

Contents

	Summary	2
	Robert Courts MP: Resolution Letter	3
	Letter from the Commissioner to Mr Robert Courts MP, 30 April 2020	3
5	Written evidence	4
	1. Letter from the Commissioner to Mr Robert Courts MP, 28 January 2020	4
	2. Letter from Mr Robert Courts MP to the Commissioner, 11 February 2020	8
	3. Letter from the Commissioner to Mr Robert Courts MP, 3 March 2020	19
	4. Letter from Mr Robert Courts MP to the Commissioner, 5 March 2020	21
10	5. Email from the Commissioner's Office to Mr Robert Courts MP, 3 April 2020	21
	6. Email from Mr Robert Courts MP to the Commissioner' Office, 14 April 2020	21

Summary

I began an inquiry on my own initiative into whether the Member had breached the registration rules through the late registration of remuneration from employment in the Register of Members' Financial Interests.

- 5 I found that the Member had on several occasions acted in breach of paragraph 14 of the House of Commons' Code of Conduct for Members, by failing to register remuneration received within the 28-day deadline the House has set. This includes payments for the Member's work at the bar, his attendance at numerous APPG for the Armed Forces briefing events and two donations.
- 10 The Member acknowledged and apologised for his breach of the rules. He notified me of 7 additional payments which should also have been registered sooner. The Member also described the steps he has taken to avoid a recurrence, including asking for a meeting with the Registrar to refresh his understanding of the rules. He also assured me that his Register entry had been brought up to date.
- 15 I asked the Registrar to arrange for the relevant entries in the Register of Members' Financial Interests to be placed in bold italics, so that it would be clear that they had been the subject of an inquiry.

I considered this to be a suitable outcome and concluded the matter by way of the rectification procedure, which is available to me under Standing Order No 150.

Robert Courts MP: Resolution Letter

Letter from the Commissioner to Mr Robert Courts MP, 30 April 2020

5 Thank you for your email of 14 April 2010, confirming the accuracy of the Decision Document. I have asked the Registrar to update your entry in the Register of Members' Financial Interests and, in due course, the relevant entry will appear in italics for a period of twelve months.

Thank you for your co-operation with my inquiry and your timely responses to my letters.

10 The evidence pack will be posted on my webpages shortly and can be found using the following link; <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-rectified/>

I am happy to confirm that I now consider this matter to be closed.

I hope you stay well and safe during these difficult times.

15 *30 April 2020*

Written evidence

1. Letter from the Commissioner to Mr Robert Courts MP, 28 January 2020

I would welcome your help with an inquiry I have started concerning your compliance with the House of Commons' Code of Conduct for Members in connection with the registration of your financial interests (paragraph 14 of the Code). I have begun this inquiry, on my own initiative, using the powers available to me under House of Commons' Standing Order No 150.

My inquiry will focus on the register entries included in the enclosed table.

The Code of Conduct for Members

“Paragraph 14 of the current Code of Conduct for Members states:

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

The Guide to the Rules relating to the conduct of Members – on registration

The main purpose of the Register of Members' Financial Interests (the Register) is

“to provide information of any pecuniary interest or other material benefit which a Member receives which might reasonably be thought by others to influence his or her action, speeches or votes in Parliament, or actions taken in his or her capacity as a Member of Parliament”.

Chapter 1 Paragraph 2

“The House requires new Members, within one month of their election, to register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election.”

You can see a copy of the detailed rules on the registration of financial interests in chapter 1 of the Guide to the Rules relating to the conduct of Members via this link:

<https://publications.parliament.uk/pa/cm201719/cmcode/1882/1882.pdf>

Next steps

It would be helpful if you would answer the following questions.

- 5 (1) In relation to the dinners and breakfasts you received from the APPG for the Armed Forces, please provide the dates of each dinner and breakfast. This will enable me to ascertain the date on which the £300 threshold was exceeded and to calculate the deadline for registering this interest.
- (2) If you accept that some or all your interests have been registered outside the House's deadline, please provide reasons why.
- 10 (3) Are you now satisfied that your current register entry is up to date in all respects?
- (4) Please describe the steps you have taken to satisfy yourself of this.
- (5) If it is not, please contact the Registrar now to bring it up to date.
- 15 (6) If on reflection you do accept that some of your interests have been registered outside the House's deadline, what steps will you now take to ensure that you prevent any further late registrations?

