

RECTIFICATION

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Summary

1. My investigation focused on a visit made by Mr Paisley to the Maldives in the autumn of 2016. I began the inquiry on my own initiative, following a BBC Northern Ireland *Spotlight* programme broadcast on 11 December 2018, which focused on a family holiday he had taken in October 2016. Part of the cost of the holiday had been met by a third party and it was alleged that this had been arranged at the behest of a foreign government. I considered whether Mr Paisley ought to have registered receipt of that hospitality in the Register of Members' Financial Interests; whether he should have made ad hoc declarations of a relevant interest arising from the hospitality; and whether he had acted in breach of the paid advocacy rules in relation to it.
5
2. In the course of my investigation, I collated a large volume of evidence. Much of it was inconclusive; some of it was contradictory and some of the accounts given by individuals were inconsistent over time. Mr Paisley said from the start that a third party had met part of the cost of his family's stay in the Maldives, describing that third party as a personal friend. Mr Paisley believed, on that basis, that he did not need to register the hospitality.
15
3. I concluded - on the balance of probabilities - that a corporate body, rather than a personal friend of Mr Paisley's, had absorbed the cost of the hospitality. Although I saw no evidence that Mr Paisley had engaged in any activities relating to his parliamentary role during his visit, the circumstances were not analogous to a family holiday which was partly paid for by someone else because of a purely personal relationship. The fact that Mr Paisley had no direct relationship with the donor created a presumption in favour of registration, and I was persuaded that having received complimentary rooms was something which others might reasonably consider to influence Mr Paisley, which made registration a requirement.
20
25
4. The hospitality Mr Paisley and his family received was a registrable benefit, which he should have registered in the Register of Members' Financial Interests within 28 days of the end of his holiday. I therefore found that Mr Paisley acted in breach of paragraph 13 of the 2015 edition of the Code of Conduct for Members.
30
5. On the basis of all the evidence available to me, bearing in mind that I had concluded that the true donor had been a corporate body and not a foreign government, I did not find that Mr Paisley had acted in breach of the rules on the declaration of interests nor the rules on paid advocacy.
35
6. This investigation has taken far too long to complete. Some of the time taken is attributable to waiting for evidence from third parties, some to the Dissolution of Parliament and some to the volume of work in my office. However, much of the delay is the result of Mr Paisley focusing his attention on rebutting allegations made in the media rather than on answering
40

specifically my questions about his adherence to the rules of the House. I believe that in so doing, when he asked for the Registrar's advice in December 2018, he did not disclose all of the relevant information. Had he disclosed more detail than about the nature of his relationship with one of the resort's owners, his contact with that individual before and after his visit to the Maldives, and about other arrangements for his holiday, he would have been advised then to register the hospitality he had received and this matter could have been concluded very much sooner, early in 2019.

5

7. Although this is not the first time Mr Paisley has broken the rules on the registration of overseas visits, he received this hospitality before I had concluded my inquiry into that other matter. He has acknowledged this new breach of the rules. He has apologised unreservedly for it and he has agreed to rectify his omission. He has described to me the steps he has taken to avoid any further recurrence. He has also apologised for unnecessarily delaying my inquiry.

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8. I considered very carefully whether it was appropriate to conclude this inquiry by way of the rectification procedure. That decision was finely balanced, but I concluded that it was appropriate to do so.

Written evidence

1. Letter from the Commissioner to Mr Ian Paisley MP, 13 December 2018

I am writing to tell you that I have decided to begin an inquiry into allegations arising from media reports about your trip to the Maldives in late October/early
5 November 2016.

Following an interview you gave on the BBC Radio Ulster *Talkback* programme during the summer, I asked you to meet with me and the Registrar of Members' Financial Interests on your return to the House in November, for the Registrar to refresh your understanding of the rules of conduct. We met last week. During that
10 meeting, you asked the Registrar about a family holiday in the Maldives in 2016 which you said had been partially funded by a long-standing personal friend as a birthday present. The Registrar told you that the rules required Members to register
15 *“Any travel or hospitality received in the course of a visit outside the UK, if it relates in any way to their membership of the House or to their parliamentary or political activities...”* but not *“Visits wholly unconnected with membership of the House or with the Member’s parliamentary or political activities (e.g. family holidays).”*

The BBC Northern Ireland Spotlight television programme aired on Tuesday night included allegations that your family’s visit to the Maldives in late October/early
20 November 2016 was arranged at the request of the Government of the Maldives, and that the Maldives Government was the true source of most of the funding for that holiday. In light of those allegations, I have decided to begin a formal inquiry.

My Inquiry

My inquiry will focus on whether

- 25 • you should have registered this visit as a financial interest in the Register of Members’ Financial Interests
- there were occasions when the rules would have required you to declare that interest; and
- you have acted in breach of the rule prohibiting paid advocacy.

The Code of Conduct for Members

Paragraphs 11 and 13 of the 2015 edition of the Code of Conduct for Members are the most relevant to this inquiry. While it is not the focus of my inquiry, paragraph 16 may also be relevant. I enclose a copy of the Code for ease of reference.¹

The Guide to the Rules relating to the conduct of Members

- 5 The main purpose of the Register of Members' Financial Interests (the Register) is set out paragraph 4 of chapter 1 in the Guide to the Rules relating to the conduct of Members (the Guide)

10 *“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 After the publication of the first Register of a Parliament, it is the responsibility of Members to notify changes in their registrable interests within 28 days of each change occurring.

The detailed rules on the registration of financial interests are found in chapter 1 of the Guide to the Rules (copy enclosed). Paragraphs 31 to 46 of that chapter explain the rules specific to overseas visits and to gifts and benefits from sources outside the UK.

- 20 Chapter 2 of the Guide sets out the rules concerning the declaration of financial interests. Paragraph 7 of that chapter lists the occasions on which declaration is required.

25 Chapter 3 of the Guide contains the detailed rules concerning “lobbying for reward or consideration”, more generally referred to as paid advocacy. The chapter is short and should be read in its entirety but I would like to draw particular attention to paragraph 4, which explains that the rules on lobbying are intended to avoid the perception that *“outside individuals or organisations may reward Members, through payment or in other ways, in the expectation that their actions in the House will benefit that outside individual or organisation, even if they do not fall within the strict definition of paid advocacy.”*

30

Next steps

In the first instance, I would welcome your comments on the allegation that you have acted in breach of the rules of conduct. In addition to your general comments, it would be helpful if you would answer the following questions.

¹ <https://publications.parliament.uk/pa/cm201516/cmcode/1076/107601.htm>

- Who was the “personal friend” who reportedly met some of the costs of your holiday in the Maldives in 2016?
 - Please set out how this person become known to you, when you first met and describe briefly the nature of the friendship.
- 5
- Please explain how your friend came to meet some of these costs.
 - You told the Registrar that you also paid for part of a holiday for this friend. Please provide details and the value of the holiday.
 - Please list in outline each element of the costs associated with your autumn 2016 holiday in the Maldives (e.g. international flights, travel within the Maldives, accommodation in various places etc). Please give dates where possible and say who met each cost. If you or your family paid for some elements, please explain.
- 10
- Please provide contact details for anyone who met these costs. (I would not expect to publish the personal contact details of any third party, but I may need to contact them direct)
- 15
- Please let me know how and when you first became aware of the suggestion that the Government of the Maldives had a role in your visit, for example by suggesting the invitation or paying for any element of the holiday.
 - Please explain what contact you have had with Government of the Maldives or its representatives, both during your visits to the Maldives and while you were elsewhere.
- 20
- Do you believe there are any occasions when the rules of the House, as set out in Chapter 2 of the 2015 Guide to the Rules, would have required you to make a declaration of interest in respect of the November 2016 visit to the Maldives, or your earlier visit in February 2016? Please consider:
- 25
- the whole of the period when you had a “reasonable expectation” of such benefit;
 - the twelve months following your return from the holiday; and
 - in particular, but not exclusively, any approaches you made to Ministers, other Members and public officials about matters concerning the Maldives and their affairs.
- 30

Please provide copies of the emails you are reported to have provided to the BBC Spotlight programme as evidence that the holiday was not arranged or funded by overseas government sources, together with any other supporting evidence you

consider to be relevant. It would be helpful to receive as much material as possible at the outset, in order to expedite my inquiry.

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

5 Important information

As you will be aware, my inquiries are conducted in private. Following the decision taken by the House on 19 July 2018, I will not publish the fact that I am conducting an inquiry into an allegation into an alleged breach of the Code of Conduct. However, should I receive other allegations about this matter, they will be declined on the basis that I have already begun an inquiry. Such correspondence will emphasise that my decision should be kept confidential.

My office will not otherwise comment on any aspect of the inquiry to third parties. They will answer direct factual questions about the processes I follow and the standards system more generally. In response to general enquiries, as well as those from the media, they will neither confirm nor deny that I have begun an 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. All the relevant evidence, including our correspondence, will be published when I have concluded my work.

For the avoidance of doubt, you should not disclose the fact of my inquiry nor any matter relating to it to third parties other than anyone whom you need to consult in order to answer my questions. If that is necessary, you should make clear to them these confidentiality requirements. You should also refrain from any comment to the media about this matter.

25 Procedure

I enclose a copy of the *Commissioner's Information Note*, which sets out the procedure for inquiries. Please note that this has not yet been updated to reflect the changes flowing from the decision of 19 July 2018.

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. Any such meeting would be minuted and it is likely that those minutes would be published as part of the record of my inquiry.

I must ask that, for the duration of my inquiry, you visit my office only by prior appointment through either [the Complaints Manager] or my PA, [name and contact details redacted]. I know that you had booked an appointment to see me next week;

if you still feel that would be appropriate perhaps you would call [names redacted] to confirm.

I should say now, as a matter of courtesy, that I may seek the advice of the Registrar of Financial Interests in the course of this inquiry. I may also seek evidence direct
5 from third parties.

Action

I would be grateful to have your response to this letter as soon as possible and no later than 20 December 2018.

Please let me know before that date if you think more time is required.

10 *13 December 2018*

2. Email from Mr Ian Paisley MP to the Commissioner's office, 17 December 2018

Thank you for the letter. I would like to confirm receipt of the letter. I also wish to continue with the prearranged brief meeting with the Commissioner tomorrow at
15 3pm. I understand this will be noted. I will be accompanied by a colleague, [name redacted].

17 December 2018

3. Agreed note of the meeting on 18 December 2018

Present at the Meeting

20 Commissioner for Standards - KS Complaints Manager - CM

Mr Ian Paisley MP - IP Colleague of IP [name redacted]

The meeting was arranged at IP's request (in accordance with paragraph 26 of the *Commissioner's Information Note* approved by the Committee on Standards on 3 February 2015).

25 KS opened the meeting by saying that she was disappointed that IP had told the media about his request for a meeting. As IP is aware, since 19 July 2018, KS may not disclose any information about complaints unless and until a formal report is published at the end of an inquiry. This means her office may neither confirm nor deny whether an inquiry is in progress, nor whether a meeting is to take place. KS
30 said that her staff had received abuse because they could not comment on IP's disclosure to the media. IP apologised for putting the Commissioner's office in that position. He also apologised for saying that he had taken advice from KS when the

advice was given by the Registrar of Members' Financial Interests. KS had been present but had not advised him.

5 KS said the *Spotlight* allegations were serious ones. If those allegations are untrue and everything was perfectly proper, the investigation would provide an authoritative statement of that. If, as IP says, he has evidence that the gift came from a proper source, that would be demonstrated through her investigation. KS said that she could conduct a formal interview today but, as IP would be aware, he would need to submit supporting evidence. She could go through each of the questions from her letter of 13 December, if IP wished, or he could wait until he had collated the evidence to respond.

15 KS said that although she had asked for a formal reply by 20 December, she wanted IP to have time to submit all the evidence at the outset and would be happy to extend the deadline until 9 January 2019. Whatever IP decided, there would be a formal agreed note of today's meeting, which would form part of the evidence at the end of the process. KS said that she had already received a number of complaints about the same matter and, as she had explained in her letter she would, she had told the complainants of the fact of her inquiry and that this information was privileged and should be kept confidential.

20 IP said he welcomed KS's decision to begin an inquiry and that her letter of 13 December was very clear about confidentiality and parliamentary privilege – he should say nothing to anyone. IP said he had told no-one but [a colleague] about the inquiry. IP asked how many complaints had been made about him. KS said it was difficult for her to say; if she were to disclose that it would be tempting for IP to speculate on the identities of the complainants and that would not be helpful.

25 IP said he did not wish to proceed with a formal interview today. He said he had collated about 90% of the evidence and taken [his colleague] through it. IP wanted to be sure he had answered all the questions and [his colleague] was assisting him with that. IP said that the investigation into the previous allegations had not been pleasant, and he wanted to make sure that he answered as fully and helpfully as he could from the start. IP said there were a couple of issues he wanted to raise at this stage.

- 35 • He fully understood that he could not speak to anyone else about the inquiry, but he knew that his political party would want to ask him questions and, in particular, he needed to know if he could divulge to them the fact that KS had initiated an inquiry.

40 KS said she could see that it would be difficult for him not to answer that question. She said that IP could disclose the fact of the inquiry to senior party officials, but he must also make clear that the information is protected by privilege and that they must respect that. [His colleague] suggested that he should be able to confirm to senior party officials that IP was under investigation and that he was co-operating with the Commissioner's inquiry. [IP's colleague] said he would not tell them anything about the scope of the inquiry or the questions KS had asked. KS said that

any breach of confidentiality would not only be a breach of privilege but might prejudice IP's position.

5 IP asked how long the inquiry might take. KS said that she would complete it as quickly as possible; as soon as she has IP's response to her letter, she would work on it.

IP said his second issue was about confidentiality.

- 10 • The friend who had paid for the holiday was obviously key to the inquiry. IP was concerned for their privacy, unlike him, they had not chosen to be in the public eye. He wanted to give accurate answers and be fair to them. What assurances of privacy could he give them?

15 KS reminded IP of how she had redacted the details of the management consultant he'd engaged to assist with estimating the cost of his trips to Sri Lanka. KS said that she had been able to take his evidence and to hold his personal details, without naming him in the report of her inquiry. She could not guarantee absolutely that she would not name IP's friend, but she would expect to protect their identity unless there was a specific reason not to do so. In that case, she would raise that issue with them before making any disclosure. She said she could not guarantee that others would not speculate, perhaps correctly.

20 [IP's colleague] said that he assumed KS would need to ask about the friend's associations, etc – could that personal data also be protected? Could it be protected if the conclusion was that the donor was genuinely a personal friend? KS reiterated that she could not offer guarantees. For example, if it transpired that the friend was a government official that would be a material fact and included in any report. If she concluded that the individual was a purely personal friend, she would not expect to disclose their identity, but she emphasised she could not guarantee that.

30 CM said that a draft report would be shared with IP before publication and if he had concerns then about disclosure of unnecessary personal data, IP would be able to raise them before the document was finalised. CM suggested that IP and [his colleague] should not share information with [their party] until there was an agreed meeting note, to avoid any misunderstanding about confidentiality.

KS asked IP if he needed more time to collate his evidence as she would rather he had sufficient time to gather everything together than to be to-ing and fro-ing later. Agreed 9 January as deadline for a full reply, rather than before Christmas.

18 December 2018

4. Email from the Registrar of Members Financial Interests to the Complaints Manager, 19 December 2018

5 I can confirm that I did not keep a note of the discussion at the meeting I had with Mr Paisley on 4 December 2018. The Parliamentary Commissioner also attended that meeting.

The purpose of the meeting was for me to explain the House's rules to Mr Paisley, and I do however have a list of the topics I covered.

19 December 2018

5. Letter from the Commissioner to the BBC, 7 January 2019

10 I am writing to seek your assistance with an inquiry I am undertaking concerning the conduct of Mr Ian Paisley MP, arising from the BBC NI *Spotlight* programme broadcast on 11 December 2018 and titled *Paisley in Paradise*. It was alleged that a holiday taken by the Paisley family in late October/early November 2016 was arranged, and ultimately funded at least in part, by the Government of the Maldives.

15 It would be helpful if you would send me a copy of any evidence held by the programme makers concerning that allegation, including material which was referenced and not shown on screen and any unused material which relates to the allegation.

20 It would also be helpful to have copies of any correspondence and notes of any conversations the programme makers had with Mr Paisley or his representatives both during, and after, making the programme. And, if a transcript of the programme has been prepared already, I would be grateful to receive a copy of that too.

25 The material would be confidential to my inquiry, but I would expect to show it to Mr Paisley as part of the investigative process. Any such material is likely to be published once my inquiries are concluded. Depending on the outcome of the inquiry, it will either be on my own webpages or as part of an appendix to a report by the Committee on Standards.

30 I do not routinely publish the details of third parties, except where their identities are material to the decisions I reach or where such information is already in the public domain. The content of any report which I might publish at the end of an inquiry would be a matter for me alone, but I would be willing to consider representations about the redaction of any personal/identifying details if that were relevant.

35 Since I am seeking your help as a witness in this inquiry, I enclose a note which sets out the procedure I follow. My inquiries are subject to parliamentary privilege and that means you must not disclose this letter, or your response, to others except insofar as it is necessary for you to do so in order to respond to my request. Should

that be necessary those with whom it is shared will be similarly bound and you should ensure that they understand these confidentiality provisions.

I would be grateful for your help on this matter. If you would let me have any such material within the next two weeks, that would be most helpful. If this is not possible, it would be helpful to have an early estimate of the time it will take to produce the material.

If you have any questions about this request or need more time to provide a substantive response, please contact my Complaints Manager, [details redacted], in the first instance.

It may be helpful to underline that my investigation is concerned solely with whether Mr Paisley has acted in breach of the Code of Conduct for Members.

Finally, I should emphasise that the fact of this inquiry has not been put into the public domain by me or my office. The House of Commons decided on 19 July 2018 that the Commissioner should no longer routinely publish the name of Members whose conduct is under inquiry, and my office will therefore neither confirm nor deny that an inquiry is in progress. The enclosed information note does not yet reflect that change but I would ask that the decision of the House is, nonetheless, respected.

7 January 2019

6. Email from Mr Ian Paisley MP to the Commissioner, 8 January 2019

I wish to formally acknowledge the document sent to me by [your office] containing the minutes of our meeting with [my colleague] (cc into this email). After reading these minutes I can confirm that I am content with its accuracy and thank you for providing me with it.

I have now completed the response to your letter to me. I was planning to arrange to have it delivered to your office on Wednesday 9 January. Upon discussing the contents with [my colleague] we have discussed having the details checked over for complete accuracy by my solicitor to ensure that I haven't inadvertently left anything out and it is as complete and comprehensive as possible. I hope this is an acceptable request.

Could I ask your indulgence that you permit me a further five working days to allow my solicitor to complete this review and that I deliver the response on Wednesday 16 January?

I hope this does not pose an unnecessary delay to your plans and will facilitate the inquiry.

8 January 2019

7. Letter from the Commissioner's office to Mr Ian Paisley MP, 9 January 2019

The Commissioner has asked me to thank you for your email of 8 January and to confirm that delaying your reply until 16 January will not hamper her inquiry.

5 As you will see from the copy of the letter enclosed, the Commissioner has recently written to the BBC to ask for sight of the material held by the *Spotlight* programme-makers.² She hopes to have their response within the next two weeks, although it may take a little longer.

9 January 2019

8. Letter from Mr Ian Paisley MP to the Commissioner, 16 January 2019

10 Ref: Holiday 30 October - 4 November 2016

On the date above I travelled to and holidayed in the Maldives along with my wife and two sons to celebrate my 50th birthday. This visit was wholly unconnected with my membership of the House and not associated with my political activities. It was a private visit.

15 I understand you are investigating this visit. This follows a BBC *Spotlight* programme claiming that the visit should have been registered because they claim it was a visit from the Maldives Government. In the Code of Conduct under paragraph 35(c), a visit wholly unconnected with membership of Parliament or with political activities need not to be registered. This was a family holiday to coincide
20 with and celebrate a milestone birthday. The holiday was partly paid for by a friend who has no connection with any of my parliamentary work.

By way of background you asked about an official visit that I made to Maldives in February 2016. That official APPG visit had no relation to this subsequent private visit. In February 2016, I attended an officially supported visit to Maldives as a
25 Member of the APPG. When I returned it was registered in the Members' Register. Since that date I made no contribution and initiated no business and made no contact with either the UK Government or the Government of the Maldives, or officials regarding any aspect of Maldives-UK politics.

30 Eight months after that official APPG visit in October 2016 I made private arrangements to travel to Maldives with my family. I complied with chapter 3 of the Code. Chapter 3, para10, states "*the restrictions under the lobbying rules apply for six months after the reward or consideration was received*". I can confirm that I engaged in no business regarding Maldives during that (8-month) period and well beyond it. I made my personal and private arrangements to travel to the Maldives eight months
35 after my official APPG visit. I therefore believe that under those rules I am clear of any perception of being engaged in [Maldivian] activities given that I waited an

² WE 5.

appropriate time before making these private arrangements and that I engaged in no political activity for more than a year regarding that country since my return.

I will endeavour below to answer your specific questions.

5 (1) Who was the personal friend who met some the costs of your holiday in 2016?

The personal friend was [name and first part of address redacted], England. He is a director and owner of a resort in the Maldives [Director A].

(2) Set out how this person became known to you, when you first met and describe briefly the nature of the friendship

10 We first met in London at the Central Methodist Hall more than 10 years ago. We struck up a friendship with each other and dined together. Our interests were not in politics but other matters, including beliefs, family and travel.

(3) Please explain how your friend came to meet some of the costs?

15 My friend personally invited me to visit his holiday resort and be his guest. In October 2016, I took up that invitation to visit his resort.

