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Summary

5 I opened an inquiry on 1 February 2022, after receiving a complaint alleging that the All-Party Parliamentary Group (APPG) for Boxing (the Group) had breached the Rules on APPGs. The complainant alleged that, by failing to provide information about the secretariat's client list within 28-days of receiving his request, the Group had breached the Guide to the Rules on All-Party Parliamentary Groups set by the House.

10 During my inquiry it became apparent there had been some confusion regarding the difference between the Group's membership list and the secretariat's client list. My investigation found that, as a result of this confusion, the APPG for Boxing had breached paragraph 32(a) of the Rules on APPGs.

15 Furthermore, my inquiry also found that the Group had submitted an inaccurate registration form to the Registrar on 12 August 2021. By failing to submit an accurate Register entry, recording 'Benefits in Kind' provided by the secretariat and received by the Group for the reporting year 2021-2022, I concluded that the APPG for Boxing had also breached Appendix 1 Paragraph 4 of the Rules on APPGs.

20 The Chair of the Group, Mr Chris Evans MP, cooperated with every step of my investigation. He acknowledged and apologised on behalf of the Group for these breaches. I have also been informed that a copy of the client list has now been shared with the complainant.

25 It became apparent during my investigation that there had been confusion around the interpretation of paragraph 32(a) of the Rules for APPGs, however, I was satisfied there was no deliberate attempt to mislead. I consider these breaches to fall at the less serious end of the spectrum and I have concluded the matter using the rectification procedure available to me under Standing Order No 150.¹

30 At the start of my investigation Mr Evans informed me he had been planning to stand down from his role, as Chair of the APPG for Boxing, at the Group's AGM. On 24 May 2022, Mr Evans informed the Registry Office that the APPG was disbanded on that day. The APPG for Boxing will, therefore, not be listed in future editions of the APPG Register.

¹ https://publications.parliament.uk/pa/cm5802/cmstords/so_804_2021/so-804_02122021v2.pdf

Chair of the All-Party Parliamentary Group for Boxing, Mr Chris Evans MP: Resolution letter

Letter from the Commissioner to the complainant, 08 June 2022

5 I wrote to you on 1 February 2022, to tell you I had begun an inquiry into your allegation that the All-Party Parliamentary Group for Boxing had breached paragraph 32(a) of the Rules for APPGs.

10 In his capacity as Chair of the Group, Mr Chris Evans MP explained the reasons why you did not receive a copy of the client list when you first requested this in October 2021. During my inquiry it became apparent there had been some confusion in understanding the difference between the Group's membership list and the secretariat's client list. My investigation found that, as a result of this confusion, the APPG for Boxing had breached paragraph 32(a) of the Rules.

15 The full rationale for my decision can be found in my letter to the Chair of the Group Mr Chris Evans MP, dated 18 May 2022 (item 21 in the written evidence pack), which you can access once the evidence pack has been published.

20 In his capacity as Chair of the APPG for Boxing, Mr Evans acknowledged and apologised for the Group's breach of the rules, and I have been informed that a copy of the secretariat's client list has now been shared with you. I consider this breach to be at the less serious end of the spectrum and have decided that this inquiry should be concluded through the rectification procedure, which is available to me through House of Commons' Standing Order No 150².

I will publish my decision and the written evidence pack shortly [on my webpages](#)³ and I will report the outcome to the Standards Committee in due course.

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

08 June 2022

² https://publications.parliament.uk/pa/cm5802/cmstords/so_804_2021/so-804_02122021v2.pdf

³ <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-2022-23/>

Written evidence

1. Email from the complainant to the Commissioner, 03 December 2021

1. I'm writing to you to complain about the All-Party Parliamentary Group ("APPG") for boxing.
- 5 2. Disclosure: I write a blog at [details redacted].
3. Stewart Public Affairs Ltd. acts as the group's secretariat.
4. The value of those secretariat services for the current year is £9 001-10 500, according to the latest register of APPGs (as at 17 November 2021).
- 10 5. I refer to the Guide to the Rules on APPGs, para 32. It's my understanding that Stewart Public Affairs Ltd. is required to disclose its clients during the last 12 months because the value of the secretariat services exceeds the threshold for registration.
- 15 6. On 19 October 2021, I emailed APPG public contact [name redacted] of Stewart Public Affairs Ltd. There I referred to the Guide to the Rules on APPGs, para 32. I asked [name redacted] to disclose the clients of Stewart Public Affairs Ltd. during the last 12 months.
7. By same-day reply, [name redacted] wrote: "The Secretariat service for the APPG on Boxing is provided at a value below the threshold for registration and, as such, we are not required to disclose our clients."
- 20 8. The next day I requested a clarification from [name redacted]. I said in an email: "The 'threshold for registration' to which you refer: what is its value, please?" She didn't respond.
9. Stewart Public Affairs Ltd. failed to disclose the requested client information within the stipulated 28 days. I therefore brought the matter to the attention of the chair and registered contact, Chris Evans MP, in an email dated 23
25 November 2021.
10. Mr Evans didn't respond.
- 30 11. However, on 24 November 2021, I received an email from [name redacted], where she said nothing about my email to Mr Evans of the previous day. There she listed the "current members" of the APPG, adding: "The annual member fee for corporate organisations is £1,250. For charities this fee is £500, and for boxing clubs it is £250."

12. Yet that email still didn't disclose the clients of Stewart Public Affairs Ltd. during the last 12 months.
13. By next-day reply, I pointed out the omission and requested an explanation. [Name redacted] responded the same day, writing: "Please feel free to call [name and number redacted], he is available now to answer your questions if you wish to speak with him directly."
14. On 29 November 2021, I told [name redacted] in an email: "There's no need for phone calls. Everything should be in writing." I finished: "Unless I receive the requested information by 17:00 on 30 November 2021, I shall assume you won't be providing it."
15. I did hear from [name redacted] within the deadline – but she simply wrote: "We are surprised that you do not want to speak to us. May I ask why you are interested in our client list?"
16. As I say, Stewart Public Affairs Ltd. failed to disclose the requested client information within the stipulated 28 days. What's more, even after writing to the chair and registered contact, Mr Evans, about the matter on 23 November 2021, the firm still didn't make the information available. Instead, Stewart Public Affairs Ltd. has obstructed and obfuscated.

03 December 2021

20 Enclosures provided by the complainant as evidence⁴

Emails exchanged between the complainant, the Public Enquiry Point for the APPG on Boxing, and Chair of the APPG Mr Chris Evans MP 19/10/2021 – 30/11/2021

25 From: [Complainant]
Sent: 19 October 2021 14:44
To: APPG Secretariat [Public Enquiry Point]
Subject: Boxing APPG

Dear [name redacted]

30 Boxing APPG

⁴ OPCS exchanged further emails with the complainant between 10 December 2021 and 17 January 2022, to inquire whether the information had been provided, and request the complainant submit copies of the correspondence between him and the APPG for Boxing secretariat and the Chair of the Group.

1. I'm writing to you in your role as public contact for the All-Party Parliamentary Group ("APPG") for boxing.

2. Disclosure: I write a blog at [website redacted].

3. I refer to the Guide to the Rules on APPGs, para 32. Please disclose the clients of Stewart Public Affairs Ltd. during the last 12 months.

Yours sincerely,
[Name redacted]

10

From: [Public Enquiry Point]
Sent: 19 October 2021 15:31
To: [Complainant]
Subject: Re: Boxing APPG

15

Dear [name redacted],

I hope this email finds you well.

20 The Secretariat service for the APPG on Boxing is provided at a value below the threshold for registration and, as such, we are not required to disclose our clients. I hope that this clarifies this request.

Please do not hesitate to get in touch with me if you have any further queries, comments, or concerns.

25

Best regards,
[Name redacted],

30

From: [Complainant]
Sent: 20 October 2021 15:30
To: [Public Enquiry Point],
Subject: Re: Boxing APPG

35

Dear [Public Enquiry Point],

1. Thank you for the response.

2. I'd be grateful for a clarification. The "threshold for registration" to which you refer: what is its value, please?

40

Yours sincerely,

[name redacted]

From: [Complainant]

Sent: 23 November 2021 14:45

To: EVANS, Chris

5 Subject: Request for comment: Boxing APPG

Dear Mr Evans,

Request for comment: Boxing APPG

10 1. I'm writing to you in your role as chair and registered contact for the All-Party Parliamentary Group ("APPG") for boxing.

2. Disclosure: I write a blog at [website redacted].

15 3. On 19 October 2021, I emailed APPG public contact [name redacted] of Stewart Public Affairs Ltd. There I referred to the Guide to the Rules on APPGs, para 32. I asked [name redacted] to disclose the clients of Stewart Public Affairs Ltd. during the last 12 months.

20 4. By same-day reply, [name redacted] wrote: "The Secretariat service for the APPG on Boxing is provided at a value below the threshold for registration and, as such, we are not required to disclose our clients."

5. The next day I requested a clarification from [name redacted]. I said in an email: "The 'threshold for registration' to which you refer: what is its value, please?" She didn't respond.

25 6. Why won't Stewart Public Affairs Ltd. disclose its clients during the last 12 months?

7. Care to comment, please?

Yours sincerely,
[Complainant]

30

From: [Public Enquiry Point],

Sent: 24 November 2021 16:59

To: [Complainant]

35 Subject: Re: Boxing APPG

Dear [name redacted],

Thank you for your email, and apologies for the delayed response.

For your information, I enclose a list of current members of the Boxing APPG:

- 5 Matchroom
BBB of C
My Next Match
Boxing Futures
Empire Fighting Chance
10 The Boxing Academy
GVC Group
StubHub
Pat Benson Boxing Academy
Fight for Peace
- 15 Associates:
GB Boxing
English Institute of Sport
England Boxing
Boxing Scotland
20 Welsh Boxing

The annual member fee for corporate organisations is £1250. For charities this fee is £500, and for boxing clubs it is £250.

There is no fee for the Boxing Governing Bodies as they are Associate members.

- 25 We will be launching a LinkedIn page for the Group shortly and do let me know if you would like to attend one of the forthcoming virtual sessions.

I hope this helps clarify any questions you might have about the APPG Boxing.

Kind regards,
[Public Enquiry Point],
30

From: [Complainant]
Sent: 25 November 2021 15:26
35 To: [Public Enquiry Point],
Subject: Re: Boxing APPG

Dear [name redacted],

- 40 1. Thank you for the response.
2. Nevertheless you still haven't disclosed the clients of Stewart Public Affairs Ltd. during the last 12 months. Why?

3. This is what I requested in my email dated 19 October 2021.

Yours sincerely,
[Name redacted]

5

From: [Public Enquiry Point],
Sent: 25 November 2021 17:48
10 To: [Complainant]
Subject: Re: Boxing APPG

Dear [name redacted],

15 Thank you for your response.

Please feel free to call [name and phone number redacted], he is available now to answer your questions if you wish to speak with him directly.

All the best,
20 [Name redacted]

From: [Complainant]
25 Sent: 29 November 2021 15:45
To: [Public Enquiry Point],
Subject: Re: Boxing APPG

Dear [name redacted],

30

1. Thank you for the response.

2. There's no need for phone calls. Everything should be in writing.

35 3. Unless I receive the requested information by 17:00 on 30 November 2021, I shall assume you won't be providing it.

Yours sincerely,
40 [Name redacted]

From: [Public Enquiry Point],
Sent: 30 November 2021 16:38
45 To: [Complainant]
Subject: Re: Boxing APPG
Dear [name redacted],

Thank you for your response.

We are surprised that you do not want to speak to us. May I ask why you are interested in our client list?

5

All the best, [Name redacted],

03 December 2021

2. Letter from the Commissioner to Mr Chris Evans MP, 01 February 2022

10 I am writing to you as Chair of the All-Party Parliamentary Group on Boxing following the receipt of an allegation from [name redacted], regarding the group's compliance with the Rules for APPG's. I have decided to open a formal inquiry into [name redacted] complaint that the Group's Secretariat, Stewart Public Affairs Ltd, did not disclose its client list within 28-days of his request for this information. I
15 have enclosed a copy of [name redacted] submission and the enclosures sent with it.

The scope of my inquiry

On 19 October 2021, [name redacted] emailed the group's Public Enquiry Point, [name redacted] of Stewart Public Affairs Ltd, and made the following request: "*I
20 refer to the Guide to the Rules on APPGs, para 32. Please disclose the clients of Stewart Public Affairs Ltd. during the last 12 months.*"

[Name redacted] contacted my office on 3 December 2021 and explained that he had exchanged a number of emails with [name redacted] in October and November 2021, but he had not received the secretariat's client list as requested. Further to
25 this, [name redacted] explained that he had emailed you directly as Chair of the group on 23 November 2021, but that he did not receive a response.

My office contacted [name redacted] on 21 December 2021, to explain that I would consider his allegation about the APPG on Boxing when I returned to the office in the New Year. On 17 January 2022, my office contacted [name redacted] to ask
30 whether he had received the details of the clients of Stewart Public Affairs Ltd. since our last correspondence. [name redacted] responded on the same day to say he had not. As a result, I decided to open a formal inquiry into [name redacted] allegation.

My inquiry will focus on whether the group has breached paragraph 32(a) of the *Guide to the Rules for All-Party Parliamentary Groups*⁵ (the Guide to the Rules). If the
35 scope of my inquiry changes, I will update you in writing.

The relevant rules of the House

⁵ <https://www.parliament.uk/about/mps-and-lords/members/apg/rules-on-appgs/>

Paragraph 3 of the APPG Guide to the Rules⁶ says:

5 3. *Each group's Chair and Registered Contact, who must be a Member of the House of Commons, is responsible for ensuring that the group complies with the rules of the House, and that any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with those rules.*

The specific rules regarding APPG secretariats and contact points, in paragraph 32 of the APPG Guide to the Rules⁷, states:

10 32. *Each group's Chair and Registered Contact is responsible for ensuring if any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with the rules of the House. In particular, if a consultancy provides such services, and the value of those services exceeds the threshold for registration, it must be prepared to disclose information about its clients; if a charity or other not for profit organisation provides such services, it must be prepared to disclose information about its donors. The organisation providing the services must either publish this information online as a matter of routine or make it available within 28 days if any person or organisation asks them to do so. The information which must be made available is as follows:*

15 *a. If a consultancy provides a secretariat or support services whose value exceeds the threshold for registration: a list of any commercial organisations who were clients of the consultancy during the preceding twelve months; or, if providing the information on request, during the twelve months immediately before the month in which the request was made.*

20

...

Paragraph 17 of the rules explains:

30 17. *All groups must keep their register entry up to date, submitting details of any registrable change within 28 days of that change. Each group must register the following key information.*

...

