

Contents

	Summary	2
	Written evidence	4
	1. Letter from the Commissioner to Mr Andrew Bridgen MP, 12 October 2023	4
5	2. Letter from Mr Andrew Bridgen MP to the Commissioner, 27 October 2023	9
	3. Letter from the Commissioner to the Registrar of Members' Financial Interests, 31 October 2023	12
	4. Letter from the Commissioner to Mr Andrew Bridgen MP, 31 October 2023	15
	5. Letter from Mr Andrew Bridgen MP to the Commissioner, 8 November 2023	16
10	6. Letter from the Registrar of Members' Financial Interests to the Commissioner, 8 November 2023	17
	7. Letter from the Commissioner to the Registrar of Members' Financial Interests, 17 November 2023	35
	8. Letter from the Commissioner to Mr Andrew Bridgen MP, 17 November 2023	36
15	9. Letter from the Registrar of Members' Financial Interests to the Commissioner, 24 November 2023	37
	10. Letter from Mr Andrew Bridgen MP to the Commissioner, 29 November 2023	38
	11. Letter from the Commissioner to Mr Andrew Bridgen MP, 30 November 2023	39
20	12. Letter from Mr Andrew Bridgen MP to the Commissioner, 11 December 2023	39
	13. Letter from the Commissioner to Mr Andrew Bridgen MP, 28 December 2023	40
25	14. Letter from Mr Andrew Bridgen MP to the Commissioner, 9 January 2024	47

Summary

Following the publication of my advice note “*Late Registration of Interests*” (PCS/AN/2023.03) on 3 February 2023, I started monitoring the registration of interests by all Members. I noted that Mr Andrew Bridgen MP appeared to have registered several interests outside the 28-day window laid down by the House in paragraph 5 of the Code of Conduct for Members of Parliament:

10 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members’ Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.*

15 Given the number of interests involved, I decided to open a formal inquiry on my own initiative using the authority given to me by Standing Order No. 150. During my inquiry I identified four further interests that also appeared to have been registered late and which I incorporated into this investigation.

Having taken evidence from Mr Bridgen and received advice from the Registrar of Members’ Financial Interests, I decided that:

- 20 a) One of the interests identified had been registered within 28 days and did not amount to a breach of the rules.
- b) Twelve connected interests, a Crowdfunder for a legal action and associated individual donations, had been registered outside the 28-day window set by the House and that these late registrations were breaches of the rules.
- 25 c) Seven further interests had been registered outside the 28-day window set by the House and that these late registrations were also breaches of the rules.

30 Based on the available evidence, I concluded that Mr Bridgen’s failure to register these interests on time was inadvertent and not deliberate, and that some of the interests could also be reasonably classed as minor.

35 Given my conclusions, I was satisfied that these breaches of the rules could be resolved through the rectification process laid out in Standing Order No. 150. As part of the rectification process, Mr Bridgen has acknowledged and apologised for his breaches of the rules. As is my usual practice, I have also asked the Registrar to arrange for the relevant entries in the Register of Members’ Financial Interests to be annotated, so it is clear they have been the subject of an inquiry.

23 January 2024

Written evidence

1. Letter from the Commissioner to Mr Andrew Bridgen MP, 12 October 2023

Following the publication of my advice note "*Late Registration of Interests*" (PCS/AN/2023.03) on 3 February 2023, I have been monitoring the registration of interests by all Members. I have noted that you have registered the following interests late since the publication of my advice note:

Cat.	Date received	Date registered	Value	Details
3	17/01/2023	17/02/2023	£800	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter, media support and speech writing.
3	17/01/2023	17/02/2023	£500	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter, media support and speech writing
3	17-18/01/2023	01/03/2023	£241.45	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter to cover the cost of meetings, lunches, dinners and counselling.
8	12/05/2023	12/06/2023	£87,080	Crowdfunding support for a defamation action. Crowdfunder website is Democracy 3.0. The fund is valued at £87,080 of 31 May 2023, with a total of £4,319 drawn down for court fees to date.
1	24/05/2023	21/08/2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
1	14/06/2023	21/08/2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
1	18/07/2023	21/08/2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
3	08/06/2023	16/08/2023	£3,750	Reclaim the Media Limited (trading as the Bad Law Project), money paid to me to

Cat.	Date received	Date registered	Value	Details
				cover court costs relating to an ongoing legal matter
3	08/06/2023	16/08/2023	£569	Reclaim the Media Limited (trading as the Bad Law Project), money paid to me to cover court costs relating to an ongoing legal matter
3	10/05/2023	18/09/2023	£530	Barry Carroll, private donation towards the defamation action crowdfund registered under Category 8 on 12 June 2023
3	10/05/2023	18/09/2023	£1,060	Stephen Harker, private donation towards the defamation action crowdfund registered under Category 8 on 12 June 2023
3	11/05/2023	18/09/2023	£531	Jane Glynn, private donation, towards the defamation action crowdfund registered under Category 8 on 12 June 2023
3	11/05/2023	18/09/2023	£319	Swee Lip Quek, private donation, towards the defamation action crowdfund registered under Category 8 on 12 June 2023
3	16/05/2023	18/09/2023	£500	Stephen St Quinton, private donation, towards the defamation action crowdfund registered under Category 8 on 12 June 2023
5	10/05/2023	18/09/2023	£530	Andrew Roberts, private overseas donation, towards the defamation action crowdfund registered under Category 8 on 12 June 2023
5	10/05/2023	18/09/2023	£421.98	Rosemary Southwood, private overseas donation, towards the defamation action crowdfund registered under Category 8 on 12 June 2023

Given the high number of late registrations, I have decided to open a formal inquiry on my own initiative using the authority given to me by Standing Order No. 150.

The scope of my inquiry

My inquiry will focus on whether you have acted in breach of paragraph 5 of the House of Commons' Code of Conduct for Members by failing to conscientiously register the interests listed above within the 28 day time limit set by the House. If the scope of my inquiry changes, I will update you in writing.

The relevant rules of the House

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

10 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those*
15 *registrable interests within 28 days.*

Chapter 1 of The Guide to the Rules relating to the conduct of Members, which is appended to the Code, contains more detail about the registration of interests including the thresholds for the various categories.

Next steps

20 I would welcome your comments on the allegation that your actions have amounted to a breach of paragraph 5 of the Code of Conduct for Members. I would also be grateful for your answers to the specific questions below. It would be helpful to receive any evidence to support your responses when you reply to this letter. Any other points you wish to make to help me with this inquiry would also be welcome.

- 25 1. Are you aware of the requirement to register all relevant financial interests within 28 days of receipt?
2. Please can you outline the circumstances that caused the interests listed above to be registered late?
- 30 3. Are you satisfied that your current entry in the Register of Members' Financial Interests is complete and accurate in all other respects and in line with Chapter 1 of the Guide to the rules?
- a) If it is not, please contact the Registrar now to bring it up to date.
- b) If it is, please tell me the steps you have taken to satisfy yourself of this.

4. Please can you reflect and then advise me of the steps to plan you take to avoid future late registrations.

Important information

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

This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published.

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

Procedure

20 Please see the Procedural Protocol in relation to the Code of Conduct, which was approved by the House on 18 October 2022. This sets out detailed information about the House's standards procedures, including the procedure I follow.

25 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.

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

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

Potential outcomes

Inquiries are generally concluded in one of three ways.

- 35 1. If the evidence does not substantiate the allegation, I will report that I consider there has been no breach of the Code. If the allegation is particularly serious

or the investigation raises matters of wider interest or relevance, I may decide nevertheless to submit a memorandum to the Committee on Standards, which the Committee will consider and then submit its own report to the House.

- 5 2. If the evidence demonstrates a breach of the rules, I may, in circumstances defined by Standing Order No. 150, report that I consider there has been a breach of the Code, and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards.

10 For inquiries that either result in a not upheld outcome or a rectification of the breach of the Rules, the investigation material, including our correspondence, will be published on the Parliament website, and the Committee will be notified.

- 15 3. If I consider there has been a breach of the Code, and
- it is either unsuitable for the rectification procedure; or
 - you do not accept my opinion that there has been a breach of the Code; or
 - you do not take (or do not agree to take) any remedial action required; or
 - the investigation raises issues of wider importance

20 I must make a referral to the Committee on Standards. The Committee will then decide whether there has been a breach of the Code. My memorandum to the Committee will be published as an appendix to the Committee's own Report.

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

Action

I would be grateful to have your response to this letter as soon as possible and no later than **24 October 2023** please.