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

Important information

20 As you know, my inquiries are conducted in private and I no longer publish the fact that I am conducting an inquiry into an allegation into an alleged breach of the Code of Conduct. My office will not 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 but will neither confirm nor deny that I have begun an inquiry.

25 Procedure

You can see a copy of the Commissioner's Information Note, which sets out the procedure for inquiries via this link:

30 <https://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf>. Please note that this has not yet been updated to reflect the changes flowing from the House's decision of 19 July 2018.

RECTIFICATION

6

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.

- 5 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.

Action

- 10 I would be grateful to have your response to this letter as soon as possible and no later than 11 February 2020.

13 May 2019

Enclosure: Table of Register Entries

	Date Received	Date Registered	Description	Value
1	21.12.2016	20.1.2017	Payments received for my work at the bar of England and Wales, all done before my election: from Blackburns Solicitors, Wessex Chambers, 33 Trinity Street, Dorchester DT1 1TT.	£1,625 +VAT
2	01.01.2017	16.08.2017	Gifts, benefits and hospitality from UK sources Name of donor: APPG for the Armed Forces Address of donor: House of Commons, London SW1A 0AA	£497 +VAT
3	01.01.2017	16.08.2017 updated 03.7.2018	Gifts, benefits and hospitality from UK sources Name of donor: APPG for the Armed Forces Address of donor: House of Commons, London SW1A 0AA	£779.75
4	14.07.2017	16.08.2017	Gifts, benefits and hospitality from UK sources Name of donor: Boeing Defence UK Address of donor: Building 630,	£340 +VAT

RECTIFICATION

			Bristol Business Park, The Crescent, Coldharbour Lane, Bristol BS16 1EJ	
5	17.10.2017	27.11.2017	Payments received for my work at the bar of England and Wales, all done before my election: from Collins, 20 Station Road, Watford WD1 1AP.	£2083.33 + VAT
6	07.11.2017	20.12.2017	Gifts, benefits and hospitality from UK sources Name of donor: Churchill College, Cambridge CB3 0DS	£500 +VAT
7	16.11.2017	27.12.2017	Payments received for my work at the bar of England and Wales, all done before my election: from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD.	£600 +VAT
8	01.01.2018	04.07.2018	Name of donor: APPG for the Armed Forces Address of donor: House of Commons, London SW1A 0AA Amount of donation or nature and value if donation in kind: eight dinners and four breakfasts	£377
9	26.3.2018	02.10.2018	Payments received for my work at the bar of England and Wales, all done before my election: from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD.	£800 +VAT

2. Letter from Mr Robert Courts MP to the Commissioner, 11 February 2020

I refer to your letter of the 28th January 2020.

To answer your questions in order:

5 1) With reference to items 2, 3 and 8 of your spreadsheet, which are the APPG for the Armed Forces briefing events.

2) - 1.1.17 - 16.8.17 - total £497 plus VAT;

3) - 1.1.17 - 16.8.17 - updated 3.7.2018 - total £779.75 plus VAT;

8) - 1.1.18 - 2.10.18 - £377;

10 I have requested confirmed dates of my attendance from the APPG rather than my own record where possible. I attach a list of the relevant dates as requested at Appendix I.

However, you will read that the current administrator of the scheme, [name redacted], does not have records "further back than 2017." In fact she means June 2017, which is the earliest date that she has for me.

15 For further dates, I have returned to my emails and attach at Appendix 2, an email from [name of staff member redacted], who *then* administered the Scheme, dated 9th August 2017, in response to a query from me dated 2nd August 2017.

20 He told me that I had attended "11 dinners and 4 breakfasts in 2017" (he means to the point of writing in August,) which totalled £497, which formed the basis of my first declaration.

You will have noted the slightly cheaper rate at that time.

