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## Summary

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5 I opened an investigation after receiving a complaint that Ms Layla Moran MP had breached paragraph 14 of the Code of Conduct for Members of Parliament. The complainant alleged Ms Moran's entry in the Register of Members' Financial Interests, regarding various donations she had received between January 2018 and September 2020, was incorrect.

10 My inquiry concluded Ms Moran had failed to register fourteen financial donations, under Category 2, within the specified time frame. My inquiry also identified the late registration of an overseas visit in 2018. In failing to register these interests within 28 days as required by the House, I found the Member had acted in breach of the rules.

Ms Moran cooperated fully with my inquiry, she acknowledged and apologised for all the breaches and she has taken the necessary steps to prevent a recurrence.

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 they had been the subject of an inquiry. I consider this to be a suitable outcome and concluded the inquiry using the rectification procedure, which is open to me under Standing Order No 150.

## Ms Layla Moran MP: Resolution letter

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### Letter from the Commissioner to the complainant, 19 March 2021

5 I wrote to you on 9 November 2020, to tell you I had begun an inquiry into your allegation that Ms Layla Moran MP had breached paragraph 14<sup>1</sup> of the *Code of Conduct for Members of Parliament*.

10 My investigation has now concluded, and I have found that in failing to register a number of financial donations within the required 28 day deadline the House has set, Ms Moran breached paragraph 14 of the Code. My investigation also identified that Ms Moran's visit to Tanzania, which took place between 29 July and 4 August 2018, was registered five days late, this was a further breach of the rules.

Ms Moran has cooperated fully with my inquiry, she has acknowledged and apologised for her breach of the rules, and she has taken the necessary steps to avoid a recurrence.

15 During my investigation it also became clear that two of the financial donations published in the Register of Members' Financial Interests (one each from Mr Brunner and Mr Roaf in 2019), contained typographical errors regarding their end dates. I found that these errors occurred when my office were inputting the data ahead of publication of the Register, and these dates have now been corrected.

20 While the number of donations registered late was a matter of concern, I do not believe Ms Moran intended to mislead. I consider this breach to be at the less serious end of the spectrum and have decided to conclude this inquiry through the rectification procedure available to me through House of Commons' Standing Order No 150. The full rationale for my decision can be found in my letter to Ms Moran, dated 1 February 2021 (item 9 in the written evidence pack).

25 I will publish my decision and the written evidence pack shortly on my webpages and I will report the outcome to the Standards Committee in due course. <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-rectified/>

30 Thank you for bringing this matter to my attention. I confirm that the matter is now closed.

*19 March 2021*

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<sup>1</sup> Previously paragraph 13 of the Code; this was updated in July 2018

## Written Evidence

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### 1. Email from the complainant to the Commissioner, 1 October 2020

I wish to raise an issue with regard to Layla Moran MP and the donations that she has received over the years. Looking at the 3 different years:

5 **2020** This is what has just been published in the Register as at 28<sup>th</sup> September 2020

Name of donor: **Hugo Brunner**

Address of donor: private

Amount of donation, or nature and value if donation in kind: £2,400  
paid in monthly instalments of £200 between January 2020 and  
10 December 2020

Donor status: individual

(Registered 25 September 2020)

Name of donor: **Jessica Frankopan**

Address of donor: private

15 Amount of donation, or nature and value if donation in kind: £2,400  
paid in monthly instalments of £200 between January 2020 and  
December 2020

Donor status: individual

(Registered 25 September 2020)

20 Name of donor: **Jane MacTaggart**

Address of donor: private

Amount of donation, or nature and value if donation in kind: £1,200  
in paid in monthly instalments of £100 between January 2020 and  
25 December 2020

Donor status: individual

(Registered 25 September 2020)

Name of donor: **Dermot Roaf**

Address of donor: private

30 Amount of donation, or nature and value if donation in kind: £1,800  
in paid in monthly instalments of £150 between January 2020 and  
December 2020

Donor status: individual

(Registered 25 September 2020)

35 As these 4 individuals have provided monthly donations from January 2020, then surely the interest would have been registered within 28 days of when Ms Moran first received these donations back in January 2020 and not from 25<sup>th</sup> September 2020

2019 This is what was published previously

Name of donor: **Jessica Frankopan**

Address of donor: private

5

Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019

Donor status: individual

(Registered 25 June 2019)

Name of donor: **Hugo Brunner**

10

Address of donor: private

Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 from January 2019 to December 2020<sup>2</sup>

Donor status: individual

15

(Registered 10 September 2019)

Name of donor: **Dermot Roaf**

Address of donor: private

20

Amount of donation, or nature and value if donation in kind: £1,800 paid in monthly instalments of £150 from January 2019 to December 2020<sup>3</sup>

Donor status: individual

(Registered 10 September 2019)

Name of donor: **Jane MacTaggart**

25

Address of donor: private

Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019

Donor status: individual

(Registered 10 January 2020)

30 These are the same 4 individuals that provided monthly donations in 2020

Looking at the 4 donations:

- **Jessica Frankopan** – Why was it only registered on 25<sup>th</sup> June 2019 when the monthly payment started in January 2019?

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<sup>2</sup> End date includes a typographical error which occurred when my office transferred the data ahead of publication. This date has since been corrected to read December 2019.

<sup>3</sup> End date includes a typographical error which occurred when my office transferred the data ahead of publication. This date has since been corrected to read December 2019.

- 5 • **Hugo Brunner** – Why was it only registered on 10<sup>th</sup> September 2019 when the monthly payment started in January 2019? The finish date is December 2020 where it should be December 2019 as 12 monthly payments of £200 is £2,400. If it was December 2020 then it would be 24 months, which at £200 per month would be £4,800
- 10 • **Dermot Roaf** - Why was it only registered on 10<sup>th</sup> September 2019 when the monthly payment started in January 2019? The finish date is December 2020 where it should be December 2019 as 12 monthly payments of £150 is £1,800. If it was December 2020 then it would be 24 months, which at £150 per month would be £3,600
- **Jane MacTaggart** - Why was it only registered on 10<sup>th</sup> January 2020 when the monthly payment started in January 2019?

These donations should have been registered within 28 days of the receipt of the first payment

15 **2018** This is what was published previously

Name of donor: **Jane MacTaggart**

Address of donor: private

20 Amount of donation or nature and value if donation in kind: £2,400  
in monthly instalments of £200 between 2 January 2018 and 1  
January 2019

Donor status: individual

(Registered 01 October 2018)

Name of donor: **Hugo Brunner**

Address of donor: private

25 Amount of donation or nature and value if donation in kind: £2,400  
in monthly instalments of £200 between 9 January 2018 and 8  
January 2019

Donor status: individual

(Registered 01 October 2018)

30 Name of donor: **Jessica Frankopan**

Address of donor: private

35 Amount of donation or nature and value if donation in kind: £2,400  
in monthly instalments of £200 between 23 January 2018 and 22  
January 2019

Donor status: individual

(Registered 01 October 2018)

Name of donor: **Dermot Roaf**

Address of donor: private

Amount of donation, or nature and value if donation in kind: £1,800

in monthly instalments of £150 between 2 January 2018 and 1 January 2019  
 Donor status: individual  
 (Registered 22 January 2019)

5 These are the same 4 individuals that provided monthly donations in 2020 and 2019

Looking at the 4 donations:

- **Jane MacTaggart** - Why was it only registered on 1<sup>st</sup> October 2018 when the monthly payment started in January 2018?
- 10 • **Hugo Brunner** – Why was it only registered on 1<sup>st</sup> October 2018 when the monthly payment started in January 2018?
- **Jessica Frankopan** – Why was it only registered on 1<sup>st</sup> October 2018 when the monthly payment started in January 2018?
- **Dermot Roaf** - Why was it only registered on 22<sup>nd</sup> January 2018 when the monthly payment started in January 2018?

