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Summary

Following a self-referral from Dr Simon Opher MP about the potential late registration of several interests, I opened a formal inquiry on 20 August 2026. My inquiry considered whether Dr Opher had breached Rule 5 of the Code of Conduct for Members by failing to register within a month of his election the following donations:

a) £5,000 from Labour Together Ltd received in April 2024.

b) £4,500 from Unison received on 22 March 2024.

c) £3,000 from Unison received on 28 June 2024.

d) £1,000 from CWU South West received on 14 February 2024.

e) £500 from CWU South West received on 28 May 2024.

f) £500 from CWU South West received on 21 June 2024.

During my inquiry Dr Opher confirmed that he had not received any other donations from CWU South West valued over £500 during the calendar year of 2024. As a result, I concluded that the donations from CWU South West listed above did not pass the threshold for registration and that no breach of the rules had occurred in relation to those donations.

Having considered the information available to me, I was satisfied that three breaches of Rule 5 had occurred in respect of the first three donations listed above. Having considered the circumstances that led to those interests being registered late, I determined that it was appropriate to conclude that the failure to register these interests on time could reasonably be described as inadvertent. On that basis I decided to conclude my inquiry by way of the rectification procedure available to me under Standing Order No. 150. As part of that process, Dr Opher acknowledged and apologised for his breaches of the rules. In addition, I have asked the Registrar to arrange for the relevant entries in the Register of Members' Financial Interests to be annotated, so it is clear to the reader that they have been the subject of an inquiry.

Daniel Greenberg CB

1 September 2026

Written evidence

1. Email from Dr Simon Opher MP to the Commissioner, 11 August 2026

I am writing because I believe my Declaration of Members' Interests submitted in July 2024 may contain errors or omissions.

At the outset, I would like to apologise sincerely for these errors. I take responsibility for ensuring that my Register is accurate and fully compliant with the rules of the House, and I regret that these matters were not identified and addressed at the relevant time.

I would, however, like to make clear that none of the donations outlined below were paid to me personally. They were all made directly to Stroud Constituency Labour Party (CLP).

The donations were also declared to the Electoral Commission and are therefore already in the public domain. The issue I am seeking to rectify is whether they should additionally have been declared in my Register of Members' Financial Interests.

On 20 July 2026, the Treasurer of Stroud Constituency Labour Party (CLP), [name redacted], wrote to my Chief of Staff to highlight potential issues. My Senior Parliamentary Assistant informed me of these concerns on 23 July 2026, at which point I asked him to investigate the matter. My office received a copy of the CLP's bank statement on 10 August 2026, which has enabled us to examine the detail of this situation closely.

The first issue relates to a £10,000 donation recorded by the Electoral Commission as having been made to Stroud CLP by Ecotricity in 2024. My Register of Members' Interests lists this donation as having been made by Dale Vince, the owner of Ecotricity. [The Treasurer of Stroud Constituency Labour Party]'s view is that the donation should have been attributed to Ecotricity rather than to Mr Vince.

The second issue concerns a £5,000 donation made by Labour Together Ltd to Stroud CLP in April 2024. In March 2024, I was informed by the Parliamentary Labour Party Office that Labour Together wished to make a donation, and I instructed that it be paid directly to the CLP. As I had not solicited the donation myself and it was made to the CLP rather than to me personally, I believed it did not need to be included in my Register of Members' Interests. The donation was, however, correctly declared to the Electoral Commission within the required timescale. I do sincerely apologise for this error.

During our review, my team also identified further donations made by trade unions to Stroud CLP that were not included in my Register of Members' Interests but declared with the Electoral Commission.

£4,500 was donated by Unison on 22 March 2024. I was aware of this donation at the time but, again, because I had not personally solicited it and the money was paid directly to the local party, I incorrectly believed that I was not required to register it.

I had no awareness of the following donations:

- £3,000 by Unison on 28 June 2024.
- £1,000 from CWU Gloucestershire on 7 June 2024.
- £1,000 from CWU South West on 14 February 2024.
- £500 from CWU South West on 28 May 2024.
- £500 from CWU South West on 21 June 2024.

For context, at the time these donations were received and should have been considered for registration, I had not yet been elected and therefore had no parliamentary staff to advise me.

I hope it is also helpful to emphasise that the donations themselves were made directly to Stroud CLP and were declared to the Electoral Commission. They have therefore been publicly available through the Electoral Commission's records.

