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Summary

The allegation I investigated was that Mr Bridgen had not declared a relevant financial interest when participating in a Westminster Hall debate about HS2 on 25 March 2015. I also considered whether Mr Bridgen had made the necessary
5 declaration on other occasions.

I found that Mr Bridgen had not considered the relevance test, i.e. he had not considered whether he had an interest which might reasonably be thought by others to influence his words or actions as a Member, when intervening in the debate on 25 March 2015 and he had, as a result, omitted to make a declaration necessary
10 under the rules of the House. This was a breach of paragraph 13 of the Code of Conduct for Members. Mr Bridgen acknowledged and apologised for this breach of the rules. Mr Bridgen has since identified two other occasions on which he omitted to make a declaration of interest.¹ He has agreed to make an apology, by way of a point of order, to the House.

15 Mr Bridgen told me that he had made the relevant disclosure to the Parliamentary Under-Secretary of State for Transport on the occasion of the Minister's visit to his constituency in November 2015.

I considered Mr Bridgen had made an appropriate response and concluded the inquiry by way of the rectification procedure available to me under Standing Order
20 No 150.

¹ On 9 October 2013 when he submitted a written Question to the Transport Secretary & on 31 October 2013 when he spoke on the High Speed Rail (Preparation) Bill

Mr Andrew Bridgen MP: Resolution letter

Letter from the Commissioner to Rt Hon Keith Vaz MP, 14 February 2017

I have now completed my inquiries into your allegation concerning the conduct of Mr Andrew Bridgen MP. I have investigated whether the rules of the House required
5 Mr Bridgen to make a declaration of a relevant interest when speaking in the Westminster Hall debate on HS2 of 25 March 2015.

Mr Bridgen told me that he had thought that his declaration of interest during previous parliamentary proceedings had been sufficient. That was incorrect. Mr Bridgen has acknowledged and apologised for his consequent breach of the Code
10 of Conduct. In the course of my inquiry, Mr Bridgen identified two other occasions on which he omitted to make a declaration of interest. (Mr Bridgen's letter of 30 January 2017 refers.) He has agreed to make the required apology to the House by way of a point of order.

I have, therefore, upheld the allegation. Subject to Mr Bridgen apologising to the
15 House, I consider he has made an acceptable response and that the rectification action is sufficient to bring the matter to a close. I will report the matter briefly to the Committee on Standards.

In due course, this letter and the relevant evidence (a copy of which I enclose) will be made available on my parliamentary web-pages.

20 As you will appreciate from reading the attached evidence pack, your letter of 8 February 2017 arrived after I had reached my decision to uphold the allegation. I have not, therefore, included it in the evidence pack as I have not relied upon it.

I am copying this letter to Mr Bridgen.

14 February 2017

Written Evidence received by the Parliamentary Commissioner for Standards

1. Letter from Rt Hon Keith Vaz MP to the Commissioner, 16 September 2016

I am writing following your response to my complaint made on 7 September 2016
5 against Andrew Bridgen, the Member for North West Leicestershire.

[Redacted]²

Mr Bridgen has spoken in the Chamber of the House of Commons about HS2 in at
least 23 appearances since 2013, five of which were after the sale of his house to the
Department of Transport on 2 June 2015. At no point did he declare an interest
10 relating to the sale of his property. The only interest he has declared on these
matters was that the HS2 route would pass close to his house, which he made on 28
January 2013.

Prior to the sale of his house, and afterwards, Mr Bridgen has specifically raised the
issue of 'compensation' for people affected by HS2 in the Chamber. Again, he did so
15 without declaring an interest or indicating that he had received £1.9 million in
taxpayer funding for his own property under a government compensation scheme.

Under the Code of Conduct, the above would be a breach of [emphasis added below]:

*10. Members shall base their conduct on a consideration of the public
interest, **avoid any conflict between personal interest and the***

² Text relates to a matter unrelated to this inquiry raised by Mr Vaz in a letter to the Commissioner dated
7 September 2016

public interest and resolve any conflict between the two, at once, and in favour of the public interest.

13. Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Member's Financial Interests. **They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders.**

Furthermore, you have set a precedent for opening such inquiries based on non-declaration of interests in a similar manner, such as [name of Member redacted] for "failing to declare a relevant interest [details redacted as not relevant to this inquiry]. I believe the above more than meets the necessary criteria for an investigation by yourself.

I have not informed the press about this letter.

15 16 September 2016

2. Letter from the Commissioner's office to Rt Hon Keith Vaz MP, 20 September 2016

I am writing to acknowledge receipt of the hard copy of your letter of 16 September 2016 to the Commissioner, explaining further your complaint about Mr Andrew Bridgen MP concerning the sale of his house under the Exceptional Hardship Scheme.

The Commissioner is currently on leave and will next be in the office at the beginning of October. I will ensure that she sees your letter on her return. She will give you a substantive response as soon as she has considered fully the additional information you have provided.

5 It might assist the Commissioner if you were able, in the meantime, to identify the specific occasions on which you consider the rules of the House would have required Mr Bridgen to declare an interest. Chapter 2 of the Guide to the Rules relating to the conduct of Members deals with the detailed rules on such matters. Paragraph 4 of that chapter explains that Members are required to declare past financial interests
10 (normally limited to those active within the last twelve months); indirect financial interests and expected future interests. Paragraph 5 provides the definition of the relevance test. As these tests must be applied to specific proceedings, I think the Commissioner would find it helpful to know which of the 23 you mention you consider to be relevant to your complaint.

15 *20 September 2016*

3. Letter from Rt Hon Keith Vaz MP to the Commissioner, 29 September 2016

I am writing in response to a letter from [name redacted] in your office regarding my complaint against Andrew Bridgen MP.

I understand you are currently on leave, and that it would be helpful if, further to my
20 letter of 16 September, I would identify the specific occasions where Mr Bridgen failed to declare an interest relating to the sale of his house to the Department of Transport under HS2 Exceptional Hardship Scheme on 2 June 2015.