(4) You told the Registrar that you had paid for part of a holiday for this friend. Please provide details and the value of this holiday.

20 I'm afraid this seems to be a misinterpretation. He paid for a significant part of my holiday. I certainly paid for hospitality for us both in the UK, but I didn't purchase a holiday for him. I did ask the Registrar in the course of our conversation on 4 December 2018, what if I had bought a friend hospitality or a holiday and they had bought me, what are the rules? The reason for my question being I have holidayed with other family friends and paid part of those costs in the past. I certainly didn't intend to claim I had bought him a holiday or that was any part of this arrangement.

25 (5) List each element of costs associated with this visit.

Flights: International flights from London with Qatar Airlines, each ticket cost £430 per person in Q class economy saver. Totalling £1,720. On arrival, as agreed in advance, I reimbursed the agent.

30 Accommodation: estimated value - of double cabin room \$450 per night. Totalling \$2,500 per room. Met by host. This was his gift. Calculating the currency transfer difference this would be £2,032.69 per room. Essentially, he complimented me two rooms in his hotel.

Extras: £1,047.97. See attached receipts. Met by me.

Total cost £6,833.35

Cost met by me: £2,767.97 (flights & extras)

Cost met by host: £4,065.38

5 Proportion met by me: 40%

(6) Contact details.

For attention of [Director A]. Company office email via his chief commercial officer [CCO] at [Coco Bodu Hithi]

10 (7) When you first became aware of any suggestion that the Government of Maldives had a role in your visit?

15 The Government had no role in my visit. They were never contacted about it and did not suggest, arrange, or pay for it. The first time I became aware of this untruthful claim was when the BBC contacted me by letter dated 3 December 2018 (see attached 1). My secretary informed me by phone of the letter on 4 December. In that letter, they claim that another man (name redacted - another Director of the hotel - Director B) booked this visit at the "*request of the Maldives Government*". Also, they wrongly asserted that it followed statements I made earlier that year in support of the Government. They are wrong on both counts. A statement they attribute to me, in the broadcasted programme, about the prison was actually made by another MP. I have never met or spoken to [Director B]. However, I note that he is a former member of a previous Government but was not in government during any of my two visits to the country.

20

25 (8) What contact did you have with the Government of the Maldives or its representatives, both during your visits to Maldives and while you were elsewhere?

October/November 2016 visit. No contact with Maldives Government at all.

30 February 2016. Official APPG visit see attached list of meetings held with Government and opposition parties and officials and justices while in the Maldives.

March 2016-October 2016 no meetings with Maldives Government.

November 2016-June 2017 no meetings with Maldives Government.

(9) Do you believe there are any occasions when the rules of the House as set out in chapter 2 of the 2015 Guide to the Rules would have required you to make a declaration of interest in respect of the October 2016 visit or the February visit?

5 I have read chapter 2 of the Code.

I do not believe I have breached any part of this in relation to my visit in either February or October 2016.

10 I did not engage in any political activity upon my return from my official visit to Maldives in February 2016 and before I decided to take a private visit that would have required me to make a declaration about either of these visits. Neither upon my return in November 2016 did I engage in any activity that would have necessitated a declaration either.

15 I made private arrangements to travel in early October 2016. I had no long-term plan to do this but decided it would coincide with my milestone birthday and it would be a welcome surprise during my children's school break. As a result of the generosity of my friend I was able to do this. The holiday had not been months in the planning.

20 For absolute clarity, I made no speeches, asked no questions, wrote no letters, refrained from any business in the House, made no approaches to Ministers or officials between February 2016 right up until my October departure.

25 Upon my return from the Maldives in November 2016 likewise, I made no speeches, asked no questions, wrote no letters, refrained from any business in the House, made no approaches to Ministers or officials during the preceding twelve month-period about any matter to do with the Maldives or my knowledge of the situation there. I had no reason to and have never been lobbied or asked by anyone to make any such approaches.

Attached are emails:

30 (1) From [the Maldivian] Ambassador [named redacted] to the UK. Upon receipt of the BBC letter I sent him a copy of that letter and asked him to respond to the claim that his Government arranged and paid for my visit. He has more than ten years of experience, working for more than one Government. He is not a political appointee to this position but a professional diplomat who has worked for several Governments. He states very clearly and leaves no room for doubt that, "*your referenced visit to the Maldives in 2016 was not arranged by the Embassy or paid for by the Government of Maldives. It is not something we would do.*" I believe his statement could not be clearer.

35

(2) From [name redacted] He is the Chief Commercial Officer³ at the Coco Collection of hotels and resorts where I holidayed in November 2016. I sent him a copy of the BBC letter to me and asked him if he could reply to the allegations being made that this holiday was in some way arranged and paid for by the Government of the Maldives. In his email he confirmed,
 5 *"I have checked our records and can confirm that your stay was a private family holiday and all invoices were settled and paid privately. Also, I checked the transfers log and I can confirm that you did not leave the island except on your departure to the airport, and in fact you remained on the island with your family the whole time."* (6 December 2018)
 10

I had his agreement to send the email to the BBC. It is clear that the allegation that the Maldives Government was involved in some way arranging and paying for this private visit is simply not true.

I hope you can see from the evidence provided that;

- 15 (1) I arranged a private vacation
- (2) I paid for 40% of the entire costs
- (3) I was a guest of a friend at his resort
- (4) That he arranged the remaining 60% of the cost for this private visit (essentially room and board)
- 20 (5) That I did not breach any of the rules of registration or declaration,

Obviously, I know that my previous record with your office is one that found me in breach of the rules of both failing to register and failing to declare, and in breach of the paid advocacy rule. I have accepted that wrongdoing and attempted to move on. I spent my time on suspension going through my own records and ensuring that I
 25 had not fallen foul of these important rules. Senior party members asked me about all other overseas visit, including this holiday that I discussed with them at the time of my suspension, and I made sure I had taken every conceivable effort to ensure both at the time of this visit and since these allegations have been made to ensure that I am not in breach of the rules. Explicitly, during the course of our conversations
 30 I asked my friend had he ever been a Government Minister or held elected office to which he told me he had not. Subsequent to the broadcast I have checked the Maldives Government website to confirm for myself if he had held any ministerial position or elected office and can find no evidence that he has. I believe that in this case I have not breached any rules on declaration, registration or advocacy. That I
 35 had no reason to treat this as anything other than a private matter, between myself and a friend and unrelated to my work. Thank you for taking the time to read this.

³ Sometimes referred to as the Chief Operating Officer

16 January 2019

9. Letter from the Commissioner to Mr Ian Paisley MP, 19 February 2019

As you know, I have been waiting to receive a response from the BBC to my letter of 7 January. Yesterday, I received from them a copy of the transcript of the *Spotlight* programme of 11 December 2018. I enclose a copy of that material for your information.⁴

I am hoping to receive some additional material from the BBC in due course and I will write to you again when I receive that.

19 February 2019

10. Letter from Mr Ian Paisley MP to the Commissioner, 25 March 2019

Thank you for sending me the transcript of the BBC *Spotlight* programme. I understand from your letter this is the "evidence" that the BBC has submitted to your investigation, so far, that is supposed to prove that the Maldives government arranged for and paid for and facilitated a visit I made to the Maldives. I have in my previous correspondence answered all of your questions on the visit and the arrangements for it. Nothing supplied by the BBC changes what I have said.

I would highlight some points in the BBC submission that I believe are worthy of note. The BBC has put emphasis on their secret sources.

(1) Source [X] confirms the room numbers that I stayed in were complimentary. I have not disputed that. However, they appear to suggest that the booking came from [name redacted] one of the resort directors [Director B] and not from my friend. I know who [Director B] is, however, I have never met him. The BBC source has provided no proof other than unsubstantiated claims that "[Director B] made the bookings". I can only suggest the source is mistaken.

(2) Source [X] confirms the date of my visit and room numbers. These are not in dispute by me.

(3) He goes on to confirm the bill was paid for in cash. I have already confirmed to you how the visit was paid. The rooms were complimentary and supplied on that basis by my friend.

(4) He claims the booking was made locally. I don't dispute this either.

⁴ Transcript not reproduced as the Commissioner sought the supporting evidence and did not rely on the transcript itself.

- (5) The BBC have made the assumption that [their] source [Y] is telling something different, when in fact he/she is confirming what I have already told you.
- 5 (6) Source [Z] confirms the rooms were complimentary. I have already confirmed that. They have no evidence to prove that the "visit was arranged at the request of the government". If they did, they would surely have produced it. The resort manager and the Ambassador deny this claim in writing because it is a false claim by the BBC. The BBC produce no evidence for this claim. I have confirmed the resort owner arranged from the complimentary rooms.
- 10 (7) I was met at the airport by the hotel concierge - I understand this is normal practice - and taken to the boat for the second leg of the journey. So, nothing of significance in that claim by the BBC. The BBC appear to suggest this was the government looking after me. It was not. My arrangements were all the normal practice of being met by the concierge.
- 15 (8) In para 182 and 183 and 184 the BBC claim they have an image of the resort's internal records and "suggested" it was done at the request of the government. Yet they have not produced this. Claiming it is "suggested" implies, once again, the BBC has nothing of substance. Importantly, the government denied this claim and they have no reason to cover for me especially given the government has now changed.
- 20 (9) In para 192 the BBC claim [Director B] booked and paid for the visit. My invitation was from another director. The resort has dismissed this claim by the BBC.
- 25 (10) The programme appears fascinated by [Director B]. I think they have tried to imply that he is my friend. Hence why so much focus is on him. I know who he is. However, I have never met him and I have no arrangement with him. I understand that before he was a director of the resort, he was in government but is no longer in government and when I was in Maldives the party that he had been in government with was in opposition and out of favour with the then government. So, if he had been my personal friend and played any part in this arrangement, he is a former not current politician. All the BBC has done is highlight that [Director B] was not in government at the time of my visit or subsequent to my visit. But approximately more than ten years ago, before he became a resort owner, he was in a government role.
- 30 35 (11) It is doubtful that [Director B] and [the former President of the Maldives] would have worked closely as suggested in para 221 after all at the end of [his] presidency [director B] faced the threat of jail by [his] government. The BBC appears to have missed the finer points of the islands' politics.
- 40

(12)The BBC document referred to in the programme appears to be receipts that confirm my room number and the cost of the complimentary room. They do not confirm the government arranged or requested or paid for it.

5 I hope you can consider these points. The BBC has now had approximately 90 days to respond with proof that the Maldives government arranged and paid for my visit to the Maldives; and further proof that I lobbied for the Maldives government. They have not been able to do so. Their television programme was not proof of any of these things. I understand that they have travelled again to the islands seeking proof after the event but obviously without any luck!

10 I have submitted to you the facts that I paid for a substantial part of my visit and that I was complimented rooms by a friend who owned the resort where I stayed. I did not engage in any advocacy for the government of the Maldives. I hope these observations are helpful to you.

25 March 2019

15 **11. Letter from the Commissioner to Mr Ian Paisley MP, 27 March 2019**

Thank you for your letter of 25 March 2019.

I will, of course, take your comments into account before I make any decision on the allegation under investigation.

20 As you know, I have asked the BBC to provide the evidence on which the *Spotlight* programme was based. My office has been in touch with their legal department and I understand they are still working through some issues with the programme team. the BBC told us a few days ago that they hope to provide some material shortly as an interim disclosure.

25 I will update you as soon as possible and give you the opportunity to comment on all the material I receive before I make any decisions.

27 March 2019

12. Material provided by the BBC, 5 April 2017

12. i. Letter from the BBC to Mr Ian Paisley, 3 December 2018

30 BBC Northern Ireland's current affairs programme *Spotlight* has been investigating overseas visits taken by you during your time as a Member of Parliament.

We intend to broadcast a programme that examines a particular trip you took with your family, which raises questions about a potential breach of parliamentary rules.

We have evidence that indicates you accepted a free holiday at Coco Bodu Hithi resort in the Maldives in October/November 2016, which was booked by the owner of a prestigious resort at the behest of the Maldivian government. This followed statements you made earlier that year in which you appeared to support the Maldivian government despite international criticism of its human rights record.

As part of our investigation I should be grateful if you would respond to the questions set out below which, as a result of our research, we are considering for inclusion in the programme.

- 10 (1) Did you, your wife [redacted], and your two sons, spend five nights at Coco Bodu Hithi resort in the Maldives from 30th October to 4th November 2016?
- (2) Our evidence indicates that full-board accommodation and transfers to and from the resort were not paid for by you or your wife. Do you accept this? Who paid for the accommodation and transfers?
- 15 (3) Our evidence suggests that your stay at Coco Bodu Hithi was booked by the resort's owner, [Director B], and done so at the request of the Maldivian government. Do you accept this? Why might this have been the case?
- 20 (4) Why did you not register this trip in Parliament's Register of Members' Financial Interests?

We are putting these questions to you to give you an opportunity to respond because we want our programme to be fair and accurate. We believe the best way to respond is in a pre-recorded television interview. However, if you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 6pm on Wednesday 5th December so it can be reflected in the programme, which we anticipate will air shortly.

I would appreciate you confirming receipt of this letter.

12.ii. Email from Mr Paisley to [the Ambassador], 4 December 2018

30 I attach a letter from the BBC.⁵ As you can see they are making an allegation that the government paid for me to take a vacation in 2016 in Maldives. This is not true.

Are you in a position to respond to me confirming the above as I wish to deal with this matter promptly?

⁵ WE 12.i.

12.iii. Email from Mr Paisley to the BBC, 6 December 2018

As discussed, email from the Ambassador.⁶

12.iv. Attachment: email from [the Ambassador] to Mr Paisley, 4 December 2018

5 As you may be aware, I have relinquished my duties as the Ambassador of the Maldives to the UK, after 10 years of service spanning over 4 successive governments. As I return back to my capital, I wish you every success.

Regarding your below copied email requesting clarification whether a visit to Maldives by you in 2016 was paid by the government of Maldives; I would like to share the following.

10 The Government of Maldives does not organise or pay for family holidays for overseas guests. Your referenced visit to Maldives in 2016 was not arranged by the Embassy or paid for by the government of Maldives. It is not something we would do.

15 As you are aware, we do sponsor APPG visits to Maldives, which are in advance shared with FCO and upon completion of such visits, they are declared by the APPG to the parliamentary bodies as per parliamentary rules.

12.v. Record of call from the BBC to Mr Paisley, 6 December 2019

After introductory pleasantries:

20 IAN P: Okay. Right, em. I em, I've seen your questions here. I can answer them for you now if you want? Eh, I've gone through the... Your- your- your first question. Em, I'll just call them up, I'll just look them up on screen here while I have you on.

BBC: Of course.

25 IAN P: Em, did you and your wife and your two sons spend five nights in Coco Bodu Hithi resort in Maldives on first of November to fourth of November, 3rd of October fourth of October 2016? Yes we did. Eh, it was a family holiday. Em, your, your evidence suggests accommodation, transfers to the resort were not paid for by you and your wife, eh, do you accept this? Em, no, not entirely. I paid for part of the trip and a friend, eh who's unconnected with my work paid for the other part of the eh trip and he received no benefit from me as a result of my work or anything. Long-
30 term, eh, friend.

BBC: And Ian, do you have any evidence of of-

⁶ WE 12.iv.

IAN P: Yes, yes.

BBC: -the part that you paid for?

IAN P: I'll- I'll- I'll come to that Your third question, em which was: our evidence suggests that your stay at Coco, eh, was booked by the resort's owner, [Director B],
5 and had done so at the request of the Maldivian government. Do you accept this? And why might that have been the case?

IAN P: Em, no. I don't accept that, and I will provide eh, now to you, evidence that categorically disproves that the trip was connected with the government of the Maldives, or in any way arranged by them or whatever. And then: why did you not
10 register the trip in the Parliamentary registration system?

IAN P: Em, the trip was not eh declared- a declarable trip, and indeed I have actually discussed it with the Commissioner anyway. Em, obviously I've discussed a lot of stuff with the commissioner in recent months

BBC: Mmm

IAN P: and all of my visits and trips I've raised and discussed and eh, I know this one is not declarable. Now, I said I would give you some evidence. I can send you, if you want, a letter from the chief commercial officer of Coco. Em, the resort. And I actually took the liberty of, when I got your letter, sending him your letter and letting him see the questions I was being asked and I said are you able to em, give me an answer
20 to these questions which disproves this, and he has.

BBC: Mmm

IAN P: Em, from his point of view in terms of as a resort owner: who booked and paid for and how it was paid for and he has answered that em, his other, the other evidence which I think was important was that I rang the embassy

25 BBC: Mmm

IAN P: -and spoke to the ambassador and I told the ambassador the questions that you had asked me,

BBC: Mmm

IAN P: -and he has written back to me and categorically stated that the Maldivian
30 government played no part whatsoever in any part of that arrangement

BBC: Mmm

IAN P: And I can send you, eh, his e-mail letter as well. Em, I'm happy to do that, I would just say that they are, they are not for publication, I'm happy to discuss the contents of the letters with you.

BBC: Yes, yes it would be helpful if you would forward them to me.

5 IAN P: I'll send them to you on that basis, but they're not for publication, but you can see from them they're very clear and people have signed them.

BBC: Okay

10 IAN P: I know [Director B], I know [him] quite well. Em, and eh and I eh, obviously, em, I think eh you've obviously had a conversation with [Director B], or you've had a conversation with other folk But, em, so I don't know what they've said to you. But the evidence from my point of view is very clear.

BBC: Em, okay, well I would really appreciate if you could forward me, em, those documents, so there's the email from the ambassador and there's the one from the commercial operating officer, is that right?

15 IAN P: Yeah, the [Chief Commercial Officer]

BBC: The [Chief Commercial Officer]

20 IAN P: For the actual company. I asked him if he could go through his records- I asked him to do a couple of things for me- I showed him the letter that you'd sent to me, and that I'd been asked these questions by the BBC. And, em, I said obviously- obviously, I know what the fact is in terms of who paid, and how it was paid and why it was paid and all the rest of it and I raised that some time ago with the Parliamentary Commissioner and discussed it with them.

BBC: So you've- so you've already this- this particular trip with the Commissioner?

IAN P: Yes, I have

25 BBC: Eh, could you also just

30 IAN P: Under the- under the rules and regulations, I could try and get you the em- Just let me just look up on my notepad here, if it helps. I think under the various category rules- they are quite complex but under the rules em- I did not have to declare that because-. And they know the circumstances, I've discussed the circumstances and who paid and the reasons for the visit and it was a family holiday and em- Can I talk to you completely off the record?

BBC: You can but just while we're talking about the pieces of information that you're going to forward me, there was the [Chief Commercial Officer] email, the ambassador's and then the evidence that you had paid for it in part?

5 IAN P: Well, I didn't say I was going to send you my invoices. I have my invoices here, I actually found them all. They're as cards(??) Em, I think you've maybe been sent some invoices as well, one of which I didn't actually recognise, but eh the thing I was going to say to you...

BBC: Uh-huh

IAN P: About, em. If I can talk to you off the record?

10 BBC: Yeah, sure

IAN P: as to the holiday and tell you about it?

BBC: Uh-huh

IAN P: Yes?

BBC: Yes, yes, yes sorry.

15 IAN P: Are you recording this, [name]?

BBC: I am, but for note-taking purposes.

IAN P: Well I'd ask you not to record this bit.

BBC: I'm- Listen, I'm not sure I can get the clearance from my editor about that he's not in the office at the moment. Eh, but if you want to talk to me please do.

20 IAN P: Well- well- If I know I'm being recorded and you're going to use it? Are you saying to me categorically that no, this is an off-the-record conversation?

BBC: I'll have to refer it, Ian. I'm so sorry.

IAN P: Right 'cause, I'm about to tell you some other stuff but obviously want to tell you off the record.

25 BBC: All right well if you would let me clear that with my editor, I can give you a ring back.

IAN P: Em okay, or if you can tell me when is a good time, just I'm on a landline here just in the corridor in Parliament...

BBC: Right

5 IAN P: And I- As I say, my phone's being charged. I left it in the library there to get a charge in it.

BBC: Alright well, listen if em, provided eh, O2 is up and running again and I can get hold of my editor em, it should be no more than 5 minutes. Shall we re-convene in 5?

10 IAN P: Well look, if we're clear that this is an off-the-record briefing and our- my recorded conversation isn't going to be used I'm happy to keep talking to you.

BBC: Again, I need to refer it. I'm so sorry, Ian. I'll refer it up to my editor, okay? Can I ring you back in 5 minutes?

IAN P: Could you not have told me you were recording this when we first spoke?

15 BBC: Em, if it's for note taking purposes and it's been cleared by my Exec em I'm happy to tell you if I'm asked.

IAN P: But are you not supposed to tell me that you're recording my conversation and that you might use it for broadcast?

BBC: Em... Not necessarily

IAN P: What do you mean, not necessarily? What are your rules?

20 BBC: These are for note-taking purposes

IAN P: So you're saying to me, you're taking notes but you're not using this for broadcast?

BBC: I'm taking notes and that's why I'm recording it; for note-taking purposes.

IAN P: Right but you're not using it for broadcast either?

25 BBC: Again, I'll have to refer- that's a separate referral to the- to the higher-ups unfortunately.

IAN P: Fine, but I would have thought you're supposed to tell a person when you're recording them.

BBC: Well I tell you what, how about I go away and I talk to my editor and I come back to you in 5? Is there a land line that I can reach you on?

IAN P: Yes, em, let me see. I'll go up to my office. I should be able to be up there in about 5 minutes.

5 BBC: Righty-oh

[Closing pleasantries omitted]

12. vi 6 December 2018 follow-up call from the BBC to Mr Paisley

IAN P: Hello?