30 I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk

Thank you for your cooperation with this matter.

12 October 2023

2. Letter from Mr Andrew Bridgen MP to the Commissioner, 27 October 2023

I am writing in response to your letter, date the 12th October, regarding my financial declarations.

5 Before going into detail, I would like to acknowledge my breach of the guidance, in certain instances, relating to your table of Categories and make clear that these late registrations were either unintentional errors, for which I am sorry, or forced omissions due to circumstance as I will explain.

10 **1. Are you aware of the requirement to register all relevant financial interests within 28 days of receipt?**

I am aware of the rules and take the guidance seriously with due respect.

2. Please can you outline the circumstances that caused the interests listed above to be registered late?

15 Unfortunately, there were several exceptional circumstances for the delay in providing the Registrar with all the correct information, which are as follows:

20 Firstly, dealing with the Crowdfunder, chronologically items 4,8,9,10,11,12,13,14,15,16 from your table. Overriding all these entry queries, is the advice I received from [name redacted], Head of Regulatory Support, The Electoral Commission (correspondence attached) which states in her view that such donations are *'usually outside of the scope of political activities'* and *'Our view is that these proceedings are a personal rather than a political matter'*.

I propose therefore you set aside any matter of reporting breach for all these items.

25 That said, in good faith whilst I was waiting for clarification from The Electoral Commission, I maintain email correspondence with the Assistant Registrar on the 30th May, regarding the Crowdfunder. The Crowdfunder disclosure form was then emailed on the 12th June 2023.

30 As for items 1,2,3,5,6 and 7 in some instances the delay in reporting was only marginally outside of the 28 days and reflected the calendar month instead. I ask that you take account of the situation where at the pivotal time in reporting, I lost both my permanent members of staff. One of these members of staff was responsible for making sure all declarations were submitted on time. Again, I am aware the organisation of my office is my responsibility, but ask that you acknowledge the difficult circumstance of staff leaving shows no disrespect of malice towards the rules, simply overwhelming pressure whilst
35 re-constituting my affairs.

I always believed the payments from the Reclaim Party had been registered within the 28-day timescale. As soon as I found out that this wasn't the case, I emailed the Registrar and apologised for the late declaration. My most recent payment (September 2023) was registered within the 28-day timescale.

- 5 3. **Are you satisfied that your current entry in the Register of Members' Financial Interests is complete and accurate in all other respects and in line with Chapter 1 of the Guide to the rules? a. If it is not, please contact the Registrar now to bring it up to date. b. If it is, please tell me the steps you have taken to satisfy yourself of this.**

10 Having viewed the declarations again, I do believe the entries are correct. However, I do want to reiterate that I did open dialogue with the Registrar's office on the 30th May. I would argue that the registration date of the 18th September, is perhaps slightly misleading. I registered the Crowdfunder several weeks before the date this date, I just did not have all the information
15 that was required to satisfy the Electoral Commission.

4. **Please can you reflect and then advise me of the steps to plan you take to avoid future late registrations.**

20 I have restructured both my offices and reviewed my office processes, such as the supervision of my employees. I now hold regular meeting with my staff members to go through any new financial declarations. I have also made sure that the third party/those involved with the Reclaim Party are fully aware of what is required, in terms of the Parliamentary procedures.

25 The last few months have been challenging for me, but I would like to assure you that there was no deliberate intention to mislead, and I apologise for my delay in declaring these interests, which in submission I propose were beyond my reasonable control. In a timely manner, I asked for clarification of my responsibilities and upon receiving it, obtaining third party information, was bound to lead to delays in reply which I did my best to expedite. At no time did I break off active communications with Commissioner's Office. My parliamentary life in respect
30 of replacement of permanent staff is once again orderly and I ask that you monitor and reflect on a future period of fully compliant behaviour by myself, which I commit to going forwards before any sanction is considered.

Enclosure 1: Emails between The Electoral Commission and The Reclaim Party

35 **Email 1: From the Head of Regulatory Support at The Electoral Commission to the National Nominating Officer at The Reclaim Party, 14 September 2023**

My apologies for the slight delay in getting back to you.

We note that you contacted the Commission regarding a crowd funding campaign being managed by or on behalf of Andrew Bridgen, your MP.

We note it is in relation to legal expenses, generally this is not covered by the rules under the Political parties, Elections and Referendums Act 2000, however if you would like bespoke advice in relation to this matter, we would be happy to review it.

- 5 In the first instance, could you please provide a link to the crowd funder and whatever detail you have around it that might be relevant.

Email 2: From the National Nominating Officer at The Reclaim Party to the Head of Regulatory Support at The Electoral Commission, 14 September 2023

Thank you for your reply.

- 10 The crowdfunder link is: <https://democracythree.org/en-gb/en-gb/the-day-democracy-died-andrew-bridgen>

Email 3: From the Head of Regulatory Support at The Electoral Commission to the National Nominating Officer at The Reclaim Party, 14 September 2023

- 15 We have reviewed the website provided to us, below is a summary of the law and our view on how it applies in this circumstance.

A summary of the law

MPs can only accept donations given for their political activity from permissible sources.

- 20 A donation is anything given to an MP with a value of more than £500 for political activities and can include donations that are received via a crowd funding website.

Political activities for MPs include things like:

- carrying out research on a particular policy that is being promoted in the UK Parliament
- 25 • holding an event in the MPs constituency to bring together different groups and individuals to discuss a particular issue or policy
- visiting another country to understand how a particular policy works there
- the running of an MPs office.

- 30 Permissible sources are UK based individuals and entities. Individuals must be on the electoral register and there are other requirements for example for companies.

A full list of permissible sources can be found here. These laws are set out in the Political parties, Elections and Referendums Act 2000 (PPERA).

Advice on the circumstances in your question

5 As a general point, legal proceedings are usually outside of the scope of political activities. We reviewed the crowd funding website and it remains our view that the money being raised is for proceedings that are outside of the scope of political activities. Our view is that these proceedings are a personal rather than a political matter.

10 On that basis we do not believe there is a requirement to check permissibility of donors where money is being given for this purpose.

15 We would however draw your attention to the possibility that the proceedings become politicised given their nature. Should you use the proceedings for political purposes, the funds raised could then become related to political activity and subject to the PPERA regime. You should therefore seek to keep clear distance between these proceedings and your political activity. You may also wish to consider whether you take steps to ensure that you have the details of donors should that be required.

Note for a crowd funder, you receive donation on the date that the crowdfunding site passes the funds to you and the donor's intention to fund political activity should be clear.

20 I would also add it is a decision for the person receiving the donation as to whether the law applies, we would take action where we had come to a different view to an individual, this would include clearly setting out our reasoning for any decision.

If there are further facts or circumstances around this that become clear that you would like us to consider please do get in touch again.

25 *27 October 2023*

3. Letter from the Commissioner to the Registrar of Members' Financial Interests, 31 October 2023

30 I would like to ask your advice on an inquiry I have recently started about Mr Andrew Bridgen MP. In essence, the inquiry is seeking to determine whether Mr Bridgen has breached paragraph 5 of the Code of Conduct for Members by registering some interests late.

I enclose a copy of my initial letter to Mr Bridgen, dated 12 October, which lists the relevant interests, and Mr Bridgen's response to me of 27 October, which includes some advice from the Electoral Commission.

Given that the Electoral Commission's position on the legal funds raised for Mr Bridgen by way of a crowdfunding campaign is:

5

As a general point, legal proceedings are usually outside of the scope of political activities. We reviewed the crowd funding website and it remains our view that the money being raised is for proceedings that are outside of the scope of political activities. Our view is that these proceedings are a personal rather than a political matter.

and considering that paragraph 3 of Chapter 1 of the Guide states:

10

...the overall purpose of the Register, which is to provide information about any financial interest or other material benefit which a Member receives which might reasonably be thought by others to influence his or her actions, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament.

15

Please can you explain why you decided these legal funds needed to be registered in the Register of Members' Financial Interests. It would be helpful to understand whether your reasoning differed in relation to the main fund, registered under Category 8, and the individual donations, which were registered under Categories 3 and 5. When you reply to this letter, please ensure that you pass to me any relevant correspondence that you exchanged with either the Electoral Commission or Mr

20

Bridgen on this specific issue.

Please can you also confirm how the registration date of 18 September 2023 was determined for the individual donations registered under Categories 3 and 5.