You identify sections of the *Guide to the Rules relating to the conduct of Members* which are relevant to this case. I will refer to these specifically, with reference to Mr Bridgen's statements relating to HS2 in the House of Commons, of which there are at least 23 since 2013. These sections of the Code of Conduct are:

5 *"Chapter 2: Declaration of Members' Interests*

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

a) past financial interests (normally limited to those active within the last twelve months);

10 *b) indirect financial interests, such as the financial interests of a spouse or partner, or another family member, if the Member is aware or could reasonably be expected to be aware of that interest. It is not necessary to identify the person concerned: a formula such as "A member of my family has a financial interest in []" will usually suffice. The definition*
15 *of a family member is as under Category 9 of the Register;³*

c) expected future interests, if the Member's plans have moved beyond vague hopes and aspirations and reached the stage where the Member has a reasonable expectation that a financial benefit will accrue;"

3 See paragraph 58 of Chapter 1 of this Guide.

"5. The test of relevance is whether those interests might reasonably be thought by others to influence his or her actions or words as a Member."

Please see below a chronology of the most relevant statements made by Mr Bridgen, where they contribute to a breach of the rules, and I will also identify the precedent set by your office in investigating similar cases.

28 January 2013 - Debate: High Speed Rail - Hansard Volume 557

- Andrew Bridgen states: *"I declare an interest. Plans unveiled this morning suggest that the preferred route of HS2 will pass within 100 feet of my family's home in North West Leicestershire."*
- This is the only declaration of interest made by Mr Bridgen relating to HS2, which he refers to in later debates. I highlight this statement and declaration for your reference.

25 March 2015 - Debate: High Speed 2 Next - Hansard: Volume 594

- Andrew Bridgen speaks three times in this debate. He does not declare an interest.
- The date this debate took place is highly relevant, as the sale of Mr Bridgen's home under the scheme was completed on 2 June 2015, two months later. Under the HS2 Exceptional Hardship Scheme, an applicant is encouraged *"to provide evidence to cover at least the past six months"* of

their circumstances. Applications are normally considered within six months. This would therefore strongly indicate that:

— Mr Bridgen had been actively compiling information for the purpose of making an application prior to this debate.

5 — Mr Bridgen had either already applied for the scheme, or was in the final stages of applying for the scheme.

• Under Chapter 2, paragraph 4 (c) of the *Guide to the Rules relating to the conduct of Members*, Mr Bridgen would have been expected to declare "expected future interests" and it would appear highly likely that
10 Mr Bridgen had a "reasonable expectation that financial benefit would accrue".

• With regards to the test of relevance, Mr Bridgen's contributions to the debate specifically mention the financing of the project, and the likely need for future government investment in the HS2 project. Mr Bridgen
15 will have indicated in any application, or have verified for an application, the value of his property and expected compensation under the HS2 scheme.

22 October 2015 - Debate: Business of the House - Hansard: Volume 600

• This is Mr Bridgen's first contribution since the sale of his house. No
20 interest is declared.

- Under Chapter 2, paragraph 4(a) of the *Guide to the Rules relating to the conduct of Members*, Mr Bridgen would have been required to declare "*past financial interests (normally limited to those active within the last twelve months)*".

5 30 November 2015 - Debate: High Speed 2 - Hansard: Volume 603

- Mr Bridgen describes in this debate "*the devastating effect that the current route would have on the village of Measham*" (please note Measham is a 7 minute drive from Mr Bridgen's home), and then states, "*when will my constituents receive the compensation they deserve?*"

10 • As stated above, Mr Bridgen has yet to declare an interest relating to the sale of his property, and does not do so now, despite this debate solely focusing on HS2. This is a clear breach of Chapter 2, paragraph 4(a) of the *Guide to the Rules relating to the conduct of Members*.

15 • With regards to the *test of relevance*, Mr Bridgen is specifically referring to and propagating compensation for those affected by HS2, which is exactly what he had received prior to this debate. He does so without making any declaration. One may argue that, as a beneficiary of the scheme, he felt it was in his interest to promote compensation for others.

Precedent

A failure to declare interests has been central to a number of your previous investigations, including no less than six of your current inquiries. [Details quoted redacted.]⁴

In this case it appears similarly clear that Mr Bridgen has repeatedly failed to declare
5 his significant compensation received under the HS2 Exceptional Hardship Scheme when making statements directly citing compensation for those affected by the scheme and the funding of HS2.

Further Questions

The examples I have identified clearly demonstrate breaches of the Code of Conduct.
10 Further investigation is also necessary to identify a number of key questions which remain unclear:

- When did Mr Bridgen begin any consultation with the administrators of the HS2 Exceptional Hardship Scheme? As early consultation may have implications for other statements Mr Bridgen has made in relation to HS2
15 which are not identified above.
- What communication did Mr Bridgen have with your office prior to, at the time of, or following the sale of his home in June 2015?

Wider breaches of the Code

⁴ The details of those other inquiries are not relevant to this inquiry

Additionally, while [name redacted] asks if I can specifically identify Mr Bridgen's breaches of the Code of Conduct pertaining to *Chapter 2 of the Guide to the Rules relating to the conduct of Members - Declaration of Members' Interests*, the additional information I have provided will also demonstrate breaches with wider points of the

5 *Code of Conduct*.

10. Members shall base their conduct on a consideration of the public interest, **avoid conflict between personal interest and the public interest** and resolve any conflict between the two, at once, and in favour of the public interest.

10 13. Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Member's Financial Interests. **They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its Committees**, and in any communications with

15 Ministers, Members, public officials or public office holders.

I hope this requested information assists you with your decision.

29 September 2016

4. Letter from the Commissioner to Rt Hon Keith Vaz MP, 11 October 2016

Thank you for your letters of 16 and 29 September 2016, clarifying your allegation

20 about non-declaration of financial interests by Mr Andrew Bridgen MP.

I am writing to let you know that I have decided to begin an inquiry into the allegation that the rules of the House required Mr Bridgen to make a declaration when he spoke in the debate on HS2 on 25 March 2015. I will also consider whether he made any appropriate declaration when the Under Secretary of State visited
5 Mr Bridgen's constituency in the autumn of 2015.