⁶ https://old.parliament.uk/documents/pcf/all-party-groups/guide-to-rules/guide.html#_idTextAnchor001

⁷ https://old.parliament.uk/documents/pcf/all-party-groups/guide-to-rules/guide.html#_idTextAnchor021

m. Details of any benefits (whether financial or in kind) which the group has received from any source other than Parliament, or from the Independent Parliamentary Standards Authority, if the total value of the benefits from that source exceeded £1,500 in the calendar year.

5 I note that at the time [name redacted] made his request for the client list of the secretariat, Stewart Public Affairs Ltd, the APPG on Boxing had registered the secretariat as providing a benefit in kind valued between £9,001 – £10,500.

Next steps

10 I would welcome your comments on the allegation from [name redacted]. In particular, I would be grateful for your answers to the following specific questions:

1. What steps have you taken as the Chair of the APPG on Boxing to ensure that the secretariat is aware of and complies with the Guide to the Rules for APPGs?

15 2. Was the information requested by [name redacted] provided within 28-days as set out in the rules for APPGs?

a) If this information was not provided to [name redacted], please explain the reasons for this?

20 Please provide any evidence you have 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

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

30 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. The same requirement extends to [the complainant].

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

Procedure

I enclose a copy of the Commissioner's Information Note⁸, 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.

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.

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

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

Potential outcomes

15 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 circumstances defined by Standing Order No. 150, uphold the allegation and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards. Where an allegation is
20 not upheld or is rectified, the investigation material, including our correspondence, will be published on the Parliament website.

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 will be published as an appendix to
25 the Committee's own Report.

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

Action

I would be grateful to have your response to this letter as soon as possible and no later than Monday 14 February 2022.

⁸ <https://www.parliament.uk/globalassets/documents/pcfs/pcs-information-note.pdf>

If you would prefer me to communicate with you via a different email 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.

5 Due to the ongoing Corona virus pandemic, my team are working both from the office and from home, so I would be grateful if you could send your response electronically to; standardscommissioner@parliament.uk

Thank you for your cooperation with this matter.

01 February 2021

10 **3. Letter from Mr Chris Evans MP, to the Commissioner, 14 February 2022**

Thank you for your letter following a complaint by a [name redacted] about the boxing all party parliamentary group, specifically that Stewart Public Affairs did not reveal their client list within 28 days when requested.

15 I think it would be helpful if I set out the background to the case. From January 2021 [name redacted] provided Secretariat support, and correctly registered benefits in kind of between £9,001-10,500.

20 This arrangement came to an end in August 2021 when the secretariat was taken over by Stewart Public Affairs and the register was updated to reflect this on 12th August 2021. Since Stewart Public Affairs took over the Boxing APPG they have been paid £500 for Secretariat services to the group.

It is my understanding that the Secretariat must reveal all members of the APPG on request and this information was provided to [name redacted] immediately, well within the 28 days stated in the APPG rules.

25 It is also my understanding that if payment in kind is less than £1500, the Secretariat is not required to publish their company client list. As Stewart Public Affairs has only received £500 since taking over the role, I believe that he was correct in his assumption he could withhold this information from [name redacted].

30 However, having looked at the online register, there was clearly a mistake with how the Secretariat change had been recorded. Stewart Public Affairs was showing as providing benefits in kind to the value of £9,001-£10,500. I believe the mistake was that just the name had been updated but the figure was not. This has now been corrected. I have asked [name redacted], MD of Stewart Public Affairs, for his email to the house authorities asking for the original update to the register as I cannot be certain whether it was a mistake by Stewart Public Affairs or the House. I have not
35 yet received this email but I will forward it on to you as soon as I have it.

Even though [name redacted] maintains his company is under the benefits in kind threshold and he is, therefore, within his rights to withhold his client list, in the

interests of openness and transparency, he has given me a copy of all the companies he has worked with in the last 12 months, which I have enclosed [see below]⁹.

5 It is correct to say [name redacted], emailed me directly and I did not respond to him. [name redacted] email contained no other contact details except a link to an obscure blog which I had never heard of, and, for security reasons, I would never click on. It has been a longstanding policy of mine not reply to unsolicited, non-constituency emails. I did talk to the Secretariat at the time and agreed that his response was in line with my understanding of the APPG rules. I therefore believed no further action was necessary until I received your letter. I had not spotted the
10 mistake on the online register until this point and will, in future, ensure that all updates are recorded and published correctly as soon as the register is live.

I hope this will help your investigation, should you require any further information, please let me know.

14 February 2022

15 **Enclosure: Letter from the Managing Director of Stewart Public Affairs Ltd. to Mr Chris Evans MP, 14 February 2022**

Dear Chris,

Disclosure of Client List

20 I write to confirm that the APPG rules refer to "commercial organisations" (32-point a) and since we assumed responsibility for the APPG on Boxing (1st August 2021) we have represented the following "non-commercial" organisations:

British Woodworking Federation (trade body)

Wendover Parish Council (local authority)

Boxing Scotland (National Governing Body)

25 British Boxing Board of Control (National Governing Body)

England Boxing (National Governing Body)

Welsh Boxing (National Governing Body)

Wendover HS2 Mitigation Action Group (local HS2 campaign group)

⁹ See enclosure after this letter

We also provide Secretariat support to the APPG on Taxation and APPG on Open Banking and Payments. It was also my understanding that we were below the “disclosure threshold” during the period 1st August 2021 to the end of the reporting year on the 28th of January 2022.

5 14 February 2022

4. Letter from the Office of the Parliamentary Commissioner for Standards to Mr Chris Evans MP, 18 February 2022

Thank you for your letter to the Commissioner dated 14 February 2022, and for the information you provided.

10 When the Commissioner wrote to you on 1 February 2022, she explained that she may seek the advice of the House authorities as part of her investigation. The Commissioner is currently away from the office; however, I am contacting you today to let you know that, in line with the Commissioner’s usual practice, I have written to the Registrar of Members’ Financial interests to request his advice. A
15 copy of that letter is included for your information (minus the enclosures previously shared with you).

I have also been asked to arrange a meeting for you with the Commissioner, to take place once the Registrar has had an opportunity to respond with his advice (due on 25 February).

20 I appreciate you have a busy schedule with many demands on your time, however, the Commissioner is available on Monday 28 February 2022, between 12:00 – 18:00. Please could you let me know whether you would also be available to meet on this date. You can respond to this email by return or you can call me on [details redacted], week commencing 21 February 2022, to discuss alternative dates.

25 In the meantime, please can I remind you that this matter remains protected by Parliamentary Privilege and should continue to be kept confidential.

18 February 2022

5. Letter from the Office of the Parliamentary Commissioner for Standards to the Registrar of Members' Financial Interests, 18 February 2022

30 I am writing in relation to the Commissioner’s ongoing investigation into the APPG for Boxing and to ask for your advice. In essence, the Commissioner has received a complaint that the APPG for Boxing has acted in breach of paragraph 32 of the *Guide to the Rules on APPGs*, by failing to provide a copy of the secretariat’s client list within 28-days of receiving a request for this information. Ahead of the Commissioner’s
35 return to the office later this month, and in line with the Commissioner’s usual practice, I am writing to ask for your advice.

I enclose a copy of the Commissioner's letter to the Chair of the APPG for Boxing Mr Chris Evans, dated 01 February 2022, and his reply dated 14 February 2022. I also enclose for your information copies of the correspondence and supporting evidence, which led to the Commissioner initiating this inquiry.

- 5 In his letter of 14 February 2022, Mr Evans explains; *"It is my understanding that the Secretariat must reveal all members of the APPG on request and this information was provided to [name redacted] [the complainant] immediately, well within the 28 days stated in the APPG rules."*

10 In this letter Mr Evans also explains that when Stewart Public Affairs Ltd. took over the secretariat duties for the Boxing group, in August 2021, an update about this change was sent to your office on 12 August 2021. He states that a mistake was made when this information was updated and says, *"I cannot be certain whether it was a mistake by Stewart Public Affairs or the House."*

15 It would be helpful to the Commissioner's inquiry if you could provide the following information.

1. Whether you or your team have been approached for advice about the Rules for APPGs by the Chair of the Boxing APPG, Mr Chris Evans, or by the secretariat, Stewart Public Affairs Ltd?
 - 20 a) If so, please could you share with the Commissioner the details of your communications and the rational for any advice that was given.
2. What communications and updates have been exchanged with your office, including any advice you have provided to the APPG or the secretariat, since the beginning of August 2021?
 - 25 a) Please include any recent communications or updates you may have received for the new reporting year.

The Commissioner would be grateful for a copy of any relevant information you may hold relating to this group and secretariat. It would be very helpful to have your reply by Monday 28 February 2022.

Thank you for your assistance.

30 *18 February 2022*

6. Letter from Mr Chris Evans MP to the Commissioner, 22 February 2022

Thank you for your most recent email, since we have last corresponded I have now received the enclosed email chain along with the registration form for the Boxing APPG from Stewart Public Affairs.

As you can see the change to the register was made on 12th August 2021, however, an incorrect figure for 'benefit in kind' of £9,001 – £10,500 in section 12(a) was entered even though Stewart Public Affairs have only received £500. The register has now been updated.

- 5 Once the request had been made by [name redacted], this should have been spotted and explained to him and the register updated with the figure under the £1500 threshold. Therefore, I would like to apologise as Chair of the Boxing APPG for the mistake. Going forward, I have impressed on Stewart Public Affairs that the register must be kept up to date with accurate information. When above the £1500
10 threshold, a request for their client list must be honoured. I will also ensure that I check details are registered correctly in future.

I look forward to meeting with you in person on 28th February, I am available at 16.00. If this time is acceptable please let me know where you wish to meet.

22 February 2022

- 15 **Enclosure: Email from the Managing Director of Stewart Public Affairs Ltd, dated 18/02/2022, along with copies of email communications between the secretariat and the Office of the Registrar on 12/08/2021.**

- From: [Managing Director of Stewart Public Affairs Ltd]
Sent: Friday, February 18, 2022 6:40:11 PM
20 To: EVANS, Chris
Subject: Fwd: APPG Register Update

Hi Chris,

- 25 I enclose the email sent to the Groups Register confirming the change of Secretariat on the 12th August 2021.

We completed the "benefits in kind" section incorrectly and kept [name redacted] original estimate in.

- 30 It should have stated "nil return" during the period August 2021 to the end of the reporting year.

I have since alerted the Groups Register and have asked them to amend their records accordingly.

Best

[Name Redacted]

From: [Name redacted]
Sent: 12 August 2021 12:48
5 To: APPG Register
Cc: Managing Director of Stewart Public Affairs Ltd
Subject: APPG Register Update

Dear Registrar,

10 I hope this email finds you well.

My name is [name redacted] and I am writing to bring to your attention that, from the 12th of August 2021, Stewart Public Affairs Ltd. will be taking over the Secretariat and Public Enquiry Point for the APPG Boxing, the APPG Open Banking and Payments, and the APPG Taxation. This means that I will be the main point of
15 contact for any public enquiries.

Could the contact details under the aforementioned APPGs please be changed to reflect this? My details are as follows:

20 Name: [details redacted]
Email Address: [details redacted]
Telephone Number: [details redacted]
Company: Stewart Public Affairs Ltd
Address: [details redacted]

25 Please let me know if you require any further information or have any queries concerning this matter.

All the best,

[Name redacted]

Stewart Public Affairs Ltd.

30 **On Thu, Aug 12, 2021, at 12:57 PM APPG Register wrote:**

Hi [name redacted]

A couple of things you will need to consider:

35 Whether or not secretariat services must be registered as a Benefit received by the APPG depends on who pays for them and how much this costs the donor for the

period covered by the group's reporting year. Please see section 12 of the Registration Form attached for details. Then, if the secretariat services do qualify for registration, please complete that section and email it to me. There is no need to send me any other part of the form (unless the group wants to register a public enquiry point, in which case see section 7 for details), and the Chair's signature is not required.

Kind regards

[name redacted]
Assistant Registrar
Office of the Parliamentary Commissioner for Standards

From: [Name redacted]
Date: Thu, Aug 12, 2021 at 3:08 PM
Subject: Re: APPG Register Update
To: APPG Register
Cc: [Name redacted] Stewart Public Affairs

Hi [name redacted],

Thank you for your response!

Please find attached the completed forms¹⁰, and do let me know if there is anything else I can provide.

I look forward to hearing from you.

All the best,

[Name redacted]
Stewart Public Affairs Ltd.

22 February 2022

7. Letter from the Registrar of Members' Financial Interests to the Commissioner, 01 March 2022

Thank you for your email of 18 February 2022 requesting information in relation to the APPG on Boxing.

You asked for the following information which I have set out below:

¹⁰ Forms not reproduced here as the relevant information is provided above.

1. Whether you or your team have been approached for advice about the Rules for APPGs by the Chair of the Boxing APPG, Mr Chris Evans, or by the secretariat, Stewart Public Affairs Ltd?
 - 5 a) If so, please could you share with the Commissioner the details of your communications and the rational for any advice that was given.

2. What communications and updates have been exchanged with your office, including any advice you have provided to the APPG or the secretariat, since the beginning of August 2021.
 - 10 a) Please include any recent communications or updates you may have received for the new reporting year.

Below is a summary of the advice and communications between the Registry Office and the APPG secretariat. I have also attached a file with the email correspondence requested .

15 **Summary of advice**

On 12 August 2021 Stewart Public Affairs Ltd. informed the Registry Office that they had taken over from [name redacted] as the group's secretariat. Stewart Public Affairs Ltd. were subsequently sent the standard guidance (Sections 12 and 7 of the Reg Form for APPGs)¹¹, about registration requirements for secretariat services and Public Enquiry Points (PEPs). They completed and returned the form. [Name redacted], the previous secretariat was deleted from the group's register entry and the details provided on the form about the new secretariat, Stewart Public Affairs Ltd. were added.

25 The Chair and Public Enquiry Point were then sent confirmation of the entry that would appear in the next edition of the Register. On the form, Stewart Public Affairs Ltd. estimated the value of the secretariat services they were providing as '£9,001-10,500' for the group's current reporting year (which ran from 29 January 2021 to 28 January 2022).

30 On 1 February 2022, [Managing Director of Stewart Public Affairs Ltd] emailed and telephoned the Registry Office. It was explained to him that in line with the earlier guidance provided (as set out in section 12 of the reg form), the financial estimate covered the whole of the group's reporting year, irrespective of when within that year the secretariat was appointed. His email said that the group's current entry
35 related to services provided by a previous secretariat [name redacted], and that the services provided by Stewart Public Affairs Ltd. were "in fact less than £1,500 and are therefore not of registrable value". On 7 February 2022, the entry on the register about the secretariat services provided by Stewart Public Affairs Ltd. was deleted as it was below the £1,500 for registration. [The Managing Director of Stewart Public

¹¹ <https://www.parliament.uk/about/mps-and-lords/members/appg/registration-forms-for-appgs/>

Affairs Ltd.] was also told that now the group had entered a new reporting year it would need to provide an estimate covering 29 January 2022 to 28 January 2023.