15 These donations should have been registered within 28 days of the receipt of the first payment

I feel that the late registration of these donations breach the Code of Conduct for Members of Parliament and should be investigated.

*1 October 2020*

20 **2. Letter from the Commissioner to Ms Layla Moran MP, 9 November 2020**

I would welcome your help with an inquiry I have opened following an allegation I received from [name redacted], about your entry in the Register of Members' Financial Interests and compliance with the House of Commons' *Code of Conduct for Members of Parliament*. This has raised a number of concerns about your entries in the Register. I enclose a copy of [name redacted] correspondence for background information.

**The scope of my inquiry**

My inquiry will focus on whether your registration of financial interests since January 2018 has put you in breach of paragraph 14<sup>4</sup> of the House of Commons' *Code of Conduct for Members*.

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<sup>4</sup> Previously paragraph 13 of the Code; this was updated in July 2018.

The *Guide to the rules relating to the Conduct of Members*<sup>5</sup>, which is appended to the Code, contains more detail about registration.

### **The Code of Conduct**

The overarching rules are found in the House of Commons' *Code of Conduct for Members*.<sup>6</sup> Paragraph 14 of the Code states:

10 “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.”

Further to the Code, the *Guide to the Rules relating to the Conduct of Members* states the following in *Chapter 1: Registration of Members’ Financial Interests*

### 15 **Requirements of the House**

Registration of interests

20 *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. After that, Members are required to register within 28 days any change in those registrable interests. Such a change includes both the acquisition of a new interest and the ceasing of any registered interest, for example because an employment has ceased or because a holding has reduced in value or been sold.*

25 ...

*Category 2: Donations and other support for activities as a Member of Parliament*

*Threshold for registration*

30 *15. Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more*

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<sup>5</sup> [https://publications.parliament.uk/pa/cm201719/cmcode/1882/188203.htm#\\_idTextAnchor009](https://publications.parliament.uk/pa/cm201719/cmcode/1882/188203.htm#_idTextAnchor009)

<sup>6</sup> <https://publications.parliament.uk/pa/cm201719/cmcode/1882/188201.htm>

than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.<sup>7</sup>

#### *Requirements for registration under Category 2(a) and 2(b)*

16. *This category has two parts:*

5 *Category 2(a): support received by a local party organisation or indirectly via a central party organisation.<sup>8</sup> A Member must register under this sub-category support received by his or her constituency party organisation or which he or she receives via a central party organisation if there was a clear link between the donation and him or her; for example, if it was given to a such an organisation with a wish that it be allocated to him or her, to his or her fighting fund or to a front bench office which he or she held; if it was assigned to him or her in circumstances where he or she was aware, or could reasonably be expected to be aware, of the identity of the donor; or if he or she had invited or encouraged the donation;*

15 *Category 2(b): any other support received by a Member. This includes support received indirectly, for example via a political club.<sup>9</sup> Before accepting any donations registrable under this category, Members must check that they are from a permissible donor. Under the Political Parties, Elections and Referendums Act, Members must not accept impermissible donations and must notify the Electoral Commission within 30 days of receipt.*

25 For the avoidance of doubt, Members must add together donations received from the same source within the calendar year to see if they exceed the registration threshold. For example, once a Member has registered a donation, he or she must then register within 28 days any further donation of over £500 from that source in the same calendar year, whether it falls under Category 2(a) or 2(b). Members who receive donations in instalments must register these, at the latest, within 28 days of the instalments exceeding £1,500 in value in the calendar year – or earlier if they have received other donations from that source in the same year.

#### ***Category 4: Visits outside the UK***

##### ***Threshold for registration***

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<sup>7</sup> The terms “donations” and “support”, as used in this chapter, include both financial support and support in kind.

<sup>8</sup> Defined as a registered political party or an accounting unit of such a party.

<sup>9</sup> A political club is not a registered political party or an accounting unit of such a party. It is likely to be a Members’ association under PPERA, defined as an organisation separate from, but which may be affiliated to, registered parties, but whose members come mainly from one party

5           31. *Members must register, subject to the paragraphs below, 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. They must also register multiple visits funded by the same source if taken together these have a value of more than £300 in a calendar year.*

...

### **Requirements for registration**

#### **33. Under this category Members must register:**

10           *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, including:*

- a) *international and other travel;*
- b) *hospitality, including hotel or other accommodation, and meals;*
- c) *car hire;*
- 15           d) *reimbursement of the costs of any of the above.*

#### **Next steps**

I would welcome your comments on the allegation that your alleged actions have amounted to a breach of paragraph 14 of the Code of Conduct for Members.

20           I have enclosed a chart showing the register entries about which I have questions. The chart sets out the known facts for each donation as I currently understand them.

1. It would be helpful if you could provide the information in the highlighted areas on the chart and return it to my office.

I would also be grateful for your answers to the following questions:

- 25           2. Were you aware of the requirement to register all relevant financial interests within the first month of being elected and, thereafter, within 28 days?
3. Were there any other donations received since 1 January 2018 which you ought to have registered under Category 2(a) or 2(b)?
4. Whether you consider you should have registered sooner your visit to Tanzania, which took place between 29 July – 4 August 2018?

a. If not, please explain to me your reasoning for this.

5. If, on reflection, you accept that some of your interests have been registered outside of the House's deadline, please explain what steps you will now take to prevent any other late registrations.

5 It would be helpful to receive any evidence to support your responses when you reply to this letter. Any other points you wish to make to help me with this inquiry would also be welcome.

### **Important information**

10 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 of 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.

### **15 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.

20 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.

25 While I do not, at this stage, know whether it will be necessary to interview you about this matter, it would be open to you to be accompanied at any such interview. I am, of course, very happy to meet with you at any stage if you would find that helpful.

I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry.

### **Potential outcomes**

30 Inquiries are generally concluded in one of three ways. If the evidence does not substantiate the allegation, it will not be upheld. If the evidence demonstrates a breach of the rules, I may – in certain circumstances – uphold the allegation and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards. Where an allegation is not upheld or is rectified, the material is published on the Parliament website, on my webpages.

35 If I uphold the allegation and it is either unsuitable for the rectification procedure, or you do not accept my decision, I must make a referral to the Committee on Standards. My Memorandum to the Committee would be published, as an appendix to the Committee's own Report.

I should make clear that all the relevant evidence, including our correspondence, will be published when this inquiry is concluded. I routinely redact the personal data of third parties unless it is relevant to my decision(s). If you provide sensitive material which you think I should consider redacting, please tell me. I would give careful consideration to any such request.

### Action

I realise my letter and the accompanying chart raise quite a few questions. I would be grateful to have your response as soon as possible or by **20 November 2020**. Please let me know before that date if you require more time to respond, by contacting [name and contact details redacted].

If you would prefer me to communicate with you by email or via a different postal address, please give the details when you reply to this letter. It would also be helpful if you were willing to provide a telephone number through which I might contact you. Information provided to me during the course of my inquiry will be retained, and disposed of, in accordance with the House of Commons' Authorised Records Disposal Policy. You can also see a copy of our privacy statement by following this link.<sup>10</sup>

Thank you for your cooperation with this matter.

*9 November 2020*

### 20 **3. Letter from Ms Layla Moran MP to the Commissioner, 20 November 2020**

Thank you for your letter of 9th November regarding your inquiry into my entry in the Register of Members' Financial Interests.