There was no intention to conceal these donations or withhold information from the House – the omissions arose from my misunderstanding of the separate registration requirements applying to Members.

I would be grateful for your advice as to which of these donations should have been included in my Register and the appropriate steps to correct any errors or omissions.

11 August 2026

2. Letter from the Commissioner to Dr Simon Opher MP, 13 August 2026

Thank you for your email of 11 August 2026 and the information you have provided. Before I respond to the substantive issues you have raised, I will first explain the process I follow. The manner in which I deal with allegations and conduct investigations is set out in the Procedural Protocol in respect of the Code, which is approved by the House. The Protocol states that I can start an investigation into an alleged breach of the rules that has been brought to my attention by the Member concerned (self-referral). When assessing a breach of the rules I must consider whether:

a) the allegations fall within my remit;

b) there is sufficient evidence to justify the initiation of an investigation into whether a breach of the Code of Conduct has occurred; and

c) an investigation would be proportionate.

5 This means that when any matter that could be a breach of the Code is brought to my attention by a Member, I will assess it against the test set out in the Protocol.

To enable me to assess the matter you have raised in a fair and timely fashion, and in line with the requirements set by the House, please can you supply the following information by 20 August 2026:

10 1. Were the donations listed in your email (excluding the donation made by Dale Vince/Ecotricity) provided to Stroud CLP to support your candidacy at the 2024 General Election?

13 August 2026

3. Email from Dr Simon Opher MP to the Commissioner, 13 August 2026

15 Thank you for your letter.

I can confirm that the £5,000 donation from Labour Together and the £4,500 donation from Unison were made to support my 2024 General Election campaign.

I was not aware of either the existence or the intended purpose of the other donations listed in my email to you.

20 However, following a review undertaken by my team, their understanding is that these donations were also made to support my General Election campaign.

Please do let me know if you require any further information.

13 August 2026

4. Letter from the Commissioner to Dr Simon Opher MP, 20 August 2026

25 Further to your emails of 11 and 13 August 2026 about your compliance with Rule 5 of the House of Commons Code of Conduct for Members, I have decided to open a formal inquiry. I enclose a copy of our previous correspondence at the end of this letter.

My inquiries

Although I have decided to open a formal inquiry, this does not mean that I have formed a view on whether a breach of the House's rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the balance of probabilities. How I conduct my inquiries is laid out in the Procedural Protocol, attached, which was drafted by the Committee on Standards and has been approved by the House.

What I am investigating

I initially intend to investigate the following issues:

1. Why the following donations, made to support your election as a Member of Parliament, were not registered within a month of your election:

    a) £5,000 from Labour Together Ltd received in April 2024.

    b) £4,500 from Unison received on 22 March 2024.

    c) £3,000 from Unison received on 28 June 2024.

2. Whether the following donations cross the threshold for registration and, if so, why they were not registered within a month of your election:

    a) £1,000 from CWU South West on 14 February 2024.

    b) £500 from CWU South West on 28 May 2024.

    c) £500 from CWU South West on 21 June 2024.

At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 of the Code of Conduct. As outlined above, I will use the balance of probabilities to form that opinion.

If during my investigation new evidence comes to light that changes the scope of my inquiry, I will update you formally in writing.

I do not consider it proportionate to investigate the issue about the recording of the donor's name for the donation of £10,000 from Ecotricity. This is because the relevant Register entry contains enough details to make it clear to the reader that

the donation was from the company Ecotricity rather than a personal donation from the company owner.

I will also not be investigating the donation from £1,000 from CWU Gloucestershire received on 7 June 2024 because it is under the threshold for registration.

The relevant rules of the House

The overarching rules are found in the House of Commons' Code of Conduct for Members. Rule 5 of the Code states:

> *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.*

The Guide to the Rules relating to the Conduct of Members, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, paragraph 14 states:

> *Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.*

Next steps

In order for me to progress my inquiry, I require the following from you:

1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.

2. Ensure that you understand what I will be investigating. If you do not understand, please let me know immediately.

3. Read carefully the appendices attached to this letter and the "Rules relating to upholding the Code" set out in section E of the Code, as these contain important information about your obligations during the investigation. If you have any questions about the content of those appendices, please let me or a member of my team know as soon as possible.