5 Also on 11 February 2022, [the Managing Director of Stewart Public Affairs Ltd.] sent an estimate of '£7501-9000' for the group's current reporting year (i.e. 29 January 2022 to 28 January 2023). This was added to the register and the Chair and [Public Enquiry Point] PEP were sent confirmation of the entry that would appear in the next published register. On 9 February 2022, the Chair and PEP were sent confirmation of the entry that would appear in the next published edition of the register (which was published that day).

10 On 11 February, [Managing Director of Stewart Public Affairs Ltd.] emailed the Registry Office to request the definition of "commercial organisations" in relation to para 32 of the Guide to the Rules on APPGs (relating to clients of a consultancy registered as an APPG's secretariat).

15 The Registry Office use the "commercial organisation" is used to describe any business or other organisation that has a financial relationship with the consultancy providing secretariat support for a APPG. It is to distinguish between organisations and individuals. Therefore, if a client is paying for services, then it would be subject to para 32 (a). If the consultancy was providing services to an organisation for free, then it would not be subject to that rule.

20 On 18 February 2022, [Managing Director of Stewart Public Affairs Ltd.] emailed the Registry Office to ask why reference to 2021 was still appearing on the Register entry about secretariat services. He was told that a new edition of the Register of APPGs is published every 6 weeks or so to reflect amendments made between publications. The reference to 2021 appears in previous published editions of the
25 Register and that those registers cannot therefore be amended.

I hope this is helpful,

01 March 2022

8. Letter from the Commissioner to Mr Chris Evans MP, 04 March 2022

30 Thank you for taking the time to meet with the Registrar and me on Monday 28 February 2022. Your replies to my questions were very useful and I hope our discussion helped to clarify any points you may have been unsure about. I have enclosed a copy of my meeting note for your information and this note will be published as part of the written evidence pack when I conclude my investigation [see Appendix 2 below].

35 When I wrote to you on 18 February 2022, I explained that I had sought advice from the Registrar. I have now received their advice and I enclose a copy of their response dated 1 March 2022, plus the relevant enclosures sent with it, for your information.

I am sending this for your information only and do not require a response. Once I have had the opportunity to review the Registrar's letter and the enclosures, I will contact you again if I need any further information. However, if you would like to comment on the details contained in the Registrar's letter, please reply as soon as possible and no later than 11 March 2022.

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.

04 March 2022

10 **9. Letter from the Commissioner to Mr Chris Evans MP, 14 March 2022**

When I wrote to you on 4 March 2022, I shared with you a copy of the advice and enclosures received from the Registrar of Members' Financial Interests, dated 1 March 2022. I have since received an updated version of the enclosures and I wanted to share this additional information with you¹².

15 After reviewing the information from the Registrar, and considering our conversation at the meeting on 28 February 2022, I would also appreciate your responses to the following questions.

20 1. Did the APPG for Boxing arrange a contract or any signed agreement with Stewart Public Affairs Ltd, setting out the responsibilities of the secretariat, when they took over those duties in August 2021?

a) Please provide any relevant agreement or communications exchanged at the time setting out the APPG for Boxing's expectations or the duties of the secretariat.

25 The registered 'Benefits in kind', reported for the APPG for Boxing in 2020/21 and for the first five months of the 2021/22 reporting year, remained at the same amount of £9,001 - £10,500. In your letter of 22 February 2022, you said this estimate of the value had been incorrectly reported to the Registrar when the secretariat submitted their registration form on 12 August 2021. You further
30 explained the actual figure received by Stewart Public Affairs Ltd. for the remainder of the 2021/22 reporting year was £500.

During our meeting on 28 February 2022, I asked about this significant reduction in the reported 'Benefits in kind'. You set out that as Stewart Public Affairs Ltd. had acted as secretariat for only part of the year, this had resulted in a reduced estimate

¹² See Appendix 1 below for email correspondence provided as enclosures by the Registrar.

of the value of the benefit. You also stated that the reduction reflected the fact the secretariat had been unable to hold any meetings.

- 5 2. Please could you set out in detail how the APPG for Boxing assesses the value of the service the secretariat provides to the group and provide any communications or written record you have which relates to any assessment of the value.

10 In your letter dated 14 February 2022, you shared with me a letter from Stewart Public Affairs Ltd, dated the same day, with the heading Disclosure of client list. In this letter [name redacted] sets out a list of seven "non-commercial" organisations, as well as two further APPG's, that his company provide secretariat duties for.

In his advice to me on 1 March 2022, the Registrar states,

15 *The Registry Office use the "commercial organisation" is used to describe any business or other organisation that has a financial relationship with the consultancy providing secretariat support for an APPG. It is to distinguish between organisations and individuals. Therefore, if a client is paying for services, then it would be subject to para 32 (a). If the consultancy was providing services to an organisation for free, then it would not be subject to that rule.*

- 20 3. Please could you confirm with the secretariat whether the list shared with you on 14 February was their full client list in line with the Registrar's definition set out above.

- a) If it was not, please could you provide me with a copy of the secretariat's full client list.

25 I look forward to receiving your replies by Monday 21 March 2022. Any other comments you would like to add would also be welcome.

30 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.

14 March 2022

10. Letter from Mr Chris Evans MP to the Commissioner, 21 March 2022

35 Thank you for your further correspondence following our recent meeting. I think it would be helpful if I answered your questions in order.

On your first point, [name redacted] was working for both [name redacted] and [name redacted] between 2017 and 2021, providing secretariat for the group before

5 [name redacted] decided they no longer wished to continue with the APPG. [Name redacted] agreed to continue providing this service under his company, Stewart Public Affairs Ltd. I enclose the minutes of the meeting confirming this. The terms and conditions were the same as they had been in the past under both [name redacted] and [name redacted].

10 On your second point on how payment is calculated. The fee structure pre-dates my time as chair, members of the APPG are charged a flat annual rate paid directly and entirely to the secretariat for providing that function. The current charging fee is as follows, the annual membership fee for corporate organisations is £1250. For charities this fee is £500, and for boxing clubs it is £250. These fees are paid directly and entirely to the secretariat for providing that function. Since Stewart Public Affairs took over the APPG they have only received £500 from the charity Fight for Peace.

15 On your third point I have spoken again to Stewart Public Affairs Ltd. and they have confirmed the list released to you is their full list of clients. The membership of the APPG has already been disclosed to the complainant.

I trust this helps you in your investigation. I am happy to meet with you to discuss anything further.

21 March 2022

20

Enclosure: Minutes from the APPG for Boxing meeting on 20/10/2021



APPG on Boxing
'Olympic Games Wrap-Up with Team GB Boxers'

10.00am – 11.00am

Wednesday, 20th October 2021

Virtual Meeting

In attendance:

Name	Organisation
Chris Evans MP	Chair, APPG on Boxing (Host)
	Speaker
	Speaker, Team GB
	Speaker, Team GB
	Speaker, GB Boxing
	Stewart Public Affairs Ltd
	Stewart Public Affairs Ltd
	My Next Match
	Vice-Chair, APPG on Boxing
	Empire Fighting Chance
	Member, APPG on Boxing
	Member, APPG on Boxing
	Member, APPG on Boxing
	GB Boxing
	Welsh Boxing
	Commonwealth Games
	Manchester Metropolitan University
	Senior Parliamentary Assistant
	Vice-Chair, APPG on Boxing
	Member, APPG on Boxing
	Member, APPG on Boxing
	Vice-Chair, APPG on Boxing
	Point Communications Ltd
	GB Boxing
	English Institute of Sport

Agenda:

1. Introduction from Chris Evans MP (Chair)
 - Chris Evans MP (CE) welcomed the attendees to the session.
 - He then allowed the panel - [REDACTED] - to introduce themselves.



2. **Pre-prepared questions to the panel**
 - CE led the conversation with the panel. He started off by asking LP, KA and NJ how they got started with their boxing careers. LP told the story of where and how she began, including the people who influenced her career, followed by NJ and KA.
 - CE then asked DA what changes he's seen in the public perspective in regard to boxing, as well as how women's boxing has evolved. DA described how the public now see boxing as an increasingly respected sport that many aspire to be Olympic champions in, and how women have fought their way into boxing and shown that they can be just as good as their male counterparts.
 - CE carried on the conversation by asking the panel how we could keep public interest throughout the year in amateur boxing, and not just restrict it to the Olympics.
 - DA responded by saying that we have to keep making the sport more visible and accessible, such as by encouraging it to be more publicised (i.e. streaming it live on television more often). The rest of the panel agreed.

3. **Q&A session**
 - CE took questions from attendees.
 - The questions covered the funding that boxing receives compared to other competitive sports and how to bridge that gap, the gender disparity amongst boxing coaches, how to equalise the ratio of men and women inside boxing clubs, how to address the needs of women who initially join boxing for self-defence (especially victims of sexual assault and so on) and are met with a boxing club largely dominated by men, whether women in boxing feel that working with men in boxing is to their advantage, whether women in boxing receive support from their male colleagues, how can MPs support boxing and boxers, and the importance of the quality of coaches in boxing.

4. **AOB**
 - CE explained that Stewart Public Affairs (SPA) had taken over Secretariat support to the Group on the 1st August 2021 and following a discussion about the Terms of Engagement it was agreed that SPA would continue in the role.
 - CE closed the session by thanking the speakers, congratulating LP and KA for their recent successes, and thanking the attendees for their presence and engagement.

11. Letter from the Commissioner to the Director of Stewart Public Affairs Ltd, 23 March 2022

5 As you are aware, I am currently conducting an inquiry into a complaint regarding the APPG for Boxing's compliance with the Guide to the Rules on All-Party Parliamentary Groups.

10 In an email sent to you on 14 February 2022, my office highlighted paragraph 35 of the Rules where it says about my inquiries, "*...The Commissioner will normally seek evidence from the Chair and Registered Contact, and from anyone else concerned*", and paragraph 36 where it says, "*... Members are expected to co-operate with any inquiry into a complaint about an APPG, as are any staff or secretariat employed or retained by the group.*"

I have now reached a point in my inquiry where I think it would be helpful for us to meet, either in my office at Richmond House or virtually using Microsoft Teams.

5 I am aware from your ongoing correspondence with my office¹³ that you are willing to meet to provide details about the secretariat duties, which Stewart Public Affairs Ltd. provides to the APPG for Boxing. Please could you contact my office manager, [details redacted], as soon as possible to arrange a mutually convenient time for a meeting.

During the meeting I would like to gain a better understanding of the following points:

- 10
- Any written agreement in place between Stewart Public Affairs Ltd. and the APPG for Boxing, for the secretariat services provided.
 - The criteria you use to assess or calculate the value of the benefit of the service your company provides to the APPG for Boxing.
 - Stewart Public Affairs Ltd. client list.

15 This will be a formal meeting, which I intend to audio record. I will send you a draft transcript afterwards for you to check for factual accuracy before I conclude my inquiry.

20 If you would like to be accompanied, please could you provide details to [name redacted] when you confirm the meeting. Please ensure, in advance, that the person accompanying you understands the confidentiality requirements and that they cannot answer questions on your behalf.

Thank you for your co-operation.

23 March 2022

12. Letter from the Commissioner to Mr Chris Evans MP, 24 March 2022

25 Thank you for your letter dated 22 March 2022, and for the information you provided.

I am writing to you as a courtesy to let you know about the next stage in my inquiry. Paragraph 35 of the Guide to the Rules on All-Party Parliamentary Groups sets out the procedure for my investigations and states, "...The Commissioner will normally

¹³ Various emails exchanged between the Director of Stewart Public Affairs Ltd. and the Commissioner's office, 01/02/2022 - 21/03/2022, not reproduced here as the relevant information appears in other parts of the written evidence pack.

seek evidence from the Chair and Registered Contact, **and from anyone else concerned**" [my emphasis].

5 Yesterday I wrote to [name redacted] Director of Stewart Public Affairs Ltd, and invited him to meet with me, and to answer questions about the secretariat services his company provide to the APPG for Boxing. A copy of my letter to [name redacted] is included for your information.

Once I have met with [name redacted], I will write to you again regarding the next steps in my inquiry. In the meantime, this matter remains protected by Parliamentary Privilege and should continue to be kept confidential.

10 *24 March 2022*

13. Letter from the Commissioner to the Director of Stewart Public Affairs Ltd, 04 April 2022

Thank you for making time to meet with me on Wednesday 30 March 2022, [personal information redacted].

15 When we met, it was explained that our meeting would be recorded and that I would share a transcript of the conversation with you. Please find a copy of the meeting transcript enclosed alongside this letter¹⁴. As part of my usual inquiry procedures, I have also shared a copy of this letter and the transcript with the Chair of the All-Party Parliamentary Group, Mr Chris Evans MP.

20 The information you provided during our meeting was very helpful and I thank you for that. You also agreed to provide me with further material to aid the investigation, this included:

- 25 • Terms of engagement letter or written Terms and Conditions, agreed with Stewart Public Affairs Ltd. when they commenced secretariat duties for the APPG for Boxing.
 - Emails exchanged between the APPG Boxing and Stewart Public Affairs Ltd. agreeing the rates of pay for the services provided.
 - A list of all meetings arranged by Stewart Public Affairs Ltd. for the Boxing APPG.
- 30 — You also agreed to include a breakdown of the hours [name redacted] spent arranging these meetings.

¹⁴ See Appendix 3 below for a copy of the meeting note.

- A copy of Stewart Public Affairs' records, or any relevant written material, setting out the income and expenditure for the APPG for Boxing since August 2021.
- You agreed to include a breakdown of how the tier system of fees relates to services provided.
- The full list of your clients who are commercial organisations.

5

10

It would be helpful to have your reply by Monday 11 April 2022, but if you require more time, please do let me know. In the meantime, this correspondence remains protected by parliamentary privilege, and I must ask that you maintain the strict confidentiality of the inquiry.

[See Appendix 3 for a transcript of this meeting].

04 April 2022

14. Letter from the Commissioner to Mr Chris Evans MP, 04 April 2022

15

I wrote to you on 24 March 2022, to let you know I had invited [name redacted] to meet with me, regarding the secretariat services provided to the APPG for Boxing by Stewart Public Affairs Ltd. I met with [name redacted] last week and have today sent him the transcript of the recording of our meeting¹⁵. A copy of my letter to [name redacted] and transcript is included for your information.

20

Once [name redacted] has provided the documentation set out in my letter to him, I will write to you again regarding the next steps in my inquiry. In the meantime, this matter remains protected by Parliamentary Privilege and should continue to be kept confidential.