Since being elected I have done my best to comply with the Code of Conduct and to follow the guidance. Where the guidance is not clear I have asked for advice from the authorities.

Where donations have been made to Oxford West & Abingdon Liberal Democrats to support campaigning in my constituency I have always erred on the side of including them in the Register if they come from a donor that I know to be supportive of my campaign. Examples of donations I have not registered are those that come from elected councillors as part of their agreed support for the Local Party or where a donation was explicitly towards another election unrelated to my role such as the European Election in 2019.

### **Donations via Oxford West & Abingdon Liberal Democrats**

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<sup>10</sup> <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/parliamentary-commissioner-for-standards/privacy-policy/>

The majority of donations I have registered were paid to Oxford West & Abingdon Liberal Democrats to support local campaigning. These donations were paid to the Local Party and the funds were managed and spent by the Local Party.

5 I am reliant on the Local Party Treasurer, a volunteer, to provide me with the relevant information. I have always added those donations to the Register once I have had that information.

10 On some occasions there were delays between the donation being accepted by the Local Party and me being given the information. As time has gone on I have asked my staff to tighten up this process so that they regularly check with the Local Party Treasurer on at least a monthly basis, so that we are able to register them in a more timely manner.

### **Regular donations to Oxford West & Abingdon Liberal Democrats**

15 A number of the donations are paid to the Local Party as regular monthly donations. I sought advice in September 2018, the first full calendar year I was an MP, when some of those donations had passed the £1,500 threshold. I then acted on the basis of the advice I was given then (attached) each year, and reported them once the threshold had been exceeded.

20 During 2019 I registered some of these regular donations earlier in the year when we identified that the same donors had made additional one-off donations that meant the £1,500 threshold had been passed.

In response to registering some of these donations this month we have now been given new advice which we will follow from now on (attached).

### **Answers to your specific questions:**

#### *Question 1*

25 See list below [appendix 2]

#### *Question 2*

Yes.

#### *Question 3*

30 Not to the best of my knowledge. I have asked my staff to double check and they have not found any.

#### *Question 4*

I registered my visit to Tanzania once I had received all the details I had already requested from Plan International UK, who were the organisers. I asked my staff to pursue this when it appeared the details were not coming through promptly. I received the information on 3 September 2018.

5 *Question 5*

I believe that I have registered all interests from the point that I had the information myself. I accept that some of the donations made to the Local Party were reported later than they should have been because I did not have the information sooner. Following some examples for this in June 2019 I asked my staff to tighten up the process of chasing information more regularly from the Local Party and we have subsequently made that checking even more frequent.

I hope this provides you with the information you need. Please let me know if I have missed anything or if you believe there are any errors in the below.

*20 November 2020*

15 **See Appendix 2 for Ms Moran's responses to question 1 above**

**4. Letter from the Commissioner to the Registrar for Members' Financial Interests, 27 November 2020**

I would like to ask your advice on a complaint I have received about Ms Layla Moran MP. In essence, the complaint is that Ms Moran acted in breach of paragraph 14 of the Code of Conduct for Members, by registering late various donations she has received since 2018.

I enclose a copy of the correspondence, from [name redacted], which led to me beginning this inquiry. I also enclose a copy of my letter to the Member dated 9 November, and her reply of 20 November 2020, for your information.

In her reply Ms Moran has provided copies of correspondence with your office dated 28 September and 1 October 2018, as well as more recent correspondence from the Assistant Registrar, from 25 September 2020. It would be helpful to know whether you have exchanged any other correspondence with Ms Moran or her office, which may be useful to my inquiry. It would also be helpful to understand the factors you took into account when giving advice to Ms Moran, and to know whether you or your office would have advised her differently if you had then the information contained in this correspondence?

It would be very helpful to have your reply by **10 December 2020**. If you require further information from Ms Moran before giving me your advice, I would be happy for you to contact her directly.

*27 November 2020*

### 5. Letter from the Commissioner to Ms Layla Moran MP, 27 November 2020

Thank you for your letter dated 20 November 2020, and for the information that it provided.

5 In my letter to you of 9 November 2020, I said that I may seek the advice of the House authorities as part of my investigation. Today I have written to the Registrar of Members' Financial Interests and a copy of that letter is included for your information (minus the enclosures previously shared with you).

10 Once I have received the Registrar's reply, I will write to you again regarding the next steps. In the meantime, this matter remains protected by parliamentary privilege and should continue to be kept confidential.

27 November 2020

### 6. Email from the Registrar for Members' Financial Interests to the Commissioner, 14 December 2020

Thank you for your letter of 27 November.

15 I have reviewed the list of donations to Ms Layla Moran MP which you provided, and annotated it (attached)<sup>11</sup>. In order to comment on whether donations were registered on time, I have obtained some information from the Electoral Commission's database, and some from Ms Moran, which she kindly provided. I can see that all donations paid directly to Ms Moran were registered in time, but some  
20 of the donations registered under Category 2(a) ("linked" donations.) were registered late. All of those registered in 2018 and a proportion of those registered in 2019 and 2020 were late, although there are a small number where I have not been able to tell.

25 Ms Moran's letter suggests that she may not have fully understood what donations she has to register and when. If we had known this earlier I would have been happy to spend time with her to explain this. The key issues are

- Category 2(a) donations. These are donations made to the local or central party but "linked" to the MP. The Guide to the Rules says:
- *Category 2(a): support received by a local party organisation or indirectly via a central party organisation. A Member must register under this sub-category support received by his or her constituency party organisation or which he or she receives via a central party organisation if there was a clear link between the donation and him or her; for example, if it was given to a such an organisation with a wish that it be allocated to him or her, to his or her fighting fund or to a front bench office which he or she held; if it was assigned to him or*

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<sup>11</sup> See appendix 2

*her in circumstances where he or she was aware, or could reasonably be expected to be aware, of the identity of the donor; or if he or she had invited or encouraged the donation;*

5 Ms Moran's letter to you suggests that she may have not been working to this exact definition.

- 10 • **Financial thresholds.** MPs have to register any donation with a value over £1,500, or over £500 if this donation takes the total of what the MP has received and accepted from this donor to over £1,500 in the same calendar year, or if the £1,500 has already been exceeded. Donations under Category 2(a) and under 2(b) both count towards this total.
- 15 • **Timetable for registering.** The normal rule is that an MP who receives a donation has 30 days to check that it is from a permissible donor and to accept it formally. After acceptance he/she has 28 days to register it. If the donation was made to the local or national party but "linked" to the MP (a Category 2(a) donation) the 28 days for registration is triggered by the party's acceptance.
- 20 • **Donations paid in instalments.** As a matter of good practice we would recommend registering such donations within 28 days of acceptance, if it is clear that registration will be needed. But MPs can also wait and register within 28 days of the instalments exceeding £1,500 in the calendar year.

The 2019 Election added another complication. MPs cannot register donations while Parliament is dissolved. And after an Election MPs have slightly longer than usual to register a donation they have accepted: a calendar month instead of 28 days.

25 Ms Moran tells you that in the past there have been delays in obtaining information about donations from her local party organisation. I hope her new arrangements will correct this. I hope also that the explanations above will help her. I would be very happy to have a virtual meeting with her and her team to ensure all is understood.

30 I have annotated the list of donations which you provided to me. Ms Moran has kindly provided a little more information about acceptance dates.

Please let me know if you need anything else.

*14 December 2020*

## **7. Letter from the Commissioner to Ms Layla Moran MP, 16 December 2020**

35 In my letter of 27 November 2020, I explained that I was seeking the advice of [name redacted], Registrar of Members' Financial Interests. I received that advice

on 14 December 2020, and I enclose a copy of her response and annotated chart for your information.