He does not however tell me the dates of those events. I have therefore had to refer to my own diary, from which it appears that I attended:

25 a) breakfast events on - 25th January, 14th March, 22nd March, 22nd March, 19th April;

b) dinner events on - 11th January, 1st February, 8th February, 20th February, 7th March, 28th March;

30 Dates after June 2017 are included in the email at Appendix 1. You will note that combining my records with those supplied by [the then administrator] suggests that in fact I only attended nine dinners rather than the eleven declared at that stage. It may be that I had said I would attend and then did not, and removed the event from

my diary. I am afraid that I simply do not know at three years after the event, and that is simply speculation. I have relied upon the figure of eleven that he gave me, even if that were slightly too many.

5 More generally, when I first arrived in the House, it was not clear to me that this was an interest that required registration, coming as it did from an APPG, and this was a view that other Members took in conversation. In my email of the 2nd August 2017, I report that the Registrar told me - I believe over the telephone - that no other MPs had declared anything. Nonetheless, on considering the rules further I formed the view that this APPG hospitality ought to be registered, and so I took steps to do so.

10 If your calculations lead you to conclude that I ought to have registered this at an earlier stage than I did - and I accept that this is likely to be the case - then I unreservedly apologise but I hope you will take into account:

15 b) that I have tried to be open and frank in declaring this interest, and that I considered the rules and proactively sought advice on whether I should be doing so;

c) that the first declaration took place under a year after I first entered the House and that since then I have continued to make regular declarations;

20 d) In the case of later registrations, that the earlier registrations I had made had met with no objection - it is now three years on - and I have simply continued to make a declaration at the point at which I thought one was likely to be necessary.

In my answer to your question 6, below, I outline the steps I have taken to ensure that any future registrations are in any event declared in good time.

2) Turning to each of the items on your spreadsheet:

25 1. Payment received for my work at the bar, done before my election.

May I make some general points at the outset.

30 All of these payments are for work carried out before I was first elected. They form part of what is called "aged debt" which is payment in arrears for work carried out before I was first elected. It will probably continue to be received for some time yet, although in decreasing frequency given that I am no longer practising.

35 It is important to note that the recorded date that the payment was "received" is the date that it was received by Chambers - i.e. the office where barristers work and where clerks pursue and receive the fees - not by me. At some point after entering the House, making my initial declaration and reading the rules, I raised this with Chambers - I cannot now recall, three years later, whether this was in writing or,

RECTIFICATION

10

5 more likely, verbally - and asked them to email me the payment receipt in all cases. This now happens for the vast majority - which means that, as I do in most cases, I am able to forward and declare the payment very quickly - and in answer to your question 6 below I outline the steps I have taken to make this procedure more formal within my office.

10 In the case of the first payment - 1 on your schedule - I accept that the payment was declared two days late, and accept that as it appears to have been emailed to me, I would have known of it fairly quickly. It was however immediately before Christmas and I can only assume that in the usual rush at that time of year, I overlooked it until January.

I cannot provide any further explanation, I am afraid, three years later, other than to apologise and ask you to take into account that I was a new member and that most of the period allowed in which to declare the payment fell over the Christmas period.

2. APPG Hospitality

15 I believe that this is consequent upon question 1 where I have explained the details. If it transpires that I have declared the interest late, again I can only apologise unreservedly and repeat the extenuating factors that I lay out above.

3. APPG Hospitality

20 I believe that this is consequent upon question 1 where I have explained the details. If it transpires that I have declared the interest late, again I can only apologise unreservedly and repeat the extenuating factors that I lay out above.

4. Gifts, benefits and hospitality - Boeing

I accept that this has been registered slightly late, by approximately five days.

25 There was some delay whilst I took advice from the Registrar and obtained the correct company names. In any event, I accept that the rules require registration in time and that advice and details should be sought in good time. I apologise for not having done so in this instance.

30 I note below in answer to your question 6 that I will, in future, ensure that I know the exact value and exact donor name in advance of even accepting any hospitality to prevent any such delays on my part in future.

5. Payment received for my work at the bar, done before my election.

It appears that I received the email telling me that the cheque was received in chambers for this item on the 17th October 2017.

RECTIFICATION

11

I had moved house on the 11th October and suspect that, when the cheque arrived, it ended up as part of a bundle of post that it took me a little while to open, and that I was prompted by the cheque arriving in the post rather than the email, which I must have missed - and I unreservedly apologise.

5 6. Gifts, benefits and hospitality - Churchill College

I accept that I ought to have confirmed the final details with the Registrar earlier, and I apologise.