BBC: Mr Paisley, hi, it's [name]

10 IAN P: Hello

BBC: Hello, hi. Is this- is this- have you had a chance to sort of settle yourself, em you're back at your office, yes?

IAN P: Yeah, I'm fine.

15 BBC: Oh well of course, this is your landline. Silly me. Listen I've just talked to my editor and eh, he's- he's- he wants us to stay on the record. You know, we've asked the questions on the record, so we'd like your answers on the record. So, we'll stick with that thanks.

IAN P: Okay, no problem. Well, look you have the answers. What I'll do then is I'll forward you by e-mail, em, the two pieces of evidence which I think are important.

20 BBC: Mmm

IAN P: And, which I think, certainly from my point of view I think clarify the situation.

BBC: Righty-oh. And eh, you had mentioned em it was part paid by you and part paid by a friend. Is there- is there- you know, do you want to elaborate on that?

25 IAN P: Eh, no. As I say, I will talk to you off the record, but I think you will appreciate that em, I'm not going to get in to any other, em, aspect other than answering the questions that you've put to me, I mean- I think whenever you see the letters you'll see I've given you quite a lot in them. And they do answer all of your questions em and em, I think you've received some very misleading and some very wrong information, and that's why I've got you those answers.

BBC: I appreciate it, yes. If you could- So shall I expect those this evening?

IAN P:Yep

BBC: Okay, great

IAN P: You'll get them hopefully in the next 20 minutes, half hour.

5 BBC: All right, thanks so much-Thanks so much Mr Paisley.

12. vii. Email from Mr Paisley to the BBC dated 6 December 2018

Find below email from the COO of the resort.⁷ Once again this is not for publication.

12. viii. Attachment: email from the Chief Operating Officer,⁸ Coco Collection Hotels and Resorts/Sunland Hotels to Mr Paisley, dated 4 December 2018

10 Hello Ian

Many thanks for your email.

Indeed this is an odd one; however I have checked our records and can confirm your stay was a private family holiday and all invoices were settled and paid privately.

15 Also, I checked the transfers log and I can confirm that you did not leave the island except on your departure to the airport, and in fact you remained on the island with your family the whole time. It is rare that we have guests who visit Male as it is a very costly exercise. I can also confirm that nobody came to visit you either, as far as we could tell it was a classic family holiday, and you were like many of our guests who come here from the UK.

20 I am more than happy to assist further, should you require it. I am happy to discuss this with anyone who wishes to ask further questions.

12. ix. Letter from the BBC to Mr Paisley, 7 December 2018

Further to our telephone conversation on 6 December 2018, there are a number of points we would like you to clarify please.

25 In our conversation, you told us your stay at Coco Bodu Hithi in October/November 2016 was a family holiday and that you paid for "part of the trip".

⁷ WE 12.vii.

⁸ Previously referred to as the Chief Commercial Officer

We are aware that you personally paid at least \$299 in extras. Was this the part of the trip for which you paid, or do you have evidence that you paid for more?

5 You also told us that a "long-term friend" who is "unconnected" to your work paid for the other part of the trip, and that he "received no benefit" from you as a result of your work.

What was the total cost of the holiday? What percentage of that cost was borne by your friend? And do either of you have evidence of this payment?

Who is your friend? And what connections does he have with the Maldives?

10 You told us during our telephone conversation that this was not a "declarable" trip - a fact which, you said, you had discussed with the Parliamentary Commissioner.

You said you had raised "who paid, and how it was paid and why it was paid and all the rest of it" with the Commissioner some time ago.

We contacted the Commissioner's office to confirm this however we were told she could not comment on "confidential conversations".

15 You later informed us by text and email: "For accuracy, the Commissioner does not give advice or guidance. I in fact spoke to the 'Registrar' and took advice from that authority."

Did you provide the Registrar with evidence that part of the holiday was paid for by your friend? Did you inform the Registrar of the identity of your friend?

20 What steps did you take to ensure that you were not being provided with accommodation at the request of the Maldivian government?

During our telephone conversation, you told us that you know the resort owner [Director B] "quite well".

25 In what capacity do you know [him]? How did you come to know him? And did this relationship arise from your role as a Member of Parliament?

As you know, we asked you whether the holiday had been booked through [Director B] upon the request of the Maldivian government. You said you did not accept it was "connected with the government of the Maldives, or in any way arranged by them", but do you accept it was booked through [Director B]?

30 Do you accept that if it was paid for out of [Director B's] account or if the cost was borne by him, or by the resort itself that you should have declared it?

You said the email sent by the former ambassador, [name redacted], was part of "evidence that categorically disproves" that your stay was not arranged through the government. But in fact, [the Ambassador] in his email said: "It's not something we would do." As his statement therefore does not address what actually happened in this specific instance, do you have any other evidence to prove that the holiday was not arranged at the request of the Maldivian government on a complimentary basis?

We are putting these questions to you to give you an opportunity to respond because we want our programme to be fair and accurate. We believe the best way to respond is in a pre-recorded television interview. However, if you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than the end of tomorrow (Saturday 8 December) so it can be reflected in the programme, which we anticipate will air shortly.

I would appreciate you confirming receipt of this letter.

12. x. Letter from the BBC to [the Ambassador], 8 December 2018 (sent by email)

BBC Northern Ireland's television current affairs programme Spotlight has been investigating a holiday taken by British MP Ian Paisley and his family at Coco Bodu Hithi in the Maldives from 30 October to 4 November 2016.

Our evidence indicates that the stay was complimentary and booked upon the request of the then Maldivian government - a regime under which you served as Ambassador.

Mr Paisley has made us aware that he has been in touch with you about this matter. He has also provided us with an email from you, in which you state that the aforementioned visit was not arranged by the Embassy or paid for by the government of Maldives.

We would like to give you the opportunity to confirm whether or not you stand by those comments.

(1) Were you aware of this holiday taken by the Paisley family before Ian Paisley contacted you with regard to our investigation a few days ago? If so, when were you made aware of this holiday and by whom?

(2) Is it possible that this holiday was arranged by the Maldivian government/members of the government with Coco Bodu Hithi resort without your knowledge?

(3) Do you maintain that the Paisleys' stay at Coco Bodu Hithi in October/November 2016 was not a complimentary holiday booked upon the request of the Maldivian Government?

Given the timescale of our proposed broadcast on this issue, I would ask if you could answer the above at your soonest convenience and no later than 6pm on Sunday 9 December. It is a matter of considerable public interest that what we report is fair, balanced and accurate.

- 5 I would appreciate you confirming receipt of this letter.

12. xi. Letter from the BBC to Mr Paisley, 10 December 2018

We would like to offer you the opportunity to respond to a number of further points we may make in our programme which is due to be broadcast at 10.40pm this evening.

- 10 You have told us that part of your family's holiday to the Maldives in October and November 2016 was paid for by a long-term friend whose identity you have not disclosed. You have indicated that the long-term friend is unconnected with your work and has received no benefit from you as a result of your work.

We have interviewed [name] QC who is an expert on public and parliamentary law.

- 15 He has told us that under the rules and the Nolan principles you have a duty to be open and transparent. He added that unless you can provide a public interest argument for not disclosing more about your long-term friend and the reason your friend paid for part of the holiday, you should be saying significantly more than you have until now about the source of this benefit.

- 20 What is your response to this? If there is a public interest argument for not disclosing the identity of your friend and/or their reason for paying for part of your holiday, what is the nature of the public interest?

- 25 As we have already told you, we have obtained evidence that your full-board accommodation and transfers during your stay with your family at Coco Bodu Hithi were complimentary. Our evidence indicates that this was requested by the government of the Maldives and facilitated by resort owner [Director B].

- 30 [The QC] has told us that in the event that the stay was requested by the Maldives government and facilitated by [Director B] that given you had advocated on behalf of the Maldives government earlier that year, the reasonable perception is that this was a reward for your advocacy and you should not have accepted the benefit.

What is your response to this?

[The QC] has also told us that in the event of you having accepted the benefit requested by the government and facilitated by [Director B], you should have registered it.

What is your response to this?

If, as our evidence suggests [Director B] facilitated part of the cost of your family's stay, [the QC] told us that you should have registered the holiday, given [Director B's] political links.

- 5 He added that it was your responsibility to establish the extent of any links between [Director B] and the Maldivian government.

What is your response to this?

- 10 You have told us you discussed the circumstances of your trip with the registrar and your understanding as a result was that the trip did not need to be declared. [The QC] also told us that his understanding is that the registrar will only provide clarity on the rules and will not advise on specific cases. He added that the responsibility lies with an MP and his or her own understanding of the rules and their own conscience.

- 15 Please provide full and detailed clarity on why you have come to the conclusion, in good conscience, that this visit did not need to be registered.

We have not yet heard from you in response to the questions we sent you on Friday. We intend to broadcast this programme at 10.40pm tonight and we therefore require your responses to both these questions and those sent on Friday by 5.30pm this evening.

- 20 We are giving you this opportunity so that our programme is fair and accurate.

If you require any clarity, please contact me on the details below. I would appreciate you confirming receipt of this letter.

12. xii. Email from [the Ambassador] to the BBC, 10 December 2018

- 25 I am travelling and, hence, couldn't check my emails any sooner. I will reply to you as soon as I get the chance. In the meantime, I can confirm that the email I sent to Mr Paisley regarding the subject matter you have written is from me.

12. xiii. Email from the BBC to Mr Paisley, 11 December 2018⁹

- 30 As a matter of courtesy, I thought I would let you know that due to today's events in Westminster, we have decided not to broadcast our programme until tomorrow evening at 10.40pm.

⁹ The BBC provided screen prints of texts they had exchanged with Mr Paisley about a response to their letters, these are not reproduced as they contain no evidence relevant to this inquiry

May I remind you that the deadline for a response to our most recent questions passed at 5.30pm this evening. But I would nevertheless still welcome your replying to my outstanding questions.

12. xiv. Email from Mr Paisley to the BBC, 11 December 2018

5 I have responded in clear and categorical terms to your questions and the inferences you have been attempting to draw, not to mention the fact that you have clearly been attempting to encourage responses that would fit in with your agenda against me.

Also, you have contacted my former staff members and tried to encourage them to conduct interviews with you to fit your agenda.

10 For the record, the Government of the Maldives did not organise or pay for my family vacation in 2016, which I do not intend to go into with you.

As I have explained to you, I am satisfied that this vacation did not have to be recorded on the Register.

15 My vacation had no connection with my parliamentary work or obligations it was, as the resort Company operations officer said to you, a private family holiday.

I have provided appropriate supporting evidence to you, even though I had not been obligated to do so. Both the government of the Maldives and the hotel resort in question have confirmed the government played no part in arranging or paying for my visit. I trust you have you have contacted them directly for clarification.

20 Of particular concern has been your blatant attempt to access my private data and personal information in relation to a family holiday which had absolutely no connection to my role as a Member of Parliament. You have harassed my former member of staff. You should therefore be aware of your obligations under the Data Protection Act in relation to my own and my family's right to privacy with regard to
25 matters that do not touch upon my political duties and obligations.

13. Material provided by the BBC, 28 May 2019¹⁰

13.i. Transcript of a document described in the tv programme as "an image of the resort's internal records"¹¹

30 Reservation 02 villas (any available category) blocked by [Director B]

¹⁰ A copy of two invoices, both in Mr Paisley's name, were also enclosed. These showed the value of the hospitality (5 nights' accommodation, 2 rooms) but not who met the cost

¹¹ The transcript did not include any identification of the source - (Z)

Government has requested [Director B] to accommodate these guests full board with soft beverage and water complimentary in main restaurant.

Combined transfers complimentary.

5 Extras chargeable.

[Director B] has requested that the airport representative holds up a name board with the guests name for easy identification of the guests.

10 Please send two placards with Mr and Mrs Paisley mentioned over it in bold letters.

13. ii. Transcript of call from the BBC to Chief Commercial Officer, 7 December 2018

CCO: Hello who's-

BBC: Hi there, am I speaking to CCO?

CCO: Yeah, who's calling?

15 BBC: This is [reporter's name] I'm calling from the BBC.

CCO: Yes, can I help?

BBC: Yes, please [CCO]. Em, I understand that eh, Ian Paisley the British MP has been in touch with you eh regarding the

CCO: Yeah, that's correct, yeah.

20 BBC: Yes, yes, yes. So regarding questions we put to him about a holiday to Coco Bodu Hithi in October/November 2016?

CCO: Right.

BBC: Eh yes-We've seen an e-mail, em, signed by you, eh, to Mr Paisley in which, em, you make it clear that all invoices were settled and paid privately, eh, for that stay.

25 CCO: Yes.

BBC: Well, [CCO], we have reason to believe that eh, the holiday was organised upon the request of the Government and that full board and

CCO: Fine (Hard to hear)

BBC: Full board and accommodation-

5 CCO: I have no infor- no information about that at all. It was just paid for and as far as we know that happens quite a lot from a lot of people who pay either with a travel agent or through another source.

BBC: Em, okay well- well- I mean, the information we have is that it was upon the request of the Government that it was full-board, full-board accommodation and that the transfers were complimentary em-

10 CCO: Well that, well that's got nothing to do- I've got no idea about any of that. All I know is that it was paid for, he stayed, and that's it.

BBC: Uh-huh. So- so can we quote you eh [CCO] on the BBC as saying that eh, saying specifically that it's not the case that it was complimentary at the request of the Government?

15 CCO: Well- Quote me for what? Em, yeah I mean you can quote me it was paid for so, yeah absolutely I've got no issue with that.

BBC: Who paid for it though, was it the Government that paid for it?

20 CCO: Well, that I'm not- No, that- that- that- you see that, we can't- See I can't give any information about anybody who has paid anything that's stayed with us unless it's got the approval of whoever stayed. Um, I can't do that. If anybody calls up and says 'oh, can you tell me, so and so, if they've stayed?' I'm not at liberty to give that information 'cause it's proprietary.

BBC: Okay, well I'll just repeat again that we do have reason to believe that it was organised upon the-

CCO: Uh-huh

25 BBC: -request of the Government and that it was full-board

CCO: Okay

BBC: -accommodation and the transfers, and that those were complimentary. Can we quote you as saying that that's not the case?

CCO: Yeah, you can! Absolutely!

30 BBC: So you're telling us it wasn't complimentary and it wasn't organised-

CCO: It was not complimentary. No, it was not complimentary.

BBC: Can you tell us that it was not organised at the request of the government?

CCO: (Inaudible) Which Government?

BBC: For the Maldivian Government.

5 CCO: (Laughing) I have absolutely no idea. The booking did not come through any sort of government eh... No! No, definitely not.

BBC: And how do you know that?

10 CCO: Because it would have said. Normally when we get a booking, eh, from I don't know, a ministry or a government. You normally on the booking it would say through x y z ministry or- or whatever it might be. In this case it wasn't.

BBC: Okay and have- I assume you've gone and you've checked all your records.

CCO: That's correct, yes.

BBC: Yes, and can you tell me cate- categorically that it was Ian Paisley who paid for it?

15 CCO: No I don't- I have no idea who paid for it.

BBC: So -you don't know who paid for accommodation-

CCO: No I don't, I don't know

BBC: at your hotel?

CCO: I don't know who actually paid for it but it was paid for.

20 BBC: Okay, have you-

CCO: What happens when you- Let me explain how it is done with bookings for Maldives, okay? Nobody actually- Everybody has to pay up front. Whoever stays in the resort right, bookings are done in advance and paid for up front.

BBC: Mmm

25 CCO: So all bookings for people who come is already pre-paid.

BBC: Right, and so you have no way of finding out who pays for accommodation at your hotel?

5 CCO: I- Of course I can, but I don't see why I'd need to. I mean, all I know it was paid for, so as far as I'm concerned that's done. I mean, guests who come and the money's been paid- it's great and then we move on.

BBC: Okay. And so-

CCO: And for us it doesn't matter, and for hoteliers around the world, y'know, if a guest has made a booking and it's been paid for and it seems all above board we have no reason to question, and we shouldn't do.

10 BBC: And you're saying-

CCO: If for example- if for example if em- I don't know, celebrities or whoever it might be who coming pay through certain areas and it's been paid for up front we have no question to ask why and who paid, because it was paid. That's how it works here.

15 BBC: And in this case you're saying that there is no suggestion or you have no knowledge that the Government had anything to do with the eh-

CCO: Oh no, I haven't- I haven't no. I have no idea specifically who particularly paid for it, no. And to be honest I know it's not any Government related because it would have said on the booking.

20 BBC: Ah would it? Okay.

CCO: Yeah. Oh definitely, yeah.

BBC: But it wasn't complimentary then?

CCO: Definitely- No, no, no. This was not a complimentary- this was a paid booking. Wasn't complimentary.

25 BBC: Can you tell me, [CCO], how much the bill totalled?

CCO: Oh I can't- No. I don't have it in front of me. I th...- If I recall, top of my head it was around 450 dollars with stay a night. Something like that. And I don't think the extras were that extravagant.

BBC: Okay.

CCO: Wasn't a- It wasn't a massive amount to be honest. I mean, I've seen- I've seen a lot bigger.

BBC (text redacted by the BBC before sharing with the Commissioner) have you discussed this with [Director B]?

5 CCO: Well he's my Director.

BBC: Okay. Okay - Em all right well ... as long as- as long as you're- as we're clear that you - you don't believe that the Government had anything to do with the organisation of this holiday.

10 CCO: No, absolutely. Basically, eh, the information that I have received from what I've seen, absolutely not it just looks like a normal booking through whoever it might have been.

BBC: Okay, and it wasn't complimentary.

CCO: No, it was not complimentary, no. Definitely not.

15 BBC: All right [named redacted], listen thanks for giving me your time. CCO: Not a problem, happy to help.

BBC: Cheers, thanks a mill. Bye.

13. iii. Direct message sent via twitter by [Director B] to BBC reporter, 3 December 2018

20 Hi [name], would be happy to discuss this sometime tomorrow. But as far as I'm aware the information from your sources is inaccurate. The booking might have originated from any source and sponsored by anyone. Regards.

14. Letter from the Commissioner to Mr Ian Paisley MP, 12 June 2019

25 I am writing today to share with you evidence I have [now] received from the BBC. You have already seen the transcript of the *Spotlight* television programme and I now enclose:

- (1) Transcripts of telephone calls between you and one of the journalists involved in making the tv programme
- 30 (2) The transcript of a call between the journalist and the COO on 7 December 2018
- (3) A screenshot of a "tweet" by [Director B]

(4) Invoices for your family's stay at the Coco Bodu Hithi

(5) Texts, letters and emails between you and the journalist

5 I am in correspondence with the BBC about some additional evidence which I hope they will disclose to me. I will update you on that in due course. In the meantime, I would be happy to receive any comments you wish to make on the enclosed material.

10 I would be grateful, in particular, for your comments on the discrepancy between the statement in your letter to me of 16 January 2019 that you "*have never met or spoken to [Director B]*" and the transcript of your conversation with the journalist which records you saying:

"I know [Director B], I know [him] quite well. Em, and eh and I eh, obviously, em, I think eh you've obviously had a conversation with [Director B], or you've had a conversation with other folk. But, em, so I don't know what they've said to you...."

15 In your letter of 16 January, you also said that you first met [your friend], more than ten years ago, at Methodist Central Hall. I have since seen a 2010 media report that, in addition to his financial involvement in the hotel industry, [Director A] held a position in the Maldivian Government around that time, as Minister for Trade and Commerce, operating from the Maldives High Commission in the UK.

20 It would be helpful if you would:

- say whether you were aware of [Director A's] post with the Maldivian Government; and
- describe more fully the circumstances of your first meeting with [Director A] and your subsequent friendship with him.

25 Please provide contact details through which I may contact [Director A] direct. I do not think it would be appropriate, in the circumstances, for me to email him via [the CCO's] company email address as you have suggested. I assume that, as a personal friend of [Director A], you would have some more direct means through which I might communicate with him.

30 Please reply to this letter by 19 June 2019.

12 June 2019

15. Letter from the Commissioner to Mr Ian Paisley MP, 27 June 2019

I wrote to you on 12 June 2019 enclosing evidence I had received from the BBC concerning the *Spotlight* programme about your visit to the Maldives, which was broadcast in October 2017. (You acknowledged receipt of my letter on 15 June, when you emailed me about [the journalist's] recent enquiries of you. Nonetheless, I enclose a copy for ease of reference.)

I asked for your comments on the material I had sent to you, as well as answers to some specific questions, by 19 June 2019.

Although you have, in the interim, been in touch with my office about the second *Spotlight* programme (which was subsequently broadcast on 25 June 2019), I have not received a response to my letter.¹²

I said then that I am in correspondence with the BBC about some additional evidence which I hoped they would disclose to me. I am still in discussion with them about that and, as you might expect, I may make further enquiries of them in light of the second television programme. I will, of course, share with you any additional evidence I might receive. However, in the meantime, I would be grateful to have your urgent response to my letter of 12 June 2019.

27 June 2019

16. Email from Mr Ian Paisley MP to the Commissioner, 2 July 2019

Further to your letter 12 June regarding the enclosures. I thought I had sent a request that you forward to me the "2010 media report" that you referred to so as I could respond fully to the points made. However, it appears that it was not sent or did not arrive with you.¹³ I have nearly completed my detailed reply to your letter but for completeness this would be helpful so as I can respond fully.

2 July 2019

17. Letter from Mr Ian Paisley MP to the Commissioner, 18 July 2019

Thank you for your letter of 12 June and for sharing the content of what the BBC has sent to you. Also, thanks to your staff member [name redacted] for supplying me with the inclusions that were missing from the documents by email on 5 July that allow me to reply to your original letter.