04 April 2022

25

15. Letter from the Commissioner to the Registrar of Members Financial Interests, 06 April 2022

30

I would like to ask your advice in relation to my inquiry into the APPG for Boxing. As you will know from earlier correspondence from my office, dated 18 February 2021, my investigation is considering whether the Group's secretariat acted in breach of paragraph 32(a) of the Guide to the Rules on All-Party Parliamentary Groups, by failing to disclose its client list within 28-days of receiving a request for this information in October 2021.

As part of my investigation I recently met with [name redacted], Managing Director of Stewart Public Affairs Ltd, the company providing secretariat services for the

¹⁵ See Appendix 3 below for a copy of the meeting note.

APPG for Boxing. I enclose a copy of the meeting transcript for your information. I have also enclosed copies of my correspondence with the Chair of the Group, Mr Chris Evans MP, and copies of supporting evidence he has shared with me so far.

It would be helpful if you could provide advice on the following points:

- 5 1. Based on the information provided by Mr Evans and [name redacted], whether the APPG for Boxing have adhered to the APPG Rules.
2. Whether there is a difference between registering the value of services provided by a secretariat to an APPG; and registering money received by an APPG, or as in this case by the secretariat, from outside organisations who
10 become associate members of the Group.
3. Whether there is any guidance in the rules about how an APPG should manage money they have received in payment for membership from outside sources?
4. Whether the APPG for Boxing are required by the Rules to submit an income and expenditure form as part of their annual reporting.
- 15 a) If yes, please could you confirm whether the Group have done so in the past three years?

It would be very helpful to have your reply by Friday 22 April 2022. If you require further information from Mr Evans or [name redacted] before giving your advice, I would be happy for you to contact them directly. Thank you for your assistance.

20 *06 April 2022*

16. Letter from the Commissioner to Mr Chris Evans MP, 06 April 2022

I am writing today to let you know I have written again to the Registrar of Members' Financial Interests, [name redacted], to request further advice in relation to my inquiry into the APPG for Boxing. Please find enclosed a copy of that letter for your
25 information (minus the enclosures previously shared with you).

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.

06 April 2022

30 **17. Letter from the Director of Stewart Public Affairs Ltd. to the Commissioner, 12 April 2022**

Re: APPG on Boxing

Thank you for your letter dated 4th April 2022 [personal information redacted]

5 As confirmed during our virtual meeting, I am more than happy to assist your inquiry that as you have stated during our discussion is only focusing on the current Guide to the *Rules on APPGs*.

10 With that in mind and having had time to reflect on our virtual meeting I would like to highlight that there are issues and questions that you and [name redacted] have asked that are not included as requirements in the current *Rules on APPGs*. In particular questions relating to "rates of pay for the services provided" and a breakdown of how the "tier system of fees relates to the services provided." These matters are not included in the current *Rules on APPGs*. However, I am more than happy to provide additional information to you than the current *Rules on APPGs* require.

15 As I'm sure you are aware, the current *Rules on APPG's* do provide for annual membership / subscription fees to be charged (as set out in point 18 (d) and when we commenced the Secretariat role on 1st August 2021 we agreed with the Chair of the Group to continue with the existing membership rate that had been in place since 2017. The annual corporate membership fee = £1200. We then offer a reduced annual rate structure to the following organisations: Charities (£500), Boxing Clubs
20 (£200) and individuals (£50). This is a completely normal reduced rate structure and has not increased since 2017. The commercial and non-commercial organisations who are members of the Group make the annual payment directly to Stewart PA to provide Secretariat Services to the Group. Again, this is in accordance with the current *Rules on APPGs*.

25 All our commercial and non-commercial clients including members of the APPG on Boxing are now publicly listed on the PRCA Public Affairs Register and I have sent the link to the Register to [name redacted] in your office and to [the complainant].

Please see below for further information highlighted in red relating to your specific questions:

30 (1) Written Terms and Conditions¹⁶, agreed with Stewart Public Affairs Ltd. when they commenced secretariat duties for the APPG for Boxing. **Please see the attached document.**

35 (2) Emails exchanged between the APPG and Stewart Public Affairs Ltd. agreeing the rates of pay for the services provided. **This requirement is not included in the current *Rules on APPGs*. Please see the attached Terms and Conditions document above for further information.**

¹⁶ See Enclosure 1

(3) A list of all meetings arranged by Stewart Public Affairs Ltd. for the Boxing APPG since August 2021:

- **Wednesday 20th October 2021 (10am - 11am): 'Olympic Games Wrap-Up with Team GB Boxers'**
- 5 • **Wednesday, 3rd November 2021 (1030am - 1130am): 'Women in Boxing'**
- **Wednesday 27th April 2022 (10am): AGM**

(4) You also agreed to include a breakdown of the hours¹⁷ [name redacted] spent arranging these meetings. **This requirement is not included in the current *Rules on APPGs*, but I am happy to provide the additional information. Please see the attached document.**

(5) A copy of Stewart Public Affairs' records, or any relevant written material, setting out the income and expenditure for the APPG for Boxing since August 2021. **As we are currently below the £12,500 threshold this requirement is not included in the current *Rules on APPGs*, but I am happy to provide the additional information. Please see the attached document.**

(6) You agreed to include a breakdown of how the tier system of fees relates to services provided. **This requirement is not included in the current *Rules on APPGs*. The current rules do provide for annual membership / subscription fees to be charged (as set out in point 18 (d) and when we commenced the Secretariat role on 1st August 2021, we agreed with the Chair to continue with the existing membership rate that had been in place since 2017. The annual corporate membership fee = £1200. We also offer reduced annual membership / subscription rates to the following organisations Charities (£500), Boxing Clubs (£200) and individuals (£50). This is a completely normal reduced rate structure and has not increased since 2017.**

(7) The full list of your clients who are commercial organisations. **Please see the link to the current PRCA Public Affairs Register detailing all Stewart PA commercial and non-commercial clients (including members of the APPG on Boxing): <https://register.prca.org.uk/register/current-register/>**

I hope that is helpful and do let me know if you require any additional information.

Regards [Name redacted]

12 April 2022

¹⁷ See Enclosure 2

Enclosure 1: APPG Terms and Conditions

APPG on Boxing

Secretariat Services Terms and Conditions

Stewart Public Affairs Ltd (Stewart PA) were appointed on 1st August 2021 to provide Secretariat services to the APPG on Boxing.

Secretariat services will be delivered from August 2021 to July 2022 and will include the following activities:

- (1) Arranging meetings of the Group as agreed with the Chair.
- (2) Liaising with officers and members of the Group as appropriate.
- (3) Producing and circulating minutes following each meeting of the Group.
- (4) Approaching and arranging speakers for meetings as agreed with the Chair.
- (5) Producing and delivering a meeting and event activity programme as agreed with the Chair.
- (6) Approaching and securing new members as agreed with the Chair.

Stewart PA trainee consultant (at PRCA benchmarking rate of £80 per hour) will deliver the programme and Secretariat Services during the period at minimum 2hrs per month or as required to prepare, attend and minute meetings and deliver events.

Membership

External members and non-parliamentarians will be charged an annual subscription / membership fee (as set out in point 18 (d) in the *Guide to the Rules on APPGs*). As agreed by the Chair in 2017, the annual corporate membership fee = £1200. A reduced annual rate structure will then apply to the following organisations: Charities (£500), Boxing Clubs (£200) and individuals (£50). Commercial and non-commercial organisations who are / agree to become members of the Group will make the annual payment directly to Stewart PA to provide Secretariat Services to the Group.

Finance and Bank Account

Currently, there is no requirement in the *Rules on APPGs* that the Chair / Office holders manage a separate bank account. Therefore, in full compliance with the *Guide to the Rules on APPGs (Advice Note 1)*, external members and non-parliamentarians will be invoiced by Stewart PA, and annual payments will be made directly into the Stewart PA business account.

Delivery

Stewart PA will produce and deliver the activity programme for 2021 / 22 as agreed with the Chair of the Group.

Enclosure 2: Breakdown of hours spent on arranging meetings**APPG on Boxing****Hours, Income and Expenditure August 2021 – April 2022****11th April 2022****[Name redacted] (hourly rate @ PRCA 2021 benchmarking for a trainee consultant = £60)**

Task	Hours	Total Hours
Communications (emails)	10hrs	20rs
Meeting planning	5hs	
Meeting attendance	2hs	
Minuting	2hrs	
Social Media	1hrs	

Income and Expenditure (August 2021 – April 2022)

Income	Expenditure
<p><u>October 2021</u> 5th October 2021: £500 (Fight for Peace, annual membership subscription)</p> <p><u>April 2022</u> 1st April 2022: £200 (The Boxing Academy, annual membership subscription) 4th April 2022: £200 (Empire Fighting Chance, annual membership subscription)</p> <p>Total: £900</p>	<p>Staff salary (August 2021 – March 2022): £1149.50</p> <p>Office administration (Zoom: August 2021 – March 2022): £16.44</p> <p>Total: £1165.94</p>

*12 April 2022***5 18. Letter from the Registrar of Members Financial Interests to the Commissioner, 22 April 2022**

Thank you for your letter dated 6 April 2022 in relation to your inquiry into the APPG on Boxing. I have set out my answers to your questions below.

If you need any further information, please do not hesitate to contact me again.

Questions

1. *Based on the information provided by Mr Evans and [name redacted], whether the APPG for Boxing have adhered to the APPG Rules.*

5 Having read the documentation you provided, it appears that the APPG for Boxing did not adhere to the rules in relation to the disclosure of client lists of the consultancy providing secretariat support. This was discussed in detail in the meeting between yourself and [name redacted].

10 In answer to your question 4 (below), I am unable to say whether the APPG adhered to the rules on income and expenditure statements as I have no information on the value of the membership fees generated in each of the previous reporting years. It may be helpful for your inquiry to request this information from [name redacted].

15 2. *Whether there is a difference between registering the value of services provided by a secretariat to an APPG; and registering money received by an APPG, or as in this case by the secretariat, from outside organisations who become associate members of the Group.*

Registering benefits

The APPG rules require APPGs to register:

20 Details of any benefits (whether financial or in kind) which the group has received from any source other than Parliament, or from the Independent Parliamentary Standards Authority, if the total value of the benefits from that source exceeded £1,500 in the calendar year.

Paragraph 6 of Appendix 1 to the rules sets out examples of benefits in kind which includes memberships:

25 **Benefits in kind may include:**

[...]

30 benefits provided to the group over a period of time, such as for example, research, administrative, secretarial or web support; regular office cleaning, contributions to preparing, printing or publishing reports; subscriptions or memberships.

An APPG is therefore required to register any benefit with a value over £1,500 from a single source in a calendar year. The Rules do not distinguish between the three

examples you have set out in your question. Instead, they set out the threshold for registration and the types of benefit that require registration.

Registering secretariats

5 The Registration form for APPGs sets out the requirements for the registration of secretariat services (the relevant section is attached as an Annex(sic)¹⁸. The form sets out a number of scenarios to guide APPGs on registration.

This includes:

- Estimating the value of the annual cost to the secretariat of providing support, including the value of staff time that is being donated.
- 10 • Whether the secretariat is donating a registrable amount in the form of provision of staff or whether the secretariat is being paid for that staff time.

3. *Whether there is any guidance in the rules about how an APPG should manage money they have received in payment for membership from outside sources?*

15 The APPG rules do not contain any requirements on the management of money. However, [Advice Note 1: Financial Management of APPGs](#) provides the following advice on bank accounts:

Finance and bank accounts

- 20 1. Chairs are strongly advised to ensure that any money the group receives or holds is in a bank account in the name of the group and controlled by officers.

Therefore, it can be argued that the arrangements put in place by the APPG on Boxing go against the advice issued by the then Chair of the Standards Committee¹⁹.

25 4. *Whether the APPG for Boxing are required by the Rules to submit an income and expenditure form as part of their annual reporting.*

- a) *If yes, please could you confirm whether the Group have done so in the past three years?*

¹⁸ See Appendix 4 below for a copy of this form.

¹⁹ <https://www.parliament.uk/globalassets/documents/pcfs/all-party-groups/advice-notes/advice-note-1.pdf>

Paragraph 28 of the APPG rules state that:

- 5 A group which has received over £12,500 from outside Parliament, in money or in kind, in its reporting year must undertake the following actions. This does not apply in respect of reporting periods ending before 7 May 2016, unless the group ceases to exist.
- a. Complete an income and expenditure statement, in accordance with the requirements at Appendix 2; and
- b. Arrange to have this approved at its AGM (or, if not possible, at another General Meeting);
- 10 c. Publish the approved statement on the website within 28 days of its approval and within four months of the end of the relevant reporting year; and
- [...]

15 In his letter dated 21 March 2022, Chris Evans MP explains that the APPG on Boxing charges membership fees to join the APPG. If the total value of the Membership fees reached the over £12,500 threshold in a reporting year, the APPG would be required to file an income and expenditure statement.

20 The APPG filed an income an expenditure statement at its AGM on 10 July 2018. No statements were filed in subsequent years. That gap may be as a result of the 2019 General Election because APPGs cease to exist after dissolution.

For the sake of completeness, I should add that the Registry Offices does not require sight of income and expenditure statements. Therefore, we do not hold them or vet them.

25 **Enclosure: See Appendix 4 for Annex: Extract from the Registrations Form for APPGs**

22 April 2022

19. Letter from the Commissioner to Mr Chris Evans MP, 25 April 2022

30 When you wrote to me on 14 February 2022, you informed me a mistake had occurred relating to the registration of 'Benefits in Kind' for the Boxing APPG secretariat, Stewart Public Affairs Ltd, on 12 August 2021. In your letter dated 22 February 2022, you confirmed that an incorrect figure, in section 12(a) of the registration form, had been submitted by the secretariat. Thank you for bringing this error to my attention. In light of this, I have extended my inquiry to include

whether you have acted in breach of the rules set out in Appendix 1 of the APPG Guide to the Rules²⁰.

The relevant rules of the House

Appendix 1 to the APPG Guide to the Rules, states:

5 *5. Each group must register the following information:*

I. Details of any benefits received (whether financial or in kind) by the group from sources other than Parliament, if the total value of the benefit from that source exceeded £1,500 in the calendar year. The information to be provided is...

- 10 • *For benefits in kind: their nature and value (in a £1,500 band). A benefit in kind involves the donor giving goods or services to the Group, or paying for these on the Group's behalf. Further notes on benefits in kind are set out below, together with a table of £1,500 bands.*

...

15 *13. Groups must register any changes to the information in their Register entry within 28 days of that change occurring.*

As you know, I met with [name redacted], Director of Stewart Public Affairs Ltd, on 30 March 2022. After that meeting [name redacted] wrote to me on 12 April 2022, providing me with some additional details related to the Secretariat services provided to the APPG for Boxing. I enclose a copy of these details for your information.