I have decided not to begin an inquiry into your allegations about non-declaration by Mr Bridgen on 22 October and 30 November 2015. In my view, paragraph 6 of chapter 2 of the 2015 Guide to the Rules relating to the conduct of Members was applicable on both occasions. That paragraph said:

10 *"Members are not required to declare an interest:*

a) If to do so would impede the business of the House; for example, during oral Questions, when asking supplementary Questions, or when responding to a Ministerial statement;"

I enclose the *Commissioner's Information Note*⁵ which sets out the procedure I
15 follow. I am writing to Mr Bridgen to let him know I have opened an inquiry. In due course, I will include on my parliamentary web pages the fact that I am conducting these inquiries. My office will not comment further on any aspect of the inquiry although, in accordance with our normal practice, in response to media requests they will provide factual information about my procedures and the House of
20 Commons standards system in general.

⁵ <http://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf>

Your correspondence with my office about this matter is now part of the evidence for this inquiry and is protected by parliamentary privilege. This means that the contents of the correspondence must not be disclosed to any third party until such time as Parliament has had the opportunity to consider any report of the inquiry.

- 5 I will not give progress reports during the course of my inquiry but I will be in touch again when my inquiry is complete.

11 October 2016

5. Letter from the Commissioner to Mr Andrew Bridgen MP, 11 October 2016

- I would welcome your help with an allegation I have received from Rt Hon Keith
10 Vaz MP in respect of the declaration of your financial interests. I enclose copies of Mr Vaz's letters of 16 and 29 September 2016.

My Inquiry

- In essence, my inquiry will consider the allegation that the rules of the House required you to declare a relevant financial interest when participating in the debate
15 on High Speed 2 on 25 March 2015 and on any other occasion.

The Code of Conduct

The *Code of Conduct* for Members of Parliament, approved by the House on 12 March 2012,⁶ provided in paragraph 13 as follows:

⁶<http://www.publications.parliament.uk/pa/cm201012/cmcode/1885/188501.htm>

“Members shall fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members’ Financial Interests. They shall always be open and frank in drawing attention to any relevant interest in any proceeding of the House or its
5 Committees, and in any communications with Ministers, Members, public officials or public office holders.”

The relevant rules of the House on the declaration of interests

I enclose a copy of chapter 2 of the 2009 *Guide to the rules relating to the conduct of Members* (which remained current throughout the 2010 Parliament). I also enclose
10 a copy of chapter 2 of the 2015 guide, which has applied since the start of the 2015 Parliament.⁷

Members are required to declare any financial interests or benefit of whatever nature, whether direct or indirect in debate, or other proceeding. The same rule places a duty on Members to disclose to Ministers, or servants of the Crown, all
15 relevant interests.

The 2009 Guide explained the test of relevance as follows:

“...a financial interest should be declared if it might reasonably be thought by others to influence the speech, representation or communication in question.”

⁷ <http://www.publications.parliament.uk/pa/cm201516/cmcode/1076/107601.htm>

The 2015 Guide contains the same definition (paragraph 5 of chapter 2).

Paragraphs 73, 74, 76 and 86 of chapter 2 of the 2009 Guide are the most relevant.

Paragraph 73 explains that the rule relating to the declaration of interest is broader in scope than the rules relating to the registration of interests. Paragraph 74 places
5 responsibility on Members, having regard to the rules of the House, to judge whether a financial interest requires declaration. Paragraph 76 says that the House endorses the advice that *“no difficulty should arise in any proceeding of the House or of its Committees in which the Member has an opportunity to speak...”* That advice is underlined in paragraph 86. It says *“The requirement to declare a relevant interest at
10 the appropriate time covers almost every aspect of a Member’s parliamentary duties extending to correspondence and meetings with Ministers and public officials...”*

Paragraphs 4, 5 and 7 of chapter 2 of the 2015 guide contain similar provisions. Members are required to declare relevant past financial interests (normally limited to those active within the last twelve months); indirect financial interests; and
15 expected future interests, when participating in various proceedings and when approaching others. Paragraph 7(c) of that chapter says:

*“Members must declare a relevant interest in any communication, formal or informal, with those who are responsible for matters of public policy, public expenditure or the delivery of public services. That
20 includes communications with Ministers, either alone or as part of a delegation; with other Members; with public officials (including the staff of government departments or agencies and public office holders).*

If those communications are in writing, then the declaration should be in writing too; otherwise it should be oral.”

Next steps

I would welcome your response to the allegations I am investigating, taking account
5 the rules of the House and, in particular, those identified above. In addition, it would
be helpful to know specifically:

- Whether you considered declaring your interest in the HS2 “Exceptional Hardship Scheme” when you spoke in the debate on 25 March 2015;⁸
- If you considered doing so and decided that the House’s rules did not
10 require a declaration, the basis for reaching that conclusion;
- Whether you sought advice from the Registrar of Members Financial Interests at any time about whether that interest might be declarable during parliamentary and other proceedings;
- Whether you declared your interest when meeting the Under-Secretary of
15 State for Transport in autumn 2015;
- If you did so, how you did that (providing supporting evidence if possible);

8

<https://hansard.parliament.uk/Commons/2015-03-25/debates/1503259000001/HighSpeed2?highlight=HS2#contribution-15032590000032>

- Whether you made appropriate declarations in any correspondence with Ministers and public officials about HS2 at that time; and
- Whether you now consider that you ought to have declared a more general interest in HS2 in any oral or written communication since
5 January 2013.

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

I enclose a copy of the Commissioner's Information Note⁹ which sets out the procedure I follow. As a matter of courtesy, I should say now that I will make
10 enquiries of the Registrar in due course. While I do not, at this stage, think 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 will include on my parliamentary webpages the fact that I am conducting an inquiry
15 and the general area of the Code which it involves. While my office will answer general enquiries about the standards system and the procedures I follow, we will not comment further on any aspect of the inquiry. As you will be aware, my inquiries are conducted in private. This letter and any subsequent correspondence between us has parliamentary privilege and may not be shared with any third party until such
20 time as a final report is published.