(1) You ask me about [Director B]. I reiterate that I have never met [him] or have spoken to him neither been in or received any communication from him. The reported BBC transcript of our conversation was an

¹² Correspondence about this not reproduced as it is not relevant to the inquiry

¹³ A duplicate was sent on 18 June, see item 13 above. The text of the article was emailed to Mr Paisley on 4 July 2019, and an on-line link to it sent on 5 July

acknowledgement by me that I knew about whom they were speaking and I had, after being confronted by their accusation in writing that he paid for my holiday, I had made it my business to find out whom they were talking about. By the time of this conversation with the BBC I knew him well by reputation and reports I had read. That is what I was saying to the journalist. I have told you that I know who he is but have never met him. This is consistent with what I have said and is the truth.

5

10

15

20

(2) You asked me about a media report suggesting [Director A] was at some time a government minister. I have checked the official Maldives government website. According to that source he has never held an official or elected government post and is not recorded anywhere as doing so. The report from an unknown media source appears to be inaccurate. I did ask him and subsequently the embassy if he was an official of the government. The High Commission told me verbally that he is a private businessman. However, he has held an honorary unpaid role of advising on trade and tourism in the same way as the UK have experts from industry in our country who serve on boards and quangos. In no way could that be regarded as being a member of the government. Importantly when I met him, he introduced himself to me as the owner and director of a hotel and never suggested he was a member of the government. The fact is, he was not a member of the government when I met him or when he hosted me. And did not subsequently become a member of the government.

25

30

(3) I am clear that at the time I met him, and the questions I asked and the circumstances of our meeting he was not a member of the government of Maldives or purporting to be so. Our meeting was non-political and social. Like you, when the allegation was made against me, I researched on the internet any mention of him. The article you refer to is the only mention of this matter and given that no official or other article carries this claim I believe it to be inaccurate. Its source is "[redacted]" and appears disreputable.

35

(4) You asked me to describe the circumstances of our first meeting. I refer you to my letter of 16 January. This sets out where we met, I cannot place the time or date exactly, and sets out our general areas of discussion. There was nothing more to it. I meet so many people privately and publicly from all over the world and I do not recall how we were introduced. We were not with other people. He invited me to be a guest at his hotel. I took up that offer.

Re the attachments you sent me, I can respond as follows:

CCO/BBC transcript

40

The BBC asks [the CCO] on several occasions if the government organised or paid for the holiday. He is consistent in his replies and says they did not. He confirms the visit was 'private'. He did not tell them who paid the hotel, it was in his words

'proprietary'. When asked on several more occasions if the government paid for my visit he laughed and said they did not. He goes further and says if the government was behind this booking that the hotel record would show it was the government who booked it. Clearly the inference is no such government booking reference exists.

5 I suggest that a government reference would be there so as the hotel would get some sort of payment back from the government for hosting clients, etc. The fact no reference is there proves my case that the government had no involvement in this matter. I have confirmed to you that the room was complimented to me by the owner. The BBC should, through their sources and claims, be able to show you that
10 they have a record of the government booking this. They do not because the government played no part in this arrangement. The CCO transcript confirms that if any government was involved it would "say in the booking". He confirms no such booking is there and that this was paid up front in the normal way. I note the BBC has redacted parts of the conversation so we cannot get a clear flow of what was said
15 but CCO consistently makes it clear there was no government involvement in this booking. Can you ask the BBC for the redactions they have made?

Text message

The text message from [Director B] to the BBC is extremely difficult to read. Can you send me a clearer copy? From what I can see it says "*...the information from your source is inaccurate. The booking might have originated from any source and sponsored by anyone.*"
20

There is no context for this. Why has the BBC not sent the preceding and following text messages to give you context? What question was he asked to make a response like this?

25 However, from what he has said he appears, on the face of it, to support what I have said to you in earlier correspondence that the BBC's undisclosed and secret sources are inaccurate in what they are saying. Remember the BBC claimed/implied in their broadcast that commenced this inquiry that [Director B] paid for my holiday and I breached the rules because at one point in his past he was a member of a former
30 government of the Maldives.

All of the BBC evidence they have sent you confirms is that the hotel people each separately confirmed to the BBC, some time ago, that when asked if the visit was backed by the Maldives government they have separately confirmed that the government of the Maldives was not involved in this visit that I was on. Hardly
35 compelling evidence!

I believe it is fair and accurate for any reasonable person to see that I made these arrangements myself, I paid for a substantial portion of the visit myself, that anyone who suggests the government paid for the visit is wrong and has zero evidence to make such a claim. From what the BBC has sent to you it cannot substantiate its
40 claim that the Maldives government was involved in this matter at all.

The invoice

5 The invoice is not signed and is not one I have in my records. I am not dismissing it but I have no recollection of it. However, its contents align with my claim to you about the approximate cost of the room that was complimented to me if calculated at the normal price.

Emails

10 My email to the BBC refers to [the journalist] stalking a former member of my staff. [The journalist] tracked this member of staff down at their new place of work and offered them inducements to make a programme against me. That member of staff felt harassed and intimidated by this action. They had no part to play in this matter hence my email to the BBC. The BBC did not do [me] the courtesy of a reply.

15 The remainder of the emails I understand confirms the material I have already sent to you and supports the points I have made since we first met to discuss this. You can see that I immediately corrected the mistake I had made about raising the issue of registration with "the Commissioner" when I should have said "the Registrar". The BBC made a big point of this. You will no doubt recall that both you and the Registrar did respond to me in that free-flowing conversation hence why I have asked at an earlier meeting for a copy of the minutes of that meeting. However, you have confirmed that none exists. I understand that conversation was free flowing
20 between the three of us but technically only the Registrar could give such advice. I clarified that for the BBC in the text messages without indicating the nature of that meeting.

25 I have waited for seven months for the BBC to send you hard evidence that the government of the Maldives paid for and arranged this visit. From that they have sent to you it falls well short of evidence that supports these claims made against me. By contrast I have provided you with a full explanation and with substantive evidence supporting my position that my friend kindly complimented me accommodation at his resort and that I paid for a substantial portion of the visit s it was private. The BBC is on a wild goose chase suggesting that [Director B] (who is
30 not a member of the government and whom I have not met) is my friend and paid for this holiday at the request of the government he is at loggerheads with. I know the BBC wish to characterise me in a particular light, and I have enough self-awareness to understand that they are wrong in what they have produced.

18 July 2019

35 **18. Letter from the Commissioner to Mr Ian Paisley MP, 23 July 2019**

Thank you for your letter of 18 July 2019. You asked about the "text" message from [Director B] to the BBC. I understand this was, in fact, a Twitter message. I am sorry that the copy sent to you was difficult to read but you have deciphered it correctly.

In my letter of 12 June, in addition to asking about the circumstances of your friendship with [Director A], I also asked for his direct contact details. I would be grateful if you would provide these by return.

5 As you are aware, since I wrote to you on 12 June enclosing the material I had obtained from the BBC, they have broadcast another episode of *Spotlight*, in which they made new allegations about the funding of your visit to Coco Bodu Hithi in November 2016. I have contacted the BBC again to ask them to provide me with a copy of the recording and, if possible, a transcript and, when I have studied that, I think it is likely that I will wish to ask them to provide copies of the material on
10 which they relied in the making of that second programme.¹⁴

I am sorry that I have not been able to progress this inquiry more quickly but, as you will appreciate, I do need to explore some issues further with the BBC. I am meeting with them later this week and hope to obtain material relating to the second *Spotlight* programme in due course.

15 I will contact you again as soon as I can. Although I think I may need to interview you at a later stage, I do not think that is likely to be during the summer recess. Nonetheless, I may need to write to you, and I would be grateful if you would provide the address at which I might reliably contact during recess.

20 In the meantime, I have noted the issues raised in your letter of 18 July 2019 and we can return to them once I have established the extent of the evidence which might be available to me.

23 July 2019

19. Evidence provided by the BBC to the Commissioner on 22 August 2019

25 On 22 August 2019 the BBC provided a bundle of evidence to the Commissioner which included:

- (1) Transcripts of calls, and the text of messages and letters between [a named former Minister in the Maldivian Government] and the BBC
- (2) Messages between the BBC and the DUP Press office

¹⁴ On 23 July 2019, the BBC provided a transcript of the *Paisley in Paradise Revisited*, broadcast on 28 June 2019, and a link through which it was possible to download the audio-visual recording. This has not been reproduced as it is not relevant to the inquiry.

- (3) Images from the Kandolhu resort's booking system
- (4) Social media posts by Mr and his wife about Kandolhu resort's social media posts¹⁵
- (5) Mail between Mr Paisley and the BBC
- 5 (6) Mail between Coco Bodu Hithi resort and the BBC, including a statement issued by Sunland Hotels
- (7) Mail between Kandolhu resort and the BBC
- (8) Mail between Paradise Island resort and the BBC
- (9) Transcript of BBC Interview with Mr Paisley
- 10 Extracts from the material relevant to my inquiry are reproduced below. I have chosen to present them in chronological order to assist the reader.

19.i Copies, described by the BBC as 'images from within Kandolhu's booking system'

Paisley [Mrs]

X	Date	Code	Description	Amount
	23/04	90021	COMP ROOMS -USD	0.01
	23/04	+	Mastercard [Bank]	0.-278.61
	22/04	+	COMP ROOMS - USD	0.01
	21/04	+	The Market Food 00	27.32
	21/04	+	COMP ROOMS - USD	0.01
	20/04	+	Vilu Bar Alc Beverage	0.00
	20/04	+	The Market Food 00	0.00

Paisley [Mrs]	18/04/14	24/04/14	CHECKED OU[T]
Paisley, Ian Richard	18/04/14	24/04/14	CHECKED OU[T]
Paisley [son's name]	18/04/14	24/04/14	CHECKED OU[T]
Paisley [son's name]	18/04/14	24/04/14	CHECKED OU[T]

15

¹⁵ Social media posts not reproduced as not relevant

19 ii Extract from transcript of telephone call between [a named former Minister in the Maldivian Government] and the BBC on 31 May 2019¹⁶

BBC: sorry to call on a Friday I know it's [your] weekend there -I've been doing some research into a holiday that the British MP [Ian Paisley] took to the Maldives in 2016
5 [and] I was hoping you might be able help me with some details.

[Former Minister- FM] - What, Yeah What kind of details?

BBC- Obviously around 2016 you had a [very] high profile position internationally in the govt and we understand that you knew Mr [Paisley] personally. Is that the case?

10 [FM] - Yes I know him eh I have met him in the Parliament in the UK and he has eh been a friend since then. I have been to UK few times? I have met [him] in Parliament in the UK.

BBC - Ok, ok, well we understand that you may have been involved in organising a holiday for Mr [Paisley] and his family at [Coco Bodu Hithi] resort, is that the case?

15 [FM] - No, I have not organised any of those - I did organise I don't know which year it was - but eh as part of the all-party talks chair I had been involved with a lot of other parliamentarians to listen to their positions and how other governments' Parliaments can help Maldives Parliament and the government, in terms of all these political crisis we have had. So in that capacity I have talked to him and others as
20 well, but I have not organised any of those trips, or holidays but there was I think 2 official visits to the Maldives that they have been organised by the foreign ministry or the President's office, but I can't tell, I'm not aware of the details right now.

BBC - OK but 2 official trips you think, that have been organised by MFA?

25 [FM] - Yes it would have been the MFA or the President's office, that is how all of those trips were handled.

BBC- OK That's really useful to know. Are you aware at all of the holiday I'm referring to?

30 [FM] - No eh I have seen him or I have met a few times in MD, but that is all in an official capacity, for those official trips but I know that he came once to the MD but he was, he never came to Male that time. (OK) I only knew from his wife's tweets that he was in MD but never met that time, (OK)I don't know if he came to Male or not but eh yes I have met him in Male on I think two occasions but those were official trips to the MD.

¹⁶ Pleasantries at start and end of the call omitted. FM = the Former Minister, BBC = journalist

BBC - Did you ever meet him at any resorts?

[FM] - No no I never met him at any resorts, I've never been to any resort to meet anyone (OK, OK and) but in that, I don't remember sometimes we hold official meetings in Kurumba that is also a resort (in where sorry?) Kurumba or Bandos, 5 [very] close to Male where we have official meetings (OK) so I'm not sure if he was involved in those I don't remember right now. I don't remember right now but we meet officials from British and others at those resorts, because they have facilities there.

BBC - what were the resorts you mentioned?

10 [FM] - Kurumba or Bandos. I don't remember if I met him at those resorts.

BBC- [Name redacted], I know it's a big ask and I know [you're] not in [your] political post anymore is there any way you could look back and check records as to who it was organised Mr [Paisley]?

[FM]-The best way would be to write to the ministry, because they would have the records on all those official visits because I don't have access to records now do I 15 don't know how I can get this... officially if you write to them I'm sure they will respond....The ministry or the president's office (OK OK) they would have the record.

BBC -That's really useful to know. In 2016 when this holiday happened and sorry I 20 won't keep you much longer, I know it's your weekend.- Did you have any, were you in touch with Mr [Paisley] around that period that you can remember?

[FM] - like I said I don't remember specifically the dates but both times I met were in my office and in an official capacity, so not in any resort definitely not in any resort I never met, but I don't remember the dates.

25 BBC - I mean like sort of in connection with organising visits, as opposed to

[FM] - all the visits would have been gone through official records. What we do is we recommend to the president's office or the foreign ministry that certain delegations would be good to meet to discuss political issues and that would have been the case so ??? work with the foreign ministry to the right Ambassador should have????? 30 That is at least the Protocol, because I remember????...which governments or parliamentarian, or parliaments should discuss those issues one of those times I remember there would have been report as well I think both times it would have been the joint British parliament some organisation there, (OK) they held press conference in Male after the trip (OK ok)so those were the times but I know I met 35 him in British parliament for sure when I have been to UK on official visits. I have been to the Parliament met him and others in the Parliament and some high officials state dignitaries. I have met them so - not in Male though.

BBC-Yes I have done a bit of research and you've travelled to UK and Europe as well.

[FM] -Yeah yeah like you said I have had some responsibilities looking after the political issues I was chair of the all-party talks, so it was my mandate.

5 BBC - OK, I'm sure if you're aware in December we broadcast a programme about [Ian Paisley] and this holiday (this December? Yes Dec 2018) and in it we reported that he took this holiday to [Coco Bodu Hithi] with his family in Oct[ober] 2016 and we reported that it was em a free holiday (OK)and organised by the MD government. Is, is there anyone else in the government you think may have organised it?

10 [FM] - I'm sure that I mean all these trips would have come from the president's office. We had official interaction with the British [government], the parliamentarians over the political issues so all of those come from the president's office and then the president's office would have requested the foreign ministry whenever there was ??? in terms of the trips they would have all the records, that I'm sure.

15 BBC-that's really really useful

[FM]- If it's about holiday I don't know, that is that is - I didn't see that programme.

BBC - that's fine I mean it was broadcast in the UK so you may not have had access to it anyway, but I just wonder would that have been a common thing for the government to provide, sort of, to arrange free holidays for foreign dignitaries?

20 [FM] - Not that I know, Not that I know - I have never seen or been aware of any one in the government providing holidays for any individual (foreign?) dignitaries but we do sponsor programmes for dignitaries, for example, I can tell you we had the security council voting funded almost all of the delegations from different parts of the world to MD and we had programmes and during those would have involved
25 myself? Some of these programmes would be about the fisheries and tourism and climate environment ...because often times what the European and others hear politically is all wrong information. So what we did was to bring these delegations to the MD and let them see the real environment, climate of the MD so Fisheries and Tourism were the top 2 industries so I remember making presentations on those
30 occasions. Embassies also true for all the Ambassadors in SL as well (OK) we did arrange trips for them as well to come as well, to come. It's all very official and foreign ministry would have all the info[rmation] on that (OK) on those things but not private holidays but we're not allowed private holidays because I the government rules and we're not allowed private holidays for anyone, not even for
35 Maldivian for that matter.

BBC - on those official trips

[FM]-But I know him, I've met him twice like I said both times were in my office in the ministry.

BBC Ok ok. So were you involved in any way with that trip the 2016 one in any way at all?

5 [FM] - No I don't know the holiday trip but I know two trips like I said, they were official trips, but I don't know those trips if he went to a resort or not but, not like you put forward a holiday trip no, official trips yes But not the delegations.

BBC - just to be clear the [Coco Bodu Hithi] trip? (sorry) Just to be clear the [Coco Bodu Hithi] trip?

10 [FM] - That also I don't know, because a lot of these delegations they take a day off during on Friday or so they go to resorts, but I wouldn't know which resorts they go so if you're talking about one of those I'm not aware, I am notfor that. But officially I remember twice he came to MD.

BBC - ok - and the Coco Bodu Hithi trip you weren't aware -you weren't involved in the organisation of that - or did you pay for it? Were you involved in the funding of it?

15 [FM] - Ha - how can I be paying for something I don't know.

BBC- Ok ok, can I just ask one more thing [name redacted] (it's alright) when we talk about the official trips was it ever common for them to bring their family members with them?

20 [FM] - No never, w eh yes some official delegations when they come they bring their families but that was not official part of it. I mean separately they might have brought their families but not, definitely government would not have funded those.

BBC - the government would not have funded the families' tickets or the families' accommodation. (No No No they won't)

25 BBC - You mentioned at the start of the conversation [name redacted] that you and Mr [Paisley] have been friends for a few years - em what's the nature of that friendship, I mean how friendly are you?

[FM] - We're friends because every time I come to UK like I said on my official trips I visit him in the parliament if he's around - only this? That's the friendship.

30 BBC - And so would you say that's in a personal kind of capacity, as opposed to a business friendship?

[FM] - No no it's official, official capacity, official trips to the UK. (em hm OK) But all of those trips because we have met a few times I definitely give him a buzz and if we have a meeting mostly it has been in the Parliament."

19.iii Letter from the BBC to [the former Minister], 11 June 2019

BBC Northern Ireland's television current affairs programme *Spotlight* reported in December 2018 that the British MP Ian Paisley and his family holidayed at Coco Bodu Hithi in the Maldives in October/November 2016.

- 5 We reported evidence that the family's stay was free of charge and that this was arranged at the request of the Maldivian government.

We intend to broadcast another programme that references Mr Paisley and his family's stay in the Maldives. We anticipate the programme will be ready to broadcast later this month.

- 10 Further to a conversation with you on the telephone on 31 May 2019, in which you denied having anything to do with the trip, we would like you to address the following questions.

- 15 How do you respond to the allegations that as a member of government, you requested that Coco Bodu Hithi director and co-owner [Director B] accommodate the Paisley family on a complimentary basis? This is based on information we have received from a number of sources.

- 20 As you explained on the telephone, you and Mr Paisley have been friends for "a few years" in connection with your official duties. Following our last programme, Mr Paisley told *Spotlight* that, regarding his holiday to Coco Bodu Hithi, he paid for part of the holiday and a "long-term friend" paid for the other part. Were you the friend he referred to? In the interest of accuracy, did you pay for part of the Paisleys' holiday?

[Text relating to allegations made about the former Minister redacted.]

- 25 We would like to interview you about the above. Or alternatively, if you would prefer to give us a statement or to discuss this over the phone, we would be very grateful.

If you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 2pm (GMT) on Tuesday 18 June so it can be reflected in the programme.

- 30 *19.iv Text of social media message from [the former Minister] to BBC reporter, 11 June 2019*

Dear [name]

I acknowledge receipt of the letter and find it ridiculous and hilarious especially after the conversation we had.

19.v Letter from the BBC to [Director B], 11 June 2019

BBC Northern Ireland's television current affairs programme *Spotlight* reported in December 2018 that the British MP Ian Paisley and his family holidayed at Coco Bodu Hithi in the Maldives in October/November 2016.

- 5 We reported evidence that the family's stay was free of charge and that this was arranged at the request of the Maldivian government. We wrote to you in December and you replied that "the booking might have originated from any source and sponsored by anyone".

- 10 We intend to broadcast another programme that references Mr Paisley and his family's stay at your resort. In the programme, which we anticipate will be ready to air later this month, we intend to report that it was at the request of the former Minister [Ministry and name of Minister redacted] that you arranged for the Paisley family to stay at your resort free of charge. What is your response to this?

- 15 This allegation is based on information we have received from a number of confidential sources. As you may recall from our previous correspondence, we want to be able to report fairly and accurately the details of who organised and/or paid for the stay at Coco Bodu Hithi as it is a matter of public interest and accountability for an MP in the UK. Our queries do not imply any wrongdoing on your part or that of your organisation.

- 20 We would like to interview you about the above. Or alternatively, please contact me if you would prefer to give us a statement or to discuss this over the phone.

If you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 2pm (GMT) on Tuesday 18th June so it can be reflected in the programme.

25 **19.vi Letter from the BBC to Mr Paisley, 11 June 2019**

BBC Northern Ireland's current affairs programme *Spotlight* has been investigating overseas visits taken by you during your time as a Member of Parliament.

- 30 Further to a programme we broadcast last December regarding a holiday you and your family took to the Maldives, we intend to broadcast another programme. We anticipate this will be ready to air later this month.

As part of our investigation I should be grateful if you would respond to the questions set out below which, as a result of our research, we are considering for inclusion in the programme.

- 35 (1) We understand you have known former Maldivian Cabinet member and Minister of [Ministry and name redacted] for a few years and that you

have met him on a number of occasions both in the UK and in Male. How would you describe your friendship?