5 It would be helpful to have your comments regarding her advice and particularly on the matters highlighted in the chart, where further information is required. Any other comments you would like to add would also be welcome.

I would be pleased to receive your reply as soon as possible and by **7 January 2020**. If you require additional time to respond please contact [name and contact details redacted].

10 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.

*16 December 2020*

### **8. Letter from Ms Layla Moran MP to the Commissioner, 7 January 2021**

Thank you for your letter of 16th December 2021 regarding your inquiry into my entry in the Register of Members' Financial Interests.

15 Before replying to the issues raised, I would like to let you know that we have a new Local Party Treasurer who took office on 1st January. We have arranged a meeting with him in order to go through the process of donation reporting in order to reduce the likelihood of any problems in the future. We have also been alerted to a change in the party's internal guidance on PPERA donation reporting which means that we  
20 will be changing our own internal process to ensure that the cumulative value of any regular payments is not missed in the future.

I am grateful for the offer of a meeting and will take that up, particularly to check that the processes we now have in place with my Local Party are sufficient.

### **General response**

25 I believe that the information provided to you by the Registrar is correct and that the content of her letter is fair.

### **Comments on some of the detail**

30 Late reporting of regular donations in 2018: As I said in my previous letter, 2018 was the first year we had to deal with donations made in regular instalments, and there was no specific guidance on this at the time. As soon as we realised there was an issue we contacted the Registrar's office and then reported the donations as advised.

Late reporting of one-off donations in early 2019: As I said in my previous letter, there was a batch of donations that we did not receive information from the Local Party about until too late, which I then reported.

5 Acceptance dates of donations from M Petterson and N Bowers: I reported these on the basis that I had been given information about them by the Local Party Treasurer. It appears that I was given that information, and registered the donations accordingly, before, as it now turns out, they were formally accepted.

10 Conjunction of category 2(a) and 2(b) donations in 2020: I accept that some of these donations were reported later than they should have been, because donations of one type should have triggered the reporting of donations of another type. Tracking these more effectively going forward, especially recurring donations that were not reported to me on time and so affected this situation, will be a key part of the process we will now have in place with the Local Party.

15 Assumptions about acceptance dates: Where the Registrar has made assumptions about likely Acceptance dates I agree with her that the Acceptance dates most likely were within the period she has assumed.

I hope this provides you with the information you need. Please let me know you need any further information from me.

20 I would like to reiterate again that I continue to do everything I can to report donations as required by the Code of Conduct in a transparent and timely manner. I will work hard with my staff and with my local party to improve our processes.

*7 January 2021*

### **9. Letter from the Commissioner to Ms Layla Moran MP, 1 February 2021**

25 Thank you for your letter of 7 January 2021, and your response to the advice received from the Registrar of Members' Financial Interests. I now have sufficient information to make a decision.

#### **My decision**

30 Having considered all the correspondence, the published rules on the registration of financial interests, and the advice from the Registrar, I have decided that in failing to register a number of donations within the required 28 day deadline the House has set, you breached paragraph 14 of the *Code of Conduct for Members of Parliament*.

#### **Rationale**

#### **Registration**

35 My investigation looked at a number of donations you received between January 2018 and September 2020, which were registered under Category 2: *Donations and*

*other support for activities as a Member of Parliament. As you are aware this category has two parts, Category 2(a), support received by a local party organisation or indirectly; and Category 2(b), any other support received by a Member.*

- 5 In your letter of 20 November 2020, you explained that you rely on the Local Party Treasurer for information about certain donations, and that, *“On some occasions there were delays between the donation being accepted by the Local Party and me being given the information.”* In that letter you added, *“I accept that some of the donations made to the Local Party were reported later than they should have been because I did not have the information sooner.”*
- 10 In her advice of 14 December 2020, the Registrar informed me that *“...all donations paid directly to Ms Moran were registered in time, but some of the donations registered under Category 2(a) (“linked” donations.) were registered late.”* The Registrar identified that, *“All of those registered in 2018 and a proportion of those registered in 2019 and 2020 were late”*. The table of donations registered, created by the Registrar and shared with you, helped to identify fourteen late registered donations over the period since October 2018. This was in breach of paragraph 14 of the Code.

- In the course of our correspondence it also appeared there had been some confusion about when certain financial interests should be registered. I’m pleased to see in your letter of 7 January 2021, that you are keen to accept the Registrar’s offer of a virtual meeting for yourself and your team, so she can explain the rules. Please could you let me know when this has been arranged.
- 20

### **Overseas visit**

- In your letter of 20 November 2020, you explained there was a delay in receiving the details about the cost of your visit to Tanzania, 29 July – 4 August 2018, and that you had to ask your staff to pursue this with the organisers. You registered your visit on 6 September 2018, which was five days late and a further breach of the rules on registration.
- 25

### **Next Steps**

- You have told me that these errors occurred as a result of communication problems with your local party. You said that you had not understood the rules about registering donations received in instalments. You also said you had not understood the need to aggregate donations received from your local party and those received directly, when calculating whether a particular donation exceeded the financial threshold. However, that misunderstanding could have accounted for at most four of the fourteen late entries.
- 30  
35

- While the number of donations registered late (fourteen since October 2018) is a matter of concern, I have seen no evidence of an attempt to mislead. I therefore consider this breach to be at the less serious end of the spectrum. Standing Order No 150 makes provision for me to conclude an inquiry without making a referral to the Committee on Standards in certain circumstances. 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.
- 40

In your replies you have indicated that you have instructed your team to check more regularly with the local party about donations received. You have also explained you were arranging to receive a briefing from the Registrar, and to meet the new Local Party Treasurer to discuss the process of donation reporting. I believe these steps will be helpful in avoiding a recurrence of registering your interests outside of the 28 days required.

I have decided that a referral to the Standards Committee is not necessary and that I can resolve this breach of the rules through rectification. To do so, the Committee would generally expect the Member to provide the following:

- 10 a) Confirmation you have accepted my decision;
- b) A clear acknowledgement that you have breached the rules; and
- c) An apology for that breach.

In order to progress this matter through the rectification process, I will also require the following:

- 15 d) Confirmation that you have arranged to attend a briefing with the Registrar;
- e) Further details about your briefing with the new Local party Treasurer, and the steps you have both agreed to ensure donations are reported within the required time frame; and
- 20 f) Confirmation that your current entry in the Register of Members' Financial Interests is complete and accurate in line with Chapter 1 of the Guide to the rules.

The above can be provided by way of your formal response to this letter.

Subject to your acknowledgement and apology for this breach of the rules, and your responses to the final points above, I would be willing to conclude this matter by way of the rectification procedure. In cases concerning the registration of interests, I would ask the Registrar to arrange for the three late-registered donations which still appear in the Register to be shown in bold italics for the next twelve months. This will indicate to the reader that these entries have been the subject of an investigation and the rectification process.

30 If you are content for me to conclude the inquiry in this way, please write to me with the above information by **14 February 2021**.

If you agree to my proposal, I will share my written evidence pack with you, so that you can check its factual accuracy before publication. I will also report the outcome

to the Committee on Standards in due course as a matter of routine. I will ask the Registrar to arrange to annotate the relevant information in the Register.

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

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

10 As you know, due to the current pandemic, my team are currently working from home only, so I would be grateful if you could please send your response electronically to [standardscommissioner@parliament.uk](mailto:standardscommissioner@parliament.uk).

*1 February 2021*

#### **10. Letter from Ms Layla Moran MP to the Commissioner, 12 February 2021**

15 Thank you for your letter of February 1<sup>st</sup> 2021.

#### **In response:**

I fully accept the decision set out in your letter.