25

Separately, I have noted that the following interests registered by Mr Bridgen, and which appear in the 16 October 2023 edition of the Register, may have been registered late:

Cat.	Date received	Date registered	Value	Details
3	10 May 2023	3 October 2023	£530	Individual donation from Dominic Taylor for the defamation action crowdfund registered under Category 8 on 12 June 2023. This donation was returned to the donor on 19 September 2023.
3	11 May 2023	3 October 2023	£955	Individual donation from Philip Cunningham for the defamation action crowdfund registered under Category 8 on 12 June 2023. This donation was returned to the donor on 10 July 2023.
4	TBC	25 September 2023	£418.82	Reimbursement of travel costs and accommodation on 12 September by the European Parliament for a trip to Brussels on 4 and 5 July. The trip was to attend as a panellist at a public debate entitled "European Public Health and Cooperation".
4	TBC	12 October 2023	£555.07	Flights and accommodation for a trip to Copenhagen to speak at the Facts Matter conference between 1 and 3 September 2023. Paid for by The Danish Freedom Movement.

In relation to these interests, please can you confirm (with reasoning where applicable):

- 5 1. Have these interests been registered within the 28-day time limit set by the House?
2. When applying the 28-day time limit to overseas visits under Category 4, which date Members should use for the date of receipt; the date of the trip or the date that the funding/repayment was received?

Please can you reply by 9 November 2023.

10 Thank you for your assistance.

Enclosure 1: Letter from the Commissioner to Mr Andrew Bridgen MP, 12 October 2023 (see item 1 above)

Enclosure 2: Letter from Mr Andrew Bridgen MP to the Commissioner, 27 October 2023 with attachments (see item 2 above)

31 October 2023

4. Letter from the Commissioner to Mr Andrew Bridgen MP, 31 October 2023

Thank you for your response of 27 October and for the information you have provided.

- 5 In my initial letter to you of 12 October, I said that I may seek the advice of the House authorities as part of my investigation. As such, today I have written to the Registrar of Members' Financial Interests for his advice. A copy of that letter is included for your information.

- 10 In the meantime, and as you will see from my letter to the Registrar, I have identified some further interests that appeared in the 16 October 2023 edition of the Register, and which might have been registered outside the 28-day time limit set by the House:

Cat.	Date received	Date registered	Value	Details
3	10 May 2023	3 October 2023	£530	Individual donation from Dominic Taylor for the defamation action crowdfund registered under Category 8 on 12 June 2023. This donation was returned to the donor on 19 September 2023.
3	11 May 2023	3 October 2023	£955	Individual donation from Philip Cunningham for the defamation action crowdfund registered under Category 8 on 12 June 2023. This donation was returned to the donor on 10 July 2023.
4	TBC	25 September 2023	£418.82	Reimbursement of travel costs and accommodation on 12 September by the European Parliament for a trip to Brussels on 4 and 5 July. The trip was to attend as a panellist at a public debate entitled "European Public Health and Cooperation".
4	TBC	12 October 2023	£555.07	Flights and accommodation for a trip to Copenhagen to speak at the Facts Matter conference between 1 and 3 September 2023. Paid for by The Danish Freedom Movement.

- 15 I haven't yet decided whether any formal action is needed about these interests, but as you will note I have asked for the Registrar's advice on these interests.

Once I have received the Registrar's reply, I will write to you again regarding the next steps; if I do decide to extend my inquiry to include the four "new" interests highlighted above, this will include giving you the opportunity to respond formally.

5 In the meantime, this matter remains protected by parliamentary privilege and should continue to be kept confidential.

Enclosure 1: Letter from the Commissioner to the Registrar of Members' Financial Interests with attachments, 31 October 2023 (see item 3 above)

31 October 2023

5. Letter from Mr Andrew Bridgen MP to the Commissioner, 8 November 2023

10 Thank you for your letter, dated the 31st October. I understand you have not asked for my response and that you are seeking clarification from the Registrar. However, I felt I needed to provide you some context to the four new allegations.

Individual donation from Mr Taylor

15 Mr Taylor donated over £300 to my Crowdfunder on the 11th May. He was chased several times for his address, however, did not respond. In the end, his donation was returned to him. However, on the 23rd September, Mr Taylor made a further donation of £530, this time providing his address. This was registered on the 3rd October.

Individual donation from Mr Cunningham

20 Mr Cunningham donated to my Crowdfunder on the 11th May. As this was over £300, his address was required, however, he did not want to provide this information. Mr Taylor's donation was therefore returned to him, but as it was originally accepted, he still needed to provide his address, which he refused to do.

25 In an email, dated the 22nd September, the Assistant Registrar gave me the following two options:

The addresses of individuals are always listed as "private" in the Register, but the reality is here is that no addresses have been provided. So we have two options:

1. We list the addresses as "private" as normal.

30 *2. We enter "not provided" instead.*

If we go with option 1, I should draw your attention the fact that if this matter is looked into it will become apparent at a later stage that you did not provide all the necessary information for these donations;

whereas option 2 will get this omission into the open at the point of publication. Please let us know how you would like to proceed.

5 I explained that we should go for option two, which was obviously the truth, and proves that my aim is always to be as transparent as possible. Furthermore, I would also like to reiterate the advice I was provided by the Electoral Commission.

Reimbursement of travel costs and accommodation on 12 September by the European Parliament

10 I dispute the allegation that this was not registered within the 28-day timeframe. At the time, I covered all financial costs for the trip, so there wasn't anything to declare, until I was reimbursed for these costs. Despite the trip being early July, I was not reimbursed until the 12th September. Both the date received and accepted were emailed to the Registrar, but this is missing from the attached.

Flights and accommodation for a trip to Copenhagen

15 My trip to Copenhagen differs to my trip to the European Parliament trip, as the organisers paid for all costs upfront (e.g. they booked my flights, etc). I chased the organisers up several times for the information (total costs, address, etc). In the end, I contacted the Registrar and explained the situation. His response was that if we don't know the actual costs then we could use an estimate based on similar visits, which I did. Again, this was within the 28-day time frame of the visit.

20 However, almost two weeks later, I finally received a response from the organisers of the trip, which was sent to the Registrar. The Registrar added the details but included the later date, which fell out of the 28 days. My office emailed him back and explained that this was unfair as the trip was declared within the appropriate timeframe, however, he refused to honour the earlier date. Again, the date received
25 was also declared, yet this is missing from the attached document.

I hope you find my letter helpful to your inquiry. I stand by what I said in my previous letter - that I fully understand and respect the importance of the rules.

8 November 2023

6. Letter from the Registrar of Members' Financial Interests to the Commissioner, 8 November 2023

30 Thank you for your letter relating to the investigation into Mr Bridgen. My answers to your questions are below.

Crowdfunding

35 *Question: Please can you explain why you decided these legal funds needed to be registered in the Register of Members' Financial Interests. It would be helpful to*

understand whether your reasoning differed in relation to the main fund, registered under Category 8, and the individual donations, which were registered under Categories 3 and 5. When you reply to this letter, please ensure that you pass to me any relevant correspondence that you exchanged with either the Electoral Commission or Mr Bridgen on this specific issue.

Electoral Commission

1. The requirements for registering in the Register of Members' Financial Interests are set out in the Code of Conduct and Guide to the Rules. The requirements for reporting to the Electoral Commission are set out in Political Parties, Elections and Referendums Act 2000. There is an overlap in the reporting requirements for donations (for example Category 2 in the Register) and the Commission uses the information under that category to avoid Members needing to register separately to both the House and the Commission. Other requirements are different. Because we have different requirements we do not routinely discuss individual registrations with the Electoral Commission. Instead, we advise Members to contact the Commission direct to ensure that they are compliant with its rules as well as those of the House. The Commission advice included in Mr Bridgen's correspondence was sought by Mr Bridgen.

20 Crowdfunding and legal funds

2. The legal action taken by Mr Bridgen relates to his wider political activities around the Covid-19 vaccine and a dispute between him and Matt Hancock MP. Our advice was based on requirements set out in the Guide to the Rules and is consistent with advice given to Members in similar situations.

25 3. The relevant sections of the rules relating to crowdfunding and legal funds are set out below.