⁹ <http://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf>

I would very much appreciate your help and co-operation and would welcome your comments on the allegations, together with any evidence you feel may assist my investigation, by close of business on 25 October 2016.

I have written to Mr Vaz to tell him that I have begun an inquiry.

5 *11 October 2016*

6. Letter from Rt Hon Keith Vaz MP to the Commissioner, 20 October 2016

I am writing to draw your attention to an article published in my and Andrew Bridgen's local newspaper, the Leicester Mercury, regarding your inquiry into Mr Bridgen.

10 I just wanted to confirm, as is shown in the article, that I have not responded to the paper's requests for information, in accordance with your wishes.

20 October 2016

7. Letter from Mr Andrew Bridgen MP to the Commissioner, 24 October 2016

15 Thank you for your letter dated 11 October 2016. I am very happy to clarify my position regarding the allegations put by the Member for Leicestershire East. I will first set the background regarding my position on HS2. I set my position prior to the route being announced that I believed the project to be a white elephant, a solution looking for a problem and a bad use of public money. This is a position I have maintained throughout the initial publishing of the route to the present day.

I announced my opposition to HS2 on 22 January (a copy of my email press release attached)¹⁰ prior to the phase 2 route being announced on 28 January 2013.

When the initial route was announced, it showed my primary residence was very close to the intended route. This was a fact I made clear when I spoke on the High
5 Speed Rail statement on 28 January 2013 where I stated "*I declare an interest. Plans unveiled this morning suggest that the preferred route of HS2 will pass within 100 feet of my family's home in North West Leicestershire.*"

The information in Mr Vaz's letter dated 29 September is also incorrect as there was a further declaration made on 26 June 2013 when I stated "*I draw the House's
10 attention to my previous declaration - that the proposed route of HS2 not only bisects my beautiful constituency, but runs within 100 yards of my home.*"

I therefore believe that my interest in HS2 was fully declared and all of my speeches and comments in the House have been firmly against the project for well over 3 years.

15 During those 3 years, I went through a divorce and the judge instigated a court order that the house had to be sold. It was placed on the market for 6 months however with the publicised HS2 route, there was no interest and the solicitors in the case advised the use of the exceptional hardship scheme. The judge made his order that the house should be sold under the HS2 Extreme hardship fund (court judgment
20 attached).¹¹ An application made via agents [name redacted] and aside from

¹⁰ Not included, as not relevant to this inquiry

¹¹ Not included, as not relevant to the is inquiry

providing the information they required, I had no personal involvement in the application as I used consultants specifically to ensure that negotiations were always at arms' length.

We had acquired the property from [name redacted] in 2011 for £2.1m plus
5 £100,000 of fixtures and fittings. Total cost £2.2m. In addition to this, I paid
£110,000 in stamp duty and spent approximately £80,000 adding equestrian
facilities. When the exceptional hardship scheme acquired the property the price
paid was £1.89 million which represents a loss of over £400,000 plus the agent's
fees of approximately £25,000. This was at a time when house prices were
10 increasing in my constituency on an annual basis. I would surmise that this was the
biggest loss anyone has suffered through selling a property to HS2 so far.

Turning to the specifics, when I rose to speak about HS2 on [25] March 2015, I did
not consider the fact that I had incurred a loss of excess of £400,000 on the sale of
my home to be of relevant interest to the points I was making. Points I had
15 consistently made about the HS2 route for some years. Had I made direct reference
to the Exceptional Hardship Scheme, I would have declared an interest however I
did not refer to the scheme, instead intervening to point out that I considered the
scheme to be a "White Elephant" which will only serve to benefit London.

I also had no wish to bring unnecessary media attention to a difficult divorce
20 involving two young children.

Were any of my correspondence with Ministers pertaining to any personal interest
in the Exceptional Hardship Scheme I would of course have made a declaration of

interest however, they were not. My consistent stance on HS2 is that I do not wish to see it happen at all and if so, it should avoid key infrastructure in my constituency. (This is also the overwhelming view of my constituents in North West Leicestershire.) I again remind you that the sale of the house was to comply with a
5 court order. The work of the consultants took over 18 months to effect the sale and it was completed on 21 April 2015. I vacated the property on this date. Any suggestion that meetings with Ministers after that date were to discuss my application are bordering on the ridiculous. I was speaking to Ministers about a proposed £350m private sector investment in a rail freight hub which will create
10 over 7000 new jobs at Castle Donington at the north of my constituency and some 18 miles from my home. I did lobby Ministers to ensure the proposed HS2 route did not disrupt this proposed development, which gained planning permission in December 2015 and is now commencing construction.

I also lobbied Robert Goodwill MP (then Minister for phase 2 of HS2) and indeed met
15 with him in my constituency to propose an alternative route around the village of Measham. This meeting was with representatives of HS2 and concerned local employers. I proposed a different route which would avoid a factory which supplies important components to Jaguar Land Rover and protect 500 jobs in my constituency. My alternative route is less disruptive to my constituency will I believe
20 save the taxpayer over £400m in cost and by HS2's own admission has no engineering reason why it should not be accepted. This meeting and its conclusions only reinforced my lack of confidence in the whole project. HS2 have not yet announced they are altering the route in line with my cost saving and less disruptive suggestion.

I have at no point changed my view or sought advantage in this matter. It is my belief that this is a spurious complaint brought about as a direct result of my complaint about the Member for Leicester East following newspaper reports of the use of drugs and escorts. Its timing is very telling.

- 5 I also feel it is worth drawing your attention to the fact that I was subject to a smear campaign within Parliament regarding a glossy mock-up of the front page of the Mail copy of a report inside that paper from November 2015 on the sale of my house to HS2 with a superimposed advertisement stating "Look HS2 sellout" (photograph sent from another MP attached).¹² These were sent using the internal post and a
- 10 number of my parliamentary colleagues received one in the first week of December 2015. I believe these anonymous leaflets were sent to every Member of Parliament through the internal mail at a rate of about 40 per day during December 2015. I had no way of tracing the culprit however only no other Member have [sic] raised the matter of my personal dealing with HS2.
- 15 I believe there is a clear attempt to use this sale against me despite the fact that it was the result of an extremely traumatic divorce, it caused me significant financial loss, and the fact that at no point have I ever publically supported the HS2 scheme or indeed voted in favour of it before, during or after the sale of my home to HS2. I believe this is in line with the views of the vast majority of my constituents.
- 20 I hope this information is useful as you conduct your enquiries.