I acknowledge that I breached the rules as you set out.

I apologise unreservedly for this breach.

#### **20 Actions taken:**

25 Along with key staff members I convened a (virtual) briefing meeting with our new Local Party Treasurer on Friday 22<sup>nd</sup> January 2021. We went through the regulations, shared a copy of the relevant advice with him and emphasised that he needs to keep more detailed records of donations to the Local Party than is required in his role as a Local Party Treasurer. We agreed that we would check with him on a weekly basis going forward, and he agreed to this. Since him starting in the role, this system has been working well.

30 I have arranged to have a briefing with the Registrar of Members' Financial Interests on Tuesday 23 February, 14:00-15:00, to check through the rules regarding donations, and specifically those that relate to donations via the Local Party and those that come in in instalments. Our Local Party Treasurer has been asked to attend.

I can confirm that we have instituted weekly checks, that we have registered those donations in instalments that are likely to pass the threshold during 2021, and that our new Local Party Treasurer is actively engaging with this process. To the best of my knowledge my Register entry is currently up to date.

5 Thank you sincerely for your help and advice in this matter.

*12 February 2021*

### **11. Letter from the Commissioner to Ms Layla Moran MP, 2 March 2021**

10 Thank you for your letter of 12 February 2021, agreeing to my proposal to conclude my inquiry by way of the rectification procedure, and in which you acknowledged and unreservedly apologised for your breach of the rules. Your letter also informed me that both you and your Local Party Treasurer were due to attend a briefing with the Registrar of Members' Financial Interests on 23 February, I hope this briefing was useful and instructive.

15 Please find enclosed a copy of the written evidence pack, which includes the correspondence exchanged during the investigation. In this pack you will find a draft copy of the letter I plan to send to the complainant; it is the first item in the pack, after the summary. While the content of the letter is a matter for me alone, I would welcome any comments on the factual accuracy of this and the written evidence pack. The complainant's name will be redacted from the published pack;  
20 please let me know if there are any further redactions you think should be made, and I will consider your request.

I would be pleased to receive any comments you wish to make on these items as soon as possible, and no later than **Friday 12 March 2021**.

25 Once I have any comments you wish to make, I will finalise the pack, which will then be published on my webpages. I will notify you of the publication of the pack and I will also notify the Committee on Standards of the outcome of my inquiry in due course.

30 In the meantime, our correspondence continues to be protected by parliamentary privilege. Until I send you and the complainant letters concluding the inquiry, this matter should remain confidential.

*2 March 2020*

## Appendix 1.

**Donations made to Ms Layla Moran MP, registered 2018 – 2020**  
**Chart sent with Commissioner’s initiation letter, 9 November**  
**2020:**

5

**Donations registered in 2018**

2(a)	2(b)	Notes
<p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 9 January 2018 and 8 January 2019  Donor status: individual  (Registered 01 October 2018)</p>		<p>Why were on-going donations under category 2(a) not registered sooner?</p> <p>What prompted you to register this donation when you did?</p>
<p>Name of donor: <b>Jessica Frankopan</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 23 January 2018 and 22 January 2019  Donor status: individual  (Registered 01 October 2018)</p>		<p>Why were on-going donations under category 2(a) not registered sooner?</p> <p>What prompted you to register this donation when you did?</p>
<p>Name of donor: <b>Jane MacTaggart</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 2 January 2018 and 1 January 2019  Donor status: individual  (Registered 01 October 2018)</p>		<p>Why were on-going donations under category 2(a) not registered sooner?</p> <p>What prompted you to register this donation when you did?</p>

Donations registered in 2019

2(a)	2(b)	Notes
<p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 from January 2019 to December 2019  Donor status: individual  (Registered 10 September 2019)</p>		<p>When was this donation accepted, and on what date each month was the on-going £200 donation received?</p> <p>Why were on-going donations under category 2(a) not registered sooner?</p> <p>What prompted you to register this donation when you did?</p>
<p>Name of donor: <b>Jessica Frankopan</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019  Donor status: individual  (Registered 25 June 2019)</p> <p>Name of donor: <b>Jessica Frankopan</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £5,000  Donor status: individual  (Registered 25 June 2019)</p>		<p>When was this donation accepted, and on what date each month was the on-going £100 donation received?</p> <p>When was the donation for £5,000 received, and when was it accepted?</p> <p>What prompted you to register these donations when you did?</p>
<p>Name of donor: <b>Dermot Roaf</b>  Address of donor: private  Amount of donation, or nature and value if donation in kind: £1,800 in monthly instalments of £150 between 2 January 2018 and 1 January 2019  Donor status: individual  (Registered 22 January 2019)</p> <p>Name of donor: <b>Dermot Roaf</b>  Address of door: private  Amount of donation, or nature and value if donation in kind: £1,800 paid in monthly instalments of £150 from January 2019 to</p>		<p>When was this donation accepted, and on what date each month was the on-going £150 donation received?</p> <p>When was this donation accepted, and on what date each month was the on-going £150 donation received?</p>

<p>December 2019 Donor status: individual (Registered 10 September 2019)</p> <p>Name of donor: <b>Dermot Roaf</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 September 2019)</p>		<p>When was the donation for £1,000 received, and when was it accepted?</p> <p>Why were on-going donations under category 2(a) not registered sooner?</p> <p>What prompted you to register these donations when you did?</p>
<p>Name of donor: <b>Auvian Ltd</b> Address of donor: 8 Abingdon Villas, London W8 6BX Amount of donation or nature and value if donation in kind: £2,500 Donor status: company, registration 04853169 (Registered 25 June 2019)</p> <p>Name of donor: <b>Nick Bowers</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,700 Donor status: individual (Registered 25 June 2019)</p> <p>Name of donor: <b>Matthew Oakeshott</b> Address of donor: private Amount of donation or nature and value if donation in kind: £10,000 Donor status: individual (Registered 25 June 2019)</p> <p>Name of donor: <b>Mark Petterson</b> Address of donor: private Amount of donation or nature and value if donation in kind: £6,600 Donor status: individual (Registered 25 June 2019)</p> <p>Name of donor: <b>Mark Petterson</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 25 June 2019)</p>		<p>When each of these donations under 2(a) were received, and when they were accepted?</p> <p>What prompted you to register each of these donations when you did?</p>

<p>Name of donor: <b>Mark Petterson</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £4,750  Donor status: individual  (Registered 25 June 2019)</p> <p>Name of donor: <b>Paul Strasburger</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £5,000  Donor status: individual  (Registered 25 June 2019)</p>		
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**Donations registered in 2020**

<b>2(a)</b>	<b>2(b)</b>	<b>Notes</b>
<p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,500  Donor status: individual  (Registered 10 January 2020)</p> <p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020  Donor status: individual  (Registered 25 September 2020)</p>	<p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,500 to my leadership campaign  Date received: 13 June 2020  Date accepted: 13 June 2020  Donor status: individual  (Registered 23 June 2020)</p> <p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £2,500 to my leadership campaign  Date received: 6 August 2020  Date accepted: 6 August 2020  Donor status: individual  (Registered 06 August 2020)</p>	<p>Donations received in category 2(b) registered within 28 days of receipt.</p> <p><b>When was the donation for £2,500 received, and when was it accepted?</b></p> <p><b>When was this donation accepted, and on what date each month was the on-going £200 donation received?</b></p> <p><b>Why were the on-going donations under category 2(a) not registered sooner?</b></p> <p><b>What prompted you to register these donations when you did?</b></p>