- 5
- (2) Did [the former Minister] have any involvement in the organisation of a holiday you, your wife, and two sons took to Coco Bodu Hithi in October/November 2016?
- 10
- (3) You told us in December 2018 that you paid for part of that holiday and a "long-term friend" paid for the other part. You declined to disclose the identity of that friend, however you said they were unconnected to your work. Our understanding is that [the former Minister] requested that the resort owner accommodate you and your family free of charge. Is [the former Minister] the friend you were referring to?
- (4) Are you aware of [the former Minister's] reported alleged links to [details redacted as not relevant to the inquiry into Mr Paisley's own conduct]?
- 15
- (5) Given [the former Minister] was a member of the Maldivian government at the time and that you and he were acquainted through your respective parliamentary/official roles, then there would arise a perception that the receipt of this trip was in connection to your work as an MP. Do you accept this? In light of this, do you accept that you should have registered the holiday on Parliament's Register of Members' Financial Interests?
- 20
- (6) [A QC], who is an expert on public and parliamentary law, and the Nolan principles which govern the conduct of public life, stated in our previous *Spotlight* programme that there was an "onus" on you under the rules and principles to be open and transparent. He quoted the parliamentary code of guidance, saying: "MPs should give reasons for their decisions and restrict information only when the wider public interest clearly demands." Do you therefore accept that there is an onus on you to reveal the identity of your friend?
- 25
- (7) Parliamentary rules require MPs to register overseas trips taken for which they did not pay themselves and that could be seen to be connected to their parliamentary duties. You did not register your holiday in October/November 2016 on the Register of Members' Financial Interests and you said in December 2018 that you were satisfied there was no need to do so. Will you now refer yourself to the Parliamentary Commissioner for Standards, and, if not, why not?
- 30
- (8) Can you explain why and on what basis "a friend" would pay for the holiday?
- 35
- (9) Are there any other holidays/trips to the Maldives that you have taken, for which you have not entirely paid?

We are putting these points and questions to you to give you an opportunity to respond because we want our programme to be fair and accurate. We believe the best way to respond is in a pre-recorded television interview. However, if you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 2pm on Tuesday 18th June so it can be reflected in the programme.

19.vii Letter from the BBC to [the former Minister], 18 June 2019

As you know, BBC Northern Ireland's television current affairs programme *Spotlight* intends to broadcast a programme concerning the British MP Ian Paisley and his links to the Maldives. We anticipate this will be ready to air in the coming weeks.

We wrote to you on 11 June 2019, asking a series of questions, some of which concerned a holiday taken by Mr Paisley and his family to Coco Bodu Hithi in October/November 2016.

You responded to the letter claiming it was "hilarious and ridiculous".

We have evidence that you requested Sunland Hotels for a rate at one of its resorts for a private stay for Mr Paisley and his family.

Our evidence indicates that you settled payment for the family's stay at Sunland's head office.

What is your response to this? Why did you pay for this holiday?

When we spoke to you, you told us your friendship with Mr Paisley was in an official capacity. Did you pay for this holiday as a personal acquaintance of Mr Paisley- i.e. in a personal capacity as opposed to an official/business capacity?

Have you funded any other trips taken by Mr Paisley anywhere in the Maldives?

We would like to interview you about the above. Or alternatively, if you would prefer to give us a statement or to discuss this over the phone, we would be very grateful.

If you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 10am (GMT) on Monday 24th June so it can be reflected in the programme.

19.viii Letter from the BBC to Mr Paisley, 18 June 2019

Further to our letter on 11 June 2019, BBC *Spotlight* has additional questions regarding visits to the Maldives taken by you during your time as a Member of Parliament.

As you know, we intend to broadcast a programme, which we anticipate will be ready to air later this month. As part of our investigation we should be grateful if you would respond to the questions set out below which, as a result of our research, we are considering for inclusion in the programme.

- 5 Following allegations that you accepted a free holiday at Coco Bodu Hithi in October/November 2016, you told BBC *Spotlight* that you paid for part and a "long-term friend" paid for the other part. You declined to disclose the identity of that friend, however you said they were unconnected to your work.

10 *Spotlight* has evidence that former [Ministry redacted] Minister [name redacted] is the person who paid for your trip.

Our evidence shows that the former Cabinet minister and close aide of the then President [named redacted] requested Sunland Hotels' co-owner [Director B] to provide a rate at one of his resorts. [The former Minister] made the request for a private stay for you and your family. He settled payment for the five-night stay, which included two villas and full-board for you, your wife and two sons, at Sunland's head office. As we reported, incidental costs, such as extras during your stay at Coco, were paid for by you.

15

What is your response to this?

20 While you claimed in December 2018 that the "long-term friend" who paid for your stay was unconnected to your work, [the former Minister] told *Spotlight* that you are friends, however that friendship is in an official capacity.

What is your response to this?

Parliamentary rules require MPs to register overseas trips taken for which they did not pay themselves and that could be seen to be connected to their parliamentary duties. Why did you not register this holiday on the Members' Register of Financial Interests?)

25

In addition to your holiday to Coco Bodu Hithi, *Spotlight* has questions concerning other trips taken by you to the Maldives, which we would like you to respond to:

30 (1) Our evidence indicates you spent six nights at Kandolhu Island resort in the Maldives from 18 April 2014. Do you accept this?

(2) We have evidence that indicates that your accommodation was provided on a complimentary basis - meaning you did not pay for it. Do you accept this?

(3) Who paid for this holiday? And why did you accept it?

- 5 (4) You have an interest in the Maldives that arises from your membership of the House of Commons - you are a member of the Maldives All Party Parliamentary Group and visited the country on two official trips, which you registered on Parliament's Register of Members' Financial Interests. According to [a QC], who is an expert on public and parliamentary law, the Nolan principles on standards in public life place an onus on you to be transparent about trips you take to countries in which you have an interest. Why did you not register this trip (April 2014) in Parliament's Register of Members' Financial Interests?
- 10 (5) You took a further trip to the Maldives from 19th to 21st January 2016. During your visit you stayed at Paradise Island Resort. Do you accept this? Who paid for it?
- 15 (6) This trip took place just weeks before you visited the Maldives as part of the APPG, which you registered. Was this January 2016 trip in any way connected with your official parliamentary duties?
- 20 (7) Parliamentary rules require MPs to register overseas trips taken for which they did not pay themselves and that could be seen to be connected to their parliamentary duties. You have taken three separate trips to the Maldives (April 2014, January 2016 and October/November 2016) which you have not registered. Will you now refer yourself to the Parliamentary Commissioner for Standards, and, if not, why not?

25 We are putting these points and questions to you to give you an opportunity to respond because we want our programme to be fair and accurate. We believe the best way to respond is in a pre-recorded television interview. However, if you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 10am on Monday 24th June so it can be reflected in the programme.

19.ix Letter from the BBC to [the former Minister], 21 June 2019

30 Further to the letter we sent you on Tuesday 18 June, we would like you to respond to one specific additional question.

35 We have obtained evidence that states the following: "In 2016, [you] requested Sunland Hotels co-owner [Director B] for a rate at one of the company's resorts. [Director B] was informed the booking was for a private stay for a personal acquaintance of [yours], Ian Paisley and his family[...] [You] settled the payment for Ian Paisley's stay at the head office."

This evidence was given to us by Sunland Hotels co-owner [Director B]. How do you respond to this?

We would like to interview you about the above. Or alternatively, please contact me if you would prefer to give us a statement or to discuss this over the phone.

5 If you prefer to respond by way of a written statement, for production reasons we would need to receive it no later than 12 noon (GMT) on Monday 24 June so it can be reflected in the programme.

19.x Undated Statement issued by Sunland Hotels

10 It is the policy of Sunland Hotels Pvt Ltd not to reveal personal information regarding current or former guests. However, due to inaccurate information reported by BBC Northern Ireland regarding this particular stay, Sunland Hotels wishes to state the following to set the record straight.

15 In 2016, [a former Minister in the Maldivian Government] requested Sunland Hotels co-owner [Director B] for a rate at one of the company's resorts. [Director B] was informed the booking was for a private stay for a personal acquaintance of [the former Minister], Ian Paisley and his family. Given that [the former Minister] was then an active member of the government, the stay was logged as a government request for Sunland Hotels' internal records.

20 The booking was not provided by Sunland Hotels on a complimentary basis as reported. As typical for booking made locally, [the former Minister] settled the payment for Ian Paisley's stay at the head office. The resort was notified not to charge the guests for their villas, meals or transfers. Any further incidentals were to be charged to the guest directly.

At the time of booking and stay, [Director B] was unaware that Mr Paisley was a member of the British Parliament. Furthermore, [Director B] has never met, communicated with, nor has had any affiliation with or since his stay in 2016.

25 **19.xi Letter from the BBC to Kandolhu resort, 22 June 2019**

I am writing from the BBC in the United Kingdom to request your assistance in research for a programme that pertains to your resort.

30 BBC Northern Ireland's television current affairs programme *Spotlight* intends to broadcast a programme later this month in which we will report that the British MP Ian Paisley, his wife and two sons stayed at Kandolhu from 18th to 23rd April 2014.

We intend to report that the family's accommodation at your resort was complimentary.

35 We understand that it was common practice in the Maldives under President [name redacted] government for visiting foreign officials to be accommodated at the country's most prestigious resorts on a complimentary basis and I would like to stress that we are alleging no wrongdoing on the resort's part.

However I should be very grateful if you would kindly provide us with further information regarding Mr Paisley's stay as we believe the issues arising from it to be a matter of public interest- both in the UK and in the Maldives.

5 In addition can you tell us who requested that Mr Paisley, his wife and their two sons be accommodated on a complimentary basis?

10 In December last year, we reported that Mr Paisley may have breached parliamentary rules by accepting a complimentary stay at another Maldivian resort at the request of the Maldivian government. It is therefore of significant public interest that we determine whether this may have been the case regarding his stay at Kandolhu.

We want our programme to be fair and accurate, so should you wish to comment on any of the above, please respond by way of a written statement. For production reasons we would need to receive it no later than 12 noon (GMT) on Monday 24 June so it can be reflected in the programme.

15 ***19.xii Letter from the BBC to Paradise Island resort, 22 June 2019***

I am writing from the BBC in the United Kingdom to request your assistance in research for a programme that pertains to your resort.

20 BBC Northern Ireland's television current affairs programme Spotlight intends to broadcast a programme later this month in which we will report that the British MP Ian Paisley stayed at Paradise Island Resort from 19th to 21 January 2016.

We understand that it was common practice in the Maldives under President [name redacted] government for visiting foreign officials to be accommodated at the country's most prestigious resorts on a complimentary basis and I would like to stress that we are alleging no wrongdoing on the resort's part.

25 We should therefore be very grateful if you would kindly provide us with further information regarding Mr Paisley's stay as we believe the issues arising from it to be a matter of public interest- both in the UK and in the Maldives.

(1) Did Mr Paisley pay for his accommodation? Or was his stay complimentary?

30 (2) Who organised Mr Paisley's stay at Paradise?

(3) Was he there in a personal capacity or on official business?

In December last year, we reported that Mr Paisley may have breached parliamentary rules by accepting a complimentary stay at another Maldivian resort

at the request of the government. It is therefore of significant public interest that we determine whether this may have been the case regarding his stay at Paradise.

5 We want our programme to be fair and accurate, so should you wish to comment on any of the above, please respond by way of a written statement. For production reasons we would need to receive it no later than 12 noon (GMT) on Monday 24th June so it can be reflected in the programme.

19.xiii Email from Kandolhu resort to the BBC, 24 June 2019

I represent Kandolhu in the UK and your email has been passed onto me by [name redacted].

10 Kandolhu respects the privacy of all its guests and is unable to make any comment on an individual's stay.

I can however, confirm that Kandolhu has not hosted any guests at the request of the Maldivian Government.

19.xiv Letter from the BBC to Mr Paisley, 25 June 2019

15 Further to my previous two letters, I want to give you an opportunity to respond to the views expressed by [the QC] which we intend to broadcast in our *Spotlight* programme.

20 He believes if the friend who, you told us in December, paid for part of your trip to the Coco Bodu Hithi resort in the Maldives in 2016 was connected to the Maldivian government, in light of everything we know now about your relationship with the Maldives government and your visits to the Maldives over the 2013 to 2016 period, it is a clear cut case of a gift which should have been registered at the time and the identity of the person making the gift should be recorded publicly in the MPs' financial interests register.

25 Regarding your visit to Paradise Island resort in January 2016, [the QC] says the MPs' code of conduct requires you to be as transparent as possible as an MP and explain the circumstances surrounding the trip.

30 In relation to the Kandolhu trip, in April 2014, he believes that you either have to give an account of the visit that shows it was, in the language of the code, unrelated to your activities as an MP or the assumption has to be you should have registered it.

Our programme is scheduled to be broadcast tonight. If you wish to make any response to this, and our previous correspondence, we need you to do so immediately.

20. Letter from the Commissioner to Mr Ian Paisley MP, (undated) sent 30 September 2019

5 Thank you for your letter of 18 July in which you clarified your relationship with [Director B] and your knowledge of [your friend, Director A's] connection with the Maldives Government.

In my earlier letter of 12 June, I asked you to provide contact details through which I could contact [Director A] direct. You have not yet provided these and I would be grateful if you would now do so.

10 On 25 June 2019 BBC *Spotlight* Northern Ireland broadcast a programme *Paisley in Paradise Revisited*. I enclose a transcript of that programme together with the following documents:

- (1) A statement from Sunland Hotels and copy text message to [Director B]
- (2) Copies of social media items referring to a visit to the Maldives
- (3) Copies of computer images concerning a visit to the Maldives in 2014
- 15 (4) Copies of text messages and 2 letters to [a former Minister in the Maldivian Government]
- (5) Transcript of a telephone call to [the former Minister]

I think it would be helpful if we met. The main areas I would wish to discuss are:

- 20 • Any comments you wish to make on the statement from Sunland Hotels that [the former Minister] arranged and paid for your holiday to Coco Bodu Hithi in 2016.
- Whether you travelled to the Maldives in April 2014 and January 2016.
- If so, who paid for the trips in April 2014 and January 2016.

25 I would be grateful if you would contact my PA, [details redacted] to arrange a mutually convenient appointment with the Registrar and me at my office in [...].

30 September 2019

21. Email from Mr Ian Paisley MP to the Commissioner, 14 October 2019

Thank you for the undated letter and bundle of documents that you sent me. They arrived at my home address last week. I have not yet had time to consider the

contents but will endeavour to study the 60 or so pages and reply when I have done so. I note I have not received a reply to my earlier letters.

You will hear back from me once I have had an opportunity to reply to your latest letter.

5 *14 October 2019*

22. Letter from the Commissioner to Mr Ian Paisley MP, 29 January 2020

Thank you for meeting me on 16 January.¹⁷ I attach a note of our discussion. I would be grateful if you would confirm as soon as possible, whether you are content that this is an accurate reflection of the key points. If you identify any inaccuracies or significant omissions, please let me know.

Your letter of 2 August 2019

Before listing the questions I would like you to address, I should first say that we have checked our paper and electronic records and cannot find the letter from you of 2 August 2019. You said that, in that letter, you had explained that your relationship with [Director A] had been strained by the publicity following the BBC Spotlight programmes and that he wanted any communication to be channelled through the COO at Coco Bodu Hithi. You said this was why you had not provided the direct contact details I had requested.

In my letter of 30 September 2019, I repeated my request for [Director A's] direct contact details. I am surprised that that appears not to have alerted you to the fact I did not have your letter of 2 August. It would have been helpful if you had told me about it sooner. I would be grateful to receive a copy of the original if that is available.

Hospitality at Coco Bodu Hithi

If I understood you correctly when we met, you said that [Director A] had initially offered you hospitality years ago and you had contacted him before your stay at Coco Bodu Hithi. You also said that you did not know until checking out, at the end of your stay, that the hotel rooms were to be “complimented”. Any evidence you have to support this would be helpful.

For example:

Do you still have any emails or other correspondence you sent to [Director A] when letting him know that you intended to visit the Maldives in autumn 2016? Did you email or write to him to thank

¹⁷ A meeting in early November had been cancelled and Parliament was then dissolved until after the 11 December 2019 General Election

5 him for the unexpected hospitality when you returned to the UK? Did you make any enquiries about whether [Director A] personally had subsidised your visit or whether the company had simply absorbed the costs? Did you consider which might be more likely and whether you should check that point?

If you have any contemporaneous evidence about any of the above or any other points which you think might assist me, I would be grateful to receive it when you reply to this letter.

Registration of overseas visits

10 Members are required to register “any visits to destinations outside the UK where the cost is over £300 if that cost is not wholly borne by the Member or by UK public funds”. The rules set out the exceptions to that general rule and among those exceptions are “visits wholly unconnected with membership of the House or with the Member’s parliamentary or political activities (e.g. family holidays)”

15 Summary of the evidence I have to date

20 You have told me that your visit to Coco Bodu Hithi did not require registration because it was a purely private holiday, partially funded by a personal friend. You have told me that you do not meet [Director A] regularly and are not “drinking buddies”. If I have understood correctly, you have not met each other’s families, nor visited each other’s homes.

I would be grateful if you could provide any information which would help me to understand why you describe [Director A] as a personal friend rather than an acquaintance.

25 I would be grateful if you would review your records and consider carefully whether you have any material which demonstrate that it was [Director A], acting in a personal capacity as a friend, who was the donor of the hospitality you received and whether you could offer the names of any disinterested third parties whom I might approach to seek supporting evidence.

30 When we met you gave me some new information about your first meeting with [Director A]. You showed me a business card, which you said was [his] and annotated with his personal telephone number. You did not allow me to read the card. I can assure you that, if you would do so, I would not publish [Director A’s] contact details. If, even with that assurance, you will not allow me to see the manuscript annotation, which I think was on the back of the card, it would be helpful
35 if you would allow me sight of the original business card as printed.

I would also be grateful to have your observations on this entry in the London Diplomatic List (2013).

MALDIVES

High Commission of the Republic of Maldives

22 Nottingham Place W1U 5NJ

5 020 7224 2135

Fax 020 7224 2157

www.maldiveshighcommission.org

Monday-Friday 09.30-17.00

10 (Vacant) High Commissioner

[Name] Acting High Commissioner

[Name - same name as Director A] Minister (Trade Representative)

[Name] * Attaché (Administrative, Consular & European Affairs)

[Name] Attaché (Finance & Protocol)

15 I appreciate that [Director A's name] is not so unusual as to rule out the possibility that the then Trade Representative is not the person with whom you are acquainted. However, I would be grateful for any information/evidence you are able to provide which might assist me on this point.

Other visits to the Maldives

20 For completeness, I would like to ask for some information in respect of two of the three other visits to the Maldives referenced in the second Spotlight programme. These are the visits your family are said to have made to the Kandolhu resort in April 2014 and to Paradise Island in January 2016.

In each case please say:

25 • whether you went to the Maldives then

- who paid for the visit (flights, accommodation, all hospitality) and their relationship to you
- whether the visit was funded or partially funded by a third party, and if it was:
 - 5 — when the visit began and ended
 - whether you were accompanied by any family members and, if so, who?
- whether you consider now that any hospitality received should have been registered in the Register of Members' Financial Interests
 - 10 — If you do not, please give the basis for that

I trust you will understand how helpful it would be if you would provide as much evidence as you can to support your answers.

Please reply to this letter by 14 February 2020.

29 January 2020

15 *Enclosure: Note of meeting on 16 January 2020.¹⁸*

Kathryn Stone (KS)

Ian Paisley (IP)

IP's colleague

Complaints Manager (CM)

20 The meeting was held at KS' request. By way of introduction, KS said that the inquiry had taken too long for a number of reasons. She summarised the current position: she has some material from the BBC, the accuracy of which is in dispute.

25 IP stated categorically that his visit to Coco Bodu Hithi in 2016 had been purely private and personal. KS said that in order to bring the inquiry to a conclusion, she needed to see any evidence IP has to support his statement.

¹⁸ A meeting arranged for 5 November had been postponed at the Commissioner's request

IP asked for clarification – was the allegation that his visit had been paid for by the Government of the Maldives?

5 CM said the focus of the inquiry was on whether IP's visit to Coco Bodu Hithi should have been registered in the Register of Members' Interests. The key question was whether the hospitality he and his family received was in any way connected with IP's political or parliamentary activities, not specifically whether it was funded by a foreign government.

10 KS reminded IP of the content of the statement issued by Sunland Hotels (the company owning the Coco Bodu Hithi resort). The statement said that an "active member of the government", [name redacted], had asked one of the resort directors (Director B – another former Government Minister) to arrange the stay; [the former Minister] had settled the bill; and the company had logged the invoice as a government-funded stay. KS invited IP to respond to that statement.

IP asked for the date the statement was made. KS said it was undated.

15 IP stated that it was a straightforward lie that [the former Minister] had funded the hospitality he'd received. He said he had done some research and was sure that he had never met [Director B] and had met [the former Minister] perhaps once when he was visiting the UK. IP said he had no connection with [the former Minister] and no reason to ask him to pay. IP said [the former Minister] had had [Director B] put
20 in jail and he (IP) was now caught in a dispute between them. IP asked for proof that [the former Minister] had paid for his hotel accommodation at Coco Bodu Hithi. He asked if the BBC had been asked to provide evidence to support the Sunland's statement.

25 IP said he had made arrangements to visit Coco Bodu Hithi through [Director A]. He said he understood [Director A] and [Director B] are related, but IP's arrangements were made through [Director A]. IP said it was possible that [Director A] and [Director B] might also be in dispute, but he did not know.

30 IP said he had paid for his own travel and met incidental bills as they arose during his stay at Coco Bodu Hithi. At the end of his visit, he had gone to reception to pay, and was told that the rooms had been "complimented".

KS asked IP if he could provide evidence of that. IP said he had already provided evidence of what he had paid for. He said he had never seen any invoice for the rooms; they had been complimented.