¹² Not included, as not relevant to this inquiry

24 October 2016

8. Letter from the Commissioner to the Registrar of Members' Financial Interests, 25 October 2016

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

The allegation I am investigating is, in essence, that Mr Bridgen should have made a declaration when he spoke in the debate on HS2 on 25 March 2015 and/or when the Under Secretary of State visited his constituency in the autumn of that year. I enclose a copy of the correspondence I have exchanged with Mr Bridgen about this matter.

10 I am aware that you and your team regularly provide advice to Members about the House's rules on declaration. I would be grateful if you would tell me what you would likely have said to Mr Bridgen if had he sought your advice about the need to make a declaration on 25 March 2015.

15 It would also be helpful if would provide a copy of any records you have of any discussions or other exchanges with Mr Bridgen and/or his team about the House's requirements in respect of declaration of interests, either in general terms or in relation to Mr Bridgen's interest in the HS2 Exceptional Hardship Scheme.

Any other relevant information you hold and/or any other comments you may wish to make would be most welcome.

20 Thank you for your assistance.

25 October 2016

9. Letter from the Commissioner to Mr Andrew Bridgen MP, 25 October 2016

Thank you for your letter of 24 October.

I will consider carefully the information you have provided before I reach a decision on this matter.

5 In line with my usual practice when considering an allegation of a breach of paragraph 13 of the Code of Conduct, I have today written to the Registrar, [redacted], to seek information from her about the advice she would generally offer to Members about the rules on declaration when her opinion is sought.

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

25 October 2016

10. Letter from the Registrar to the Commissioner, 27 October 2016

Thank you for your letter of 25 October about your inquiry into Mr Andrew Bridgen MP and the declaration of his financial interests.

15 From the material you have sent, it seems to me that – even though he did very properly declare his interests on 28 January and 26 June 2013 - Mr Bridgen may have misunderstood the rules on the requirement to disclose his interests. The Code of Conduct says in paragraph 10:

20 *"10. Members shall base their conduct on a consideration of the public interest, avoid conflict between personal interest and the public*

interest and resolve any conflict between the two, at once, and in favour of the public interest."

Members are not required to make a declaration on occasions when they are influenced by their private interests, since such occasions should not arise. A
5 Member would be in breach of the Code if he or she followed private interests instead of the public interest.

Instead, the purpose of declaration is as set out as follows in Chapter 2 of the Guide to the Rules:

10 *"2. The declaration of interests ensures that Members, the public and others are made aware at the appropriate time, in proceedings of the House and on other occasions, of any interest relevant to those proceedings or to the actions or words of a Member. ...*

15 *5. The test of relevance is whether those interests might reasonably be thought by others to influence his or her actions or words as a Member."*

If Mr Bridgen had sought my advice on whether to declare an interest, I would have invited him to consider whether that interest which was one which someone else might reasonably have considered to influence his actions or words as a Member. Mr Bridgen says that his interests did not in fact influence his words as an MP, which
20 is proper.

The material you have sent suggests that at the time of the Westminster Hall debate on 25 March 2015, Mr Bridgen was in the process of selling his home via the compensation scheme but the transaction was not yet complete. If this is correct Mr Bridgen had a financial interest as the owner of a property blighted by the planned route for HS2. Someone else might reasonably have thought therefore that he had
5 an interest in stopping HS2 from going ahead. On that basis I would have advised him, when speaking in the debate, to say that he owned a property close to the route of HS2. This would be in accordance with the Guide to the Rules.

I realise that it could also be argued that in March 2015 Mr Bridgen's financial
10 interest was best served if HS2 went ahead, so that he would obtain compensation. But Members are required to declare an interest on the basis of what others might reasonably think, even if on occasion their interests might lie in a different direction.

By November 2015, however, when the Parliamentary Under-Secretary of State for Transport visited Mr Bridgen's constituency, Mr Bridgen no longer owned his
15 property. In his capacity as constituency MP, Mr Bridgen lobbied the Minister for changes to the HS2 route, for the benefit of local business and industry. I have considered carefully what I would have said to Mr Bridgen if he had consulted us then. It is always difficult to say what advice we would have given in a hypothetical case. That is because such advice is always given after a discussion with the Member,
20 and would depend on the exact circumstances.

Nevertheless, in the interests of openness and honesty, I think I would have advised that it would be good practice for Mr Bridgen to declare, when lobbying the Minister in this way both outside the Chamber and (on 30 November 2015) within it, that he

had himself recently received a compensation payment. But I appreciate that neither the payment which he had by then received, nor his previous ownership of the house, came within the category of interests which might have been considered to influence him at this point.

5 I have no record of advising Mr Bridgen about declaration of interests.

27 October 2016

11. Letter from the Commissioner to Mr Andrew Bridgen MP, 31 October 2016

When I wrote to you on 25 October, I said that I had written to the Registrar, [redacted], to seek information from her about the advice she would generally offer
10 to Members about the rules on declaration. I enclose a copy of her reply for your information.

As you can see, [the Registrar], has referred to the *test of relevance*, which I set out in my letter to you of 11 October and she has explained how she considers it would have applied to your circumstances when speaking in the Westminster Hall debate
15 of 25 March 2015 and when the Parliamentary Under-Secretary of State for Transport visited your constituency in November 2015.

I am writing to you now to invite your comments on [the Registrar's] advice before I reach my own decision on the allegation under investigation. If there is any other evidence which you consider would have been relevant, I would be happy to receive
20 that as well. I would be grateful to have your full response to this letter by 14 November 2016.