- 20
- Email from [name redacted] dated 12 April 2022.
 - APPG for Boxing Hours, Income and Expenditure August 2021 – April 2022
- 25
- APPG on Boxing Terms and Conditions

I also wrote to you on 6 April 2022 and explained that I would be seeking further advice from the Registrar of Members' Financial Interests, in order to clarify whether the registration for the APPG for Boxing was now accurate. On 22 April 2022, I received the Registrar's advice and I enclose a copy of his letter for your information.

²⁰ [Register entries for All-Party Parliamentary Groups](#)

It would be helpful to have your comments regarding the Registrar's advice. Any comments you would like to make regarding the other details shared with you would also be welcome.

5 Please could you reply by Tuesday 3 May 2022. 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.

25 April 2022

20. Letter from Mr Chris Evans MP to the Commissioner, 26 April 2022

10 Further to your latest email about your inquiry into the Boxing APPG. On 22nd February, I wrote to you, pointing out the mistake in the register and apologising on behalf of the group. On 28th February, I met with you, a member of your staff and the Registrar of Financial Interests, when I apologised again in person. I think I have now explained in some detail how the mistake came about and have nothing further to add.

15 It has always been my intention to resign as the chair of the group at the next AGM scheduled for 27th April. I had hoped your inquiry would have concluded by then but assume this is unlikely now. However, I will continue to help where I can after I have stepped down.

26 April 2022

20 21. Letter from the Commissioner to Mr Chris Evans MP, 18 May 2022

Thank you for your letter dated 26 April 2022, and for confirming your earlier stated intention to stand down as Chair of the All-Party Parliamentary Group ("APPG") for Boxing ("the Group") at the Annual General Meeting, which was due to take place on 27 April 2022.

25 Having considered the information available to me, I now have sufficient information to make a decision on the allegations that the Group breached the Rules for APPGs²¹ by:

- Failing to disclose a copy of the secretariat's client list to [name redacted] within 28 days of receiving the request
- 30 • Submitting an inaccurate registration form to the Registrar of Members' Financial Interests ("the Registrar") on 12 August 2021

²¹ Appendix 4: Rules for All-Party Parliamentary Groups, as agreed by the House of Commons on 13 May 2014

My decision

I have considered our correspondence, the information provided by the secretariat for the Group, the published rules and guidance, and the evidence and advice provided by the Registrar. I have concluded that, in failing to disclose a copy of the secretariat's client list to [name redacted] within 28 days of receiving the request, the Group breached the Rules for APPGs.

Further to this, I have also concluded that the submission of an inaccurate registration form, received by the Registrar on 12 August 2021, was an additional breach of the Rules for APPGs.

However, for the reasons outlined below, I do not intend to refer this matter to the Standards Committee for consideration. Instead, I have decided to conclude this matter using the rectification process provided by Standing Order No. 150.

The Rules for All-Party Parliamentary Groups and Guidance

The Rules for APPGs state that:

APPGs should declare when an external organisation provides a secretariat and, if funding for this is provided from a third party, the source of that funding. Where a secretariat is provided by a consultancy, that consultancy should make information about their clients available either on their website on request.

Paragraph 32 of the Guide to the Rules for All-Party Parliamentary Groups ("Guide to the Rules") states that the Chair and Registered Contact of an APPG are responsible for ensuring that the organisation providing its secretariat or support services is aware of, and complies with, the Rules, including its obligations to provide information about its clients to anyone who asks for them within 28 days. Paragraph 32 adds:

a. If a consultancy provides a secretariat or support services whose value exceeds the threshold for registration: a list of any commercial organisations who were clients of the consultancy during the preceding twelve months; or, if providing the information on request, during the twelve months immediately before the month in which the request was made.

The Rules for APPGs also state that:

Financial and material benefits should be registered promptly with information about the date of receipt by group as well as date of registration.

Appendix 1 Paragraph 4 of the Guide to the Rules states that APPG's are responsible for their own register entries and for ensuring compliance with the Rules. The APPG must register any changes to the information within 28 days of that change occurring.

5 Rationale

Sharing the secretariat's client list

10 I wrote to you as Chair of the Group, on 1 February 2022, setting out [name redacted] allegation that there had been a failure to comply with the Rules for APPGs. I informed you that I was opening an inquiry into the Group's compliance with paragraph 32(a) of the Guide to the Rules. I also stated that if the scope of my inquiry changed, I would update you in writing.

In your reply dated 14 February 2022, you explained that,

15 *"It is my understanding that the Secretariat must reveal all members of the APPG on request and this information was provided to [name redacted] immediately, well within the 28 days stated in the APPG rules."*

In your following letter dated 22 February 2022, you set out the following:

20 *"I have impressed on Stewart Public Affairs that the register must be kept up to date with accurate information. When above the £1500 threshold, a request for their client list must be honoured."*

It became apparent from our early correspondence that there was some confusion about the difference between the Group's membership list, and the client list of the company providing the secretariat.

25 Ahead of our meeting on 28 February 2022, the Registrar provided a definition of the phrase 'commercial organisations', as well as his advice regarding paragraph 32(a) of the Guide to the Rules,

30 *"The Registry Office use the term "commercial organisation" to describe any business or other organisation that has a financial relationship with the consultancy providing secretariat support for an APPG. It is to distinguish between organisations and individuals. Therefore, if a client is paying for services, then it would be subject to para 32 (a). If the consultancy was providing services to an organisation for free, then it would not be subject to that rule."*

During our meeting on 28 February 2022, you assured both me and the Registrar that you understood the definition and the above advice in relation to paragraph 32(a) of the Guide to the Rules.

5 On 14 February 2022, you informed me that an error of registration had occurred, and the value of the services provided by the secretariat for the second half of the year, from 12 August 2021, did not reach the £1,500 threshold required for registration (see below). As a result, you believed the Group were not required to provide the information requested by [name redacted]. However, when [name redacted] submitted his request for the client list, the Group's Register entry
10 indicated the value of Benefits in Kind for the reporting year 29 January 2021 to 28 January 2022 to be £9,001 - £10,500.

When providing his advice, dated 1 March 2022, the Registrar detailed a telephone conversation that took place with [the Managing Director of Stewart Public Affairs Ltd.] on 1 February 2022. They discussed the threshold for the registration of
15 "benefits in kind" and the Registrar clarified that,

"...in line with the earlier guidance provided (as set out in section 12 of the reg form), the financial estimate covered the whole of the group's reporting year, irrespective of when within that year the secretariat was appointed."

20 In his advice dated 22 April 2022, the Registrar stated, "...the APPG for Boxing did not adhere to the rules in relation to the disclosure of client lists of the consultancy providing secretariat support."

I agree with the Registrar's assessment and have therefore concluded that the Group breached the Rules for APPGs.

25 [The Managing Director of Stewart Public Affairs Ltd.] emailed me on 1 April 2022, to confirm that he has now shared the client list with [name redacted]. He also informed me that the secretariat, Stewart Public Affairs Ltd, has joined the Public Relations and Communications Association, and their client list is now available on the Public Affairs Register²².

30 **Inaccurate registration of Benefits in Kind**

In your letter dated 14 February 2022, you referred the matter of the Group's incorrect registration to me. In your follow-up letter of 22 February 2022, you explained that a mistake occurred regarding the registration of the value of the
35 "benefits in kind". This occurred following the submission of Stewart Public Affairs Ltd.'s first Register entry after they took over the secretariat duties on 12 August 2021. Having provided a copy of the original registration form and an email chain

²² <https://register.prca.org.uk/register/profile/?company=Stewart%20Public%20Affairs%20Ltd>

showing the secretariat's correspondence with the Registrar in August 2021, you apologised for the mistake and said that:

5 *"...an incorrect figure for 'benefit in kind' of £9,001 – £10,500 in section 12(a) was entered even though Stewart Public Affairs have only received £500."*

Thank you for your acknowledgement and apology.

Additional factors

10 As already set out above, when I opened my inquiry, it became apparent there was some confusion about the difference between the Group's membership list and secretariat's client list. There also seemed to be confusion about the 'benefits in kind', provided to the Group by the secretariat, and the payment of Membership fees.

15 As my inquiry progressed, questions arose about how the value of the benefit provided by the secretariat was assessed by the Group. I also had concerns about the way that money, paid in annual fees for membership of the APPG for Boxing, was administered by the Group and the secretariat.

20 In order to satisfy myself that the registration entry was now accurate, I arranged to meet with [name redacted], Director of Stewart Public Affairs Ltd, on 4 April 2022. Before the meeting, I sought advice from the Registrar on registering the value of services provided by a secretariat, as well as how an APPG should manage the income from its membership fees.

In his reply, dated 22 April 2022, the Registrar explained that, although the APPG Rules do not set out specific requirements on the management of money, Advice Note 1²³ sets out the following advice:

25 **Finance and bank accounts**

1. Chairs are strongly advised to ensure that any money the group receives or holds is in a bank account in the name of the group and controlled by officers.

30 The Registrar advised that *"...it can be argued that the arrangements put in place by the APPG on Boxing go against the advice issued by the then Chair of the Standards Committee."*²⁴

²³ <https://www.parliament.uk/globalassets/documents/pcfs/all-party-groups/advice-notes/advice-note-1.pdf>

²⁴ Derived from guidance issued by the Chair of the Standards Committee on 6 December 2016 and the Parliamentary Commissioner for Standards' Advisory email of 12 June 2017.

I wrote to you on 25 April to share this advice, I also included further correspondence and documents from [name redacted] (dated 12 April 2022), including a copy of the terms and conditions between the secretariat and the Group, and information about hours, income and expenditure between August 2021 – April 2022.

It would have been helpful to have received the documentation setting out the terms and conditions when I requested it on 14 March 2022, rather than your written assurances that the terms and conditions remained the same as they had been under the previous secretariat. Had this information been made available earlier in the investigation I would have been able to conclude this inquiry sooner.

In making my decision, I am only commenting on the actions of the Group, I make no comment on the actions of the secretariat itself as it does not fall within my remit. I have considered the information provided by the Group, the secretariat and the Registrar. Whilst, based on the evidence available to me, the breach appears to be inadvertent insofar as you assumed the secretariat knew the Rules for APPGs, I have however not only found a failure to understand and communicate the roles and responsibilities of the various parties of the Group to the secretariat, I have also identified a longstanding failure to check and monitor the value and services provided by the secretariat.

It was of some concern that these errors occurred as a result of an assumption by the Chair of the Group that the new secretariat had a greater understanding of the Rules for APPGs than the Group. However, in view of the above I am satisfied that, on this occasion, there was no deliberate attempt to mislead, and after very careful consideration I consider this breach to be at the less serious end of the spectrum.

25 **Next Steps**

This has been a finely balanced decision. Given the Group's failure to fully understand and communicate the Rules for the APPG's, its failure to ensure adequate monitoring of its secretariat, and the failure to ensure its register entry is correct, I gave serious consideration to referring the matter to the Committee on Standards for sanction. However, in making my decision I have been mindful of the unique circumstances that relate to APPG's and, in this case, I considered the breach to be inadvertent. I also note your acknowledgement and apology for the mistake in the Group's Register entry.

As I explained above, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification process, rather than by making a referral to the Committee on Standards. The Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach.

To resolve this breach of the rules through rectification, the Committee would generally expect the Member to provide the following:

- a) Confirmation you have accepted my decision;
- b) A clear acknowledgement that you have breached the rules;
- c) An apology for the breach; and
- 5 d) Information of the steps you have taken to rectify the breach and to ensure there is no recurrence of the breach.

You have already acknowledged and apologised for the APPG for Boxing's breach of the rules relating to the incorrect registration. In order to progress this through rectification, I will require the following from you:

- a) Confirmation you have accepted my decision.
- 10 b) A formal written apology to me for the breach of the Rules regarding the failure of the Group to disclose a secretariat's client list within 28 days of receiving the request.
- c) Confirmation that all relevant information from this inquiry has been shared with the new Chair of the Group.
- 15 d) Confirmation that the Chair is satisfied that the secretariat is fully aware of its responsibilities under the Rules for APPGs, and what action it intends to take to ensure the secretariat is meeting those obligations.

If you are content for me to conclude the inquiry in this way, please write to me with the above information by 26 May 2022.

- 20 If you agree to my proposal, I will share a draft copy of 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.

- 25 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.

- 30 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.

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.

18 May 2022

22. Letter from Mr Chris Evans MP to the Commissioner, 24 May 2022

5 Thank you for your email of the 18th May 2022. I fully accept your ruling and would like to apologise unreservedly on behalf of the Boxing APPG for failing to disclose a copy of the secretariat's client list to [name redacted] within 28 days of receiving the request and reiterate my earlier apology for submitting an inaccurate registration form to the Registrar of Members' Financial Interests on 12 August 2021.

10 In terms of going forward, I have officially tendered my resignation to the group, however, the APPG was unable to elect a new chair. Therefore, I have written to the Assistant Registrar asking the group be removed from any future editions of the register. I have attached a copy of the letter for your information.

I trust this satisfies your requirements. Should you require any further information, please let me know.

24 May 2022

15

Appendix 1

Emails exchanged between Registry Office and Stewart Public Affairs Ltd. – shared with Commissioner 01/03/2022 and updated 07/03/2022

20

1. Emails notifying the registration team of the new secretariat for the APPG for Boxing, 12/08/2021 - 13/08/2022

25 From: [Contact for Public Enquiries]
Sent: 12 August 2021 12:48
To: APPG Register
Cc: [Managing director Stewart Public Affairs]
Subject: APPG Register Update

30 Dear Registrar,

I hope this email finds you well.

35 My name is [name redacted] and I am writing to bring to your attention that, from the 12th of August 2021, Stewart Public Affairs Ltd. will be taking over the Secretariat and Public Enquiry Point for the APPG Boxing, the APPG Open Banking and Payments, and the APPG Taxation. This means that I will be the main point of contact for any public enquiries.

Could the contact details under the aforementioned APPGs please be changed to reflect this? My details are as follows:

Name: [Name redacted]

Email Address: [Email redacted]

5 Telephone Number: [Number redacted]

Company: Stewart Public Affairs Ltd

Address: [details redacted]

10 Please let me know if you require any further information or have any queries concerning this matter.

All the best,

[Name redacted]

Stewart Public Affairs Ltd.

15

On Thu, Aug 12, 2021 at 12:57 PM APPG Register [Assistant Registrar] wrote:

20 Hi [Name redacted]

A couple of things you will need to consider:

25 Whether or not secretariat services must be registered as a Benefit received by the APPG depends on who pays for them and how much this costs the donor for the period covered by the group's reporting year. Please see section 12 of the Registration Form attached for details. Then, if the secretariat services do qualify for registration, please complete that section and email it to me. There is no need to send me any other part of the form (unless the group wants to register a public enquiry point, in which case see section 7 for details), and the Chair's signature is
30 not required.