<p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020 Donor status: individual (Registered 25 September 2020)</p> <p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 January 2020)</p>	<p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 to my leadership campaign Date received: 2 March 2020 Date accepted: 2 March 2020 Donor status: individual (Registered 18 March 2020)</p> <p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,000 to my leadership campaign Date received: 10 August 2020 Date accepted: 10 August 2020 Donor status: individual (Registered 03 September 2020)</p>	<p>Donations received under category 2(b) were registered within 28 days of receipt.</p> <p>When was this donation accepted, and on what date each month was the on-going £200 donation received?</p> <p>When was the donation for £1,000 received, and when was it accepted?</p> <p>Why were on-going donations in category 2(a) not registered sooner?</p> <p>What prompted you to register these donations when you did?</p>
<p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £1,200 in paid in monthly instalments of</p>	<p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £2,000 to my leadership campaign Date received: 10 July 2020 Date accepted: 10 July 2020 Donor status: individual (Registered 10 July 2020)</p>	<p>Donation received under category 2(b) was registered within 28 days of receipt.</p> <p>When was this donation accepted, and on what date each month was the on-going £100 donation received?</p> <p>When was the donation for £1,000 received, and when was it accepted?</p> <p>When was this donation accepted, and on what date each month was the on-going £100 donation received?</p>

<p>£100 between January 2020 and December 2020 Donor status: individual (Registered 25 September 2020)</p>		<p>Why were the on-going donations in category 2(a) not registered sooner?</p> <p>What prompted you to register these donations when you did?</p>
<p>Name of donor: <b>Peter Bennett-Jones</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Peter Bennett-Jones</b> Address of donor: private Amount of donation or nature and value if donation in kind: £750 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Nick Bowers</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Robert Laurence</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,000 Donor status: individual (Registered 10 January 2020)</p> <p>Name of donor: <b>Edward Powell</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 Donor status: individual (Registered 10 January 2020)</p>		<p>When each of these donations under 2(a) were received, and when they were accepted?</p> <p>What prompted you to register each of these donations when you did?</p>

## Appendix 2.

### Information provided by Ms Layla Moran MP, re: initiation letter and chart, 20 November 2020

#### Information in response to Question 1:

##### 5 Donations reported in 2018 under 2(a)

Name of donor: **Hugo Brunner**

Address of donor: private

Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 9 January 2018 and 8 January 2019

10 Donor status: individual

(Registered 01 October 2018)

This was a regular monthly donation to the Local Party. I asked for advice about how to register regular donations at the point I knew the cumulative total had passed the £1,500 threshold, in September 2018. I then registered this donation in line with that advice.

15

Name of donor: **Jessica Frankopan**

Address of donor: private

Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 23 January 2018 and 22 January 2019

20

Donor status: individual

(Registered 01 October 2018)

This was a regular monthly donation to the Local Party. I asked for advice about how to register regular donations at the point I knew the cumulative total had passed the £1,500 threshold, in September 2018. I then registered this donation in line with that advice.

25

Name of donor: **Jane MacTaggart**

Address of donor: private

Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 2 January 2018 and 1 January 2019

30

Donor status: individual

(Registered 01 October 2018)

This was a regular monthly donation to the Local Party. I asked for advice about how to register regular donations at the point I knew the cumulative total had passed the £1,500 threshold, in September 2018. I then registered this donation in line with that advice.

35

#### Donations reported in 2019 under 2(a) (except where specified)

40 Name of donor: **Hugo Brunner**

Address of donor: private

Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 from January 2019 to December 2019

Donor status: individual

45

(Registered 10 September 2019)

The first donation to the Local Party in 2019 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.

5 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018.

Name of donor: **Jessica Frankopan**

Address of donor: private

10 Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019

Donor status: individual

(Registered 25 June 2019)

15 The first donation to the Local Party in 2019 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.

20 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018, at the point I had information that showed that cumulative donations from this donor had exceeded £1,500 in the calendar year.

Name of donor: **Jessica Frankopan**

Address of donor: private

25 Amount of donation or nature and value if donation in kind: £5,000

Donor status: individual (Registered 25 June 2019)

30 This donation was received by the Local Party on the 6<sup>th</sup> February 2019 and accepted by them. I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Dermot Roaf**

Address of donor: private

35 Amount of donation, or nature and value if donation in kind: £1,800 in monthly instalments of £150 between 2 January 2018 and 1 January 2019

Donor status: individual

(Registered 22 January 2019)

40 This was a regular monthly donation to the Local Party during 2018. The first donation to the Local Party in 2018 was made on the 1<sup>st</sup> January and the ongoing payments were usually made on the 1<sup>st</sup> of each month.

45 I registered this donation in line with the advice I had been given in September 2018, at the point I had information that showed that cumulative donations from this donor had exceeded £1,500 in the calendar year.

Name of donor: **Dermot Roaf**

Address of door: private Amount of donation, or nature and value if donation in kind:

£1,800 paid in monthly instalments of £150 from January 2019 to December 2019

Donor status: individual

(Registered 10 September 2019)

The first donation to the Local Party in 2019 was made on the 1<sup>st</sup> January and the ongoing payments were usually made on the 1<sup>st</sup> of each month.

5 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018, at the point I had information that showed that cumulative donations from this donor had exceeded £1,500 in the calendar year.

10 Name of donor: **Dermot Roaf**  
Address of donor: private  
Amount of donation, or nature and value if donation in kind: £1,000  
Donor status: individual  
(Registered 10 September 2019)

15 This donation was received by the Local Party on the 20<sup>th</sup> August 2019 and accepted by them.

20 I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Auvian Ltd**  
Address of donor: 8 Abingdon Villas, London W8 6BX  
Amount of donation or nature and value if donation in kind: £2,500  
25 Donor status: company, registration 04853169  
(Registered 25 June 2019)

This donation was received by the Local Party on the 8<sup>th</sup> February 2019 and accepted by them.

30 I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

35 This and the following six donations were reported later than the guidelines as we had not been given the information by the Local Party. I was reminded by the Registration Assistant of the importance of reporting interests within the guidelines and asked my staff to check with the Local Party more regularly from this point onwards.

Name of donor: **Nick Bowers**  
Address of donor: private  
40 Amount of donation or nature and value if donation in kind: £5,700  
Donor status: individual  
(Registered 25 June 2019)

45 This donation was received by the Local Party on the 13<sup>th</sup> May 2019 and accepted by them.

I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Matthew Oakeshott**

Address of donor: private  
Amount of donation or nature and value if donation in kind: £10,000  
Donor status: individual  
(Registered 25 June 2019)

5

This donation was received by the Local Party on the 16<sup>th</sup> May 2019 and accepted by them.

I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

10

Name of donor: **Mark Petterson**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £6,600  
Donor status: individual  
(Registered 25 June 2019)

15

This donation was received by the Local Party on the 10<sup>th</sup> January 2019 and accepted by them.

20

I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Mark Petterson**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £1,000  
Donor status: individual  
(Registered 25 June 2019)

25

This donation was received by the Local Party on the 17<sup>th</sup> April 2019 and accepted by them.

30

I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Mark Petterson**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £4,750  
Donor status: individual  
(Registered 25 June 2019)

35

This donation was received by the Local Party on the 13<sup>th</sup> May 2019 and accepted by them.

40

I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

Name of donor: **Paul Strasburger**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £5,000  
Donor status: individual  
(Registered 25 June 2019)

45

This donation was received by the Local Party on the 6<sup>th</sup> February 2019 and accepted by them.

- 5 I registered this donation at the point I had information about it and my staff had checked the details with the Local Party.