Category 8: Miscellaneous

Requirements for registration

54. Under this category Members must register:

- 30 a) Significant, formal unpaid roles such as an unpaid directorship, a directorship of a company not currently trading, or a trusteeship;
- b) A formal role with a party organisation, including job title, start date, salary (if applicable), and whether it is a full time or part time role;
- 35 c) Funds established to defray legal costs arising out of the Member's work, including 'crowdfunded' legal funds for action to which the

Member is a party, including stating what (if any) benefit has been received by the Member;

5 *d) Any relevant financial interest or material benefit which does not clearly fall into one of the other categories, including any shareholding which falls below the relevant threshold, or any other financial asset, including an asset held in trust, if this meets the test of relevance; in other words, that it might reasonably be thought by others to influence a Member's actions or words as a Member; and*

10 *e) Any other interest, if it might reasonably be thought by others to influence a Member's actions or words as a Member in the same way as a financial interest. This might include, for example, non-practising membership of a profession.*

Category 3: Gifts, benefits and hospitality from UK sources

Legal funds

15 *29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member's activities as a Member of Parliament.*

20 4. On 7 July 2023, the Commissioner published an Advice Note on crowdfunding, which is attached. That Advice Note was published following discussion on this specific case. It reiterates the requirement for crowdfunding to be registered under Category 8: Miscellaneous:

25 *10. Whether or not any individual donation requires registration, however, the campaign itself should be registered under Category 8 (Miscellaneous) – in the same way as crowdfunding for legal costs as mentioned at paragraph 54(c) of Chapter 1.*

30 5. It also sets out the requirement for donations in support of personal legal funding to be registered under Category 3: Gifts, benefits and hospitality from UK sources:

7. Crowdfunded donations in support of personal legal funding will need to be registered under Category 3: Gifts, benefits and hospitality from UK sources if they meet the threshold of over £300 from the same source in a calendar year.

35 6. Set out at appendix 1 is the correspondence between the Registry Office and Mr Bridgen (and his office) on the crowdfunding registration.

Registration dates

Question: Please can you also confirm how the registration date of 18 September 2023 was determined for the individual donations registered under Categories 3 and 5.

7. Paragraph 5 of the Code of Conduct states:

5 *5. Members must fulfil conscientiously the requirements of the House
in respect of the registration of interests in the Register of Members'
Financial Interests. New Members must register all their current
financial interests, and any registrable benefits (other than earnings)
10 received in the 12 months before their election within one month of
their election, and Members must register any change in those
registrable interests within 28 days.*

8. A registration date can only be given to an interest when all of the information required has been provided. In the case of Category 3 registrations, they are as follows:

15 *25. Members are required to provide the following information:*

a) The name and address of the donor;

b) The amount of the donation, or its nature and value if it is a donation in kind;

c) The dates of receipt and acceptance;

20 *d) The status of the donor (whether an individual, building society,
friendly society, LLP, registered party (other than the Member's own
party), trade union, unincorporated association or company, in which
case the company registration number is required);*

25 *e) If the donor is a trust, the name and address of the person who
created the trust; if created after 27 July 1999, the names and
addresses of all others who have transferred property to the trust, or,
if created before 27 July 1999, the date it was created;*

30 *f) If the donation is by means of a bequest, the name and last address
of the person who made the bequest, or, if that address is not listed in
an electoral register, the last address where that person was registered
in the previous five years.*

9. The registration date of 18 September was given to the registrations because it was the date on which we received all of information set out above.

Individual donations from Dominic Taylor and Philip Cunningham

10. These interests were registered outside of the 28-day limit. The correspondence relating to these interests is set out at Appendix 2.

Reimbursement of travel costs and accommodation on 12 September by the European Parliament

- 5 11. This interest was registered outside of the 28-day limit. The correspondence relating to this interest is set out at Appendix 3.

Flights and accommodation for a trip to Copenhagen

12. This interest was registered outside of the 28-day limit. The correspondence relating to this interest is set out at Appendix 4.

10 **Appendix 1, correspondence between the Registration team and Mr Andrew Bridgen MP about the registration of his crowdfunding activity**

a) Email from the Registration team to Mr Bridgen, 13 June 2023

Thank you for the update.

- 15 Below, is your updated entry which will appear in the next edition of the Register (published later this week). Please let us know when you draw down additional funds and we will update the entry.

- 20 I should add that crowdfunded donations in support of personal legal funding will need to be registered under Category 3: Gifts, benefits and hospitality from UK sources if they meet the threshold of over £300 from the same source in a calendar year. Therefore, you will need to check the donations in case any of them have reached that threshold. If they have and are from individuals, we will need their name and address. The address will not be published, but we require it to pass on to the Electoral Commission.

I hope this is helpful.

25 **b) Email from Mr Bridgen to the Registration team, 12 June 2023**

Please find attached a form, registering the Crowdfunding page.

Do let me know if you need anything else.

c) Email from the Registration team to Mr Bridgen, 30 May 2023

- 30 Thank you for getting back to me on the lunch. This update will be included in this week's online version of the Register, which we hope to publish on Thursday.

Under the current rules for the Miscellaneous Category:

54. Under this category Members must register:

a) ...

5 c) *Funds established to defray legal costs arising out of the Member's work, including 'crowdfunded' legal funds for action to which the Member is a party, including stating what (if any) benefit has been received by the Member;*

Please complete the attached Category 8 form to register the crowdfund itself.

10 The Registrar will discuss with the Commissioner how best to register donations that meet the threshold or amounts that you draw down from the fund.

In the meantime, we advise that you speak to the Electoral Commission to make sure that you are also complying with their rules. The Commission's number is 0333 103 1928, option 2 (campaigner or member of a party with a query about political finance).

15 **d) Email from Mr Bridgen to the Registration team, 30 May 2023**

The amount for Andrew and three staff came is £172.15. All other details are correct.

20 On another note, I am not sure if you're aware, but Andrew is involved in a Crowdfunding page to raise fees to fund a legal case against Matt Hancock. The last time I looked, it the amount raised stood at £86,051. Please could you confirm what Andrew needs to do to declare this?

Appendix 2, correspondence between the Registration team and Mr Andrew Bridgen MP about the registration the individual donations from Dominic Taylor and Philip Cunningham

25 **a) Email from Mr Bridgen to the Registration team, 3 October 2023**

Just when things couldn't get more complicated...Mr Taylor has re-donated £530 (on 23/09/23) and now provided his address:

[content redacted]

30 That just leaves Mr Cunningham, who has refused to provide his address. Please list this as "not provided".

Is there anything else you need?

b) Email from the Registration team to Mr Bridgen, 22 September 2023

Okay Mr Bridgen

5 Going back to my earlier point on being consistent when it comes to the registration of support and benefits whether they are subject to PPERA or not, and as you have confirmed that the donations from Mr Cunningham and Mr Taylor were accepted on the same day, we have to add these two donations to the Register.

10 As I have explained previously, we require the name and address of the donor before we can add the details of a donation to the Register. The Registrar and I appreciate that you it has not been possible for you to obtain the addresses of these two donors.

The addresses of individuals are always listed as “private” in the Register, but the reality is here is that no addresses have been provided. So we have two options:

- 15
- We list the addresses as “private” as normal.
 - We enter “not provided” instead.

20 If we go with option 1, I should draw your attention the fact that if this matter is looked into it will become apparent at a later stage that you did not provide all the necessary information for these donations; whereas option 2 will get this omission into the open at the point of publication. Please let us know how you would like to proceed.

I will be on leave next week, but the Registrar will be available if you have any questions. And the cover date of the next version of the Register will be 16 October 2023.

25 **c) Email from the Registration team to Mr Bridgen, 21 September 2023**

Thank you for getting back to me first thing this morning, ahead of publication. I really appreciate it.

We should publish later today. I will get back to you on Mr Cunningham and Mr Taylor after publication.

30 **d) Email from Mr Bridgen to the Registration team, 21 September 2023**

I believe those dates are fine.

I still do not have addresses for Mr Cunningham and Mr Taylor – They are currently refusing to provide this information.

e) Email from the Registration team to Mr Bridgen, 20 September 2023

Electoral Commission and this week's version of the Register

5 Thank you for seeking the Electoral Commission's advice and sharing their response with us. This is helpful to us, and I am glad that there was no issue with you having accepted this support from these sources including those outside the UK.

As you have been instructed, I have also noted the following:

10 *Note for a crowd funder, you receive donation on the date that the crowdfunding site passes the funds to you and the donor's intention to fund political activity should be clear.*

15 We always aim to be in line with the Electoral Commission's requirements and consistent when it comes to the registration of support and benefits whether they are subject to PPERA or not.

On Monday, you confirmed that:

Yes, I received and accepted the donations on the same day.

20 So I do not intend to alter the dates of receipt and acceptance already in the Register and which will be published tomorrow or on Friday. If we do need to alter the dates of receipt and acceptance, we will need to remove these donations from this week's publication and re-add them for inclusion in the following version.