Kind regards

Assistant Registrar

35 From: [Contact for Public Enquiries]

Sent: 12 August 2021 15:08

To: APPG Register

Cc: Managing Director Stewart Public Affairs

Subject: Re: APPG Register Update

40

Hi [Assistant Registrar],

Thank you for your response!

Please find attached the completed forms, and do let me know if there is anything else I can provide.

5 I look forward to hearing from you.

All the best,

[Name redacted]
Stewart Public Affairs Ltd.

10

On Thu, Aug 12, 2021 at 3:27 PM APPG Register [Assistant Registrar] wrote:

Hi [name redacted]

Does Stewart Public Affairs Ltd. have a website?

15

Kind regards

[Name redacted]
Assistant Registrar

20

From: [Contact for Public Enquiries]

Sent: 12 August 2021 17:00

25

To: APPG Register

Subject: Re: APPG Register Update

Hi [Assistant Registrar],

30 Currently, Stewart Public Affairs Ltd. does not have a website. I hope this doesn't pose any issues!

All the best,

[Name redacted]
Stewart Public Affairs Ltd.

35

From: [Office of the Registrar]

Sent: 13 August 2021 14:59

40

To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Boxing - Confirmation of Register Amendment

Dear Chair & Registered Contact,

5 This is to acknowledge receipt of a register amendment the group recently notified us of about benefits received.

A copy of the entry I have accordingly made in the [Register of All-Party Parliamentary Groups](#) is enclosed for your records. The entry will appear in the next edition of the Register, a new edition of which is published every 6 weeks or so.

10 A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

Yours sincerely,
Office of the Parliamentary Commissioner for Standards

15

2. Emails exchanged between the APPG for Boxing secretariat and the registration team regarding registration thresholds, 01/02/2022 - 01/03/2022

20 From: [Managing Director Stewart Public Affairs Ltd]
Sent: 01 February 2022 14:00
To: APPG Register
Subject: Advice: APPG value of registrable threshold

25 Good afternoon,

I would be grateful if you could confirm what the current value of the registrable threshold is?

30 Stewart Public Affairs took over the APPG Boxing Secretariat in August 2021 from [name redacted] and since that date have only received one payment of £500 from a corporate member. Does that payment breach the registrable threshold and have to be declared? I assume not as it is below the value of £1500.

Very grateful for your advice.

35 Many thanks
[Name redacted]
Managing Director
Stewart Public Affairs Ltd.

5 From: [Managing Director Stewart Public Affairs Ltd]
Sent: 01 February 2022 15:23
To: APPG Register
Subject: APPG Boxing / APPG Taxation / APPG Open Banking and Payments "Benefit in Kind" information

10 Good afternoon,

The APPG Register entries for the APPG Boxing, APPG Taxation and APPG Open Banking and Payments "benefits in kind" sections are incorrect.

15 They are [name redacted] entries from January 2021. We took over the Secretariats for all three Groups on 1st August 2021 and the correct Benefit in Kind entries for all three Groups should read "up to £1500".

Please can you make the adjustments immediately.

Many thanks

20 [Name redacted]
Managing Director
Stewart Public Affairs Ltd

25 From: [Managing Director Stewart Public Affairs Ltd]
Sent: 01 February 2022 15:35
To: APPG Register
Subject: Re: APPG Boxing / APPG Taxation / APPG Open Banking and Payments
30 "Benefit in Kind" information

Further to my earlier email:

35 The "benefits in kind" provided by Stewart Public Affairs to the APPG Boxing, Taxation and Open Banking and Payments are in fact less than £1500 and are therefore not of registrable value.

Please adjust your records accordingly.

Many thanks

40 [Name redacted]
Managing Director
Stewart Public Affairs Ltd.

01/02/2022 Note of telephone call, Managing Director Stewart Public Affairs Ltd. to the Assistant Registrar.

5 Reiterated the guidance set out in section 12 of the reg form, including the threshold and the fact that the estimate covers the whole of the group's reporting year, irrespective of when within that year the secretariat was appointed.

10 From: [Managing Director Stewart Public Affairs Ltd]
Sent: 01 February 2022 18:31
To: APPG Register
Subject: APPG Boxing "Benefits in Kind" from 1st August 2021 to end of reporting year 28th January 2022

15 Dear [Assistant Registrar],

Thanks for your guidance and steer this afternoon.

20 I can confirm that the "Benefits in Kind" received by the Group from Stewart PA from 1st August 2021 to the end of the reporting year on the 28th January 2022 was less than £1500.

I would be grateful if you could adjust your records accordingly.

25 Best

[Name redacted]
Managing Director
Stewart Public Affairs Ltd

30 **On Mon, Feb 7, 2022 at 11:45 AM APPG Register [Assistant Registrar] wrote:**

Dear [Managing Director of Stewart Public Affairs Ltd]

35 I note you have provided an estimate for a reporting year that has in fact now ended. Please provide an estimate for your current reporting year, which runs from 29 Jan 2022 to 28 Jan 2023. This will then replace the estimate you currently have on the register.

Incidentally, we are aiming to publish the next edition of the register this Wednesday.

40 Kind regards
Assistant Registrar

From: [Office of the Registrar]

Sent: 09 February 2022 10:02

5 To: APPG Register

Subject: [BCC] All-Party Parliamentary Group for Boxing - Confirmation of Register Amendment

Dear Chair & Registered Contact,

10

This is to acknowledge receipt of a register amendment the group recently notified us of about benefits received.

A copy of the entry I have accordingly made in the [Register of All-Party Parliamentary Groups](#) is enclosed for your records²⁵. The entry will appear in the next edition of the Register, a new edition of which is published every 6 weeks or so.

15

A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

Yours sincerely,

20

Office of the Parliamentary Commissioner for Standards

From: [Managing Director Stewart Public Affairs Ltd]

Sent: 09 February 2022 12:17

To: [Assistant Registrar]

25

Dear [Assistant Registrar]

Many thanks for the update.

30

The estimate provided was to correct the inaccurate estimate for the reporting year that has now ended.

I will shortly provide an estimate for the current reporting year, running from 29 Jan 2022 to 28 Jan 2023.

Best regards

35

[Name redacted]
Managing Director

²⁵ Not reproduced here

Stewart Public Affairs Ltd

5 From: [Managing Director Stewart Public Affairs Ltd]
Sent: 11 February 2022 16:55
To: APPG Register
Subject: Re: FW: APPG Boxing "Benefits in Kind" from 1st August 2021 to end of
reporting year 28th January 2022

10

Dear [Assistant Registrar],

As promised, I enclose a Benefits in Kind estimate for the current reporting year covering the period 29th January 2022 - 28th January 2023 = £7,501 - £9,000.

Best regards

15 [Name redacted]
Managing Director
Stewart Public Affairs Ltd

20 From: [Office of the Registrar]
Sent: 14 February 2022 14:51
To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Boxing - Confirmation of Register
Amendment

25

Dear Chair & Registered Contact,

This is to acknowledge receipt of a register amendment the group recently notified us of about benefits received.

30 A copy of the entry I have accordingly made in the [Register of All-Party Parliamentary Groups](#) is enclosed for your records²⁶. The entry will appear in the next edition of the Register, a new edition of which is published every 6 weeks or so.

A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

35 Yours sincerely,
Office of the Parliamentary Commissioner for Standards

²⁶ Not reproduced here

From: [Managing Director Stewart Public Affairs Ltd]
Sent: 18 February 2022 21:10
To: APPG Register
Subject: Re: FW: APPG Boxing "Benefits in Kind" from 1st August 2021 to end of
5 reporting year 28th January 2022

Dear [Assistant Registrar],

10 Your records are still showing that a "benefit in kind" was received by Stewart PA in
January 2021. That is incorrect as Stewart PA did not give the Group any benefits in
kind in January 2021 because it did not become the Secretariat of the Group until
August 2021. That record is misleading and incorrect. Can you please remove it from
the register.

Many thanks
[Name redacted]
15 Managing Director
Stewart Public Affairs Ltd

20 From: APPG Register
Sent: 21 February 2022 16:48
To: [Managing Director Stewart Public Affairs Ltd]
Subject: APPG Boxing "Benefits in Kind" from 1st August 2021 to end of reporting
year 28th January 2022
25

Dear [Name redacted]

30 A new edition of the Register of APPGs is published every 6 weeks or so to reflect
amendments made between publications. The reference to 2021 appears in old
published editions of the Register. Those Registers constitute unalterable records
and therefore cannot be amended.

35 For any APPG, the start and end date of its secretariat estimate reflects the value of
the secretariat services that are being provided by the named secretariat during the
period covered by the group's reporting year. Hence the start and end date of the
estimate is the start and end date of the group's reporting year. The date on which
the secretariat was appointed within that year is immaterial and is not recorded on
the Register. It is for that reason that the benefit in kind provided by Stewart Public
Affairs Ltd. is recorded in the way set out in the Register.

40 Kind regards
Assistant Registrar

From: [Managing Director] Stewart Public Affairs Ltd.
Sent: 21 February 2022 17:25
To: APPG Register
Subject: Re: APPG Boxing "Benefits in Kind" from 1st August 2021 to end of
5 reporting year 28th January 2022

Dear [Assistant Registrar],

10 Many thanks for coming back to me. However the record is misleading as it implies that Stewart PA provided the benefit in kind to the Group in January 2021 which it did not.

The named Secretariat In January 2021 was [name redacted] and that is [name redacted] estimate and not Stewart PA's.

15 It clearly states that the benefit in kind was received on the 29th January 2021 but was only registered on the 12th August 2021 when Stewart PA became the named secretariat.

I have been why Stewart PA have provided a benefit in kind to the Group in January 2021 when it was not the named Secretariat at the time.

20 Can you advise on how I should respond please?

Best regards
[Name redacted]
Managing Director
Stewart Public Affairs Ltd

25

From: APPG Register
Sent: 01 March 2022 15:04
30 To: [Managing Director] Stewart Public Affairs Ltd.
Subject: APPG Boxing - Registration of Secretariat Estimates

Dear [name redacted]

35 The way secretariat estimates are registered for APPGs is as follows. The start and end date of the estimate simply reflect the start and end date of the reporting year the estimate covers, nothing else. The date on which the secretariat was appointed within that year is immaterial and is not recorded on the Register. In the estimate the field headed 'Registered' simply reflects the date the group submitted the
40 estimate to my office, not the date the secretariat started work for the group.

For 2021-22, the estimate registered by [name redacted] and the estimate registered by Stewart Public Affairs both covered the same period (i.e. 29 Jan 2021-

28 Jan 2022). For this reason both estimates have the start and end dates of 29 Jan 2021-28 Jan 2022 and that is why those dates are shown on the Register.

Kind regards

Assistant Registrar

5

3. Emails exchanged between APPG for Boxing secretariat and the registration team requesting a definition of 'commercial organisations', 11/02/2022 - 01/03/2022

10 From: [Managing Director] Stewart Public Affairs Ltd.
Sent: 11 February 2022 16:50
To: APPG Register
Subject: Definition of Commercial Organisation

15 Dear [Assistant Registrar],

I would be very grateful if you could provide a definition of "commercial organisations" as set out in point 32 (a) in the Guide to the Rules on All-Party Parliamentary Groups.

20

Does this definition include trade bodies, sport national governing bodies and Parish Councils who are not usually defined as "commercial organisations"?

Many thanks
[name redacted]

25

30

32. Each group's Chair and Registered Contact is responsible for ensuring if any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with the rules of the House. In particular, if a consultancy provides such services, and the value of those services exceeds the threshold for registration, it must be prepared to disclose information about its clients; if a charity or other not for profit organisation provides such services, it must be prepared to disclose information about its donors. The organisation providing the services must either publish this information online as a matter of routine or make it available within 28 days if any person or organisation asks them to do so. The information which must be made available is as follows:

35

40

a. If a consultancy provides a secretariat or support services whose value exceeds the threshold for registration: a list of any commercial

organisations who were clients of the consultancy during the preceding twelve months; or, if providing the information on request, during the twelve months immediately before the month in which the request was made. --

5 [Name redacted]
Managing Director
Stewart Public Affairs Ltd

10 From: APPG Register
Sent: 01 March 2022 15:04
To: [Managing Director] Stewart Public Affairs Ltd.
Subject: Boxing APPG - Definition of Commercial Organisation

15 Dear Sir,

In response to your question, the term “commercial organisation” is used to describe any business or other organisation that has a financial relationship with the consultancy providing secretariat support for a APPG. It is to distinguish between
20 organisations and individuals. Therefore, if a client is paying for services, then it would be subject to para 32 (a). If the consultancy was providing services to an organisation for free, then it would not be subject to that rule.

I hope this is helpful.

25 Regards,
Registrar of Members’ Financial Interests
Office of the Parliamentary Commissioner for Standards

Appendix 2

30 **Note of the meeting between the Commissioner and Mr Chris Evans MP, Chair of the APPG for Boxing, 28 February 2022**

In person meeting started - 15:51pm

Attendees:

- Parliamentary Commissioner for Standards, Kathryn Stone (KS)
- 35 • Mr Chris Evans, Chair of the APPG for Boxing (CE)
- Registrar of Members’ Financial Interests (RMFI)
- Investigations and Complaints officer (IC) acting as note taker

Meeting started with introductions and an outline of the following:

- the reasons an inquiry had been opened,
- why a meeting had been requested with Mr Evans as Chair of the APPG,
- 5 • reiterated the fact that the Chair has overall responsibility for ensuring the Group and the secretariat are aware of, and follow, the rules.

10 **CE:** started by expressing his thanks for the opportunity to meet with KS face-to-face. He explained he was intending to step down as the Chair of the APPG for Boxing at their forthcoming AGM in April 2022. CE added that since he had been Chair of the Group, he had been careful not to accept anything like tickets or trips, which might be seen as having a link to his work as Chair; this had been a bit of a distraction.

15 **KS:** set out how the meeting would proceed indicating that both she and RMFI would be asking the questions, which were designed to check a few things for the record and CE's understanding of the rules.

KS: asked about what measures CE had in place to ensure the secretariat was aware of the APPG rules when they took over the role for the group?

20 **CE:** explained that, when they took over as the Boxing secretariat in August 2021, he was aware Stewart Public Affairs Ltd. also acted as secretariat for other APPGs. He assumed they were familiar with the rules, and he agreed he should have checked their understanding of those rules at the time.