35 KS reminded IP that she had asked three times for [Director A's] contact details. IP said he'd provided that when first asked - contact should be through the company's COO. IP said "it's what I've been told to do. To say I am persona non grata now with [Director A] is an understatement." IP said that the COO had been told that he is in charge of communications about IP's stay to ensure that messages are consistent. IP

believed that [Director B] had gone “freelance” when authorising the statement on behalf of Sunland, leaving him (IP) caught in the cross-fire.

5 IP referred to a letter he said he’d sent to KS on 2 August 2019. He said that this matter had had a reputational impact on [Director A's] company and contact should be through the channels outlined in his letter of January 2019.

KS asked IP to explain why he believed his relationship with [Director A] is totally unconnected with his parliamentary/political life. IP said he had already done this. He’d explained when they had first met, i.e. years ago at an event at Methodist Central Hall.

10 IP said he didn’t meet [Director A] every week; they weren’t drinking buddies. Years earlier [Director A] had very graciously said that he co-owned the resort and made the offer. KS remarked that it was a very generous gift from a friend. IP said that the rooms had been complimented and had probably cost the resort nothing in real terms.

15 KS emphasised that she wanted to come to a balanced and fair decision. She has a statement apparently made on behalf of Sunland Hotels group that [a former Minister] paid, and a statement from IP that [Director A] paid. She asked what evidence IP could provide that a personal friendship had been formed between IP and [Director A]. How might he persuade a reasonable person on the balance of
20 probabilities that the gift of hospitality was unconnected with his political and parliamentary activities? IP had visited the Maldives with the APPG not long before; might they reasonably think the two visits were connected? What might persuade a reasonable bystander that the hospitality was simply a gift from a personal friend?

25 IP remarked that that was not the test. He said it was that one couldn’t engage in lobbying [on behalf of donors]. He said that he had been scrupulous about that.

CM said that the first order question was whether or not IP had had a registrable or declarable interest, and that was where the relevance test (what another person might reasonably think) came into play. Paid advocacy, or lobbying, was a secondary consideration at this stage.

30 KS asked again about the availability of evidence that [Director A] was a purely personal friend. IP said that the relationship had never been political. [Director A] was not a politician. They’d met, years ago in the cafeteria at Methodist Central Hall at an event held there. IP had never met [Director A's] children, but knew he has two. They hadn’t visited each other’s homes. They weren’t “boozing buddies”; they
35 didn’t see each other every week. IP said [Director A] made the offer years ago. When IP had been making arrangements to go to the Maldives, he’d contacted [Director A]. IP said it was only when he went to settle his bill, credit card in hand, that he was told that the rooms had been complimented and there was no balance to pay. (He had paid for incidentals as and when they’d arisen.)

KS asked IP to comment on the statement from Sunland that the rooms were paid for by [the former Minister] – in direct contrast to IP’s account. IP responded that KS was relying on a statement produced by Sunland for the BBC. The BBC were not impartial in this matter. He said the statement was totally unreliable and asked how
5 KS had tested the BBC’s evidence. KS said that, for now, she was testing it by giving IP the opportunity to provide evidence to the contrary.

IP’s colleague asked if the hotel had provided invoices (for charging [the former Minister]). KS said she was looking for IP to provide some evidence to support his own account.

10 CM suggested that perhaps IP could provide the name of Sunland’s legal counsel, who KS could then approach direct to give a statement. IP said KS could approach the COO; IP had not spoken to him since January 2019. CM said that it would be helpful to have direct contact with a disinterested party. CM pointed out that the
15 COO’s contact details had been provided as the route through which to contact [Director A].

IP said that he had provided those details so KS could contact [Director A]. He said that, from his perspective, KS appeared to be relying on the BBC’s account. KS said that was clearly not the case; if she were, she would have already concluded her inquiry. KS had not yet reached a decision and was giving IP another opportunity to
20 submit evidence to support his stated position.

IP’s colleague asked whether the BBC had provided supporting evidence for Sunland’s statement; did they have copies of invoices for [the former Minister] for example? Otherwise, this was just an internal statement, disputed by others at the resort. Had KS sought other evidence from the BBC? [IP’s colleague] stated that the
25 BBC should be expected to provide evidence of the same standard expected of IP.

KS said she was seeking evidence from both sides. She said that it was in everyone’s interests for all the relevant evidence to be considered, and to stand up to scrutiny.

KS asked IP about his visit to the Kandolhu resort. IP said that, given his past experience, he wanted specific questions sent to him in writing, and he would
30 endeavour to answer promptly.

[IP’s colleague] asked what IP would have to produce to satisfy KS. Would a statement from [Director A] about the nature of their friendship do?

CM asked again about [Director A’s] contact details. She asked what others might infer from IP’s failure to provide direct contact details for a personal friend? IP said
35 this was naïve. While Members might understand KS’s role, private individuals outside of Parliament might not welcome direct contact from the Commissioner, asking questions about their friendships. IP said he’d explained before about the strain on his friendship with [Director A] as a result of all the publicity. KS acknowledged that pressures on IP, especially in light of the earlier inquiry into

hospitality he'd received in Sri Lanka, and that this might make others wary of hearing from her. However, what evidence could IP give her to support his account?

5 IP said that he had, as one example, a business card, which [Director A] had annotated with his personal telephone number. IP took the business card from a folder he had with him and KS said it would be helpful to see it. IP declined to give it to the Commissioner.

10 IP said that KS could not be accused of "going easy" on him. KS said that she was determined to conduct a fair investigation, which meant testing the evidence. She said that if IP could demonstrate that the hospitality was purely private and personal, from a personal friend, that would be the end of the matter, but she had to weigh all the evidence and reach a decision on the balance of probabilities.

END

23. Email from the Commissioner's office to Mr Paisley MP, 5 February 2020

15 [The Commissioner] has asked me to send to you a scanned copy of her most recent letter dated 29 January. This is attached. I will text you the password on your mobile. Please confirm that I have the correct number for you [redacted].

5 February 2020

24. Email from Mr Ian Paisley MP to the Commissioner, 20 February 2020

20 I have a partially drafted reply to your last letter. I hope to have a review of the minute complete and back with your office next week and a more detailed reply with you after that. When I have gathered this material, I would like the opportunity to meet again to discuss. I trust this is in order as the matters you have asked require some more research on my part.

20 February 2020

25. Email from Mr Ian Paisley MP to the Commissioner, 28 February 2020

25 Thank you for the letter emailed to me. I am pleased to say the original eventually did arrive at my home address. I will endeavour to address the matters you have raised with me. Firstly, at the meeting on 16 January you quoted from a press statement. Can you please forward to me a copy of that press release so I can
30 respond to its claims as they relate to this inquiry.

Below, I have set out some additions and corrections to the report on our meeting that I hope are helpful.¹⁹ I have attached a copy of the letter you claim you did not receive from July 2019.

5 Finally, in order to answer the outstanding matters in terms of the nature of my friendship I have sought written evidence that I hope will be helpful and I can furnish you with this soon as I take receipt of it.

With regards to your additional questions I will check my diary and other records and come back to you with a complete answer separately from this communication.

26. Email from Mr Ian Paisley MP to the Commissioner, 9 March 2020

10 Further to my email of 28 February I asked for a copy of the press statement you quoted from in our meeting in January. I haven't received a copy of that statement. I believe I am at a disadvantage and unable to complete some answers to questions you have asked until I see the content of that press statement given your reliance on it. Can you please send me a copy of that so as I can reply fully to your letter of
15 29 January.

I will be in the USA from 10 March until 13 March and back in my office on 18 March when I will be able to consider the contents of that press statement along with the additional matters you have asked me about. I will endeavour to have a further reply to those questions with you thereafter.

20 As requested in my previous email it would in my view be helpful to meet again and go over that material. I look forward to hearing from your office about dates that would be suitable for us to meet. Thank you for your attention to these matters.

9 March 2020

27. Email from the Commissioner's Office to Mr Ian Paisley MP, 10 March 2020

25 When you met [the Commissioner] on 16 January, she referred to the "statement issued by Sunland Hotels". You questioned the provenance of the statement and later in the conversation [the Commissioner] referred to the same statement as "*a statement apparently made on behalf of Sunland Hotels group*". Kathryn had sent you a copy of the Sunland statement with her letter in September 2018, when she
30 enclosed evidence received from the BBC. Although her letter was undated, I think it was sent to you on 30 September. You acknowledged receipt of it and the enclosed bundle on 14 October. I enclose a further copy of [the Commissioner's] letter and another copy of the statement but not the other enclosures. I will text the password for the attachment to your mobile.

¹⁹ Proposed amendments not reproduced. See WE## below

I cannot see any other reference to a press statement but, if this is not what you are looking for, perhaps you would let me know by return. I think [the Commissioner] would find it helpful to have your written response and supporting evidence ahead of another meeting. If you would let me know when you expect to send your full reply to [the Commissioner's] letter, I will ask [her PA] to arrange a date now for you to meet [her] after that.

10 March 2020

28. Email from Mr Ian Paisley MP to the Commissioner, 16 March 202

Thank you for the email I am back in my office today after my USA visit last week and have downloaded this letter and press statement. I will endeavour to now complete my reply to the Commissioner as discussed in previous emails. Thanks for letting me have this information.

16 March 2020

29. Email from the Commissioner's Office to Mr Ian Paisley MP, 16 March 2020

As per my previous email, please would you let me know when you expect to have a full written response for [the Commissioner]. We can then look to set up a meeting (or a telephone call given current circumstances) soon after that.

16 March 2020

30. Email from Mr Ian Paisley to the Commissioner's Office 16 March 2020

Thanks, [name redacted]. I have only just received the press statement details that were being quoted today and will reply as quickly as possible.

16 March 2020

31. Email from the Commissioner to Mr Ian Paisley MP, 18 March 2020

[My colleague] has forwarded to me your email of 16 March 2020. I was surprised by your reply to her. You say that you have "*only just received the press statement details*". That is not accurate. As [my colleague] explained when she mailed you on 10 March, the press statement was sent to you over five months ago and we spoke about it in January. Nothing you said then suggested that you did not receive the copy of the statement with the rest of the bundle (receipt of which you acknowledged at the time).

In light of that, I think it is reasonable to ask you again to commit now to a firm date – in the very near future – by which you will send me a full response to all the questions I posed at, and after, our meeting on 16 January.

You have already expressed concern about how long the investigation is taking. I am keen to make as much progress as I can as soon as possible. I need further evidence from you before I am able to do anything more. Given the current circumstances, we may not be able to meet face-to-face in the short term, but I do not think that need necessarily delay my investigation.

I am able to meet with you and [your colleague] by Skype for Business or speak by phone.

18 March 2020

32. Email from Mr Ian Paisley MP to the Commissioner, 18 March 2020

Thank you for your email. At our meeting in January you quoted from a press release. I had asked what date that was, and you had told me it was undated. In my follow-up reply I asked for a copy of the press release you were quoting from. I think that is reasonable. Upon receiving the press statement this week, it is clear it is the same press release that was sent before, however, for accuracy it is important that we are looking at the same material. There is certainly no intention on my part to delay anything. A detailed reply as promised, will follow as well as details of some follow up actions I have taken since our meeting. In the interests of accuracy, I believe I was correct to seek a copy of the statement you had quoted from. On a separate point. I had forwarded corrections and additions to the minute of our last meeting. Can you let me know the outcome of that communication and if a complete minute is now available?

I look forward to arranging a follow up meeting/call as circumstances dictate and will be replying to your letter within days. Please once again be assured there is no intention on my part to delay your inquiry.

18 March 2020

33. Email from the Commissioner to Mr Ian Paisley MP, 19 March 2020

Thank you for your email and for your clarification. You will understand that it was important for me to be clear that I had sent the undated Sunland Hotels statement to you last September. Thank you also for your commitment to send me a full reply "within days". To avoid ambiguity, please let me have your full response and the associated evidence that you would like me to consider by 27 March 2020.

[My colleague] will now send you re the revised note of our meeting of 16 January. I have approved this. I am sorry not to have sent it sooner. My team and I are all working remotely due to the current health crisis and this is presenting us with some new opportunities for mastering technology. You will see that I have accepted some, but not all, of your proposed amendments. Both [of us] recall discussing with you the point about what another person might reasonably think influenced an MP's words or actions, and about the different rules on registration, declaration and lobbying. [My colleague] has also checked her contemporaneous manuscript notes,

which – although not verbatim – are in line with my recollection. You will see that I have amplified the second point in the note, which I hope will be helpful.

I am happy for you to add an addendum to clarify any points, but I believe the note of the meeting should stand as attached.²⁰

- 5 The password for the attachment is the same as the password [we] sent to you by text on 10 March.

19 March 2020

34. Letter from Mr Ian Paisley MP to the Commissioner, 26 March 2020

10 Thank you for your letter 29 January 2020. In it you ask for supporting evidence to counter the claim made by [Director B] in a press release. Thank you for sending me a copy and confirming it was the one used by the BBC and sent to me last year. That press statement completely contradicts an earlier statement the same gentleman made to the first BBC programme. In one statement, the BBC claims he was the person behind the organising and purchase of a hotel room for me. In fact, the claim
15 then was that he was my friend who had paid for my visit. As I told you at our meeting on 16 January, I believe I have been caught in the crossfire between two men who are at loggerheads with each other.

20 Since our meeting, I contacted [the former Minister]. I sent him a copy of the press statement and have asked him to respond to that allegation. I attach my email to him (1) and importantly, his reply (2). In his reply to me he categorically denies he played any part in arranging or paying for my visit. He has very helpfully sent a series of messages between himself and [Director B], from the time the BBC made their initial enquiries, and these confrontations between [the former Minister] and [Director B] show that when [the former Minister] challenged [Director B] about the
25 contents of what he had said, [Director B] claimed he had not said what the BBC claim he said.

30 I think it is very clear that [Director B's] words are totally unreliable. It is grossly unfair that his statement is being used as evidence that the government paid for my visit when he has been so twisted and unreliable and contradictory. He had told the BBC several versions of events; he has lied in a press statement; and when confronted he has denied what he has said.

35 [The former Minister], outlines to me a number of matters, including that [Director B] has subsequently fled the country, is facing fraud charges and was under duress from other individual that may explain his erratic comments and behaviour. I cannot comment on that as I simply do not know why he had done this but I believe the comments by [the former Minister] are credible and consistent and support what I have said all along. [The former Minister] makes the observation that if he, a

²⁰ WE22 (enclosure)

government minister at the time, had gone to a travel agent and booked a hotel for me there would evidence and witnesses. None of that exists because it is a figment of [Director B's] imagination. The BBC in producing this fabrication did not properly scrutinise the character of the person they had based their programmes on. It is
5 unfair and against any sense of justice that I should be held to account for the erratic claims of such an unreliable person.

I once again make clear that I have never met [Director B] or have spoken to him and only became aware of him when the BBC first contacted me in 2018 about a programme they were making. I note he has stated he has never met or
10 communicated with me. He played no part in the arrangements I made to privately travel to the Maldives. The second man, [the former Minister], I met when I was on an official visit with other APPG members. I note he has stated to the BBC publicly, that he played no part in my private visit. It is the case that I have subsequently met him (the former Minister) on subsequent visit he made to the UK. This was at
15 Parliament and he was on official business. Our acquaintance was professional and politician to politician. I have not met him since he ceased to be a politician.

In effect, you have two statements to consider. The one comes from [Director B] who has now made two claims - both of which I refute. The second from [the former Minister] who has denied he or the government he was part of played any part in
20 my private visit. Any reasonable person - which is the test you had applied to this - would see one person making up numerous accounts that are inconsistent with each other, and a second person making a consistent statement and asking, quite reasonably, where is the evidence for the claims made by [Director B]? Instead of producing press statements, [Director B] should be able to produce a receipt that
25 [the former Minister] paid and on what date he paid. I am sure the BBC asked for this and if they had it, they would have produced it. It is clear no such receipt exists because [the former Minister] did not play any part in this private matter. It appears that I am to be judged on gossip and hearsay not evidence. I have, by contrast produced the receipts that I paid for my visit.

30 On that important point, I once again refer you to my letter and evidence sent to you on 16 January 2019. I trust you have had an opportunity to review that as it contains evidence and statements from independent witnesses all supporting my statements and contradicting the statement you put to me on 16 January 2020 from [Director B].

35 I have included the material again for ease of reference.²¹ The first piece of material is from [name redacted], who at the time of the visit in question was the ambassador to the UK. On 4 December 2018, he states in relation to my private visit "*The Government of Maldives does not organise or pay for family holidays for overseas guests. Your referred visit to the Maldives in 2016 was not arranged by the Embassy or by the Government of the Maldives. It is not something we would do.*" This
40 gentleman remains a very senior diplomat with the Maldives foreign affairs department and can be contacted to stand over this statement. I believe he strongly

²¹ Duplicate material not reproduced again here

rebutts the false claims made against me and refutes the statements by [Director B]. He importantly supports what I have consistently told you that I visited the island privately.

5 I paid for a considerable portion of the holiday and was complimented the rooms by the owner of the venue at the conclusion of my stay. I was surprised and delighted to have been complimented the rooms at the time. I was anticipating perhaps at best a reduced rate at the conclusion of my stay but in fact the room rate was complimented. At the time, I passed on my thanks to the management and staff who were there and who had looked after us. I did not start sending thank you letters or
10 emails as the matter was done and I had personally said thank you to the staff. I do not believe I did anything wrong in accepting the surprise. I am appalled that this has been made a public matter as a result of gossip and claims and counter claims by individuals who have their own agenda.

15 Secondly, I attach another letter dated 4 December 2018 from the Chief Operations Officer, [name redacted], of the resort where I stayed in 2016. He too could not be any more clear. He confirms my visit was "*a private family holiday and all invoices were settled and paid privately.*" He too offered to assist further. I believe [he] could confirm no bills were ever issued to or paid by the Maldives government. That the room was complimented to me by the resort at the conclusion of the visit.

20 I had hoped that perhaps your office would have at the very least made contact with him or with the Ambassador to verify these statements. These men owe me nothing, are completely independent and once again their statements verify what I have told you. On the basis of these statements I believe I have acted appropriately and did not need to register this visit. Given my own outlay and the fact that the rooms were
25 complimented to me by the hotel and its owner at the end of my visit I feel I acted in accordance with the rules that apply.

I have, as a result of our last meeting, sought to meet with my friend and ask him if he can say or provide anything else that would be of help to you in coming to a conclusion. If and when that happens, I will update you. He is not currently in the
30 UK. You asked for an independent person who could verify our friendship. I would suggest that you talk directly to the Ambassador to the UK, [name redacted] as he would know both of us independently. For ease of reference I can supply you with his email or telephone number which is available in my original letter of January 2018.

35 You asked for a copy of the letter I sent on 2 August 2019 which appears to have been lost. This was not an electronic communication but a hard copy letter. I attach a photocopy.

I enclose a redacted copy of [Director A's] business card that [he] shared with me
40 (4). I believe this adds substance to your investigation confirming that he is the owner of the resort where I stayed and that is the basis upon which I got to know him.

In answer to your question regarding an entry in the London diplomatic list from seven years ago, I have contacted the foreign affairs division of the Maldives for any clarification they can offer. Once I have this, I will share it with you immediately. I agree the name is not uncommon and I have met another [man with this name] who

5 is the Maldives Ambassador to the USA. As you know in our country trade representatives are usually honorary posts not government jobs. I note that this is an entry date which does not coincide with my visit. However, I will await to hear back from the Government on the details of that matter. For my part, I am unaware of [Director A] holding any government role during my friendship with him.

10 You have asked me about other visits to the Maldives.

1. In 2016, I was in Paradise Island for two nights as the guest of friends, [names redacted] from [Northern Ireland], people who I have known for a very long period of time. I was their guest and travelled privately with them.

15 2. I was in Kandolhu in 2014. This was a private visit I and my wife took. However, it was cut short and I had to return early (i.e. I was there two nights of a planned week stay), to my home because my father took ill. I have no other details such as itineraries, tickets, receipts etc.

I apologise that it has taken me longer to respond to your inquiry that I had hoped however, the mixture of events that have impacted on us all and a number of

20 enquiries that I have made and detailed above will I hope demonstrate that I have been engaged in trying to resolve these matters.

26 March 2020

Enclosure 1: Email from Mr Paisley to [the former Minister], undated

I have forwarded to you a copy of a press statement made last year by [Director B].

25 In it he accuses you of booking and paying for and on behalf of the government a hotel stay that I and my family made to the Coco island resort in 2016.

It would be helpful if you could write to me with your observations about the press statement and anything else that you think would be helpful to explain it so that I can pass it onto the investigator.

30 ***Enclosure 2: Email from [the former Minister] to Mr Paisley, 25 March 2020***

I find it really disturbing that [Director B] has lied in spite of initially denying the allegation. But it is not difficult to understand why he is doing this. As you might know he has left the country for some time now as authorities are trying to get him for many fraud/financial cases. When initially the allegations were made, I called

35 him and said why is [the BBC] claiming that it was him [Director B] who had said it was the government through me that paid for your trip. [Director B] at the time told me that he didn't say that to [the BBC], but [they] claimed that [they had] many sources as witnesses to that and [they] just want a confirmation from [Director B].

[Director B] told me he was indirectly threatened to stir the reputation of the resort and also was forced by [redacted] (the previous Foreign Minister and a key political opponent) who is a close friend of [Director B's]. You might not know that the island that you went to is actually owned/rented by the current President's father-in-law.
 5 And the fact that they confronted me with these (and more allegations) during my 2019 parliamentary campaign, then later stopped bothering me after I lost the election, suggest political motivation.