So please confirm before midday tomorrow whether or not we need to amend the dates of receipt and acceptance for the crowd funder donations.

25 **Mr Taylor and Mr Cunningham**

These two donations will need to be registered because they were not returned within 30 days of receipt.

30 Unless you tell us otherwise because of the Electoral Commission's advice referenced above, I will put each of these two donations down as being accepted on the same day as they were received but also include the dates on which they were returned to the donor.

Do you now have the address of either donor?

f) Email from Mr Bridgen to the Registration team, 20 September 2023

Just confirming that Mr Taylor's donation was returned on the 19th September.

g) Email from Mr Bridgen to the Registration team, 20 September 2023

5 Thank you for this.

The donation was returned to Mr Cunningham on the 10th July. I am waiting for confirmation on Mr Taylor.

You previously mentioned that I should speak to the Electoral Commission, and I have now received the below. Does this change anything?

10 *We have reviewed the website provided to us, below is a summary of the law and our view on how it applies in this circumstance.*

A summary of the law

MPs can only accept donations given for their political activity from permissible sources.

15 *A donation is anything given to an MP with a value of more than £500 for political activities and can include donations that are received via a crowd funding website.*

Political activities for MPs include things like:

- 20
- carrying out research on a particular policy that is being promoted in the UK Parliament*
 - holding an event in the MPs constituency to bring together different groups and individuals to discuss a particular issue or policy*
 - visiting another country to understand how a particular policy works there*
 - the running of an MPs office.*

25 *Permissible sources are UK based individuals and entities. Individuals must be on the electoral register and there are other requirements for example for companies. A full list of permissible sources can be found here. These laws are set out in the Political parties, Elections and Referendums Act 2000 (PPERA).*

Advice on the circumstances in your question

5 *As a general point, legal proceedings are usually outside of the scope of political activities. We reviewed the crowd funding website and it remains our view that the money being raised is for proceedings that are outside of the scope of political activities. Our view is that these proceedings are a personal rather than a political matter.*

On that basis we do not believe there is a requirement to check permissibility of donors where money is being given for this purpose.

10 *We would however draw your attention to the possibility that the proceedings become politicised given their nature. Should you use the proceedings for political purposes, the funds raised could then become related to political activity and subject to the PPERA regime. You should therefore seek to keep clear distance between these proceedings and your political activity. You may also wish to consider whether you take steps to ensure that you have the details of donors should that be required.*

15 *Note for a crowd funder, you receive donation on the date that the crowdfunding site passes the funds to you and the donors intention to fund political activity should be clear.*

20 *I would also add it is a decision for the person receiving the donation as to whether the law applies, we would take action where we had come to a different view to an individual, this would include clearly setting out our reasoning for any decision.*

If there are further facts or circumstances around this that become clear that you would like us to consider please do get in touch again.

The Electoral Commission

25 **h) Email from the Registration team to Mr Bridgen, 19 September 2023**

I have added all of the crowdfunder donations except for those from Mr Cunningham and Mr Taylor. They will be included in this week's version of the Register (dated yesterday), which we hope to publish on Thursday.

30 We could not add these donations to the Register until we received confirmation of the acceptance date. This means they all have a registration date of yesterday.

I have, however, referenced in each entry the crowd fund registered under Category 8 in June.

35 Please could you let me know before the end of tomorrow if you would like to make any changes to the wording of these new entries?

i) Email from Mr Bridgen to the Registration team, 18 September 2023

Yes, I received and accepted the donations on the same day.

I will come back to you on the other questions as soon as I can.

j) Email from the Registration team to Mr Bridgen, 18 September 2023

5 Thanks again Mr Bridgen

As I have explained, we need the date of receipt and acceptance for each donation before we can add them to the Register.

10 Did you receive and accept all of these donations on the same day or, as it now sounds like you did with Mr Cunningham's donation, complete some form of checks before accepting them on a later date?

On what date did you return the donor to Mr Taylor?

And where are we on the donation from Mr Cunningham? Do you have an address for him? And had you already accepted it before he asked for it to be returned? Please also tell me the date on which it was returned.

15 k) Email from Mr Bridgen to the Registration team, 18 September 2023

I have just checked, and I did send the dates of the donations to you on the 26th June.

20 There is no address for Mr Cunningham because he declined to provide it, and asked for the donation to be returned. Likewise, there is no address from Mr Taylor, because he didn't provide one and failed to reply when he was contacted.

Below is what I sent to you on the 26th June.

First Name	Last Name	Email Address	Donation Amount	Donation Date
Stephen	Harker	Content redacted	£1,060.00	10.05.2023
Phillip	Cunningham	Content redacted	£955.00	11.05.2023
Jane	Glynn	Content redacted	£531.00	11.05.2023

First Name	Last Name	Email Address	Donation Amount	Donation Date
Barry	Carroll	Content redacted	£530.00	10.05.2023
Dominic	Taylor	Content redacted	£530.00	10.05.2023
Andrew	Roberts	Content redacted	£530.00	10.05.2023
Stephen	St Quinton	Content redacted	£500.00	16.05.2023
Rosemary	Southwood	Content redacted	£421.98	13.05.2023
Swee	Lip Quek	Content redacted	£319.00	11.05.2023

Is there any further information you need?

l) Email from the Registration team to Mr Bridgen, 14 September 2023

Thank you Mr Bridgen

- 5 This advice is towards the bottom of this email chain, and directly before it I wrote:

Normally, Members have 30 days from receipt of a donation of over £500 to check the permissibility of the donor before returning or accepting it. They then have 28 days from the date of acceptance to register the details with the House.

- 10 My understanding has always been that all of these donations have already been accepted regardless of whether they are from permissible sources or the donor has provided their address. So they should all have been registered before now.

m) Email from Mr Bridgen to the Registration team, 14 September 2023

- 15 Apologies. In a previous email, you said:

You will need to check with them but, as these are donations are to cover personal legal fees, they may not be subject to Electoral Commissions donor permissibility requirements. If you have not already cleared this with them, I recommend calling the Electoral Commission on 0333 103 1928, option 2 (campaigner or member of a party with a query about political finance) to be certain.

- 20

This is what I have been waiting for advice on. However, I will find out the dates the donations were paid.

n) Email from the Registration team to Mr Bridgen, 14 September 2023

In the attached email you explain that:

5 *In terms of the crowd funder issue, the person on the phone at the Electoral Commission wasn't able to assist, and I am waiting for a response from somebody. I will chase this up.*

10 As these donations have already been accepted (please let me know if I have misunderstood), rather than wait for the permissibility advice from the Electoral Commission or anyone else, please answer my original question:

- Were the donations all received and accepted on the same day?

If they were not, we will need the dates on which you decided to accept them.

15 And if you have already accepted the donations from Mr Cunningham and Mr Taylor, you will need to register them as well whether or not they have been returned or you are unable to obtain the donor's address.

o) Email from the Registration team to Mr Bridgen, 20 July 2023

Thank you Mr Bridgen

If you had already accepted Mr Cunningham's donation, even if it is returned, you will need to register it.

20 Were the donations all received and accepted on the same day?

Normally, Members have 30 days from receipt of a donation of over £500 to check the permissibility of the donor before returning or accepting it. They then have 28 days from the date of acceptance to register the details with the House.

25 You will need to check with them but, as these are donations are to cover personal legal fees, they may not be subject to Electoral Commissions donor permissibility requirements. If you have not already cleared this with them, I recommend calling the Electoral Commission on 0333 103 1928, option 2
30 (campaigner or member of a party with a query about political finance) to be certain.

p) Email from Mr Bridgen to the Registration team, 18 July 2023

Good morning,

I registered my Crowdfunder recently, please find the addresses of those who donated more than £300.

There were 9 individuals, who donated £300 or more to the AB Crowdfunder.

5 One asked for the donation to be returned (Mr Cunningham), another has not yet replied (Mr Taylor). Attached is the spreadsheet with the full details of the other 7.

q) Email from the Registration team to Mr Bridgen, 27 June 2023

10 Thank you for emailing us with the individual donations that have met the registration threshold. Unfortunately, we will need the individual's home addresses as we are required to pass them on to the Electoral Commission.