7. Payment received for my work at the bar, done before my election.

10 I regret that I can offer no further explanation other than that above: I may not have been prompted to declare this payment until I received the cheque in the post if I had missed an email telling me about it. I apologise and explain below the steps that I have taken to prevent such a late registration again.

8. APPG Hospitality

15 I believe that this is consequent upon question 1 where I have explained the details. If it transpires that I have declared the interest slightly late, again I can only apologise unreservedly and repeat the extenuating factors that I lay out above.

9. Payment received for my work at the bar, done before my election.

I believe this may be an error on the part of the Registrar. I attach the email chain and receipted invoice as Appendix 3.

20 You will note (see the fee note,) that chambers received the cheque on the 2nd October 2018, and (see the email,) emailed it to me that same day. I sent it to the Registrar that evening, and the Assistant Registrar responded the following day to acknowledge.

25 If you look at the first line of the fee note, you will see that I originally did the work on the 26th March 2014. This is perhaps a question for the Registrar, but the fact that the date I did the work and the date recorded as receiving the cheque are both stated to be 26th March is striking. It seems likely that the Assistant Registrar confused the day that I did the work with the day that the cheque was received in chambers.

30 In any event, the email shows that the date recorded as my having received the payment - 26th March - is clearly wrong, since I received notification of the payment - but not the cheque - on 2nd October, and sent it on to the Registrar to be declared that same day, before, in fact, I had physically received the cheque.

RECTIFICATION

12

3) I have undertaken the steps that I have taken in answer to your question 4 and there are some matters that I have raised with the Registrar.

4) In order to satisfy myself, I have:

5 a) Requested an update of all Armed Forces APPG events that I have attended from the administrator in order to confirm whether any further declaration is required and to bring it up to date if necessary, and I have sent the same on to the Registrar to be added to the register. This is the same document that I have enclosed here;

10 b) I have gone through my hard copy file of fee notes that would have come with cheques received. I have cross-referenced what I have with what is on the register. Unfortunately I have found some that I appear to have overlooked and I have now sent these to the Registrar to be declared. They are dated as received 25/1/18, 26/1/18, 6/2/18, 6/2/18, 26/2/18, 23/4/19. I can only apologise for the oversight: they are largely from one period of time and those must have come in more or less together. I clearly thought that they had been declared, in error;

15 c) I have re-read the rules again and after taking advice from the Registrar, I have made a further declaration of "linked donations" to my fighting fund for the 2019 and 2017 General Elections.

20 5) I have contacted the Registrar in order to bring my register entry up to date accordingly, as laid out above.

25 6) As I state above, on reflection I do accept that some of my interests have, inadvertently, been declared outside of the House's deadline, although I hope you will take into account that there are some extenuating circumstances, and that I have been open and frank in declaring an interest even if the registration date slipped outside of the deadline.

In any event I unreservedly apologise for any inadvertent error, particularly where it can be seen, and I accept, that my administrative processes for timely declaration were not perhaps what they should have been.

30 You ask me what steps I will now take to prevent any late registrations in future. Firstly, as I hope the time scale shows, my administrative processes have markedly improved in more recent times.

Notwithstanding -

35 I have instructed my Parliamentary staff to book themselves onto the course that is available to train them to help Members with their declarations, which will be of assistance in providing a further oversight, and I will either book myself onto a

RECTIFICATION

13

similar one or meet with the Registrar in order to ensure that I understand the rules and best practice for efficient declaration on all matters.

In respect of "aged debt" cheques.

5 As I state above, some time ago I asked Chambers to ensure that I am emailed the cheque receipt at the time that they process it. This now happens in the vast majority of cases and when I receive it, I simply forward it immediately to the Registrar, who takes the required details and it appears on my registry of interests,

10 In order to provide some further oversight, I have asked that any receipts are sent to my Parliamentary email address, which is of course monitored by my staff. Whilst the responsibility for making a declaration is of course mine, it will assist if a second pair of eyes sees anything incoming. Whoever sees the payment first can then send it to the Registrar immediately.

With regard to any payments that are *not* emailed. I can only wait for them to arrive in the post and will scan and email any such payment to the Registrar immediately.

