paragraph 18 (d) says, "Groups may include non-parliamentarians as external members, and may charge them a subscription or membership fee, but they must not have voting rights". You have given assurances that in the APPG for Boxing only parliamentarians have voting rights. On that basis I do not find a breach of this rule.

20 You have acknowledged that Mr Leo was told that "all membership applications have to be approved by [you] and all parliamentary and corporate members". You have also acknowledged that that was wrong. I agree. That statement will understandably have led Mr Leo to think that paragraph 18 had been breached.

Paragraph 21 of the rules (publication of information)

25 It is clear that prior to my investigation the APPG Boxing's website did not meet all the requirements of paragraph 21. Over the course of my inquiry additional information has been included on the group's website, concerning active members; meeting dates and minutes of meetings. That action was necessary because the group was previously in breach of paragraph 21. I therefore uphold the allegation of a breach of that rule.

30 I know that Mr Leo was concerned about whether his contribution to the meeting was properly reflected in the minutes. However, that is not a matter for me; the rules specify only that the published minutes should record attendees and decisions.

35 You said in your letter of 25 July 2018 that it was not your intention to advertise your book on the website. That would be inappropriate on the website of an APPG and in connection with the crowned portcullis. Thank you for having removed the references to your book from the group's website.

Paragraph 24

The group's website did not carry a properly worded disclaimer, as required by paragraph 24 of the rules until 25 July 2018. That was also a breach of the rules.

5 Conclusion

I have identified breaches of two of the rules for APPGs. However, I consider these breaches to be at the less serious end of the spectrum. Under Standing Order 150, I am able to rectify a complaint without submitting a full and formal memorandum to the Committee on Standards. I would instead write to Mr Leo to inform him of my decision, following which the matter would be closed. I inform the Committee of the outcome and my letter to the complainant and the relevant correspondence is in due course published on my webpages.

As chair of the APPG you are responsible for ensuring the group complies with the rules.¹ In order for me to implement the rectification procedure, it would be necessary for you to accept that the group was in breach of the Guide to the Rules on APPGs and to apologise on the group's behalf. It would also be helpful if you would state clearly the steps you propose to take to ensure that the group complies with the Guide to the Rules in future.

Other matters

I understand that as the Chairman of the group you might have considered it necessary to share some of the details of the complaint with the Registered contact point, [name redacted]. However, I was surprised and disappointed to receive information direct from him which appeared to be intended to show the complainant in a negative light. Since that information is not relevant to my decision on whether or not the group acted in breach of the House's rules, the information he submitted will not be included in the written evidence pack, which will be published in due course.

Next steps

I have outlined the steps that would be necessary for me to resolve this matter through the rectification procedure. If you accept that the group has acted in breach of the rules, it would be sufficient for you to apologise on behalf of the group by way of a letter in reply to mine. I would then share with you a draft of my letter to Mr Leo and a copy of the written evidence which would be published on my webpages (here: <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-rectified/rectifications-2018-19/>). While the content of these documents is a matter for me alone, you would have the opportunity to comment on their factual accuracy.

If you do not accept that the group has acted in breach of the rules, you should say so and explain clearly the reasons for your disagreement with my decision.

Please reply to this letter by 10 October 2018.

5 *19 September 2018*

8. Letter from Mr Chris Evans MP to the Commissioner, 1 October 2018

Thank you ever so much for writing to me with reference to your letter about the investigation into the APPG on Boxing.

10 Firstly, I would like to thank you for your swift and prompt conclusion to this investigation.

I fully accept that the group has breached paragraph 21 of the rules and paragraph 24. Therefore, I wish to apologise unreservedly on behalf of the group.

15 In terms of the next step forward, as you know, once the investigation had started a disclaimer was put immediately on the website along with the minutes of all meetings.

This is a practice I will continue to do and I endeavour along with TFA to ensure that a robust framework is in place to ensure that this matter does not arise again.

You can rest assured I will endeavour myself personally to ensure that the group stays within compliance.

20 *1 October 2018*