[The BBC] initially contacted me via WhatsApp and appeared very friendly when [they] asked about my role in the government with regard to foreign relations. Later
 10 by WhatsApp [they] send me a letter with many allegations. The allegations were so ridiculous and unfounded that my lawyers suggested not even to answer. Here I attach a letter [the BBC] sent me and the response I prepared which I didn't send due to lawyers' advice.²²

I am also attaching some screenshots of communications with [Director B] on the
 15 matter for your referral. I also find that the initial allegation that the government paid for your trip has been altered to me as the one who paid which itself shows that the allegations are unfounded and they are just fishing hoping they will find something showing that I have paid for your trip. Or even any evidence of me going into the head office to make the payment. During the alleged period, I was a Minister,
 20 you think it is logical for me to walk into a private office to make a payment like that? In short I find the allegations baseless and pretty desperate.

Transcription of text messages, undated:

Hon [Director B's surname]

25 *"Hi [name redacted], BBC wrote to me claiming that you have told them that I requested to arrange a complimentary trip to Bodu Hithi for MP Ian Parsley. Is this true?"*

"No I didn't. They sent me the same saying that they will run it and asked me for comment.

They claim they have this info from a number of sources"

30 *"This is ridiculous and unnecessary isn't it.*

I will write a letter to you tomorrow asking the same please respond asap so that I can respond to the BBC.

Otherwise hope all are fine with you"

²² Unsent letter not reproduced here

"OK

Yes I am thanks"

Enclosure 3: Text of letter dated 2 August 2019²³

5 Thank you for your letter dated 23 July 2019. You have asked me for other contact details. I refer you to my previous correspondence as this is the best way to make contact directly with my friend. You appreciate given the quite damaging reputation issues that the BBC has attempted to pursue, this has had an impact on his Company and any contact therefore should be made through those official channels.

10 I will of course raise this with him directly and no doubt when you contact him you will receive a prompt response.

Enclosure 4: Text of the front face of a business card

COCO

[Director A]

Coco Collection Resorts Hotels Resorts

15 [address provided and redacted]

35. Letter from Mr Ian Paisley MP to the Commissioner, 3 April 2020

20 Further to my letter 26 March 2020 I have today received the attached letter dated 20 March 2020 from [name redacted], the Chief Commercial Officer of Coco Resorts. I had contacted him after our last meeting and asked him if there was anything else he could add to his previous email that I sent you that would be helpful. I asked him if he could set out how the payments were made and recorded by the hotel at the time and how the complimentary room system service operates.

25 His letter, attached, once again confirms that this was a "private" holiday and settled by me. In terms of the complimentary rooms, he says the costs for this were "absorbed by us, as per the owner's discretion. We have no record anywhere of any invoice or bill that was either issued or settled by the Maldives government. I had also told the BBC the same thing that if there was then there would have to be an official record of it somewhere."

30 With regards to the conduct of [Director B] and why he has said these things. He makes it clear the resort has no record of what [Director B] claimed.

²³ Mr Paisley provided a photograph of a copy of the signed and dated letter. There is no record of receipt of this letter in the Commissioner's office in August 2019

I hope you find this letter helpful. In our discussion in January you had asked if I could put forward anything that dismissed [Director B's] press statement. I believe I have already done so and that the attached letter confirms what I have said to you. That the hotel complimented me rooms and the costs were absorbed by the hotel at the discretion of the owner. Whilst this may not be a common practice, it was certainly not unusual and the hotel has practices and procedures in place for such occurrences of discretionary discount. The fact of the matter is that I did receive this discount of complimentary rooms and did so by the hotel at the discretion of its owner. There was nothing more to it than that. I did not believe this fell into a category that I should register. I would hope that a reasonable person would see it in that light. All of the noise around allegations of a government sponsored visit is completely untrue and without any substance and has simply succeeded in blackening what actually occurred.

If I am wrong in how I interpreted the rules in that matter I would be happy to have that pointed out to me and corrected accordingly. Any further material that I find I will send to you immediately.

As ever I look forward to hearing from you.

3 April 2020

Enclosure: Letter from Chief Commercial Officer to Mr Paisley, 20 March 2020

As I had stated back in 2018, your private family holiday and stay was settled privately and all the additional invoices and outstanding were settled as well by yourself.

Your rooms were made complimentary by the resort/hotel as it was settled privately, and as an internal practice we do not therefore charge visible revenues on this, as this common practice and costs absorbed by us, as per the owner's discretion.

We have no record anywhere of any invoice or bill that was either issued or settled by the Maldives government. I had also told the BBC the same thing that if there was then there would have to be an official record of it somewhere.

I also note [Director B's] comments to the BBC; these appear to be contradictory of each other as we have no record of this anywhere at the resort level.

36. Letter from the Commissioner to Mr Ian Paisley MP, 17 April 2020

Thank you for your letters of 26 March and 3 April. I understand that you may have further material to send to me when you hear from others, including [Director A]. As you will appreciate, I and my team are working remotely at present and hard copy correspondence is subject to delay. (I received your letter of 3 April yesterday.) I would, therefore, be grateful if, until I confirm otherwise, you would scan and send correspondence to [address redacted].

I am disappointed that you have not provided an address through which I might contact [Director A] direct. As you know, I did not consider it to be appropriate to contact him via [the senior employee] you had suggested. However, since you have repeatedly declined my request, I will now try to contact him via that route.

5 In the meantime, there are few points I would like you to clarify for me.

You have told me that you first approached [Director A] about your intention to travel to the Maldives shortly before your trip at the end of October 2016. You've also told me that, at best, you were expecting a discounted room rate, and were therefore surprised when you were not required to pay anything for your rooms.

10 Please tell me what exactly you had arranged with [Director A] before staying at Coco Bodu Hithi and how the holiday was booked.

When you made these arrangements did you expect to spend time with [Director A] and his family while in Coco Bodu Hithi?

15 On the basis of your recent letters, I understand that you did not make any enquiries after your stay to establish whether [Director A] had personally met the cost of your stay or whether the hotel/resort had absorbed the cost.

Is that correct?

If not, please explain what enquiries you made and the outcome.

20 In light of the contents of [the COO's] letter to you of 20 March, I do need to return to the question of your friendship with [Director A].

To date, you have told me that you

- are not drinking buddies with [him] and you don't meet him every week
- have not met his family and have not visited his home
- 25 • first met him about ten years ago, at an event at the Methodist Central Hall and that it was "non-political and social"
- "struck up a friendship with each other and dined together", your shared interests including beliefs, family and travel.

30 In order to arrive at a fully informed decision about whether the hospitality you received from the hotel was registrable, I need to understand whether it was offered because of your role as Member or was in any other way connected to your

parliamentary and political activities. It would help me to do this if you would answer the following questions:

How frequently have you met [Director A] since you first met him?

5 In what circumstances have you met him? For example, do you and he arrange to meet socially, or do you meet only when you both attend events organised by others?

If the latter, please give a brief description of the types of event and locations at which you met him before your holiday in October 2016.

10 You have mentioned providing hospitality to [Director A] in the UK; please would you give a brief description of that hospitality with an estimate of the number of occasions/frequency.

15 Have you received any other benefits from or through [Director A]? For example, did you receive a discount on the cost of your flights to the Maldives, or on your food costs? Have you received any other benefits from him at other times? If the answer to either question is yes, please provide details.

I would be grateful if you would let me have your answers to the questions above as soon as possible, and no later than 1 May 2020.

20 I hope it will be helpful to emphasise again that the key issue at this stage is not whether or not the Maldives Government partially funded your visit to the Maldives in October 2016. Rather, my inquiry is focused on whether the rules of the House required you to register the hospitality you received in the Register of Members' Financial Interests. I need to ask you these additional questions because you have provided me with so little information. You can find the rules on registering foreign visits in paragraphs 32 to 38 of chapter 1 of the Guide to the Rules.

25 *17 April 2020*

37. Email from the Commissioner's Office to Chief Commercial Officer, 17 April 2020

Dear [CCO name redacted]

30 Ian Paisley has given us this email address through which to contact [Director A]. I would be grateful if you would forward this email direct to [him] as soon as possible.

17 April 2020

38. Letter from the Commissioner to [Director A], 17 April 2020

I am writing to ask for your assistance with an inquiry I am undertaking into whether the MP, Mr Ian Paisley, should have registered in the Register of Members' Financial Interests hospitality that he received when he visited the Maldives, staying at the Coco Bodu Hithi resort, at the end of October/beginning of November 2016.

I should first explain that I have been appointed by the House of Commons to investigate allegations that MPs have acted in breach of the House of Commons' Code of Conduct for Members (hyperlink in covering email). This inquiry is focused solely on whether Mr Paisley has fulfilled his obligation to the House to be transparent about his financial interests. There is no implied criticism of either the offer, or the acceptance, of hospitality, nor is there any implied criticism of the resort and its staff and owners.

Before explaining the detail, I hope it will be helpful to provide a little background information. Among other things, the Code requires MPs to register their financial interests in accordance with the chapter 1 of the Guide to the Rules relating to the conduct of Members (which is appended to the Code). Members must register their financial interests including any visits to destinations outside the UK where the cost is over £300 if that cost is not wholly borne by the MP or by UK public funds, or otherwise exempt from registration. (You can see the Guide to the rules by following the hyperlink provided.) Where an MP has acted in breach of the rules, they must generally take steps to rectify the breach.

In order to conclude my inquiry, I need to establish whether or not this hospitality was exempt, and it would be most helpful to have some information direct from you to inform my decision. Mr Paisley gave me your name and advised me to contact you via [one of your employee's] email address. [Mr Paisley] is aware that I am contacting you. I would, however, ask that you do not discuss the contents of this letter with him.

I would be grateful if you would assist me by answering the following questions.

(1) When did Mr Paisley first contact you about his intention to visit the Maldives in October/November 2016?

(2) What arrangements did you make with him at that time?

(3) Did you personally meet the cost of his stay, i.e. did you pay the balance of his bill, or were the costs absorbed by the hotel (group)/the resort/another corporate entity? If you did not personally bear the cost, please say who/which organisation did.

(4) Did you arrange or provide any other benefits for Mr Paisley and his family either in 2016 or at any other time? For example, did he in

October/November 2016 receive discounts or special rates for flights or food? If so please provide details.

(5) Was Mr Paisley's status as an MP a factor in the decision to arrange the rooms on this basis?

5 (6) Please describe, as far as you can recall, when and where you first met Mr Paisley, and the circumstances of that meeting.

(7) How frequently have you met since then?

10 (8) Do you meet socially at each other's invitation or do you generally meet in other circumstances (for example, meeting only when you attend the same events)?

(9) How would you describe your relationship with Mr Paisley, for example, would you consider him to be an acquaintance, a personal friend or a close friend?

15 If you have any documentation relating to Mr Paisley's visit in October/November 2016, it would be very helpful if you would scan and forward it to me.

20 Your response will be shared with Mr Paisley and it is likely to be published as part of any report of my inquiry. I do not routinely publish the names of third parties to an inquiry and I would not expect to publish your name unless I conclude that the rules of the House required Mr Paisley to register the hospitality he received in the Register of Members' Financial Interests. In that case, I would publish the information that he would have been required to disclose in the Register.

I should emphasise that, should I decide that Mr Paisley should have registered the hospitality, it would have been his responsibility to do that, not yours.

25 I would be happy to consider redacting any other personal details in your response which may be of sensitive nature, so please advise me about this when you reply to this letter.

You can see more information about my role and how I do my work in the Commissioner's Information Note to which a hyperlink is provided in the covering email.

30 Confidentiality

My inquiries are carried out in private and they are protected by parliamentary privilege. The fact of this correspondence, and the content of it, should not be disclosed or discussed with any third party, except insofar as it is necessary to consult others to answer my questions. If you should need to disclose for this

purpose, you should ensure that the individual(s) understand and agree to adhere to these confidentiality requirements.

Your response

5 I would be grateful to receive a reply to this letter as soon as possible. If you are not able to reply in full by 1 May 2020, I would be grateful if you would contact my office to let me know when you expect to be able to provide a full response.

Please send you reply to standardscommissioner@parliament.uk.

17 April 2020

39. Email from Coco Collection 17 April 2020

10 Thank you for your email.

Your email has been forwarded to one of Coco Collection Team members, as [the CCO] is no longer with Coco Collection.

Please note that, for that time being your future correspondences may be directed as per below:

15 Director of Sales [email address redacted]²⁴

Director of Marketing : [email address redacted]

17 April 2020

40. Letter from Mr Ian Paisley MP to the Commissioner, 24 April 2020

20 Thank you for your letter 17 April 2020. I can only confirm that all correspondence is sent direct to you by email as requested. I post a hard copy for your convenience. I understand that hard copies may be delayed because you are working remotely but as I send a scanned copy that should not cause any delay. I sent a copy of my last two letters on the date they were posted. For reference my letter of 3 April, that you referred to was sent the same day by email and I have your acknowledgement of this
25 dated 5 April. I trust there was no delay in that matter.

30 Turning to your letter I will address each point as it arises. In January 2019 I sent you official contact details for [Director A] as my contact detail for him was a private mobile number. [Name redacted], his company CCO, had already made public comment on the case and was in my view the obvious person to contact. I have not had any direct contact with [Director A] since the allegations were made. I did try

²⁴ Email sent to one of the Directors on 17 April 2020 No reply received.

but without success. Anyway, I did not think it appropriate to do so. [The CCO's] number is [UK mobile no]. I hope this is helpful.

5 I made no specific arrangements with [Director A] in 2016. I had his verbal invitation to visit the resort at some time and, after I had made arrangements, I called him to let him know when I would be there as a courtesy call. I did not get to speak to him directly but left a message. I did not receive a call back. I had made my own bookings direct with the resort and airlines as is normal.

No, I did not expect to spend time while at Coco with [Director A]. I had no idea where he would be. My plan was to spend a private time with my family which I did.

10 On the day of my departure and when checking out of Coco. I [was] complimented the room charge. I believe this was at the discretion of the resort and most probably because I am known to the owner, [Director A]. I thanked the management and the staff for such kindness and did so in person. I made no contact with anyone else, including [Director A] after my stay, as the matter was closed.

15 Yes, I agree with your summary of what I have told you about my friendship with [Director A].

20 I have met him a couple of times since we first met. I haven't seen him since my visit to Coco in 2016. I met him for lunch in Methodist Central Hall. I believe he was attending a tourism Expo. I was at an event at the hall. We had lunch and got to know each other. Subsequently I met him for coffee. I have never met him with other people or at his workplace or at my place of work. I have never attended functions that he has been present at or met him at such functions. The hospitality that I provided was that I bought our lunch when we first met and got to know each other and I believe I purchased coffee and cakes on another occasion.

25 I have received no other benefits or benefits in kind from [Director A] since we met and since I was in Coco. In fact, I haven't seen him since then, but that was not deliberate just as extremely busy people and I believe our paths would naturally cross again at some point. Given that I only heard about the resort through him and that he had asked me to visit at some point, I made a fair and reasonable view that
30 the kindness of the resort to me at the end of my visit was because I was known by the owner.

35 You referred to the rules on registration. I have read the section you referred me to before answering your letter. It states in paragraph 33 "*Under this category Members must register: Any travel or hospitality they receive in the course of a visit outside the UK, if it relates in any way to their membership of the House or to their parliamentary activities or political actions or activities.*" This visit had no relationship whatsoever with my parliamentary activities or political actions or activities.

In paragraph 35(c) the rule continues that Members do not need to register "*visits wholly unconnected with membership of the House or with a Member's parliamentary*

or political holidays (e.g. family holidays)." This visit falls, I believe, into that category of the rules.

My visit to Coco was nothing to do with my political activity or my membership. I made my own arrangements and was complimented the room at the end of my stay.
5 I hope I have applied the rule correctly. I do not know if this is the rule that was in place in 2016 as they do get reviewed regularly but reading the rules that you have put to me and under the circumstances of the visit I hope that I have interpreted the rules correctly.

As I said at our meeting in December 2018, I am happy to be guided by you and the
10 Registrar about this matter. I would be happy for you and the Registrar to take me through the rules and to understand them more fully in light of all that I have told you. I am frustrated that this has taken so long to resolve. I understand that the long delay at the beginning was because you were awaiting new material from the BBC. I have answered all of your questions precisely and expeditiously and look forward
15 to meeting as we discussed in January to hopefully conclude this matter.

24 April 2020

41. Email from the Commissioner's Office to the former CCO, 28 April 2020

[1] Thank you for returning my call so quickly.²⁵ I said I would send a quick email to confirm my understanding of our conversation.

20 [2] You explained that you came to the end of your contract with Coco Collection at the end of March, returning to the UK just before the resort closed because of the Covid-19 pandemic.

[3] You said that while you were at the resort, you did not have a lot of contact with
25 [Director A] and, although you understand he has a UK base, you do not have any contact details for him.

[4] You told me that it was not at all unusual for the owners of the hotel to authorise rooms to be complimented and for the business to absorb the cost (with a zero income set against the complimented room).

[5] If I have misunderstood in any way, please do correct me by return.

30 As you know, this correspondence should be kept strictly confidential, and I will pass on the above information to the Commissioner, Kathryn Stone. Should she wish to ask any follow-up questions, you agreed that we might contact you through this email address.

²⁵ The CCO had replied to a voicemail message left on his mobile number a little earlier in the day

Thank you for your assistance.

28 April 2020

42. Email from the former CCO to the Commissioner's office, 28 April 2020

Many thanks for the call and the subsequent email.²⁶

- 5 I can confirm receipt of the said email and have responded below next to your questions.

Many thanks and kind regards,

[The CCO had inserted his answers next to each of the paragraphs numbered 2 to 5 of the original email.]

- 10 [2] Yes, that is correct after almost 4 years with the group.

[3] Yes that is correct. As Chief Commercial Officer (CCO) ultimately [Director A] was my employer but I just got on with running the business. I do not have his personal contact details but would if I had to contact him I would be able to via his office and his PA. My direct report was to one of his brothers.²⁷

- 15 [4] That is correct, exactly so.

[5] No issue at all, and I am more than happy to help.

28 April 2020

43. Email from the Commissioner's Office to the former CCO, 28 April 2020

- 20 Thank you so much for your prompt reply. The Commissioner has asked me to say that she would be grateful if you would provide any contact details you have for [Director A] - both his direct company email and that of his PA.²⁸

28 April 2020

²⁶ WE 41

²⁷ The CCO had said in conversation that the four owners of the resort are brothers

²⁸ The CCO later said that, having returned his IT kit to his former employer, he no longer had access to the company email address book

**44. Letter from the Commissioner to the Registrar of Members' Interests,
30 April 2020**

I would like to ask your advice on a complaint I have recently received about Mr Ian Paisley MP. In essence, the complaint is that he acted in breach of paragraph 13 of the 2015 Code of Conduct for Members, because he did not register as an overseas visit, a trip to the Maldives that he and his family made in October 2016 which was partially funded by a third party.

I attach a copy of my letter to the Member, initiating the inquiry and of the subsequent correspondence I have exchanged with him and the various witnesses.

I would be helpful to know how you would have advised Mr Paisley if he had sought advice from you/your team about the House's registration requirements and how they applied to the circumstances of his visit.

It would be very helpful to have your reply by 15 May 2020.

Thank you for your assistance.

30 April 2020

45. Letter from the Commissioner to Mr Ian Paisley MP, 30 April 2020

Thank you for your letter of 24 April 2020. I am sorry that there was some confusion over the date of receipt of your last letter. I do not know what happened to your email and how it came to be overlooked but please accept my apologies for that.

From the beginning of my inquiry you have told me that you did not think that you needed to register the hospitality you received at the Coco Bodu Hithi resort in October 2016 because your stay was a purely private family occasion. You told me that you had had no long-term plan to travel to go to the Maldives at that time but had decided it would *"coincide with my milestone birthday and it would be a welcome surprise during my children's school break. As a result of the generosity of my friend I was able to do this."*

I appreciate that you felt that the Chief Commercial Officer was *"the obvious person to contact"* when I first asked you for [Director A's] contact details. However, in my view, it was more appropriate to contact direct the *"personal friend"* whom you had told me, in your letter of 16 January 2019, had partially funded your stay. You told me then that you had *"first met in London at the Central Methodist Hall more than 10 years ago. [You] had "struck up a friendship with each other and dined together. [Y]our interests were not in politics but in other matters, including beliefs, family and travel."*

In my letter of 12 June 2019, I asked you to *"describe more fully the circumstances of your first meeting with [Director A] and your subsequent friendship with him."* In

response you repeated that the circumstances of your meeting were non-political and social. You referred back to your letter of 16 January 2019.

5 When we met on 16 January 2020 you told me that your friendship had been strained by the publicity following the BBC Spotlight programmes and he wanted any communication to be channelled through the CCO. You gave me some fresh information about your contact with [Director A] and I asked you to provide any more information which would “*help me to understand why you described [Director A] as a personal friend rather than an acquaintance*”. Your reply did not throw any more light on that matter but you did provide a copy of a letter from the CCO who
10 said that “*Your rooms were complimentary by the resort/hotel [...] and costs absorbed by us, as per the owner’s discretion*”.

In my letter to you of 17 April I summarised the extent of the information you had provided about [Director A] and asked you some explicit questions. I now understand that:

- 15 • You did not speak to [Director A] before your trip to the Maldives in October 2016; you called him and left a message to let him know you would be staying at the hotel and he did not return your call. (You had previously told me that you had, at best, expected a discount and had been surprised when the rooms were entirely complimentary.)
- 20 • You have met [Director A] only a couple of times since your first meeting ten years ago, when he invited you to stay at the hotel.
- You were “complimented” the room charge and understood that the hotel had absorbed the cost of your room “I believe this was at the discretion of the resort and most probably because I am known to the owner.”
- 25 • You have not seen [Director A] since your stay at Coco Bodu Hithi and you did not contact him to thank him personally afterwards.
- You have tried to contact [Director A] recently and he has not replied to your approaches.