15 In respect of hospitality.

My office will now keep a running spreadsheet in which any hospitality accepted is recorded in real time and as soon as it reaches the declaration limit I will know to declare it.

20 As I note above in answer to your question 2, I will, in future, ensure that I know the exact value and exact donor name in advance of accepting any hospitality to prevent any similar delays.

11 February 2020

Enclosures: 3 Appendices

Appendix 1

25 **Email from Robert Courts MP to [name redacted], 29 January 2020**
Subject: APPG AF attendance

30 Please see Robert's attendance at APPG Armed Forces events below. I've gone back as far as I can but am afraid I wasn't given records any further back than 2017. In 2019, dinners are valued at £45 each and breakfasts at £15 each. Earlier events will have been slightly cheaper but this is before I was involved and I'm afraid I'm unsure as to what they were valued at.

I hope this is helpful.

RECTIFICATION

14

2019-11-04 — dinner
2019-10-23 — breakfast
2019-07-10 — breakfast
2019-07-03 — breakfast
5 2019-06-19 — breakfast
2019-03-27 — breakfast
2019-02-27 — dinner
2019-02-12 — breakfast
2019-02-05 — dinner
10 2019-01-30 — breakfast
2019-01-21 — dinner
2018-12-11 — dinner
2018-12-04 — dinner
2018-11-27 — breakfast
15 2018-11-21 — dinner
2018-11-05 — dinner
2018-10-30 — breakfast
2018-10-23 — dinner
2018-10-17 — breakfast
20 2018-09-11 — dinner
2018-09-05 — dinner
2018-07-03 — dinner
2018-06-27 — dinner
2018-06-12 — breakfast
25 2018-05-09 — breakfast
2018-05-01 — dinner
2018-04-23 — dinner
2018-04-16 — dinner
2018-03-13 — dinner
30 2018-03-06 — dinner
2018-02-07 — breakfast
2018-01-29 — dinner
2018-01-17 — breakfast
2017-12-18 — dinner
35 2017-12-12 — dinner
2017-12-06 — breakfast
2017-11-28 — breakfast
2017-11-22 — breakfast
2017-11-01 — dinner
40 2017-10-10 — dinner
2017-09-13 — dinner
2017-09-05 — dinner
2017-07-17 — dinner
2017-07-12 — dinner
45 2017-06-28 — dinner

Appendix 2

Email from Robert Courts MP to [name redacted], 2 August 2017

Subject: APPG Dinner Declaring

5 Please can you help?!

It has occurred to me that the APPG AF dinners we receive are potentially declarable.

Even if each dinner does not go over £300, over the course of a calendar year we could be approaching this as an ongoing benefit.

10 Anyway I have mentioned it to the registrar. She tells me that no other MPs have declared anything which seems extraordinary, either it doesn't need to be declared, or others are not declaring it and really should be - and we risk a problem.

I cannot think how I would declare it given the multiple sponsors anyway.

The Registrar has said that the following info is what she needs -

15 Name of donor: APPG for the Armed Forces
Address of donor: c/o House of Commons
Amount of donation, or nature and value if donation in kind:
Hospitality valued at £....
Date received: [give dates of events].....
Date accepted: [probably the same sequence of dates; cannot be earlier]..
20 Donor status: other

Can you help with what advice you have on this and what others declare? I can only imagine that you can give me a value of each dinner, and a sequence of the events I have attended, and I declare as of the last dinner a couple of weeks ago.

25 Hoping you can help with this...

Thanks!

Email from Robert Courts MP to [name redacted], 8 August 2017

30 **Subject: APPG Dinner Declaring**

I wondered if you're away - no bounceback though - as you're so efficient at these things!