25 **CE:** also apologised to RMFI and the registration team for the mistake made when the new secretariat submitted their first registration form in August 2021. CE reiterated comments made in his earlier letter to the Commissioner, where he had suggested someone had made a mistake concerning the registration. He confirmed this mistake was made by the secretariat, and his second letter had explained this fact to KS. CE was sorry if there had been any suggestion in his correspondence the mistake was made by the registration team. CE "held up his hands" that he had not checked the registration form when it had been submitted by the secretariat.

30 **RMFI:** asked how CE dealt with inquiries from the public about the APPG for boxing?

35 **CE:** explained that as an MP he receives a lot of emails every day. Some emails are spam, some from journalists, and others he considers might be suspicious or present a security risk if links are clicked. He is very cautious and mindful of security issues when dealing with emails from unknown people, and he didn't take the email from [name redacted] as seriously as he should have.

RMFI: went on to check that CE understood that paragraph 32(a) concerns disclosure of the secretariat's client list and not the membership list of the APPG for Boxing.

CE: said that he did now understand this explanation.

- 5 **KS:** asked about what changes to the secretariat duties led to the value of the benefit reducing by over £8,000.

10 **CE:** reiterated that the value of the benefit initially reported by the secretariat was an inadvertent error. He explained that, as the secretariat took over the role in August the value was split between the previous secretariat and Stewart Public Affairs Ltd, this resulted in a reduced estimate of the value of the benefit.

15 When asked how £500 represented over 5 months of secretariat duties, CE further explained that as the APPG had been unable to hold any meetings, the value of the service provided by the secretariat was much reduced. He agreed it was possible the value of the benefit would go up again in the future as Group activity started to increase.

Meeting ended 16:07pm

28 February 2022

Appendix 3

- 20 **Note of the meeting between the Commissioner and the Managing Director of Stewart Public Affairs Ltd, who provide secretariat services to the APPG for Boxing, 30 March 2022**

Virtual MS Teams meeting started - 10:30

Attendees:

- 25
- Ms Kathryn Stone, Parliamentary Commissioner for Standards (KS)
 - Managing Director Stewart Public Affairs Ltd. (MD)
 - Senior Investigations and Complaints Manager (SICM)

Introductions,

- 30 **KS:** OK, so in order for us to kind of resolve this and have a better understanding of the role played by your firm. Could you please explain to me in as much detail as you

can, precisely what services Stuart Public Affairs provides to the boxing All-Party Parliamentary Group?

5 **MD:** Yes, of course, Kathryn, I'm. I'm more than happy to do that. Can I just make some kind of initial comments just regarding this, how this inquiry started? So clearly the initial inquiry was concerning the boxing All-Party Parliamentary Group from [name redacted]. I think we all know that that's abundantly clear, I then responded to him in as much detail as I possibly could and as I felt was right at the time, offering him a telephone call to discuss the boxing All-Party Parliamentary Group. Which I think, I'm not sure whether it's he, he or she, because there's not
10 really much information about that particular person. So at this point, I don't know.

Uhm, so I offered. [name redacted] a telephone call. I offered, I invited [name redacted] to meetings of the Boxing Party Parliamentary Group because I felt that's where his interests lie. I also sent him over a full list of members of the boxing All-Party Parliamentary Group. So, I just want to make sure, again, I'm not sure whether
15 he is a he or she at this particular point because I notice that there's no information whatsoever available on this particular person then.

As a rule, Kathryn I'm always minded to engage fully and transparently, but I'm always a bit risk averse when people refuse to talk to me, and so I felt this really wasn't a genuine inquiry about the boxing All-Party Parliamentary Group. So, I just want to put that point on record because this is the first chance I've had really to
20 engage with you and, you know, I'm keen just to make that clear to you at the very start.

So, you asked me a question about the role that Stuart Public Affairs provides regarding the boxing All-Party Parliamentary Group. So, we provide the secretariat support to the Group and that is aligned with the terms of engagement, which are to
25 arrange meetings of the Group as agreed with the Chair, to liaise with Officers and members of the Group as appropriate, to produce and circulate meeting minutes, obviously to attend meetings, following each meeting with a Group. And to approach and liaise with speakers as appropriate and as agrees with the Chair. So hopefully
30 does that clarify? And of course, I should also add, to engage with future prospective corporate members of the Group and actual members.

KS: OK, so that ex., so that's kind of that's the 'what' you do, [name redacted], I wonder if you could just tell me 'who' does that, 'how' they do that, 'when' they do that, if you could just kind of give me a bit more detail about that, that would be
35 great.

MD: Yeah, yeah, of course. Of course. I mean, I obviously liaise with the Chair of the Group, but I, as I should maybe have explained, Stewart Public Affairs is a micro business, it's myself and I have two, two days of my consultant, [name redacted]. So, [name redacted] does all the day-to-day liaison with regards to the secretariat and
40 the administration support to the Group.

KS: OK, and how often do you do this? How often does the Group meet? If you could just talk me through the when bit of that.

MD: Yeah, of course, I mean I think really, we're talking about the period where Stuart Public Affairs assumed the secretariat role for the Group Kathryn, is that right? So from August really through to now, if that makes sense. So basically, during that period the Group met twice. So we had a women in boxing meeting and we had a boxing and the Olympic Games meeting, following the success of British boxers at the games in Tokyo last summer. So those were two one-hour meetings and they were virtual meetings, as I'm sure we've all become aware of working in the virtual world, and bizarrely enough I think it's sometimes easier to arrange virtual meeting, particularly when you're talking about Parliament because people don't have to arrange access, people don't have to come into London. So in actual fact it kind of saves our time a little bit on the secretariat side, so we held two meetings during that period, lasting one hour in total.

KS: OK, thank you. I want to know if you could just expand a bit on how the services you provide are agreed between yourselves and the All-Party Parliamentary Group.

MD: OK, well, I mean everything is agreed through the Chair. So I mean, Chris Evans and he is the Chair of the Group. So we would liaise with Chris' Office to agree on diaries, to agree on speaker, panel, content, and to agree on programme of work.

KS: OK, and as I understand it, the terms and conditions of the services that you provide were agreed by [name redacted], that's the predecessor firm, your predecessor firm, is that right? And they continue in the same way with Stuart Public Affairs. So there was a firm before Stuart Affairs that was your firm, the terms and conditions of the agreement between yourselves and the boxing or Party Parliamentary Group were agreed and it carries on in that way. Is that right?

MD: Well, I mean, I mean it's the same, it's the same support that you would provide to any or All-Party Parliamentary Group. So it just depends on the, you know, particular objectives of the Chair but in essence, we would provide the admin support behind the Group as I've just explained.

KS: OK, and presumably there's a written contract or agreement setting out the kind of expectations of yourselves and the All-Party Parliamentary Group?

MD: I mean, there's a terms of engagement letter.

KS: OK. Could you send that through to us [name redacted] because, I think that's going be really, really helpful in helping us to understand precisely what it is you do and what the kind of expectations are. I think that would be really helpful to see that.

MD: Sorry Kathryn, the screen froze there a little bit. Could you just repeat that?

KS: Yeah. Could you send us through that terms and conditions letter just so that we've got the kind of the document that sets out what the boxing All-Party Parliamentary Group gets from Stuart Public Affairs, I think that would be really helpful for us to see that.

5 **MD:** Yeah, yep. Of course, yeah, of course, that's fine.

KS: Ok, and just building on that a little bit. How do you assess the value of the benefit provided by Stuart Public Affairs to the boxing All-Party Parliamentary Group? What's the, what's the process for assessing the value? How do you know what to charge them?

10 **MD:** OK. So in terms of how we would measure the value, we talking about the value of the benefit in kind that we would provide to the Group?

KS: Benefit in kind or any charge across that you have, how do you assess that?

15 **MD:** So that's kind of assessed against the a, A) the program of the Group, B) the amount of hours that we would commit in terms of providing the secretariat services to the Group.

KS: And do you have an hourly rate then [name redacted]?

MD: Yes, we do, yes.

KS: OK, and what's that?

20 **MD:** Well it varies, I mean my hourly rate is higher than [name redacted], for instance. So [name redacted] provides the secretariat services to the Group, so her hourly rate is £11.05 per hour.

KS: OK. Thank you, and yours.

MD: So my hourly rate is higher than that, obviously, I'm a, my standard rate is £250 per hour.

25 **KS:** Thank you. Thanks very much. And is it you who are responsible for assessing the value? Or is it? How does that bit work? Do you say this is what the cost is, or do you agree, or just tell me the mechanism for making those decisions?

30 **MD:** I mean, those are obviously internal Stewart Public Affairs rates, so that's very much my call. It's up to the, I think the point here is that we're not forcing ourselves upon the boxing All-Party Parliamentary Group and there are many public affairs firms out there. It's a competitive market, so it really is the Group's decision as to whether they want to engage with us or not.

KS: OK, I get that and I'm just interested in the kind of fluctuation in that value across the years, [name redacted], what was the reason for that? Can you just give us some explanation why there's such a fluctuation between some years and...?

MD: Yeah. Oh, do you mean do you mean well? Which year are you referring to?

5 **KS:** Well, there's some years that the cost of the services that you provide has been significantly more than it has been in other years. And I just wondered what if we could just? Just, you know, record the reasons why that was, just to be clear about it, yes.

10 **MD:** Yeah, I think clearly that, I mean that's going to vary according to the according to the programme and the amount of events you would put on, I mean clearly you know, most of the work at the moment is virtual, and in particular I think it varies according to the number of times the Group meets what the Group is planning to do. So in previous years, you know the Group has had dinner events and functions in Parliament. It's had, you know, roundtable meetings in Parliament, which tends to
15 sort of, you know. Obviously those events tend to take longer to plan and a more intensive to plan with regards to resource, so that I mean that would be the reason.

I mean you mentioned you mentioned [name redacted]. I know that we had come into the halfway through the year obviously [name redacted] are a much, much larger firm than us and I think the Group also had a much more intensive programme
20 during the first half of the year than they did the second half of the year. So I think, I mean that would be my reasoning behind why it might vary.

KS: OK, that's really helpful, [name redacted], thank you and forgive me for not quite understanding this, and this is precisely why it's so useful and helpful to have these conversations. When the membership fees are paid, where does the money go? Is
25 it paid directly to you, or does it go through the APPG? How does that work?

MD: It's paid, it's paid to us.

KS: OK. And is it paid into a separate account because aren't, the boxing All-Party Parliamentary Group account or is how is it? How is it recorded in your account?

30 **MD:** It's recorded as a payment, as a membership fee for the boxing All-Party Parliamentary Group.

KS: OK, what's the money used for? Because it seems to me that the Members pay their fees to you, and you then show... How does that bit work? The charge back or what happens with the money?

35 **MD:** Well the members pay us a fee, and we would provide the service in terms of the Secretariat service and arrange events, and provide speakers, and provide all the admin support to wrap around the Group.

KS: OK. So and you record the expenditure then, so you're £250 an hour. [name redacted] £11.05 an hour. You spend 2 hours, she spends 3 hours. You record that separately?

5 **MD:** Yeah. So, I mean this. I presume this relates to, you're asking about the period from August to February. Because that's because that's the period that relates to Stuart Public Affairs.

10 **KS:** Yeah, I'm just trying to establish how the money paid by the members of the boxing All-Party Parliamentary Group is, is accounted for and used by Stuart Public Affairs as the secretariat and of course the challenge for the Chair is that he is responsible for the activities of the All-Party Parliamentary Group, including the money and where that's being managed by a separate organization.

KS: And there needs to be a very real clarity about how it's used it because, you know, what we don't want it is any unfortunate wrinkles about expenditure and recording.

15 **MD:** No. Course not. Of course not. So, I mean, if I can just clarify that so since August 2021, when Stuart Public Affairs assumed the secretariat position, so we only received one member fee during that period. So the key invoicing period in terms of member fees is this half of the year so. Yeah, so if that is helpful. And I could give you the hours that [name redacted] spent on arranging the meetings. During that period,
20 if that's helpful.

KS: That really helpful, just to see that the records that you have of the income and expenditure that's going to be very helpful. And I wonder does the level of service provided change depending on the level of fees paid. So do you have like a tiered membership or how does that bit work or is it a flat membership fee and people get
25 the same service for the same fee, different APPG have different approaches. What's yours?

MD: Indeed, they do say, I mean, I know that some Groups do have a flat or tiered system, the boxing Group has a tiered system. So corporate members would pay a little bit more than, say, a charity or a boxing club.

30 **KS:** Right, OK. And it would be useful for us to have a kind of understanding from you if you could just include that in your kind of written material or record?

MD: Yeah. No, I think, I mean, I think this is what I'm quite surprised at because I did send that through, I sent it through to [name redacted] and I know that I'm sure he's shared that information with you. And I'm, I'm more than happy, you know to share
35 that. I'm just, I'm surprised that you're asking that question because I think you probably have that information already.

KS: OK, you've provided a list of Members to, oh sorry.

SICM: Kathryn, could I just jump in there?

KS: Yes.

SICM: Because it looks like we're a little bit at cross purposes. So, is it that the membership fees coming in go to [name redacted], Stewart Public Affairs and that's
5 the value of the services? Or is it that you assess what the services are going to be in your estimate and that's the value of the benefit?

MD: No, the membership comes in, first of all, the fee comes in. I mean I think it's important to point out, I mean those are the levels that we set. I mean Members can decide whether they want to join or not.

10 **SICM:** Yes, I'm not disagreeing with that I'm more say, if you got say 20 members, the money would come in and that would be, all go to Stuart Public Affairs and that would be the level of the benefit provided? Or is it the benefit provided is the set hours because earlier you said it was about the number of hours and about how
15 much work was going to be putting in, so which is it? is it the membership fees coming in or is it the hours that you're working?

MD: Well, I think it's a mixture of both. I mean, I'm following on the guidance in terms of the guidance on All-Party Parliamentary Groups, how benefit in kind is assessed and it's a mixture as I read that, as I read that guidance it's a mixture of
20 income coming in and the amount of hours resource that we would commit to the Group.

SICM: OK so you. So, it's, I'm not marrying this up, I'm afraid. Is it that you base the number of hours based on how much money has come in? Because what happens, say if you get 20 new members and there's £20,000, do you then say right, well we had, using the rate of £11.00 an hour, that means we're going to have to do this much.
25 How does that work?

MD: I mean that, I mean they're set rates, so, you know the rates are set, and the programme is agreed by the Members. So we would then deliver you know on the programme.

30 **SICM:** OK. And does any of that money then say if for example, more membership fees come in, then the kind of number of hours discussion that we talked about earlier, does any of those fees then go to the APPG or does it stay with Stuart Public Affairs?

MD: It sticks with us.

35 **SICM:** Right, OK. And you keep separate accounts, does it all go into your main account or is there a separate boxing APPG account?

MD: Yes, it all goes into the main account, but it's logged under the boxing All-Party Parliamentary Group.