30 I wrote to [Director A], via the CCO, on 17 April 2020. An automated email response stated that the CCO was no longer with the company. Using the mobile number you provided in your letter dated 24 April 2020, one of my team called the CCO. He said he did not have [Director A's] personal contact details. The CCO confirmed that the cost of the complimentary hospitality had been absorbed by the hotel.

35 In light of your most recent letter, I have today written to the Registrar of Members’ Financial Interests to ask how she would have advised you had you disclosed the information contained in our correspondence over the last sixteen months. I attach a copy of my letter to her and will share her advice with you in due course.

In the meantime, for the sake of completeness, I would be grateful for the answers to the following questions.

- When did you last see [Director A]?
- 5 • What efforts have you made to contact him since I began my enquiry (with dates)?
- Did you, at any stage in your friendship, mention the fact that you are a Member of Parliament or otherwise make him aware of that fact?

I would be grateful to have a reply to the questions above as soon as possible and no later than 15 May 2020. To minimise the risk of any further confusion, please email
10 your reply to [address redacted] and to me at [redacted]. Please do not send any hard copy for the time being as it may not be possible for us to continue our periodic collection of mail from [redacted].

30 April 2020

46. Letter from Mr Ian Paisley MP to the Commissioner, 6 May 2020

15 Thank you for your letter 30 April. I appreciate your acknowledgement that you received my letter of the 3rd April on the 5 April and not on the 17 April and trust you had time to consider its contents.

I made a decision to travel to Maldives Coco resort to mark a milestone birthday. It was not a long-term plan. I knew the owner and had an open invitation, from some
20 time previous, to "come visit" and I decided to do so. I did not get to speak to the owner immediately before I travelled but left a message. I had met the owner years before and had a good rapport with him. Our friendship was entirely social. The discount given to me at the conclusion of the vacation was absorbed by the hotel resort and I believe at the discretion of the owner. There was never any sense that I
25 am only going if it is "free". I made plans to travel and did so without any specific or exact offers of support.

Thank you for sharing the letter you have sent to the registrar. I look forward to seeing the reply.

I hope the following answers to your additional questions is helpful.

30 I can't be absolutely precise about a date when I last saw him in person but from memory it was in 2012 or 2013 most likely 2013.

In terms of efforts to contact him; I did try just before the BBC broadcast their programme in late 2018. But I received no reply. I made one other attempt to call him in January [2019] before I replied to your first letter but without any success.

Given, by that time, the resort was already making public comments via its COO, as well as the High commission via its representative, that both confirmed what I was saying, I left it to those organisations to confirm the government had nothing to do with this visit, and did not know about it; and that the resort had effectively picked up the bill for my room. In my own efforts trying to reach out to him it was made very clear that this private matter had become very embarrassing for the resort.

In any of my meetings with him for lunch or coffee they were purely social encounters. I would be surprised if he didn't know I was a public figure as he certainly knew of my famous father. But it certainly was NOT of any relevance to any of our social encounters or conversations. As I have said before I did not engage in any business or politics with him.

I hope this information is helpful. Once again, I reiterate to you my sincere belief that this was a purely private matter. That it had zero association with my role as a politician. I am more than willing to receive yours and the registrar's guidance and advice and instruction about this and any matter as I do not wish to be on the wrong side of these rules and obligations.

As instructed, I have emailed this only and will retain a hard copy to give to you later. For convenience I have [copied] this to the registrar.

6 May 2020

20 **47. Letter from the Registrar to the Commissioner, 7 May 2020**

Thank you for your letter of 30 April. You asked me what advice I would have given to Mr Paisley, in view of the information now available to you, if he had asked whether to register the visit he made to the Coco Bodu Hithi resort in the Maldives with his family in the autumn of 2016.

25 Guide to the Rules

When an MP asks if they should register a foreign visit, I normally refer them to the Guide to the Rules. The overall purpose of the Register of Members' Financial Interests is described as follows in paragraph 5 of the Introduction to the Guide to the Rules:

30 *"...to provide information about any financial interest which might reasonably be thought by others to influence a Member's actions, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament."*

35 The Guide sets out nine specific categories of interest which have to be registered, subject to financial thresholds and detailed rules. Paragraph 8 of the Introduction makes plain that if an MP has an interest which meets the purpose of the Register as

set out above, but does not fall into one of the nine categories, it should nevertheless be registered, usually in the Miscellaneous section.

Visits outside the UK are a type of benefit which has to be registered. Detailed guidance is set out at paragraphs 31 to 38 of Chapter 1 of the Guide to the Rules.

5 Paragraph 33 requires MPs to register *“Any travel or hospitality received in the course of a visit outside the UK, if it relates in any way to their membership of the House or to their parliamentary or political activities.”* Paragraph 35 may also be relevant. This explains that the following do not require registration: *“Visits wholly unconnected with their membership of the House or with the Member’s parliamentary*
10 *or political activities (eg family holidays).”*

Purpose of the visit

Before advising an MP in these circumstances, I would normally ask him or her to tell me about the purpose of the visit and about their relationship with the donor. On this occasion, Mr Paisley tells you that the benefit received was a family holiday.

15 Paragraph 35, quoted above, lists family holidays as examples of benefits which do not need to be registered. I do not think this means that family holidays should never be registered. I understand this to mean, to give an example, that an MP should not expect to register a family holiday, free of charge, in a sibling’s Mediterranean holiday villa. In such a situation the hospitality provided arises from the familial
20 relationship, and not from the MP’s parliamentary or political role; and the stay itself is unrelated to that role. If on the other hand an MP received hospitality for himself and his family from a political contact who was not a personal friend, then - depending on the circumstances - I (like my predecessors) would advise registering it.

25 Relationship with the donor

If advising Mr Paisley, I would have asked him about his relationship with the funder of his holiday. From his letter of 6 May it seems clear that - contrary to the impression given by his early correspondence - the funder was not Mr Paisley’s friend, but the company which his friend co-owned.

30 Advice

The benefit Mr Paisley received was substantial (at a value of just over £4,000) and the circumstances were unusual. I have therefore thought carefully about the advice I would have given. I believe that I would have advised Mr Paisley to register the holiday, for the following reasons:

35 1. It seems that Mr Paisley’s connection with the resort company was through a not particularly close friendship with its part owner, whom he says he has not met since 2012 or 2013. The circumstances are therefore not analogous to a family holiday which was given because of the familial bond, and which does not need to

be registered. On the other hand, the fact that Mr Paisley had no direct relationship with the giver would have created a presumption in favour of registration.

2. Mr Paisley says in his letter of 6 May "I would be surprised if [my friend] didn't know I was a public figure as he certainly knew of my famous father." This leads me to believe that Mr Paisley's membership of the House or his parliamentary or political activities might have been an element in the friendship which formed part of the link to the company which funded his holiday. If this was in fact true, the holiday should have been registered.

3. In case you disagree with me, I add that I believe the visit was something which someone else might reasonably consider to influence Mr Paisley, and for that reason ought to have been registered because it met the overarching purpose of the Register.

Earlier decisions of the Committee

Given the unusual circumstances, I have also referred to the reports of past cases involving the registration of hospitality which have come before the Standards Committee and its predecessors. Only a very few have come to the Committee in recent years. However, the approach set out in the Committee on Standards and Privileges' Ninth Report of 1998-9, HC 611, is helpful. Although it refers to lenders rather than donors, it sets down some principles. Here is the relevant paragraph:

"In our view the questions which need to be answered in deciding whether a benefit is registrable are the same whether the benefit is received from another Member or from someone outside the House:

- Might the benefit reasonably be thought by others to relate to membership of the House?
- Might it reasonably be thought by others to influence the Member who receives it?
- Might it reasonably be thought by others to be intended by the lender to influence the Member who receives it?"

The Committee recommended that if the answer to any of these questions was yes, the benefit should be registered.

Conclusions

In view of the substantial benefit Mr Paisley received, I believe that the answer to at least the second of the above questions was yes. I have already addressed the first point at no 3 above. In light of this, and of my reasoning above, I conclude that I would have advised Mr Paisley to register this hospitality.

Please let me know if you need anything else.

7 May 2020

48. Letter from the Commissioner to Mr Ian Paisley MP, 11 May 2020

5 Thank you for your letter of 6 May 2020. When I wrote to you on 30 April, I said that I had shared our correspondence with the Registrar and asked her to tell me how she would have advised you had you sought her advice in November 2016.

10 I attach as an appendix to this letter a copy of her advice.²⁹ As you can see, the Registrar has told me that she would have advised you to register the hospitality you received at the Coco Bodu Hithi resort in October/November 2016. She explains how she reached that conclusion.

15 Before I reach a decision, I would like to invite your comments on the Registrar's advice. If you disagree with it, please explain your reasons. Once I have your comments, I will review all the evidence taking into account the Registrar's advice and any comments you make. I hope that, at stage, I will then be able to make a decision on how to bring this matter to a close. If, in the meantime, you should hear from [Director A], I would be grateful if you would ask him to contact me. He can do so via my parliamentary email address, which you have, or by telephoning [details redacted] to arrange a time to speak.

Please respond to this letter by 25 May 2020.

20 *11 May 2020*

49. Letter from Mr Ian Paisley MP to the Commissioner, 19 May 2020

Thank you for your letter and the report from the Registrar. I appreciate the Registrar providing me with this report and its contents that I have studied.

25 As you will recall in 2018, we met in your office along with the Registrar and discussed these issues. Certainly, if I had been aware then of this detailed advice, I would have had the opportunity to detail all of this and hopefully have dealt with this matter then. However, the ongoing media interest and resulting inquiry has elongated this matter. I have made it clear from the outset, and throughout this inquiry that I wish to comply with the rules, as we are obliged to do, and am happy
30 to receive both your advice and that of the Registrar, to help me. Should your instruction be that I should belatedly register my family holiday, I will of course do so. I accept that your advice and guidance is crucial to help Members and to protect the reputation of the House.

²⁹ WE 47

From the Registrar's report, it is clear, I should not have interpreted the rule the way I did, and I accept that without qualification.

Thank you for your consideration of the above.

19 May 2020

5 **50. Letter from the Commissioner to Mr Ian Paisley MP, 18 June 2020**

Thank you for your letter of 19 May 2020, accepting the Registrar's advice that you should have registered in the Register of Members' Financial Interests the hospitality you received at the Coco Bodu Hithi Resort in the autumn of 2016.

10 I have reviewed all the evidence very carefully and I am now able to make a decision on the three issues identified in my letter to you of 13 December 2018. Those were whether:

- you should have registered the visit as a financial interest in the Register of Members' Financial Interests
- 15 • there were occasions when the rules would have required you to declare that interest
- you had acted in breach of the rules on paid advocacy.

My decisions

I have decided that:

- 20 • you acted in breach of paragraph 13 of the 2015 edition of the Code of Conduct for Members by omitting to register the hospitality you received at Coco Bodu Hithi;
- I have seen no evidence that there were occasions when the rules would have required you to declare that interest; and
- I have seen no evidence of a breach of the rules on paid advocacy.

25 On the basis of the information I have seen, I do not propose to inquire further into the second and third matters.

Rationale

I began my inquiry, in the context of allegations made by BBC NI's Spotlight programme that you had failed to register hospitality provided by, or at the behest

of, the Maldivian Government. During the course of my investigation, BBC NI broadcast a second programme, making fresh allegations, as well as identifying a different individual as the Maldivian Government representative involved in your visit to Coco Bodu Hithi. Your responses to my enquiries of you have largely focused
5 on discrediting the BBC's allegations.

As you are aware, the BBC gave me copies of some of the evidence on which they relied when making the Spotlight programmes. The accounts given by some of the witnesses have varied over time and have not been corroborated. Your own account has been consistent, insofar as you have always maintained that your friend,
10 [Director A], had facilitated the hospitality.

I have reached the conclusion that this is the most likely explanation of events based on the evidence available to me. I do not consider the evidence justifies further investigation into the alleged connection with the Maldivian government.

I have not seen any evidence that you gave any thought then to the possibility that
15 the hotel had absorbed the cost of the hospitality and that it, rather than [Director A], was the true donor. Please can you explain why you did not ask about that at the time?

Other matters

This inquiry has taken far longer than it ought to have done for a number of reasons. I hope to be able to conclude it very soon but, having reached a decision on the
20 allegations under investigation, I need now to decide what, if any, further action is necessary.

As you will know, I may close an inquiry without reference to the Committee on Standards in certain circumstances, as prescribed in Standing Order No 150. This is
25 known as "rectification." Inquiries into non-registration may be concluded in that way, provided the Member acknowledges their breach of the rules, apologises for it and agrees to make a belated entry in the Register, which will be entered in bold italic with an appropriate explanatory note.

Given the lack of evidence linking the hospitality to a foreign government and all the
30 available evidence supports your account that your activities while staying at Coco Bodu Hithi were those of a family holiday, I think your breach of paragraph 13 is at the less serious end of the spectrum and it might, therefore, be possible to conclude the inquiry by way of a rectification. However, before I reach a decision, I do need to ask you to reflect on the length of time this inquiry has taken.

I accept that some of the delay in concluding this inquiry has been attributable to
35 delays here. Some of the delay is attributable to waiting for evidence from the BBC.

Nonetheless, your responses have not always been helpful and before I can decide whether this matter is suitable for rectification, I feel I must ask you to reflect on the chronology below, and then to meet with me to give me your comments.

Chronology

5 I began my inquiry on 13 December 2018, drawing to your attention the BBC NI
Spotlight programme broadcast earlier that week, in which it was alleged that your
family's visit to the Maldives in late October/early November 2016 was arranged at
the request of the Maldives government and that this was the true source of the
10 funding for most of that holiday. In that context, I asked you a series of questions,
including the name of the personal friend whom you had previously told me had
funded part of your holiday as a birthday present. I asked you for his name and
contact details, how he first became known to you and to describe briefly the nature
of the friendship.

15 We met on 18 December 2018 and, when you asked me about protecting your
friend's identity, I explained that if I concluded he was a purely personal friend I
would not expect to disclose his identity.

20 When you replied to my letter on the 16 January 2019, you gave me your friend's
name [Director A] but not his direct contact details. You told me how you had met,
more than 10 years earlier and said that you had "struck up a friendship". You
suggested that I contact your friend through the Chief Operating Officer (the COO)
of the holiday resort, via his company email address.

25 On 12 June 2019 I asked you to "describe more fully the circumstances of your first
meeting with [Director A] and your subsequent friendship with him". I also asked
you to provide "contact details through which I may contact [Director A] direct." I
said I did not think it was appropriate for me to contact him through the COO.

30 On 18 July 2019 you replied and said "I refer you to my letter of 16 January. This sets
out where we met, I cannot place the time or date exactly, and set out our general
areas of discussion. There was nothing more to it. I meet so many people privately
and publicly from all over the world and I do not recall how we were introduced. We
were not with other people. He invited me to be a guest at his hotel. I took up that
offer." Again, you did not provide me with any contact details for [Director A].

I asked again for [Director A's] contact details in my letters of 23 July and
30 September 2019, and you did not provide them.

35 During our interview on 16 January 2020, you told me that you had "made
arrangements to visit Coco Bodu Hithi through [Director A]". You also said that you
had been 'told' contact should be through the Company COO. You said, "to say I'm
persona non-grata now with [Director A] is an understatement." When I asked you
about your relationship with [Director A], you defined it in terms of what it was not;

that is: you did not see each other every week, you were not “boozing buddies” , you had not met each other’s family and you had not visited each other’s home.

5 During this same interview you showed me a business card for [Director A], which he had annotated with his personal telephone number. You took the business card from a folder and I said it would be helpful to see it. However, you declined to give the business card to me.

10 When I wrote to you on 29 January 2020, I asked you to help me to understand why you describe [Director A] as a personal friend, rather than an acquaintance. I also asked you to provide any evidence you had to support your account that you had not known that the hotel rooms were to be complimented until checking out, and gave you some examples of the sort of evidence you might usefully provide.

15 When you replied to this letter on 26 March 2020, you told me that you had been expecting “perhaps at best a reduced rate at the conclusion of [your] stay”. You also told me that you “did not start sending thank you letters or emails as the matter was done”. You told me that “as a result of our last meeting [you had] sought to meet with [your] friend and ask him if he can say or provide anything that would be of help to [me].

I asked you again about your relationship with [Director A] on 17 April 2020 and it was only after that that you told me that you had:

- 20
- not spoken to him before leaving for Coco Bodu Hithi but had left him a message,
 - met him “a couple of times since [you] first met” more than ten years ago
 - last met him seven or eight years ago
 - tried to contact him in late 2018 and early 2019, without success.

25 As I think you now appreciate, this is rather different from the information you provided when you first spoke to the Registrar and me about whether you should register the holiday. It would be helpful to understand why you did not provide such a clear statement of your relationship with [Director A] earlier in the investigative process.

30 For completeness, I would be grateful if you would let me know what, if any, information you have received in response to the enquiries you have made about the inclusion of [the name of Director A] as a representative of Maldives Government in the 2013 London Diplomatic list (your letter of 26 March refers).

I hope that after a short video-call with you, I will be able to decide how to bring this inquiry to a final conclusion. Please contact [details redacted] to arrange a meeting call.

18 June 2020

5 **51. Letter from the Commissioner to Mr Ian Paisley MP, 13 July 2020**

I am writing to summarise our video-conference call of 1 July 2020. Your colleague, [name redacted], and mine, [name redacted], also attended.

10 I began by reminding you of the key points in my letter of 18 June and asked for your reflections. You said that the comment in my letter about you having focused on discrediting the BBC's allegations rather than answering my questions had resonated with you. On reflection you recognised that you had been "completely absorbed" in answering the BBC's allegations rather than focused on my questions about a possible breach of the House's rules on registration, declaration and paid advocacy. You told me that you recognise now that you should have been more
15 mindful of the responsibilities of public office. Looking back, you said that you could see that you had not been as transparent as you ought to have been, that you blame yourself for that and wanted to apologise.

20 I asked if you were able now to give me a categorical assurance that your Register entry is accurate and complete. You told me that you had gone through your diaries and you believe that you have made a full and frank disclosure of everything requiring registration. You said that you would seek advice should you have any doubts about these requirements in future.

25 I asked if, in 2016, you had thought about asking whether it was the hotel rather than [Director A] meeting the cost of your complimented hotel rooms. You told me that you had started thinking about this only after I had asked you about it specifically. You said that you had contacted [Director A] and you had thought you might be given a reduction, but you had not thought more deeply about it than that until recently. You said, with hindsight, you now realise that if you accept any hospitality you must ask who has paid for it.

30 We spoke about the London Diplomatic List entry to which I had referred in my letter of 18 June. You told me that you had tried to find out whether the [name] listed there was the person you know, but that your efforts had drawn a blank. I do not think any useful purpose would be served by pursuing that point any further. You have acknowledged that the hospitality ought to have been registered. I have
35 seen no evidence that in 2016 you thought that the Maldivian Government had paid directly or indirectly for your holiday. But you took no steps to establish the true donor at the time.

Next steps

I said in my last letter that, before I could decide how to conclude my inquiry, I needed to understand better why you had not provided the information I needed sooner. I now have that insight and I am satisfied that you genuinely regret having caused delay.

- 5 You have acknowledged your breach of the rules and made a profuse apology. You agreed that, when my inquiry has concluded, you will make a belated register entry in the Register of Members' Financial Interests. I will arrange for the Registrar to contact you about that in due course, and I will ask her to place that Register entry in bold italic type to show that it has been the subject of an inquiry. You have assured
10 me that you have taken steps both to ensure that no other registrable benefits have been omitted and to avoid a breach of these rules in the future.

In light of all that, I will conclude this inquiry by way of the rectification procedure. This will involve placing in the public domain our correspondence and all of the relevant evidence accrued over the last eighteen months. Now that I am satisfied,
15 on the balance of probabilities, that the donor was a corporate entity, I will redact the names of the various individuals who have been cited in that material. This may take a little time and I will share a draft of the evidence package with you, so that you may check it for factual accuracy, before it is published. Until I tell you otherwise, this correspondence must, therefore, remain confidential.

- 20 I would be grateful if you would acknowledge receipt of this letter and let me know, by 22 July 2020, if you believe I have omitted anything important from this summary of our conversation of 1 July.³⁰

13 July 2020

53. Letter from the Commissioner to Mr Ian Paisley MP, 7 September 2020

- 25 I am sorry it has taken quite so long for me to be able to write to you again but I now attach, as promised, the package of material that I propose to publish when I formally conclude this investigation.

I would be grateful if you would check it carefully for factual accuracy and let me know as soon as possible, and no later than 17 September, whether you have any
30 points to raise.

You will see that I have redacted the names of the various witnesses and, as far as possible, avoiding including any other details that would lead to their identification, unless their title was, itself, relevant to consideration of their evidence. I think I've made all the appropriate redactions but please let me know if there are others that

³⁰ Mr Paisley subsequently messaged the Commissioner's office to confirm that he was satisfied that the letter was accurate and he did not wish to add to it.

you think should be made. I cannot guarantee at this stage that I will accept all such suggestions but I will consider very carefully any that you make.

5 I think all of the material will be familiar. The only item that you will not previously have seen should be the summary at the very beginning of the document. As you will know, the content of that is for me alone, but I will give careful consideration to any comments you might have on that.

10 Once I have your comments – or confirmation that you have none – I will arrange for the material to be published. I will also ask the Registrar to contact you to arrange for the necessary addition to your Register entry, for that entry to be made in bold italics and for an appropriate text to be added – to remain in the Register for 12 months – to show that it has been the subject of the rectification procedure. Until I formally notify you of the conclusion of my inquiry, you should continue to keep this matter confidential.

7 September 2020