Email from Assistant Registrar to Robert Courts MP, 9 August 2017

35 **Subject: APPG Dinner Declaring**

Apologies for the delay in responding. You are quite right that dinners and breakfasts are potentially declarable. [The Member's] entry in the Register of Members' Financial Interests already reflects this for 2016:

Name of donor: APPG for the Armed Forces
Address of donor: House of Commons, London SW1A 0AA
Amount of donation or nature and value if donation in kind: six dinners value £40
5 each; thirteen breakfasts value £14.25 each; total £425.25
Date received: 1 January 2016 to 2 December 2016
Date accepted: 1 January 2016 to 2 December 2016
Donor status: other

10 An update for 2017 has also been submitted.

I have looked at my records and you attended 11 dinners and 4 breakfasts in 2017.
I would therefore suggest phrasing your declaration along the following lines:

Name of donor: APPG for the Armed Forces
Address of donor: House of Commons, London SW1A 0AA
15 Amount of donation or nature and value if donation in kind: eleven dinners value
£40 each; four breakfasts value £14.25 each; total £497.00
Date received: 1 January 2017 to 31 July 2017
Date accepted: 1 January 2017 to 31 July 2017
Donor status: other

20 I trust this is helpful, but do please let me know if you require any further
information.

Appendix 3

Email from Assistant Registrar to Robert Courts MP, 3 October 2018

25 **Subject: Document for case ID 128811, [name redacted]**

Thank you Mr Courts

30 This one will appear in the online version of the Register of Members' Financial
Interests dated 15 October 2018.

Courts, Robert (Witney)

1. Employment and earnings

35 Payments received my work at the bar of England and Wales, all done before my
election:

2 October 2017, received £1500 plus VAT from Coles Miller LLP 44/46 Parkstone
Road, Poole BH 15 2PG. (Registered 03 October 2017)

4 October 2017, received £1,968.75 plus VAT from Evans Derry, 5 Church Hill,
Colleshill B46 3AD. (Registered 05 October 2017)

40 11 October 2017, received £4,000 plus VAT from Boyes Turner, Abbots House,
Abbey Street, Reading RG1 3BD. (Registered 11 October 2017)

17 October 2017, received £2,083.33 plus VAT Collins, 20 Station Road, Watford
WD1 1AP. (Registered 27 November 2017)

45 16 November 2017, received £600 plus VAT from Evans Derry, 5 Church Hill,
Colleshill, Warwickshire B46 3AD, (Registered 27 December 2017)

RECTIFICATION

17

- 29 November 2017, received £3,100 plus VAT from Boyes Turner, Abbots House, Abbey Street, Reading RG1 3BD. (Registered 27 December 2017)
- 17 January 2018, received £656.25 plus VAT from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD. (Registered 22 January 2018)
- 5 31 January 2018, received £1,400 plus VAT from Evans Derry, 46 Chelmsley Circle, Chelmsley Wood, Birmingham B37 5UH. (Registered 19 February 2018)
- 5 March 2018, received £1,250 plus VAT from Dalgarno Solicitors, 11 Suez Street, Warrington WA1 1EF. (Registered 12 March 2018)
- 15 March 2018, received £3,862.50 plus VAT from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD. (Registered 19 March 2018)
- 10 5 April 2016, received £6,600 plus VAT from Coles Miller LLP, 44/46 Parkstone Road, Poole BH15 2PG. (Registered 06 April 2018)
- 24 April 2018, received £249.50 plus VAT from William Graham Law Ltd. 24 Neptune Court, Ocean Way, Cardiff CF24 5PJ (Registered 26 April 2018)
- 15 22 May 2018, received £104.17 plus VAT from William Graham Law Ltd, 24 Neptune Court, Ocean Way, Cardiff CF24 5PJ. (Registered 24 May 2018)
- 31 May 2018, received £3,150 plus VAT from Coles Miller LLP, 44/46 Parkstone Road, Poole BH15 2PG. (Registered 04 June 18)
- 31 May 2018, received £750 plus VAT from Coles Miller LLP, 44/46 Parkstone Road, Poole BH15 2PG. (Registered 18 June 2018)
- 20 18 June 2018, received £3,583.33 plus VAT from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD. (Registered 18 June 2018)
- 20 June 2018. received £600 plus VAT from Thorneycroft Solicitors, Bridge Street Mills, Bridge Street, Macclesfield SK11 6QA. (Registered 25 June 2018)
- 25 16 July 2018 received £2,250 plus VAT from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD. (Registered 16 July 2018)
- 16 July 2018, received £2,250 plus VAT from Evans Derry, 46 Chelmsley Circle, Chelmsley Wood, Birmingham B37 5UH. (Registered 27 July 2018)
- 24 September 2018, received £2,850 plus VAT from Thorneycrofts, Bridge Street Mills, Bridge Street, Macclesfield SK11 6QA. (Registered 24 September 2018)
- 30 20 September 2018, received £500 plus VAT from Evans Derry, 46 Chelmsley Circle, Chelmsley Wood, Birmingham B37 5UH. (Registered 25 September 2018)
- 26 March 2018. received £800 plus VAT from Evans Derry, 5 Church Hill, Coleshill, Warwickshire B46 3AD. (Registered 02 October 2018)
- 35 24 November 2017, payment of £1,800 plus VAT made to my local Association by SP Broadway Consultants, 50 Broadway London SW1H 0RG in return for a speech which I gave on 16 November 2017. Hours: 2 hrs. (Registered 20 December 2017)
3. Gifts, benefits and hospitality from UK sources
- 40 Name of donor: APPG for the Armed Forces
Address of donor: House of Commons, London SW1A 0AA
Amount of donation or nature and value if donation in kind: seventeen dinners value £40 each; seven breakfasts value £14.25 each: total £779.75
Date received: 1 January 2017 to 31 December 2017
- 45 Date accepted: 1 January 2017 to 31 December 2017
Donor status: other
(Registered 16 August 2017; updated 03 July 2018)
Name of donor: International Churchill Society (UK)
Address of donor: Churchill College, Cambridge CB3 0DS