SICM: I see. OK. Thank you. I think that kind of explains that for me. When you were talking earlier about the number of hours and the rates, is that recorded anywhere?
5 Are there any emails between you and Stuart Public Affairs in the APG that kind of sets out, you know, these are rates, these are the hours?

MD: Possibly, I would have to check that [SICM]. Yeah.

SICM: Would you mind just if you have them that would be very helpful if you have.

MD: OK.

10 **SICM:** And...

KS: I actually think [SICM], as [name redacted] explained earlier that there was a T's and C's between the two between the company, Stuart Public Affairs and the All-Party Parliamentary Group, so it's likely that it's going to be in that, the hours provided and the costs and so on, I would imagine.

15 **SICM:** OK. Thank you very much. That's all for me on that point.

MD: OK.

KS: Thank you and thanks for that [SICM]. It's helped to crystallize things from me. I did have a list of things I wanted to just check back, and you've covered them all so well done. So, you've provided a list of members to [name redacted], and we've
20 received a list of non-commercial organisations who are your clients from Chris Evans?

MD: Yep.

KS: Now the rules require a list of all clients who are commercial organisations, and I know that my colleague the Registrar has previously set out the meaning of
25 commercial organisations. I wonder when you send us this information, could you also please provide us a full list of your clients who are commercial organisations as well? Could you do that?

MD: I mean that is the full list, and so what you may be referring to is obviously the other All-Party Groups that we would provide secretariat services for, APPG
30 taxation; Open Banking and Payments, they do have members so I could send those through to you as well.

KS: Right, I'm just as a follow up and obviously it's separate from the conversation about the boxing All-Party Parliamentary Group. Is the way that you structure the

services to those other All-Party Parliamentary Groups the same? People send in a flat rate membership fee, and they get a service from you and that's not related to, the number of hours is not related to the amount of money they spend, is that right?

MD: Yes, that's right. Yes.

5 **KS:** OK, excellent. Right. Well, I'm really grateful to you, [name redacted]. It's been a very illuminating meeting and I'm grateful for your time and for the answers to the questions and just want to check back with [SICM], oh, you've got your hand up, [SICM], If you haven't got any other questions that were, or points we should have covered?

10 **SICM:** It was actually just what you said about the T's and C's that reminded me. So it was helpful to understand at the beginning the attempt you've made to get in contact with [name redacted] and I have seen the emails where you're kind of offering phone calls, etc. However, their email asked for a client list. Is there any, and I know you gave the members list. Is there any reason you didn't just give them the
15 client list?

MD: Well, I think I think as I explained at the start, I like to engage with people who have shown an interest in the boxing Group and in Stuart Public Affairs. I mean having read his blog and having just tried to, I don't even know if it's a him you know to be frank with you. So having read [name redacted], I'm not I'm not sure he or she
20 is [details redacted] either, so that there's absolutely nothing about this person that there's no back story and I know that you've had a look at my LinkedIn account prior to this meeting this morning [SICM], so I think people like to do you know some background research just to find out where this person is coming from, who funds this person, and so on, this person's blog is particularly aggressive and I felt um...

25 I wanted to protect my client base if that makes sense to you. And I felt with if he or she wasn't prepared to engage in a constructive way then, I took the decision to not share it at that time, because I felt the engagement wasn't constructive. I think also there's a genuine question that I know that I've raised in my complaints process. So his, I don't even know he is a he. So the initial inquiry relates to the boxing All-Party
30 Parliamentary Group, so I gave them as much information as I could. And I think as much information as is, in my view, is reasonable.

I think there is a genuine question to ask about the ruling going forwards, whether the balance is right, whether it is right, you know, for consultancies to share details of their entire client list when the query relates to the boxing All-Party
35 Parliamentary Group. Now I understand that's probably a matter for a different day, but in my view, I think that's where the rulings perhaps maybe the balance isn't right, because I had no idea how this person was going to use that client list. And you know, we are a very small micro business. And I felt that if that person wasn't prepared to engage constructively with me and I felt I had shared, I've given them
40 all the information and more that they required regarding the boxing All-Party Parliamentary Group.

I realize that that probably isn't aligned with the rules as they stand, that I would argue, I think the rules as they stand aren't balanced enough and I think that's the matter. I know that the Committee on Standards is having a look at All-Party Groups going forward. I'm quite happy to, you know, submit some points to that. I have
5 shared some of the points also with Chris Bryant MP as well, because I feel also that the wording around the words on the commercial, how that's defined. I had a look at it and really your, the way the way you defined it is not, it's not really aligned with how it's defined, and I think you know for my size, you know, our client list, we don't
10 have, you know, kind of commercial clients we work for charities, we work for local authority, we worked for the national governing bodies. So I think probably, I think in my view that the wording needs to be tightened to make it clearer.

SICM: That is really helpful and you're quite right, the Committee on Standards is the right body to do that. We're not in charge of the rules. We're here to...

MD: No, no, I know, I know that, but I just felt I wanted to make that, I wanted to
15 make that point to you. Sorry, Kathryn, did you want to?

KS: Yeah, I'm just. I'm just listening to you to speak there [name redacted] and, it is the case when whenever we have conversations with people about breaches of the rules they say, but that "I don't think the rules should be written like that, I think the rules should be written like that." I'm really pleased that you've had the
20 conversation with the Chair of the Committee on Standards, and I'm really pleased that you're going to put some points forward to the All-Party Parliamentary Group consultation. As [SICM] said, you know our job is to implement the rules as they are, not as they would like them to be. And so if you get a request for your list of commercial organisations, forgive me, it's not really for you to determine whether
25 or not you think that's a sincere and genuine request. You are, the All-Party Parliamentary Group, which Chris Evans is responsible for, not you, is required to provide that.

And until that changes, that's where we have to go with it, and that might not suit a whole range of things in where we are now in the world, in terms of GDPR, in terms
30 of commercial interests, in terms of commercial sensitivity and so on. And those are all really, really important points to land. But right now, the way that they are, that's where we have to go. And I'm sorry that it's frustrating and irritating but that's how it has to be until we can change it. And maybe your experience of this will lead to the change, you know, I'm so grateful to you for your kind of cooperation and very, very
35 helpful contextualization, of where we've got to so far.

MD: Yeah, yeah.

KS: So I'm going to provide you with a copy of the transcript of the meeting, and I'll also set out in writing the next steps that the inquiry will take. In the meantime, if
40 you could send us back the Ts and Cs that you have between the organizations, if you could send us back some evidence of how you account for the income and expenditure from members of the All-Party Parliamentary Group and if you could supply the list of commercial organisations that would be very helpful towards us

and to [name redacted], whoever they are. That would I really, really helped here to settle things.

MD: Yes, of course

5 **KS:** I'm very conscious, I've probably taken up far too much of your time [name redacted] and, if there are any further questions, please get back in touch with us if there's anything that's not clear. If there were things in the transcript that you think either we haven't expressed clearly enough, or you want to kind of elaborate on please feel free to do that. [Personal information redacted].

10 **MD:** Thanks Kathryn and [SICM], it's been good to talk to you. And I just wanted to make one final point, if I may. It's just with regards to the Mail on Sunday leak that happens as part of this inquiry. And I mean, I was a little bit upset about how that's been handled, if I'm being frank with you, I'm not, I'm still not sure how the Mail on Sunday got information about the inquiry.

15 It mentions [name redacted] by name, and it also claims that Stuart Public Affairs had breached the rules and at that point, and indeed at this point this is more information than you have announced about the inquiry to date. And I realize that that is in full breach of your inquiry rules and in my view it's very clear that [name redacted] had leaked that information to the Mail on Sunday and this has caused, you know, considerable distress and upset for myself and [name redacted].
20 I'm just a bit concerned as to how that happens. In particular I'm concerned about the fact that I highlighted it to your staff. I think it was [name redacted] that the Mail on Sunday were asking me questions about the inquiry and they, they got more information than you had announced around it. And then the following week an article was published.

25 So I just want to know really what action you're planning to take and with [name redacted], I'm also aware you kind of conducted an internal leak inquiry, which, as I understand it, was conducted by a member of the Commissioner staff who was inquiring into their Commissioner?

30 **KS:** OK, let me clarify that for you. We did undertake a leak inquiry. It was undertaken by the legal adviser to the team, who is indeed a member of the team here, but as a qualified registered legal practitioner is required to act, as all my team are required to act, entirely professionally and appropriately at all times and a leak inquiry was carried out and no member of this team had any conversation at all, with any journalist about this matter. And in fact, when people do make enquiries of
35 the team here, we simply direct them to the website and say, if it's on the website, we're investigating. If it isn't, we aren't at the moment.

40 So you can be assured that no leak happened from this office. And in respect of 'who' leaked the investigation, we like you can only speculate on that. And if we were to have evidence that a complainant had leaked the information, then of course we would strongly deprecate that we have no control over members of the public and

how they conduct themselves and what they do. But of course we would strongly deprecate any leak where we have said very clearly in our correspondence that this matter is confidential. [SICM], I don't know if you want to add anything to that.

SICM: No, I think you've covered everything clearly. Thank you.

5 **KS:** OK.

MD: But surely [name redacted] is not a member of the public. He is a fully-fledged part of this inquiry, and I would have thought that your staff would have made it crystal clear to him during, or her, I don't know them, that it's inappropriate to talk to the media about this enquiry or indeed talk to the media about more than the
10 inquiry than you have announced, I just wondered if that happens.

KS: We, in a letter to complainants, we talk about the importance of maintaining confidentiality and, sadly, we have no control over members of the public and what they do and how they do it. As I said, if we have any evidence that [name redacted] has leaked any information, then in our kind of summary of our investigation, we
15 can strongly deprecate any leak. But I'm afraid without evidence that it was from them, then we're not in a position to do anything we can only speculate in the same way that you can.

MD: OK. So you're confirming, Kathryn, that the week that followed the email that I sent into [name redacted], flagging up the risk of an article, that the Commissioner's
20 Office took no action at all during that week.

KS: We're here to ask you questions, [name redacted], and I understand that you are frustrated and irritated about a leak. We've already confirmed to you that a leak investigation was carried out by our legal adviser and no leak was, well no leak was created or sent from this office to any journalist about this matter. I have no control
25 at all over the complainants, save as to invite them in the strongest terms in an initiation letter to maintain the confidentiality of the investigation. And that's what we did.

MD: OK. Which is clearly being broken, of course.

KS: Well, we can. We can speculate as to the [inaudible as voices merge].

30 **MD:** Well, I don't know who else would have leaked it. If you're if you're confirming that you know your staff haven't leaked it. I didn't leak it. And so, who did? I suppose is the question.

KS: Well, you know, as I said, our investigations are evidence-based [name redacted], and we would have, if we have evidence of that, then we would consider
35 what steps to take. But as I said there was no leak from this office. My legal adviser who is required under a professional oath to behave competently as a legal adviser

carried that out, and I can give you an absolute assurance that nothing was leaked from this office.

MD: OK, but clearly, clearly information happened to end up in the Mail on Sunday.

5 **KS:** I can't account for that that aren't there. There is no, there is no evidence of any leak from this office at all.

MD: OK, so no action was taken against the complainant.

10 **KS:** We invite all our complainants, we write to them and we tell them that these investigations are confidential. But as I said, I have absolutely no control over complainants, members of the public, and we have to go on trust that they will maintain the confidentiality of the investigation. I'm kind of going round in circles, [name redacted]. I know it must be irritating. I know it must be frustrating, but please do accept my assurance that there was no leak from this office.

MD: No, of course, of course, Kathryn. That's absolutely fine. And just in terms of next steps, what would be the appropriate next steps?

15 **KS:** OK, So what we're going to do is we're going to reflect on the conversation that we've had this morning. We will send you a transcript of the meeting for your record. I'm also going to outline in writing the next steps because we need to just kind of step back and look at the information that you've kindly given us and see where that takes us. It might be that we have a, you know, a couple more kind of clarificatory
20 questions, but I'm hopeful that we'll be able to kind of move this on as expediently as we can. What I will say to you is that we never sacrifice thoroughness and fairness for expediency, and I want to make sure that we get this right because obviously, you know you are professional providing services to All-Party Parliamentary Groups and it's in everyone's interests for us to come to a fair outcome in this matter, OK?

25 **MD:** Perfect, Kathryn. That's lovely. And thank you again for your time.

KS: Alright, thanks so much.

Meeting ended at 11:09 (meeting length 39:47).

30 March 2022

30 **Appendix 4**

Enclosure provided by the Registrar of Members Financial Interests with his letter dated 22 April 2022

Annex: Extract from the Registration Form for APPGs

(1) Registration of secretariat services provided to the group

Whether or not secretariat services must be registered as a benefit depends on who pays for them and how much they pay in the course of the group's reporting year (which is defined in section 9 above) to meet the cost of them. The most common scenarios are outlined below to help you determine what, if anything, your group is required to register.

If either of the following scenarios applies to your group, do not complete section 12. If neither scenario applies to your group, read the guidance below on estimating the value of staff time.

- **An individual or organisation is paid from parliamentary expenses or parliamentary funding** for the time they spend assisting the group. For example, an officer of the group may have a member of staff who is paid by IPSA (the Independent Parliamentary Standards Authority) and provides secretariat services as part of their wider role for the officer concerned.
- **An individual or organisation is paid by the group to act as its secretariat, from money given directly to the group from sources outside Parliament.** [NB: Although the secretariat services themselves are not registrable, the money used by the group to pay for them may qualify as a registrable financial benefit - see section 10].

Estimating the value of the staff time donated by the secretariat to the group in the group's reporting year

- The value is the estimated annual cost to the secretariat, based on the hours the secretariat's staff are likely to work for the group over the course of the group's reporting year, multiplied by their hourly rate of pay. Wherever possible the estimate should be based on the full costs met by the employer (eg pension contributions, office accommodation and any other costs for which figures are available).
- Include in your estimate any money the secretariat is paid during its reporting year by any other organisation specifically for the purpose of providing secretariat services to the group. (An example of this would be a consultancy that is paid by one of its clients to be the group's secretariat). This will give the combined annual estimate of the costs borne by all the organisations involved.
- If your estimate is £1500 or less do not complete boxes 12a-f below.

- If your estimate is more than £1500 complete boxes 12a-f below.

a) What is the total value of the staff time that is being donated by the secretariat to the group in its reporting year?

By referring to the table in section 17, write below the value band your estimate falls in.

b) Is the secretariat itself donating more than £1500 in the reporting year in the form of staff time to the group?

Yes

No

c) Is the secretariat being paid over £1500 in the reporting year by any organisation specifically for the purpose of providing secretariat services to the group?

Yes

No

d) If you answered YES to (c) please name the organisation(s) below.

e) What is the name of the organisation that is acting as the group's secretariat?

f) What is the website address of the organisation that is acting as the group's secretariat?