I note that on 19 October 2016 an article appeared in the Leicester Mercury which said *“Mr Bridgen told the Mercury it was the Leicester East MP who filed the complaint in relation to the Conservative’s sale of his house in Appleby Manga to a compensation scheme for owners of property blighted by the proposed HS2 rail line.”* The Mercury

5 quoted you as having said *“He has trawled around and is suggesting I made an excessive amount of money when I sold my house to HS2”*. If correctly attributed, this is an inaccurate representation of the scope of my inquiry. I must, once again, draw your attention to the fact that my inquiries are protected by parliamentary privilege and should not be discussed with any third parties while my work is in progress.

10 31 October 2016

12. Letter from Mr Andrew Bridgen MP to the Commissioner, 2 November 2016

Thank you for your letter dated 31 October 2016. I am very happy to offer further comment on this matter. Dealing first with the point you have raised in your last

15 paragraph, if my recollection is correct, I gave that quote prior to being informed of the full details of the complaint. The journalist in question contacted me at home posing questions having obviously been tipped off about the complaint, presumably by the complainant or a close source. My office also received calls prior to your letter stating a complaint had been made relating to HS2. The comment that you reference

20 would have been my suspicion of what the Member for Leicester East was going to imply.

Turning to the letter that you have received from [the Registrar], I believed my previous declarations covered my interest in HS2 and apologise for not making my interest clear again at the Westminster Hall debate of 25 March 2015. I have

reviewed my interventions during this Westminster Hall debate and they were completely in line with my previous position talking about the scheme being a white elephant. I made no mention of either the exceptional hardship scheme or compensation.

5 [The Registrar] has stated that I could have an interest in HS2 not going ahead due to its proximity to my former property or going ahead due to the compensation fund. I would again point to the fact that I opposed HS2 before the route was announced, and the property transaction which was forced upon me by a Court Order cost me around £400,000. Both facts that I referenced in my previous letter with supporting
10 evidence.

On the matter of the Ministerial visit, I did make the Minister aware of the transaction as I stated to him that I had been informed that the people maintaining the property, which I told him that I had been forced to sell to HS2, had filled in the swimming pool, damaging the value of the property, because of health and safety
15 regulations. The Minister asked an HS2 representative who was with him at the visit to look into the matter.

Again, I hope this information is useful as you conduct your enquiries.

2 November 2016

20 **13. Letter from the Commissioner to Mr Andrew Bridgen MP, 9 November 2016**

Thank you for your letter of 2 November 2016. I am grateful for your prompt response acknowledging and apologising for not making a relevant interest clear in

the Westminster Hall debate of 25 March 2015. This, together with the information you have provided about your conversation with the Parliamentary Under-Secretary of State for Transport is sufficient for me to be able to make a decision on the allegation under consideration.

5 My decision

“The declaration of interests ensures that Members, the public and others are made aware at the appropriate time, in proceedings of the House and on other occasions, of any interest relevant to those proceedings or to the actions or words of a Member.”¹³

The Registrar has told me that she would have advised you to make a declaration of interest on 25 March 2015. I accept her advice. You have told me that you believed a previous declaration covered your interest in HS2. That was a mistaken belief; a declaration should be made on each occasion that an interest is relevant to proceedings. The omission of a declaration on 25 March 2015 was a breach of paragraph 13 of the Code of Conduct.

15 You have told me that you made the Minister aware of the transaction, which involved the sale of your former marital home through the Exceptional Hardship Scheme, when he visited your constituency in November 2015. Such action would have satisfied paragraph 13 of the Code and I do not uphold that element of the inquiry.

20 Next steps

¹³ Chapter 2, paragraph 2 of the Guide to the Rules relating to the conduct of Members

The application of the relevance test

In your letters of 24 October and 2 November 2016 you emphasised the consistency of your stance on HS2 before and after the sale of your property through the HS2 compensation scheme, and that your financial interest has not influenced your position. I think it is important to say that that is not the allegation I have investigated. If a financial interest had influenced your words or action, that would be a serious matter.

However, on the basis of the information you have provided, it is clear that you did not consider the relevance test, i.e. whether your interests might reasonably be thought by others to influence your actions or words as a Member, on 25 March 2015, because you mistakenly thought that an earlier declaration would suffice.

In light of that, I would be grateful if you would tell me what steps you have taken since receiving the Registrar's advice to identify whether there have been other occasions when you have made the same – incorrect – assumption that an earlier declaration in relation to any of your financial interests meant that no further declaration was required of you. Please also let me know the outcome of the actions you have taken.

Resolving this inquiry

I need now to consider how best to resolve this matter. With your agreement, I would be ready to consider resolving this matter through the rectification procedure. Under Standing Order No 150, I am able to use this procedure without submitting a full and formal memorandum to the Committee on Standards. I would,

instead, inform the Committee of the outcome and my decision letter, with all the relevant correspondence, would be published on my webpages in due course.

Under the rectification procedure, the Committee would normally expect the Member to have acknowledged their breach of the Code, apologised and taken any
5 steps necessary to rectify the error. Paragraph 16 of Chapter 4 of the Guide to the Rules relating to the conduct of Members, says that in the case of non-declaration, the procedure "*requires an apology to the House by means of a point of order in accordance with the procedure established for such apologies.* You have already acknowledged your error and apologised to me for it. If you were prepared to accept
10 my decision and agree to raise the required point of order (including any other instances, if appropriate), I would consider that to be an appropriate resolution to this inquiry.

It would be very helpful if you would provide the additional information requested above and let me know by close of business on 23 November 2016 whether you
15 would like me to rectify the complaint on the basis I have suggested. I enclose a copy of the material that would be published on my website, including a copy of the letter which I would send to Rt Hon Keith Vaz MP (as the first item in the package), if you agree to my proposal. The content of the letter to Mr Vaz is, of course, a matter for me alone but I would welcome any comment on its factual accuracy.

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

9 November 2016

14. Letter from Mr Andrew Bridgen MP to the Commissioner, 16 November 2016

Thank you for your letter dated 9th November 2016 with your decision on this
5 matter. I am happy to follow the course of action you have set out under Paragraph
14 of Chapter 4 of the Guide to the Rules relating to the conduct of Members.