RECTIFICATION

18

Amount of donation or nature and value if donation in kind: ticket for the Sir Winston Churchill Awards dinner, value £500

Date received: 7 November 2017

Date accepted: 7 November 2017

5 Donor status: other

(Registered 20 December 2017)

Name of donor: APPG for the Armed Forces

Address of donor: House of Commons, London SW1A 0AA

10 Amount of donation or nature and value if donation in kind: eight dinners value £40 each; four breakfasts value £14.25 each; total £377

Date received: 1 January 2018 to 3 July 2018

Date accepted: 1 January 2018 to 3 July 2018

Donor status: other

15 (Registered 04 July 2018)

Name of donor: Boeing Defence UK

Address of donor: Building 630, Bristol Business Park, The Crescent, Coldharbour Lane, Bristol BS16 1EJ

20 Amount of donation or nature and value if donation in kind: For myself and a staff member, tickets for hospitality area and refreshments at the Royal International Air Tattoo with a total value of £340 plus VAT (£170 plus VAT each)

Date received: 13 August 2018

Date accepted: 13 August 2018

25 Donor status: company, registration 01290439

(Registered 02 August 2018)

8. Miscellaneous

30 Member of the Bar of England and Wales, not currently practising. (Registered 18 November 2016)

I received passes for myself and a staff member to enter the hospitality area at the Royal International Air Tattoo on 13 August 2018. These are not available to buy but I estimate that their total value, for two people, was £136 (two entry passes, and incidental refreshments, from Airbus, Gunnels Wood Road, Stevenage SG1 2AS.). I

35 also received passes from Boeing which are registered under Category 3.

(Registered 02 August 2018)

Email from Robert Courts MP to Commons Registrar, 2 October 2018

Subject: Document for case ID 128811, [name redacted]

40

Please could I declare the attached payment

Date	Description	Amount	VAT
45 26/03/2014	Advice on Liability (2 hours)	£400.00	£80.00
31/07/2014	Particulars of Claim	£400.00	£80.00

RECTIFICATION

19

(2 hours)

02/10/2018	Payment received with thanks by cheque	£800.00	£160.00
------------	---	---------	---------

5

3. Letter from the Commissioner to Mr Robert Courts MP, 3 March 2020

Thank you for your letter of 11 February 2020, acknowledging and apologising for your breach of the registration rules. The background information you have provided is helpful. Thank you also for confirmation that your register entry is now up-to-date, and for explaining the steps that you have taken to ensure your future compliance with the rules. As you know, compliance with the registration requirements is the personal responsibility of each Member.

10

My decision

Since 2017 you have attended numerous APPG for the Armed Forces briefing events. In my letter dated 28 January 2020 I referred to them as a group item as the dates of each event were not available to me from the Register. You have kindly provided the dates when they occurred and it is clear most of them have not been registered within the 28-day limit, as set by the rules. This has led to your breach of paragraph 14 of the Code of Conduct.

