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Ms Charlotte Leslie MP: Resolution letter

Letter to Mr Chris Evans MP from the Commissioner, 16 July 2014

1. I have now completed my inquiries into your complaint against Ms Charlotte Leslie MP in respect of her registration and declaration of donations.

5 2. In essence, your complaint was that Ms Leslie failed to register donations to her constituency party within the 28 days determined by the House, despite the links she had with the donors, and that she failed to declare two of these donations in the House.

3. I have consulted Ms Leslie and the House Authorities about this matter.

4. Ms Leslie has acknowledged the late registration of a series of donations and, as you
10 know, she has already apologised to the House for those lapses. She has agreed that the relevant entries in the Register of Members' Financial Interests should be italicised for a period of 12 months by way of rectification.

5. In the light of the information provided by Ms Leslie and the advice I have received from the Registrar, I am satisfied that Ms Leslie did not breach the rules on the declaration of
15 relevant interests on any of the following occasions 2 June 2010; 12 January 2011; 8 November 2012; 13 December 2012; and 9 January 2013. This is because the one donation where the question of relevance might have arisen (from David Ord Ltd) was not received until 16 May 2013. While the rules require a Member to declare an interest where they have a reasonable expectation that a benefit will accrue, Ms Leslie has made clear that she
20 did not have such an expectation at the times of these proceedings.

6. I have, therefore, upheld the part of your complaint that relates to Ms Leslie's late registration of registrable interests. I have not upheld the part of your complaint that relates to declaration of relevant financial interests when participating in parliamentary proceedings.

25 7. I consider that Ms Leslie has made a prompt and acceptable response to the part of the complaint that I have upheld. I accept the rectification action as sufficient to bring the matter to a close.

Written evidence received by the Parliamentary Commissioner for Standards

1. Letter from Mr Chris Evans MP to the Commissioner, 11 April 2014

5 10. On 8th April 2014 Charlotte Leslie made the following point of order in the House of Commons:

10 *"I would like to apologise for failing to inform the Register of Members' Financial Interests of financial donations to my local Conservative party in a timely fashion. I discovered this in August last year, and immediately acted to register these donations, which were already registered with the Electoral Commission. I have today been alerted to the fact that because of this I have asked three written questions, made my maiden speech and one intervention and asked a Select Committee witness a question, all without declaring a potentially relevant interest. I can confirm, however, that I have in no way personally financially benefited."*

15 11. It has emerged that the donations she failed to register amounted £28,000 made to her local Conservative association.

12. I do not believe it is enough for Ms Leslie to assert that she did not benefit personally, nor do I believe the circumstances in which questions were asked in Parliament have been adequately explained.

20 13. Indeed I felt sure that she would refer herself to the Commissioner for Standards; however, this does not appear to have happened. I am therefore writing to formally request you investigate what appears to be a breach of the Code of Conduct.

14. I look forward to hearing from you.

11 April 2014

25 2. Letter from the Commissioner to Mr Chris Evans MP, 6 May 2014

15. Thank you for your letter of 11 April with your complaint about Ms Leslie in respect of the registration and declaration of her financial interests. I have decided to begin an inquiry into part of your complaint.

8. I will report the matter briefly to the Committee on Standards. In due course, this letter and the relevant evidence (a copy of which I enclose) will be made available via my parliamentary web-pages.

9. I am copying this letter to Ms Leslie MP.

5 *14 July 2014*

16. In essence, the complaint which I have accepted is that Ms Leslie failed to register donations to her constituency party within the 28 days determined by the House, despite the links she had with the donors, and that she failed to declare two of these donations in the House.

5 17. I have not accepted your complaint in respect of the non-declaration of Ms Leslie's financial interest arising from donations to her local party from Mr Theodore Agnew as this predates the committee meeting at which Mr Agnew appeared as a witness by more than twelve months. MPs are normally expected to declare only those relevant interests which were current in the last 12 months.

10 18. I enclose a note which sets out the procedure I follow. I have accepted your complaint, and I have written to the Member to invite her comments. When I have her response, I will decide how best to proceed.

19. I would be grateful if you would regard this letter as confidential. Please do not publish this correspondence or the evidence.

15 6 May 2014

**3. Letter from the Commissioner to Ms Charlotte Leslie MP,
6 May 2014**

20. I would welcome your help on a complaint which I have received from Mr Chris Evans MP in respect of the registration and declaration of your financial interests.