As per your request, I have reviewed the instances I have referred to HS2 in the
House which totals 9 occasions. I have written to [redacted], the Registrar of
Member' Financial Interests to cite these instances and asked that she assesses
10 them. I have attached a copy of that correspondence.

When this has been clarified, I will be happy to raise the point of order which I trust
will resolve this matter.

16 November 2016

**Attachment: Letter from Mr Andrew Bridgen MP to [redacted], Registrar,
15 16 November 2016**

I am writing further to your letter dated 27th October 2016 regarding my
declaration of financial interests relating to HS2 and my former main residential
property. As I have explained to Ms Hudson, I believed that I had made my interest
in this matter clear however I accept that I should have done this on every instance
20 I raised the matter and to that end, I have reviewed that comments in the House on
that matter of HS2 and have established 10 separate dates where I have referred to
HS2 without making a declaration. Some of these have been as an aside when

discussing other issues and others have been pointed questions. I would be grateful if you could review these comments to assess whether I would have needed to have made a declaration:

12/2/2013 - Westminster Hall Debate on manufacturing in the East Midlands

5 6/3/2013 - Prime Ministers Questions

27/6/2013 - Transport & Leader of the House Oral Questions

9/10/2013 - A written question to the Transport Secretary

31/10/2013 - High Speed Rail (Preparation) Bill

17/12/2013 - Transport Oral Questions

10 6/2/2014 - Transport Oral Questions

13/3/2014 - Business of the House Questions

30/10/2014 - Business of the House Questions

25/3/2015 - High Speed 2 Westminster Hall Debate

I raised have raised the issue of HS2 6 times further to these instances, however I
15 had disposed of main property in April 2015 so I presume no further declaration
needed to be made. I would be grateful if you could confirm this.

In retrospect, I accept that I should have sought your advice regarding my financial interest regarding HS2 and I do apologise for not doing so.

I have accepted that I need to apologise to the House via a point of order and will do so following your assessment of when I should have made a declaration.

5 16 November 2016

15. Letter from the Commissioner to Mr Andrew Bridgen MP, 23 November 2016

Thank you for your letter of 16 November 2015, confirming that you accept my finding and will apologise for your breach of paragraph 13 of the Code of Conduct
10 by way of a point of order.

You copied to me the letter you sent at the same time to the Registrar. She is, of course, happy to advise you about the specifics of the rules on declaration, including how they have changed at the beginning of the 2015 Parliament, and how they might apply in the light of information you provide to her about your personal
15 circumstances. However, this is a matter on which I am seeking your own judgement.

I hope it will be of some assistance in that task, if I first remind you of the relevant parts of chapter 2 of the current *Guide to the Rules relating to the conduct of Members*,¹⁴ and then flag some of the issues which you may need to consider. (The
20 information you have provided about the occasions on which you have referred to

¹⁴ Similar provisions applied during the 2010 Parliament, although the paragraph numbers and precise wording of the relevant parts of the 2009 Guide were different

HS2 in the House is a useful starting point but, as you will see, it may not be sufficient. I also think you may have mistakenly included 25 March 2015 in your list of occasions about which you wish to consult the Registrar, as we have already agreed that the rules of the House did require you to make a declaration on that occasion.)

5 Paragraph 2 of chapter 2 explains the purpose of declaration which is to ensure that the public and others “*are made aware at the appropriate time, in proceedings of the House **and other occasions, of any interest relevant to those proceedings.***” (My emphasis added.) Paragraph 7 details the different occasions on which declarations are required and includes “*communications with Ministers, either alone or as part of*
10 *a delegation; with other Members; with public officials (including staff of government departments or agencies and public office holders)*”. This means that you need to consider whether there have been occasions, outside of the proceedings in the Chamber, where your ownership of a property so close to the proposed route of HS2 and/or your application for compensation under the Exceptional Hardship Scheme,
15 constituted a relevant interest. For example, the rules of the House might have required you to make a declaration when writing to a Minister on behalf of a constituent about the proposed route or about the scope and terms of the compensation to be offered. They might also have required you to make a declaration when participating in Select Committees. I cannot offer you an
20 exhaustive list of either the occasions or the topics which you would need to consider but I hope this gives you a clearer sense of the scope of the declaration requirements.

Paragraph 4 of chapter 2 of the Guide explains the timeframe in which a past interest might still be declarable, if relevant, and it explains that future interests may be

declarable once a Member's plans have "*moved beyond vague hopes and aspirations and reached a stage where the Member has a reasonable expectation that financial benefit will accrue.*" This paragraph will, therefore, have a bearing on which of your interests might have been declarable and when.

5 While I am satisfied that I can conclude my inquiry using the rectification process, subject to the resolution of this one outstanding issue, I do not think I should do so until such time as you have identified whether there are any other occasions where a declaration was required but not made. I would, therefore, be grateful if you would take the steps necessary for you to be able to answer my original question on this
10 point by 6 December 2016.¹⁵

The Registrar would, as always, be happy to discuss your particular circumstances and to give advice on whether the rules of the House would have required you to make declarations on other occasions. However, it would, I believe, be helpful for you to have more information to hand before contacting her to arrange a meeting.

15 Her telephone number is [redacted].

23 November 2016

16. Letter from Mr Andrew Bridgen MP to the Commissioner, 7 December 2016

Further to your letter dated 23rd November 2016, I have now had a meeting with
20 the Registrar of Members' Financial Interests and discussed this matter. It has been explained to me that just making an initial declaration was not sufficient and we

¹⁵ Deadline extended to 13 December 2016 for Mr Bridgen to meet Registrar

discussed where it may have been appropriate to declare an interest on the matter of HS2.

In light of the advice I received and considering the fact that I had previously declared an interest regarding HS2, I believe it could have been considered appropriate to have made the declaration once again in the High Speed 2
5 Westminster Hall Debate on the 25th March 2015, as my house was at the time being sold through the exceptional hardship scheme, at what may I add was a significantly lower amount than I paid for it 2 years before. Again I would point out that I did not refer specially to the exceptional hardship scheme at any point.