When we have that information, we will provide you and Mr Bridgen with an updated Register entry.

r) Email from Mr Bridgen to the Registration team, 26 June 2023

15 Sorry, I should also point out that as of this moment, the Crowdfunder stands at £96,872.

s) Email from Mr Bridgen to the Registration team, 26 June 2023

Apologies for the delay. One issue is that addresses have not been collected. Is it possible to use the address of the Crowdfunder? The address is:

20 Remake Nation Ltd

Whitestone House,

Whitestone,

Exeter,

EX4 2JY

25 Below are those donations above £300.

First Name	Last Name	Email Address	Donation Amount	Donation Date
Stephen	Harker	Content redacted	£1,060.00	10.05.2023
Phillip	Cunningham	Content redacted	£955.00	11.05.2023
Jane	Glynn	Content redacted	£531.00	11.05.2023
Barry	Carroll	Content redacted	£530.00	10.05.2023
Dominic	Taylor	Content redacted	£530.00	10.05.2023
Andrew	Roberts	Content redacted	£530.00	10.05.2023
Stephen	St Quinton	Content redacted	£500.00	16.05.2023
Rosemary	Southwood	Content redacted	£421.98	13.05.2023
Swee	Lip Quek	Content redacted	£319.00	11.05.2023

5 Please could you confirm how these would be registered? Andrew has received a press enquiry about why he has declared a lump sum, rather than a breakdown of funds – I think there has been some confusion on my part, as the Crowdfunding is ongoing, I wasn't sure how the time limit (in terms of registering) would apply. I have just been thinking of it as one lump sum.

I would be very grateful for any advice you could offer.

t) Email from the Registration team to Mr Bridgen, undated

Thank you for the update.

10 Below, is your updated entry which will appear in the next edition of the Register (published later this week). Please let us know when you draw down additional funds and we will update the entry.

15 I should add that crowdfunded donations in support of personal legal funding will need to be registered under Category 3: Gifts, benefits and hospitality from UK sources if they meet the threshold of over £300 from the same source in a calendar year. Therefore, you will need to check the donations in case any of them have reached that threshold. If they have and are from individuals, we

will need their name and address. The address will not be published, but we require it to pass on to the Electoral Commission.

u) Email from Mr Bridgen to the Registration team, 12 June 2023

Please find attached a form, registering the Crowdfunding page.

5 Do let me know if you need anything else.

v) Email from the Registration team to Mr Bridgen, 30 May 2023

Thank you for getting back to me on the lunch. This update will be included in this week's online version of the Register, which we hope to publish on Thursday.

10 Under the current rules for the Miscellaneous Category:

54. Under this category Members must register:

a) ...

15 *c) Funds established to defray legal costs arising out of the Member's work, including 'crowdfunded' legal funds for action to which the Member is a party, including stating what (if any) benefit has been received by the Member;*

Please complete the attached Category 8 form to register the crowdfund itself.

The Registrar will discuss with the Commissioner how best to register donations that meet the threshold or amounts that you draw down from the fund.

20 In the meantime, we advise that you speak to the Electoral Commission to make sure that you are also complying with their rules. The Commission's number is 0333 103 1928, option 2 (campaigner or member of a party with a query about political finance).

25 **Appendix 3, correspondence between the Registration team and Mr Andrew Bridgen MP about the registration of the reimbursement of travel and accommodation costs for a trip to Brussels by the European Parliament**

a) Email from the Registration team to Mr Bridgen, undated

Thank you for the additional information.

Set out below is your entry, which will be included in the next online version of the Register of Members' Financial Interests (dated 16 October 2023). I would be grateful if you could confirm that the entry is correct.

I have put the destination as Brussels. Do let me know if this is incorrect.

5 **b) Email from Mr Bridgen to the Registration team, 25 September 2023**

Yes, payment was received by the European Parliament. I was invited by Mr Mislav KOLAKUŠIĆ, non-attached Member of the European Parliament.

I stayed one night – I travelled on Tuesday 4th July, and returned on Wednesday 6th July.

10 **c) Email from the Registration team to Mr Bridgen, 25 September 2023**

Thank you for this update.

Was this provided by the European Parliament? If it was not, could you let us know who the donor was.

15 And for visits, we will need the start and end date of the visit (I see accommodation is included in the reimbursement).

When we have that information, we will provide you with an updated entry.

d) Email from Mr Bridgen to the Registration team, 25 September 2023

Please could I declare the following, which I believe falls under Category 4 - Visits outside the UK:

20 *Guest speaker (panellist) at a public debate, entitled 'European Public Health and Cooperation' on the 4th July 2023.*

Approximately three hours work.

Reimbursement of costs (travel and accommodation): £418.82

25 *Address of donor: European Parliament, Rue Wiertz 60, B-1047 Brussels, Belgium*

Date accepted: 12th September 2023

Date received: 12th September 2023

Is there any further information you require?

I will also come back to you on the Crowdfunding issue.

5 **Appendix 4, correspondence between the Registration team and Mr Andrew Bridgen MP about the registration of flights and accommodation costs for a trip to Copenhagen by The Danish Freedom Movement**

a) Email from the Registration team to Mr Bridgen, undated

Whilst I appreciate that Mr Bridgen had difficulty in obtaining the address of the donor, we can only give an entry a registration date when we have all the information needed to add it to the Register.

10 The 12 October date is consistent with that policy.

b) Email from Mr Bridgen to the Registration team, 16 October 2023

15 Please could you confirm if the date of registration would not be the 27th September, which is when Andrew emailed to register the visit? He has tried several times to get in contact with the organisers to confirm the details, but they were not responding.

c) Email from the Registration team to Mr Bridgen, 16 October 2023

Thank you for this update.

20 Set out below is your entry, which will be included in the next online version of the Register of Members' Financial Interests (dated 16 October 2023). I would be grateful if you could confirm that the entry is correct.

Because this has now fallen outside of the deadline for registering interests, I should remind you to register any new interests, updates to existing interests and expired interests within 28 days.

d) Email from Mr Bridgen to the Registration team, 12 October 2023

25 After several chases, Andrew has finally received the address and total amount for this visit:

Total cost of visit (flights, accommodation, etc) DKK 4.790 (£555.07)

Name and address of donor: FBF2020, Hindegade 6, 1303 Copenhagen K, Denmark

30 Do let me know if you require anything else.

e) Email from Mr Bridgen to the Registration team, 28 September 2023

Based on other similar visits, please could we say £500? I am still hopeful that I will get confirmation from the organisers.

5 The event was organised by The Danish Freedom Movement – I am also waiting for an address.

Apologies about this.

f) Email from the Registration team to Mr Bridgen, 27 September 2023

Thank you for your email.

10 If you are unable to get the actual costs, we advise that you provide us with estimates based on the market value of the flights and accommodation. We can register that and you can update the entry when the organisers provide you with the costs.

To complete the registration, we will also need the name and address of the organisation that paid for your costs.

15 g) Email from Mr Bridgen to the Registration team, 27 September 2023

Earlier this month, I spoke at a conference in Copenhagen. I have been trying to get hold of the organisers since, for them to confirm the costs of the flights and accommodation, but no one is coming back to me. Please could you advise what I should do?

20 Details are as follows:

Speaker at Facts matter conference in Copenhagen – Approximately three hours work.

The conference was organized by The Danish Freedom Movement.

Friday 1st September-Sunday 3rd September

25 *Flights and accommodation provided.*

8 November 2023

7. Letter from the Commissioner to the Registrar of Members' Financial Interests, 17 November 2023

Thank you for your letter of 8 November 2023.

5 It would be helpful to understand how you came to the conclusion that Mr Bridgen's two overseas trips were registered outside the 28-day limit set by the House. Please can you also confirm when the 28-day registration window for "Category 4: Visits outside the UK" starts; the date of the trip or the date that the funding/repayment was received?

Please can you reply by **29 November 2023**.

Thank you for your continued assistance.

17 November 2023

10 **8. Letter from the Commissioner to Mr Andrew Bridgen MP, 17 November 2023**

Thank you for your letter dated 8 November 2023. You will recall that in my letter of 31 October 2023, I explained that I would be seeking the advice of [name redacted], Registrar of Members' Financial Interests. I have now received his advice, and I enclose below a copy for your review and any further comments you wish to make in addition to those in your letter of 8 November.

For your information, I have also written to the Registrar again for final clarification on two outstanding points (copy attached).

20 Given the Registrar's advice about the additional four interests identified in my letter of 31 October, I have decided to formally expand my inquiry to consider if those interests have been registered in line with the House's rules. To assist with my overall decision-making, and in addition to any comments you wish to make about the Registrar's advice, please could you also address the two points below:

1. Please can you explain the purpose of the Crowdfunder and outline in summary the legal action that it is funding.
- 25 2. When you planned and undertook your trip to Brussels on 4 and 5 July were you expecting your travel costs and accommodation to be reimbursed by the European Parliament? If you were not expecting these costs to be met, when did you become aware that they would be reimbursed?