**Donations reported in 2019 under 2(a)** (except where specified)

- 10 Name of donor: **Hugo Brunner**  
 Address of donor: private  
 Amount of donation or nature and value if donation in kind: £2,500  
 Donor status: individual  
 (Registered 10 January 2020)
- 15 This was a donation made to the Local Party during the general election period on 20<sup>th</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline.
- 20 Name of donor: **Hugo Brunner**  
 Address of donor: private  
 Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020  
 Donor status: individual  
 (Registered 25 September 2020)
- 25 The first donation to the Local Party in 2020 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.
- 30 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018.
- 35 Name of donor: **Jessica Frankopan**  
 Address of donor: private  
 Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020  
 Donor status: individual  
 (Registered 25 September 2020)
- 40 The first donation to the Local Party in 2020 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.
- This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018.
- 45 Name of donor: **Jessica Frankopan**  
 Address of donor: private  
 Amount of donation or nature and value if donation in kind: £1,000  
 Donor status: individual

(Registered 10 January 2020)

5 This was a donation made to the Local Party before the general election period on 9<sup>th</sup> September 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline. (This will have come in after our final pre-election check in September 2019 which is why it wasn't included in the update on 10<sup>th</sup> September 2019.)

10 Name of donor: **Jane MacTaggart**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019  
Donor status: individual  
(Registered 10 January 2020)

15 The first donation to the Local Party in 2019 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.

20 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018 and after the donor had passed the reporting threshold due to a separate election donation.

25 Name of donor: **Jane MacTaggart**  
Address of donor: private  
Amount of donation or nature and value if donation in kind: £1,000  
Donor status: individual  
(Registered 10 January 2020)

30 This was a donation made to the Local Party during the general election period on 4<sup>th</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline because, combined with their regular payment this donor had passed the threshold.

35 Name of donor: **Jane MacTaggart**  
Address of donor: private  
Amount of donation, or nature and value if donation in kind: £1,200 in paid in monthly instalments of £100 between January 2020 and December 2020  
Donor status: individual  
(Registered 25 September 2020)

40 The first donation to the Local Party in 2019 was made on the 8<sup>th</sup> January and the ongoing payments were usually made on the 8<sup>th</sup> of each month.

45 This was a regular monthly donation to the Local Party. I registered this donation in line with the advice I had been given in September 2018 and after the donor had passed the reporting threshold due to a separate donation to my leadership election campaign.

Name of donor: **Peter Bennett-Jones**  
Address of donor: private

Amount of donation or nature and value if donation in kind: £1,000

Donor status: individual

(Registered 10 January 2020)

5 This was a donation made to the Local Party during the general election period on 1<sup>st</sup> December 2019 and accepted by them. I registered this donation at the point I had information about it because, combined with another donations, this donor had passed the reporting threshold and by the post-election registration deadline.

10 Name of donor: **Peter Bennett-Jones**

Address of donor: private

Amount of donation or nature and value if donation in kind: £750

Donor status: individual

(Registered 10 January 2020)

15

This was a donation made to the Local Party during the general election period on 1<sup>st</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it because, combined with another donations, this donor had passed the reporting threshold and by the post-election registration deadline.

20

Name of donor: **Nick Bowers**

Address of donor: private

Amount of donation or nature and value if donation in kind: £5,000

Donor status: individual

25

(Registered 10 January 2020)

This was a donation made to the Local Party during the general election period on 5<sup>th</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline.

30

Name of donor: **Robert Laurence**

Address of donor: private

Amount of donation or nature and value if donation in kind: £2,000

Donor status: individual

35

(Registered 10 January 2020)

[Please note – we have this as a donation of £2,500 and we believe that we reported it as such at the time in our post-General Election submission to the Registrar.]

40 This was a donation made to the Local Party during the general election period on 18<sup>th</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline.

45 Name of donor: **Edward Powell**

Address of donor: private

Amount of donation or nature and value if donation in kind: £5,000

Donor status: individual

(Registered 10 January 2020)

This was a donation made to the Local Party during the general election period on 8<sup>th</sup> November 2019 and accepted by them. I registered this donation at the point I had information about it and by the post-election registration deadline.

## 5 Appendix 3.

### **Donations made to Ms Layla Moran MP, registered 2018 – 2020: Registrar's comments, 11 December 2020**

10

#### **Donations registered in 2018** *Information in italics was given by Ms Moran*

2(a)	2(b)	Registrar's comments
Name of donor: <b>Hugo Brunner</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 9 January 2018 and 8 January 2019 Donor status: individual (Registered 01 October 2018)		This should have been registered at the latest within 28 days of the instalments exceeding £1,500; i.e. within 28 days of 9 August
Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 23 January 2018 and 22 January 2019 Donor status: individual (Registered 01 October 2018)		This should have been registered at the latest within 28 days of the instalments exceeding £1,500; i.e. within 28 days of 23 August
Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,400 in monthly instalments of £200 between 2 January 2018 and 1 January 2019 Donor status: individual (Registered 01 October 2018)		This should have been registered at the latest within 28 days of the instalments exceeding £1,500; i.e. within 28 days of 2 August

15

Donations registered in 2019

2(a)	2(b)	Registrar's comments
<p>Name of donor: <b>Hugo Brunner</b>  Address of donor: private  Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 from January 2019 to December 2019  Donor status: individual  (Registered 10 September 2019)</p> <p><i>This was paid on the 8<sup>th</sup> of each month</i></p>		<p>This should have been registered at the latest within 28 days of the instalments exceeding £1,500; i.e. within 28 days of 8 August</p>
<p>Name of donor: <b>Jessica Frankopan</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019  Donor status: individual  (Registered 25 June 2019)</p> <p><i>This was paid on the 8<sup>th</sup> of each month</i></p> <p>Name of donor: <b>Jessica Frankopan</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £5,000  Donor status: individual  (Registered 25 June 2019)</p> <p><i>This was received on 6 February. According to the Electoral Commission, it was accepted on 8 March</i></p>		<p>This should have been registered at the latest within 28 days of 8 March, when Ms Moran accepted £5,000 and the threshold was exceeded.</p> <p>This should have been registered at the latest within 28 days of acceptance; i.e. within 28 days of 8 March</p>
<p>Name of donor: <b>Dermot Roaf</b>  Address of donor: private  Amount of donation, or nature and value if donation in kind: £1,800 in monthly instalments of £150 between 2 January 2018 and 1 January 2019  Donor status: individual  (Registered 22 January 2019)</p> <p><i>This was received on the 1st of each month</i></p> <p>Name of donor: <b>Dermot Roaf</b>  Address of door: private</p>		<p><u>2018 donation</u>  The Category 2(a) donation of £1,800 in instalments should have been registered at the latest within 28 days of the instalments exceeding £1,500; i.e. within 28 days of 1 November 2018</p>

<p>Amount of donation, or nature and value if donation in kind: £1,800 paid in monthly instalments of £150 from January 2019 to December 2019 Donor status: individual (Registered 10 September 2019)</p> <p><i>This was usually received on the 1<sup>st</sup> of each month</i></p> <p>Name of donor: <b>Dermot Roaf</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 September 2019)</p> <p><i>Received 20 August 2019</i></p>		<p>Registered in time</p> <p>Registered in time</p>
<p>Name of donor: <b>Auvian Ltd</b> Address of donor: 8 Abingdon Villas, London W8 6BX Amount of donation or nature and value if donation in kind: £2,500 Donor status: company, registration 04853169 (Registered 25 June 2019)</p> <p><i>Received 8 February 2019</i> Accepted 20 March 2019 according to the Electoral Commission database</p> <p>Name of donor: <b>Nick Bowers</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,700 Donor status: individual (Registered 25 June 2019)</p> <p><i>Received 13 May 2019</i> Accepted 30 June 2019 according to the Electoral Commission database</p> <p>Name of donor: <b>Matthew Oakeshott</b> Address of donor: private Amount of donation or nature and value if donation in kind: £10,000 Donor status: individual (Registered 25 June 2019)</p> <p><i>Received 16 May 2019</i></p>		<p>This should have been registered within 28 days of 20 March 2019</p> <p>If the dates are right the donation has been registered before the local party had formally accepted the donation.</p> <p>If the dates are right the donation has been registered before the local party had formally accepted the donation.</p>