4. Reply to this letter, by **28 August 2026**, with:

a) Your general comments on the allegation that your alleged actions have amounted to a breach of Rule 5 of the Code of Conduct for Members.

b) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

Question 1: After your election as a Member of Parliament why did you not check what donations had been made to your local constituency party association to support your election.

Question 2: Please outline what measures you have now put in place to routinely check what donations have been made to your local constituency party association to support your activities as a Member.

Question 3: After your election as a Member of Parliament why did you not check the rules about the registration of Member's interests?

Question 4: Did you receive any other donations over £500 from CWU South West in 2024?

Question 5: Are you satisfied that your entry in the Register of Members' Financial Interests is otherwise up-to-date and accurate? If your entry is not up-to-date and accurate, please can you outline the errors and/or omissions.

c) Any other points you wish to make to help me with my inquiry.

5. If you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

Important information

Attached to this letter are several appendices which provide important information on:

- Appendix 1: Support for you
- Appendix 2: Confidentiality
- Appendix 3: How my investigations are conducted
- Appendix 4: Possible outcomes from my inquiry

5 **Contact details**

If you would prefer me to communicate with you by a different email address, please provide details when replying. I would be grateful if you could send your response by email.

Appendix 1: Support for you – not reproduced here

10 **Appendix 2: Confidentiality – not reproduced here**

Appendix 3: How my investigations are conducted – not reproduced here

Appendix 4: Possible outcomes from my inquiry – not reproduced here

Enclosure 1: Email from Dr Simon Opher MP to Commissioner, 11 August 2026 – see item 1 above

15 **Enclosure 2: Letter from the Commissioner to Dr Simon Opher MP, 13 August 2026 – see item 2 above**

Enclosure 3: Email from Dr Simon Opher MP to the Commissioner, 13 August 2026 – see item 3 above

20 August 2026

20 **5. Email from Dr Simon Opher MP to the Commissioner, 24 August 2026**

Thank you for your letter dated 20th August regarding compliance with Rule 5 of the House of Commons Code of Conduct for Members. As per my telephone conversation with [name redacted] last Friday, I would like to designate my Chief of Staff [name redacted] (cc'd in here) to be included in further correspondence.

25 Your summary is clear and helpful.

I would like to re-iterate what I said when I drew this matter to your attention – that I take full responsibility for the fact that while all 2024 campaign donations were reported to the Electoral Commission they were not fully reported in the Register of Members' Financial Interests. I apologise wholeheartedly for this omission.

In March 2026, my senior PA contacted the registry of interests team to query whether the donation from Ecotricity/Dale Vince could be removed from my register as this was made to the CLP rather than myself. After receiving a copy of the rules from the registry, my senior PA took no further action after determining that this donation should remain listed as I personally solicited this.

He was not aware of donations to the CLP from Labour Together or trade unions so did not bring the need to register these to my attention. It was my realisation that this was not correct that led me to contact your office last week.

In response to your specific questions, I confirm that I am in good health, understand the reason and scope of your investigation, and have read and understand the content of your letter.

My responses to your specific questions are as follows:

Question 1: Immediately after the election my understanding was that all donations had been declared by the local constituency party (CLP) and were in the public domain. With hindsight I now understand that I did not have full and complete visibility of the donations and where they were declared. During the campaign, all donations were routed through the CLP and I neither received nor spent any of the donated money myself. While everything was declared to the Electoral Commission, not everything was reported on the Register of Interests as it should have been. I did not fully appreciate that all donations needed to be recorded in both places.

Question 2: We now have a system where any donation received will go through our own office account. My Chief of Staff produces monthly reports on transactions etc, ensuring full visibility and transparency.

Question 3: It is clear now that I did not fully understand the rules and misunderstood which donations should be declared where. My focus at the time was on setting up the office and my understanding was that the declaration to the Electoral Commission was sufficient. It was my realisation that this was not correct that led me to contact your office last week.

Question 4: The treasurer of the CLP has provided me with copies of their bank statements. I can confirm that there are no other donations over £500 from CWU South West in 2024.

Question 5: My entry in the Register of Members' Financial Interests is full and up to date apart from the matters we raised with you. I will update the Register following your findings.

I hope that this covers everything – let me know if you need anything further.

I apologise again for the errors on my part and the inconvenience caused.