Please could you reply by **29 November 2023**.

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

Enclosure 1: Letter from the Registrar of Members' Financial Interests to the Commissioner, 8 November 2023 (see item 6 above)

Enclosure 2: Letter from the Commissioner to the Registrar of Members' Financial Interests, 17 November 2023 (see item 7 above)

17 November 2023

5 9. Letter from the Registrar of Members' Financial Interests to the Commissioner, 24 November 2023

Thank you for your follow-up letter regarding your investigation into Mr Bridgen.

The 28-day window for registering visits where a donor has provided the flights and accommodation starts on the day that a Member returns to the UK. That day is Day 1.

10 Where a Member has been reimbursed for expenditure incurred on a visit, Day 1 of the registration window is the day on which the Member receives that reimbursement.

A registration date for an interest can only be given when the Registry Office has all the information required to make an entry in the Register.

15 Visit to Copenhagen

Mr Bridgen went on this visit on 1 September and returned on 3 September. Therefore, 3 September was Day 1 of the registration window.

20 Mr Bridgen first notified the Registry Office on 27 September (Day 25). On the same day, the Registry Office advised Mr Bridgen that he needed to supply the address of the donor and the value of the benefits he received (including the option of providing an estimate if there was a difficulty in obtaining the actual amounts). Mr Bridgen provided the address and the actual amounts on 12 October, and that date was given as the date of registration. 12 October is Day 40 and therefore outside of the 28-day window for registration.

25 Visit to the European Union

Mr Bridgen went on this visit on 4 July and returned on 5 July (Day 1). Mr Bridgen first notified the Registry Office of this visit on 25 September with details of the visit and the reimbursement made to Mr Bridgen on 12 September.

30 Our original position was that, on the basis of the return date of 5 July, this interest was registered late. However, on reflection, we should take 12 September as Day 1 as that is when Mr Bridgen was reimbursed. Therefore, this interest was registered within the 28-day window. I apologise for the misleading statement in my previous letter.

24 November 2023

10. Letter from Mr Andrew Bridgen MP to the Commissioner, 29 November 2023

5 Thank you for your letter, dated the 17th November. I will address the two points in as much detail as possible.

Please can you explain the purpose of the Crowdfunder and outline in summary the legal action that it is funding.

The purpose of the Crowdfunder is twofold.

- 10 1. To raise funds for the purpose of making a defamation claim against Matt Hancock MP, whom I cite on my Court Claim Form as libelling me as an antisemite, with the purpose of avoiding being held accountable for his and the government's non-disclosure of, now well known, Covid vaccine harms.
2. To raise funds in support of vaccine injured people and the families of those harmed or killed by Covid vaccines.

15 I have declared on the Fundraiser platform that none of the monies raised will be used for any purpose, other than legal support for the claim and to improve the lives of loved ones affected by covid vaccine harms.

20 I will not personally or politically as an MP benefit from any of the donations to the Crowdfunder. Also, any settlement of claim or award by the court will be donated to families of those harmed or killed by Covid vaccines.

Furthermore, I would like to clarify that the Crowdfunder was organised by a third party. I had never seen any of the names of those who donated, therefore I cannot be influenced in any way.

25 **When you planned and undertook your trip to Brussels on 4 and 5 July were you expecting your travel costs and accommodation to be reimbursed by the European Parliament? If you were not expecting these costs to be met, when did you become aware that they would be reimbursed?**

30 I was aware that I would probably receive reimbursement for my trip to the European Parliament. However, there is not always a guarantee that you will be reimbursed. Furthermore, lengthy European Parliament procedures meant this was not received until the 12th September.

35 I note that you have written to the Registrar to seek clarification on whether visits outside the UK should be registered within 28 days of the trip, or when reimbursement was received. My understanding of the rules is that I should register any payments/donations within 28 days of them being received, which is what I did.

I am not sure what I could have registered before that date. Furthermore, having viewed the code of conduct, I cannot see where it states that a visit outside the UK should be registered within 28 days of the trip, even when no reimbursement has been received.

- 5 My entry in the register states clearly the date of my visit and the date I was reimbursed and therefore, I do not see how I can be any more transparent.

I hope you find my explanation helpful. As always, I am happy to answer any further questions you may have.

29 November 2023

10 **11. Letter from the Commissioner to Mr Andrew Bridgen MP, 30 November 2023**

Thank you for your letter of 29 November 2023 and for the further information you supplied.

- 15 You will recall that on 17 November 2023 I wrote again to the Registrar of Members' Financial Interests seeking further advice on the registration of overseas visits (copy attached for reference). I have now received the Registrar's advice and enclose his advice below for your review. If you would like to make any comments on this additional advice, please could I have your response by **11 December 2023**.

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

30 November 2023

12. Letter from Mr Andrew Bridgen MP to the Commissioner, 11 December 2023

- 25 Thank you for your letter, dated the 30th November. I would like to make comments regarding the Registrar's response to you, regarding my visit to Copenhagen.

- 30 Following my trip, I contacted the organisers to provide me with the relevant information so I could register the visit. After several chases, I did not receive any response, and I was aware that the 28-day deadline for registration was due to expire. I contacted the Registrar on the 27th September, to explain the situation. The Registrar responded, the same day, with the following:

"If you are unable to get the actual costs, we advise that you provide us with estimates based on the market value of the flights and accommodation. We can register that and you can update the entry when the organisers provide you with the costs. "

I responded to this email the following day, with the information requested by the Registrar - As I had been on a couple of similar trips, I based the costs on those. As far as I was concerned, at the advice of the Registrar, this visit was registered within the required timeframe.

5 The issue is, that almost two weeks later, the organisers finally provided me with the relevant information. I forward this to the Registrar and this later date was registered. While I appreciate that it is only possible to give an entry a registration date when all information was provided, I believe I acted in good faith by contacting the Registrar for advice - Within the 28-day time frame. I provided the information,
10 following his advice, and I therefore feel that it is misleading to not honour the date of the 27th September. As explained previously, my office did contact the Registrar to raise this concern.

I feel, very strongly, that I did everything I possibly could in this situation. I was aware of the 28-day rule and did my best to honour this. I have been transparent
15 with all my financial declarations and have sought advice from the Registrar when necessary.

11 December 2023

13. Letter from the Commissioner to Mr Andrew Bridgen MP, 28 December 2023

20 Thank you for your letter of 11 December 2023, and the additional comments you provided. Having considered the evidence carefully, I now have sufficient information to resolve the allegation that you have breached paragraph 5 of the Code of Conduct for Members.

My decision

25 I have considered our correspondence, the published rules and guidance on the registration of interests, and the advice from the Registrar. I consider that there have been breaches of paragraph 5 of the Code. However, for the reasons outlined below, I do not intend to refer this matter to the Committee on Standards. Instead, I have decided to offer you the opportunity to conclude this matter using the
30 rectification process provided by Standing Order No. 150.

Rationale

As you know, paragraph 5 of the Code states:

35 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of*

their election, and Members must register any change in those registrable interests within 28 days.

On 12 October 2023 I wrote to you to confirm that I would be investigating several interests, which appeared to have been registered outside the 28-day window set down by the House in paragraph 5. On 17 November 2023, I wrote again to confirm that I was formally extending the scope of my inquiry to consider four additional interests that also appeared to have been registered outside the 28-day period.

For the purposes of my decision-making, I have divided these interests into three groups, which I will consider in turn.

10 a) No breach of the Rules

Cat.	Date received	Date registered	Value	Details
4	TBC	25 September 2023	£418.82	Reimbursement of travel costs and accommodation on 12 September by the European Parliament for a trip to Brussels on 4 and 5 July. The trip was to attend as a panellist at a public debate entitled "European Public Health and Cooperation".