<p><b>Accepted 30 June 2019 according to the Electoral Commission database</b></p> <p>Name of donor: <b>Mark Petterson</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £6,600  Donor status: individual  (Registered 25 June 2019)</p> <p><i>Received 10 January 2019</i>  Accepted 9 February 2019 according to Electoral Commission database</p> <p>Name of donor: <b>Mark Petterson</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £1,000  Donor status: individual  (Registered 25 June 2019)</p> <p><i>Received 17 April 2019</i>  <b>Accepted 30 June 2019</b></p> <p>Name of donor: <b>Mark Petterson</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £4,750  Donor status: individual  (Registered 25 June 2019)</p> <p><i>Received 13 May 2019</i>  <b>Accepted 30 June 2019</b></p> <p>Name of donor: <b>Paul Strasburger</b>  Address of donor: private  Amount of donation or nature and value if donation in kind: £5,000  Donor status: individual  (Registered 25 June 2019)</p> <p><i>Received 6 February 2019</i></p> <p>Received 8 February 2019 and accepted 10 March 2019 according to Electoral Commission database</p>		<p>This should have been registered within 28 days of 9 February 2019</p> <p><b>If the dates are right the donation has been registered before the local party had formally accepted the donation.</b></p> <p><b>If the dates are right the donation has been registered before the local party had formally accepted the donation.</b></p> <p>This should have been registered within 28 days of 10 March 2019</p>
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**Donations registered in 2020**

2(a)	2(b)	Notes
<p>Name of donor: <b>Hugo Brunner</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,500 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 20 November 2019; accepted 20 December 2019</i></p> <p>Name of donor: <b>Hugo Brunner</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020 Donor status: individual (Registered 25 September 2020)</p>	<p>Name of donor: <b>Hugo Brunner</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,500 to my leadership campaign Date received: 13 June 2020 Date accepted: 13 June 2020 Donor status: individual (Registered 23 June 2020)</p> <p>Name of donor: <b>Hugo Brunner</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,500 to my leadership campaign Date received: 6 August 2020 Date accepted: 6 August 2020</p> <p>Donor status: individual (Registered 06 August 2020)</p>	<p>The two Category 2b donations were registered in time.</p> <p><u>2019 donation.</u> The Category 2a donation of £2,500 was accepted during December 2019 and registered within 28 days, so it was registered in time.</p> <p><u>2020 donation</u></p> <p>The Category 2(a) donation of £2,400 in instalments should have been registered at the latest within 28 days of Ms Moran accepting the first Category 2b donation (of £2,500); i.e. within 28 days of 13 June, when the threshold was exceeded.</p>
<p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £2,400 paid in monthly instalments of £200 between January 2020 and December 2020 Donor status: individual (Registered 25 September 2020)</p> <p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000</p>	<p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 to my leadership campaign Date received: 2 March 2020 Date accepted: 2 March 2020 Donor status: individual (Registered 18 March 2020)</p> <p>Name of donor: <b>Jessica Frankopan</b> Address of donor: private Amount of donation or nature and value if donation in kind:</p>	<p>The two Category 2b donations were registered in time.</p> <p><u>2020 donation</u></p> <p>The Category 2(a) donation of £2,400 in instalments should have been registered at the latest within 28 days of Ms Moran accepting the first Category 2b donation (of £5,000); i.e. within 28 days of 2 March, when the threshold was exceeded.</p>

<p>Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 9 September 2019</i></p> <p>Accepted 9 October 2019 according to Electoral Commission database</p>	<p>£2,000 to my leadership campaign</p> <p>Date received: 10 August 2020 Date accepted: 10 August 2020</p> <p>Donor status: individual (Registered 03 September 2020)</p>	<p><u>2019 donation</u></p> <p>The Category 2a donation of £1,000 should have been registered within 28 days of being accepted on 9 October 2019, since the over £1,500 threshold had already been exceeded. (See the item relating to the £5,000 donation accepted on 8 March 2019 and registered on 25 June 2019. That is listed under donations registered in 2019)</p>
<p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,200 paid in monthly instalments of £100 between January and December 2019</p> <p>Donor status: individual (Registered 10 January 2020)</p> <p><i>This was paid on the 8<sup>th</sup> of each month</i></p> <p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 4 November 2019</i></p> <p><b><i>No acceptance date found, but submitted to national party on 30 November 2019.</i></b></p> <p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £1,200 in paid in monthly instalments of £100 between January 2020 and December 2020</p>	<p>Name of donor: <b>Jane MacTaggart</b> Address of donor: private Amount of donation, or nature and value if donation in kind: £2,000 to my leadership campaign</p> <p>Date received: 10 July 2020 Date accepted: 10 July 2020</p> <p>Donor status: individual (Registered 10 July 2020)</p>	<p>The category 2b donation was registered in time.</p> <p><u>2019 donations</u></p> <p>Both the £1,200 and the £1,000 registered on 10 January 2020 fall below the registration threshold for individual payments. But if both were accepted in 2019, they both require registration. The £1,200 did not require registration until the £1,000 had been accepted. If the £1,000 was accepted in 2019 while the House was dissolved, both payments would have been registered in time.</p> <p><u>2020 donation</u></p> <p>The £1,200 given in 2020 ought to have been registered within 28 days of 10 July 2020, when the Category 2b donation was accepted and the over £1,500 threshold was exceeded.</p>

<p>Donor status: individual (Registered 25 September 2020)</p>		
<p>Name of donor: <b>Peter Bennett-Jones</b> Address of donor: private Amount of donation or nature and value if donation in kind: £1,000 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 1 December 2019</i> <b>No acceptance date found, but submitted to national party on 31 December 2019.</b></p> <p>Name of donor: <b>Peter Bennett-Jones</b> Address of donor: private Amount of donation or nature and value if donation in kind: £750 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 1 November 2019</i> <b>No acceptance date given</b></p>		<p><u>2019 donations</u></p> <p>The £1,000 and the £750 each fall below the registration threshold for individual payments, but both would require registration if both were accepted in 2019.</p> <p>If the £1,000 was accepted in December 2019, thus triggering the requirement to register the £750, both donations were registered in time.</p>
<p>Name of donor: <b>Nick Bowers</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 5 November 2019</i> Accepted 5 December 2019 according to Electoral Commission database</p> <p>Name of donor: <b>Robert Laurence</b> Address of donor: private Amount of donation or nature and value if donation in kind: £2,500 Donor status: individual</p>		<p>This donation was accepted during Dissolution and registered within one month of the House's return, so it was registered in time.</p> <p>This donation was received during Dissolution and registered within one month of the House's return, so it was registered in time.</p>

<p>(Registered 10 January 2020; updated 20 November 2020)</p> <p><i>Received 18 November 2019</i> Accepted 18 December 2019, according to Electoral Commission database</p>		
<p>Name of donor: <b>Edward Powell</b> Address of donor: private Amount of donation or nature and value if donation in kind: £5,000 Donor status: individual (Registered 10 January 2020)</p> <p><i>Received 8 November 2018</i> Accepted 8 December 2019, according to Electoral Commission database</p>		<p>This donation was accepted during Dissolution and registered within one month of the House's return, so it was registered in time.</p>