15

In addition, you have failed to register two donations received within 28 days, as required by the House, under the category of gifts, benefits and hospitality. You have also failed to register two payments you have received for your work at the bar within 28 days. This has led to your breach of paragraph 14 of the Code of Conduct.

20

You have acknowledged and apologised for the above breaches of the rules.

You have also notified me of 7 further payments for your work at the bar from 25 January 2018 to 23 April 2018, which you realised you had failed to register. These late registrations are further breaches of paragraph 14 of the Code of Conduct.

25

You have kindly pointed out that one of the registrations for your work at the bar, which I wrote to you about in my letter of the 28 January 2020, had been incorrectly registered. It has been accepted by the Registrar that this was an administrative error and I know that she has apologised to you about this. The date of receipt of this payment should have been recorded as 2 October 2018. Consequently, this payment was registered within the 28-day limit.

30

Standing Order No 150 makes provision for me to conclude an inquiry without making a referral to the Committee on Standards in certain circumstances, using the "rectification" procedure. I have considered this option carefully and the decision is finely balanced. I am concerned about the number of late entries and the number of payments which had not been registered at all. They do not suggest "conscientious"

35

RECTIFICATION

20

fulfilment of the House's requirements and might justify referral to the Committee on Standards. However, you have acknowledged and apologised for the breaches, volunteered information about payments which had not been registered and have described in detail steps you intend to take to ensure your register is maintained in the future. Taking all this into account I have decided to conclude this matter by rectification on this occasion.

The Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach. As you have already met the first two requirements, all that remains is for me to ask the Registrar to arrange for the relevant entries to be italicised in the Register of Members' Financial Interests to indicate that they have been the subject of an inquiry and rectification.

Next steps

I understand that the Registrar has been trying to contact you in order to arrange a refresher meeting, further to your request. The Registrar sent you an e-mail on 26 and 27 February 2020. Perhaps you could let me know when this refresher meeting has been scheduled and taken place.

If you are content for me to conclude the inquiry in this way, I would publish the enclosed evidence pack – subject to any comments you wish to make on its factual accuracy. The material, once agreed, would be published on my webpages, here: <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-rectified/rectifications-2018-191/>. I would also report the outcome to the Committee on Standards in due course.

You have mentioned that your staff members will be attending courses in relation to registration of Members' financial interests. It may be helpful to say that the Registrar periodically runs these workshops. If any of your staff would find it helpful to attend, they might contact my PA, [name redacted], direct to book a place. She can be reached on [redacted].

Please let me have a response to this letter by 17 March 2020.

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

3 March 2020

4. Letter from Mr Robert Courts MP to the Commissioner, 5 March 2020

Thank you for your letter of 3rd March.

5 I can confirm that I am happy for you to conclude your inquiry in the way you suggest.

I can also confirm that I am scheduled to meet with the Registrar at 11.00 on 9th March to undertake a refresher session. Furthermore, my staff have booked themselves a place on the Workshop on Registering Members ' Financial Interests which is due to take place on 1st April.

10 *5 March 2020*

5. Email from the Commissioner's Office to Mr Robert Courts MP, 3 April 2020

I hope you are well during these difficult times.

15 Thank you for your letter of 5 March 2020, which unfortunately was not received by Kathryn until 20 March 2020. Kathryn notes the contents of this letter and has asked me to send you a copy of the final draft of the Evidence Pack, which is attached. I would be grateful if you would take some time to look through this document and ensure it is factually accurate. Please let me know if you find any inaccuracies. Once we have received your response, Kathryn will be able to conclude this matter.

20 I am aware that these are trying times but would be grateful to receive a response by close of business on Tuesday 14 April 2020.

3 April 2020

6. Email from Mr Robert Courts MP to the Commissioner' Office, 14 April 2020

Thank you for your email.

25 I cannot see any inaccuracies, other than that I state that my staff have been booked on a course for 1st April. Whilst accurate at the time I said it, the course was, as I understand it, subsequently postponed for understandable reasons.

Nonetheless my commitment remains – as soon as such a course is available again then I will be booking my staff on it.

If there is anything further that you require from me, please do let me know.

30 *14 April 2020*