I have considered your evidence about your trip to Brussels in July 2023 in relation to when you received the reimbursement of your costs and whether you expected to receive repayment of your costs when you travelled. In light of that evidence, and the amended position taken by the Registrar in his letter of 24 November 2023, I am satisfied that this interest was registered within the 28-day window set by the House and that no breach of paragraph 5 has occurred.

b) Crowdfunder and other related interests

Cat.	Date received	Date registered	Value	Details
8	12 May 2023	12 June 2023	£87,080	Crowdfunding support for a defamation action. Crowdfunder website is Democracy 3.0. The fund is valued at £87,080 of 31 May 2023, with a total of £4,319 drawn down for court fees to date.
3	8 June 2023	16 August 2023	£3,750	Reclaim the Media Limited (trading as the Bad Law Project), money paid to me to cover

Cat.	Date received	Date registered	Value	Details
				court costs relating to an ongoing legal matter
3	8 June 2023	16 August 2023	£569	Reclaim the Media Limited (trading as the Bad Law Project), money paid to me to cover court costs relating to an ongoing legal matter
3	10 May 2023	18 September 2023	£530	Barry Carroll, private donation towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
3	10 May 2023	18 September 2023	£1,060	Stephen Harker, private donation towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
3	11 May 2023	18 September 2023	£531	Jane Glynn, private donation, towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
3	11 May 2023	18 September 2023	£319	Swee Lip Quek, private donation, towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
3	16 May 2023	18 September 2023	£500	Stephen St Quinton, private donation, towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
5	10 May 2023	18 September 2023	£530	Andrew Roberts, private overseas donation, towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
5	10 May 2023	18 September 2023	£421.98	Rosemary Southwood, private overseas donation, towards the defamation action Crowdfunder registered under Category 8 on 12 June 2023
3	10 May 2023	3 October 2023	£530	Individual donation from Dominic Taylor for the defamation action Crowdfunder registered under Category 8 on 12 June 2023. This donation was returned to the donor on 19 September 2023.

Cat.	Date received	Date registered	Value	Details
3	11 May 2023	3 October 2023	£955	Individual donation from Philip Cunningham for the defamation action Crowdfunder registered under Category 8 on 12 June 2023. This donation was returned to the donor on 10 July 2023.

I am grateful to you for sharing the advice provided by the Electoral Commission about the Crowdfunder and associated donations, which clearly states:

5 *“...that the money being raised is for proceedings that are outside of the scope of political activities. Our view is that these proceedings are a personal rather than a political matter.”*

10 However, and as outlined by the Registrar in his letter of 8 November 2023, you will recognise that the House sets its own requirements for the registration of financial interests which extends beyond political donations. The House has made two express provisions for the registration of legal funds. The first is laid out under Category 3: Gifts, benefits and hospitality from UK sources at paragraph 29 and states:

Legal funds

15 *29. Members should normally register under this category contributions to legal funds (including in-kind contributions). This would apply if, for example, the legal action arose out of activity as a Member of Parliament but the donation was not specifically in support of the Member’s activities as a Member of Parliament.*

20 The second is laid out under Category 8: Miscellaneous at paragraph 54(c) and states:

54. Under this category Members must register:

25 *c) Funds established to defray legal costs arising out of the Member’s work, including ‘crowdfunded’ legal funds for action to which the Member is a party, including stating what (if any) benefit has been received by the Member.*

In your letter of 29 November 2023, you told me that:

The purpose of the Crowdfunder is twofold.

5 1. *To raise funds for the purpose of making a defamation claim against Matt Hancock MP, whom I cite on my Court Claim Form as libelling me as an antisemite, with the purpose of avoiding being held accountable for his and the government's non-disclosure of, now well known, Covid vaccine harms.*

2. *To raise funds in support of vaccine injured people and the families of those harmed or killed by Covid vaccines.*

10 Although the second purpose of the Crowdfunder does not fit either of the provisions laid down by the House, the first purpose, in my opinion, unarguably does. I am therefore satisfied that you were correct to register the Crowdfunder, the private donations made through the Crowdfunder that passed the threshold for individual registration, and the other payments from Reclaim the Media for the same case. Having correctly decided to register these interests, you were required by the House to register them within 28 days of receipt. Failing to do so breaches
15 paragraph 5 of the Code.

20 However, I have noted from the correspondence you exchanged with the Registrar and his team that you made a determined effort to register these interests but were hampered in part by the difficulties in securing the personal details of the individual donors. I am also mindful that the use of Crowdfunding for parliamentary activity is an evolving, and administratively challenging, undertaking. In recognition of these difficulties, I issued an advice note on Crowdfunding in July 2023.¹ I have also taken into account your evidence about the loss of your previous staff and the impact of the restructuring your office.

25 For these reasons, I have concluded that your failure to register these interests on time was inadvertent and not deliberate. In my opinion, these breaches are therefore suitable for rectification under Standing Order No. 150.

c) Other interests

Cat.	Date received	Date registered	Value	Details
3	17 January 2023	17 February 2023	£800	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter, media support and speech writing.
3	17 January 2023	17 February 2023	£500	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter, media support and speech writing

¹<https://www.parliament.uk/globalassets/documents/pcfs/advice-notes/advice-note-2023.07.07---crowdfunding.pdf>

Cat.	Date received	Date registered	Value	Details
3	17 to 18 January 2023	1 March 2023	£241.45	Reclaim the Media Limited (trading as the Bad Law Project), in relation to a legal matter to cover the cost of meetings, lunches, dinners and counselling.
1	24 May 2023	21 August 2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
1	14 June 2023	21 August 2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
1	18 July 2023	21 August 2023	£1,500	Payments from Reclaim the Media Limited (trading as the Bad Law Project) for political consultancy/advice
4	TBC	12 October 2023	£555.07	Flights and accommodation for a trip to Copenhagen to speak at the Facts Matter conference between 1 and 3 September 2023. Paid for by The Danish Freedom Movement.

I accept that you provided an estimated cost for your trip to Copenhagen to the Registration team on 28 September 2023, which was within the required 28-day window. However, you will understand that the cost of an overseas visit is only part of the information needed to create a complete entry in the Register.² In this instance, paragraph 35 of the Guide is clear that the address details of the donor, along with other information, are needed to register an overseas visit. As you did not provide the address details for the donor until 12 October 2023, this meant an entry in the Register could not be generated until that date, which was outside the 28-day window.

As before, I accept your evidence about the loss of your previous staff and the impact of restructuring your office. I am also mindful that several of the interests in this group have been registered only a few days late and some are of a comparatively lower value. For these reasons, I have concluded that your failure to register the interests in this group on time was inadvertent, and not deliberate, and that some of these interests can also be reasonably classed as minor. In my opinion, these breaches are therefore also suitable for rectification under Standing Order No. 150.

² For reference, I have recently published an advice note about registering estimates: <https://www.parliament.uk/globalassets/documents/pcfs/advice-notes/advice-note-2023.11.23-registering-estimated-values.pdf>

Next Steps

- As I explained above, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification process, rather than by making a referral to the Committee on Standards. The Committee would generally expect the Member to
- 5 have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach. Rectification of the late registration of interests also requires the relevant entries in the current Register to be amended to bold italic type and to include an appropriate explanatory note. The amended entry will remain on the Register for a period of one year.
- 10 I am satisfied that your letter of 26 October 2023 provides both an acknowledgement and apology for your breaches of the rules concerning the first set of interests that my initial letter of 12 October 2023 contained. I am also satisfied that your same letter outlines sensible steps that you have put in place to avoid
- 15 therefore the following from you please:
- a) Confirmation you have accepted my opinion.
 - b) A clear acknowledgement that the registration of the flights and accommodation for your trip to Copenhagen, and the returned donations from Mr Taylor and Mr Cunningham, were all registered late and amount
 - 20 to a breach of the rules.
 - c) An apology for those three breaches.
 - d) An undertaking that you will liaise with Registrar to identify any training needs for you and your team on the requirements laid out in the Guide to the Rules.
- 25 The above can be provided by way of your formal response to this letter.

If you are content for me to conclude the inquiry in this way, please write to me with the above information by **12 January 2024**.

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

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

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

5 I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk

28 December 2023

14. Letter from Mr Andrew Bridgen MP to the Commissioner, 9 January 2024

Thank you for your letter, dated the 28th December.

10 I am writing to confirm that I accept the decision you have made, regarding the registration of my financial interests. I both acknowledge and apologise for the fact that I breached the Code of Conduct for Members of Parliament, by registering the following payments beyond the 28- day limit:

- My trip to Copenhagen, where my accommodation and flights were paid for.
- 15 • Returned donations from Mr Taylor and Mr Cunningham, who donated to my Crowdfunder.

20 I appreciate that you have given me the opportunity to conclude this matter via the rectification process, and I can assure you that I will be following all your advice. Furthermore, as you have advised, I will be making contact with the Registrar to see if training is available for myself and my staff regarding the guide to the rules.

I would like to put on record, once again, that I take the rules very seriously and I take full responsibility for the above breaches.

Thank you for bringing this matter to a close.

9 January 2024