10 Therefore if this is agreeable, I will seek to raise a point of order to rectify this matter in the House.

7 December 2016

17. Letter from the Commissioner to Mr Andrew Bridgen MP, 12 December 2016

15 Thank you for your letter of 7 December, following your meeting with the Registrar on 6 December.

I cannot conclude my inquiry until I am satisfied that you have understood what I have investigated, why I have found you to have acted in breach of the rules and when that breach occurred. It also important that I have some confidence that you
20 understand what you need to do to reduce the risk of committing a similar breach in the future. For these reasons, I asked in my letter of 9 November that you tell me the steps you have taken to identify whether there have been other occasions when

you have made an incorrect assumption about the need to make a declaration of interest.

Your letter does not answer that question directly, nor does it otherwise provide me with the assurances I am seeking.

5 Since our correspondence appears to be based on some misunderstanding about the House's requirements of Members in respect of declaration of relevant interests "*in any proceeding of the House or its Committees, and in any communications with Ministers, Members, public officials or public office holders*", I think this matter might be resolved more quickly through a face-to-face meeting, rather than by further
10 exchanges of letters.

I would therefore be grateful if you would contact my PA, [redacted], to arrange a mutually convenient appointment as soon as possible. [redacted] can be contacted on 0207 219 3738 or via [redacted]@parliament.uk. It would be helpful if, when you do so, you let her know whether you expect to be accompanied at our meeting and,
15 if so, by whom.

In the meantime, you may find it helpful to read the some of the written evidence published alongside the Committee on Standards Second Report of Session 2015-16 (HC 803). That evidence can be found on the Parliament website here:

<http://www.parliament.uk/documents/commons-committees/Standards-Committee/geoffrey-cox-written-evidence.pdf>. You will see that I asked a similar
20 question of the Member concerned on 9 October 2015 when inquiring into an

allegation concerning failures to register certain of his interests within the House's deadlines.

I do hope that we are able to resolve this matter soon, so that you may make the appropriate apology to the House, enabling me to bring this inquiry to an
5 appropriate conclusion.

12 December 2016

18. Letter from the Commissioner to Mr Andrew Bridgen MP, 19 January 2017

When we met on Tuesday I said I would write to give you a brief note of the points we discussed and to confirm what I have asked you to do.

10 I summarised the key points from my letter of 12 December. I need to be satisfied that you have understood what I have investigated, why I have found you to have acted in breach of the rules and when that breach occurred. I need to have some confidence that you understand what you need to do to reduce the risk of committing a similar breach in the future.

15 Given that you had previously told me that your breach of the rules occurred because of an assumption you made, I am seeking to establish whether there are, or are likely to have been, other occasions where you made a similar assumption. That assumption, which was incorrect, was that an earlier declaration of interest meant you did not need to declare an interest when speaking about HS2 in the Westminster

20 Hall debate of 25 March 2015,

As you have accepted that your assumption was incorrect, if you can describe for me the steps you have taken to identify whether there have been other such occasions, and tell me the outcome of those actions, I think that will be sufficient to bring this inquiry to a close. (The outstanding action for you then would be to make an
5 appropriate apology to the House, by way of a point of order.)

By way of example, it would be helpful to know if, when writing on behalf of constituents concerned about the proposals for HS2, you have routinely made a declaration to the relevant Ministers or officials when others might reasonably have thought that the proximity of your property to the proposed route for HS2 or your
10 (successful) application to the Exceptional Hardship Scheme might have influenced your words or actions as a Member. (For a full list of occasions to consider, please refer to paragraphs 78 to 87 of the 2009 Guide to the Rules (paragraphs 7 of chapter 2 of the 2015 Guide).

As you are already aware, a past, current or future interest is declarable. I will not
15 repeat the detailed provisions here; these are set out in paragraph 73 of the 2009 Guide to the Rules (paragraph 4 of chapter 2 of the 2015 Guide).

I appreciate that you may not have records now of every possible occasion on which a declaration *might* have been required and that it will not necessarily be possible for you to guarantee that nothing has been overlooked. This is why it would be
20 helpful to have a clear understanding of the review process you have undertaken.

Once I have that information, and subject to the appropriate apology being made, this matter will be concluded. I would be grateful to have a substantive reply to this letter by 9 February 2017. If that date is difficult, please contact my office.

19 January 2017

5 **19. Letter from Mr Andrew Bridgen MP to the Commissioner, 30 January 2017**

Thank you for your letter dated 19th January 2017 further to our helpful meeting on the 17th January 2017.

10 Firstly on the point regarding declarations to the House and based on my meeting with [the Registrar], I believe that in addition to the debate on the 25th March 2015, I should have declared an Interest when I submitted a written question to the Transport Secretary on the 9th October 2013 and when I spoke in the High Speed Rail (Preparation) Bill on the 31st October 2013.

15 On the matter of dealing with constituents, when I met constituents face to face, I would routinely explain my position regarding HS2 and the fact that my primary residence was sited close to the line. Should the query concern the Exceptional Hardship Scheme, I would also explain my experience of the process. When I wrote on behalf of a constituent regarding HS2 and the exceptional hardship scheme, I did not declare an interest to the Minister in the letter as I considered that I was representing a constituent and my personal situation was in no way related to case.

20 Again, if that assumption was incorrect, I will be happy to apologise for this. I have searched my constituent records and have identified 2 constituents I have contacted the Department on behalf of regarding the EHS.

We discussed face to face briefings and meetings I have had with the Department of Transport and HS2 where I have made comment. With the passing of time, I am unable to remember if I specifically raised the exceptional hardship scheme or whether I declared any interest, I am writing to both organisations requesting
5 information of any briefings or meetings I have attended and whether they have minutes of these meetings which attended and spoke in. I have attached both of these letters and will inform you when I have received a response.¹⁶ At this point, we can hopefully conclude the matter. If there are any points, I have not covered, please do contact me again.

10 *30 January 2017*

¹⁶ Text of those letters not included, as not relevant to my decision