24 August 2026

6. Letter from the Commissioner to Dr Simon Opher MP, 26 August 2026

Thank you for your email of 24 August 2026 and the additional information you have provided. Having considered the evidence carefully, I now have sufficient information to determine whether there has been a breach of Rule 5 of the Code of Conduct.

My decision

I have considered our correspondence, the published rules, and the guidance concerning the registration of financial interests. I consider that there have been three breaches of Rule 5 of the Code because the following three interests were not registered within the one month post-election period specified by the House:

a) £5,000 from Labour Together Ltd received in April 2024.

b) £4,500 from Unison received on 22 March 2024.

c) £3,000 from Unison received on 28 June 2024.

I have concluded that there has been no breach of the rules in relation to the donations from CWU South West because the amounts provided do not cross the threshold for registration.

For the reasons outlined below, I do not intend to refer this matter to the Committee on Standards. Instead, I have decided that this matter is suitable for the rectification process provided by Standing Order No. 150.

Reasoning

Rule 5 of the Code states:

> *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members'*

> *Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.*

The Guide to the Rules relating to the Conduct of Members, which is appended to the Code, contains more detail about the registration of financial interests. Chapter 1, paragraph 14 states:

> *Members must register, subject to the paragraphs below, support for their activities as a Member, or for candidacy at an election for parliamentary or non-parliamentary office, which has a value of more than £1,500, either as a single donation or in multiple donations of more than £500 from the same source in a calendar year.*

These obligations are distinct from and complementary to the requirements to register donations with the Electoral Commission. As a new Member you were required by the House to register, within a month of your election, all donations that were provided to support your candidacy and which were received in the twelve months before your election. This requirement applied regardless of whether you personally solicited and arranged the donation. You have confirmed that the three donations listed above were provided to support your candidacy at the 2024 General Election and therefore should have been registered within a month of that election. The failure to do so means that Rule 5 has been breached on three occasions.

Because two of the donations from CWU South West are not more than £500, and as you have confirmed that you did not receive any other donations more than £500 from CWU South West in 2024, this means that the total that you received from this source does not cross the £1,500 threshold for registration.

Under Standing Order No. 150, I do not need to make a report to the Committee on Standards and can use the rectification process:

> *in any case where the Member concerned has agreed that he has failed to register or declare an interest, if it is the Commissioner's opinion that the interest involved is minor, or the failure was inadvertent*

Although the addition of these interests to the Register is significantly late, I have concluded that your breaches of the Rules can be described as inadvertent. This is because although you checked that these donations had been registered with the Electoral Commission you did not properly apply your mind to the House's rules and the requirements for new Members. This was a regrettable oversight, but as your entry in the Register appears otherwise to be in order, and as you made a self-

referral in respect of these breaches, I consider it appropriate to offer you the opportunity to rectify your breaches of the Rules.

Next Steps

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. You have already acknowledged and apologised for your breach of the rules. You have also confirmed the administrative steps that you have put in place to ensure that future interests are identified and registered on time. Therefore, to use the rectification process to conclude this inquiry, I will require the following from you please:

a) Confirmation that you have read and accepted my decision.

b) Confirmation that you will read and familiarise yourself with the rules laid out in Chapter 1 of the Guide to the Rules.

If you are content for me to conclude the inquiry in this way, please write to me with the above confirmations by **4 September 2026**. In cases concerning the registration of interests, I also ask the Registrar to arrange for the relevant entries to be italicised in the Register of Members' Financial Interests to indicate to the reader that the entries have been the subject of an inquiry and rectification process.

If you agree to my proposal, I will share my draft written evidence pack with you in due course, so that you can check its factual accuracy before publication. I will also report the outcome of the inquiry at its close to the Committee on Standards as a matter of routine.

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

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

26 August 2026

7. Email from Dr Simon Opher MP to the Commissioner, 26 August 2026

Thank you for your letter dated 26 August regarding your inquiry into the registration of my financial interests.

I can confirm that I have read and accept your decision. I would also like to reiterate my apology for the omission of these donations from my Register of Interests.

As you will be aware, I have already taken administrative steps to ensure that this does not happen again. I can also confirm that I will carefully re-read and familiarise myself with the rules set out in Chapter 1 of the Guide to the Rules.

Thank you to you and your team for your assistance throughout the course of this inquiry.

Please do let me know if you require any further information.

26 August 2026