20 21. I enclose a copy of Mr Evans' letter of 11 April. In essence, the complaint which I have accepted is that you failed to register donations to your constituency party within the 28 days determined by the House, despite the links you had with the donors, and that you failed to declare two of these donations in the House.

25 22. I have seen the apology which you made by way of a point of order on 8 April 2014. I consider however that while this was welcome, in view of the number of the omissions from the Register, I do need to inquire into the circumstances.

23. I have not accepted that part of the complaint which relates to the donation by Mr Theodore Agnew, as this predated the Committee meeting at which Mr Agnew appeared by more than twelve months. MPs are normally expected to declare only those relevant interests which are current in the last 12 months.

5 24. The *Code of Conduct* for Members of Parliament approved by the House on 12 March 2012 provides in paragraph 13 as follows:

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

25. These provisions replace similar provisions in the Code of Conduct approved by the House on 13 July 2005, which was in force when you entered the House in 2010.

15 26. The rules relating to the registration and declaration of Members' interests are set out in chapters 1 and 2 of the Guide to the Rules relating to the conduct of Members. Chapter 1 of the Guide identifies the categories of registrable interest. In the 2009 Guide, which is still current, Category 4 defines registrable sponsorships as follows:

20 (a) *Any donation received by a Member's constituency party or association, or relevant grouping of associations which is linked either to candidacy at an election to membership of the House; and*

(b) *any other form of financial or material support as a Member of Parliament,*

amounting to more than £1,000 from a single source, whether as a single donation or as multiple donations of more than 1200 during the course of a calendar year."

25 27. The relevant thresholds were increased to more than £1,500 and more than £500 from 1 January 2010.

28. Paragraphs 30 and 32 in the 2009 Guide provide further guidance on the interpretation of whether any donation is "linked" to a Member's membership of the House. In particular, paragraph 30 provides as follows:

5 "For the purposes of the Register of Members' Financial Interests, support should be regarded as "linked" directly to a Member's candidacy or membership of the House if it is expressly tied to the Member by name, eg if it is a contribution to the Member's fighting fund or a donation which has been invited or encouraged by the Member or candidate. Financial contributions to constituency associations, parties or area associations, etc, which are not linked to a Member's candidacy or membership of the House, that is where the donation would have been forthcoming irrespective of the identity of the candidate or Member, and the candidate or Member played no personal part in securing it, do not have to be registered on the Register of Members' Financial Interests."

And paragraph 32 provides as follows:

15 "It is not possible to give an exhaustive list of what might be considered 'linked' to an individual, and, as always, Members who are in any doubt should consult the Registrar.¹² They are also reminded that the requirement to register covers only donations of which they are aware or might reasonably be expected to be aware. Registration by the Member is additional to any registration required of the local organisation."

Footnote 12 to that paragraph provides as follows:

20 "Members might, in this context, ask themselves such questions as 'Did I write to or meet the donor asking for a contribution?' 'Was a letter sent out headed 'Campaign [Re-] Elect [name]', 'Was I the guest of honour at a dinner where donations were sought?' and 'Have I a particular relationship to the donor which would not be the case in respect of another candidate?'. If the answer to any of these is 'Yes', then the presumption should be in favour of registration."

25 29. The rules in relation to the declaration of Members' interests are set out in Chapter 2 of the Guide. Paragraph 72 of the 2009 Guide provides as follows:

30 "In 1974 the House replaced a long standing convention with a rule that any relevant financial interest or benefit of whatever nature, whether direct or indirect, should be declared in debate, or other proceeding. The same rule places a duty on Members to disclose to Ministers, or servants of the Crown, all relevant interests. The term 'servants of the Crown' should be interpreted as applying to the staff of executive agencies as well as to all staff employed in government departments."

30. Paragraph 73 includes the following:

35 "The rule relating to declaration of interest is broader in scope than the rules relating to the registration of interests in three important respects. As well as current interests, Members are required to declare both relevant past interests and relevant interests

which they may be expecting to have. In practice only interests held in the recent past, i.e. those current within the previous twelve months, need normally be considered for declaration."

31. Paragraph 74 provides the following definition of a relevant interest:

5 *"The basic test of relevance should be the same for declaration as it is for registration of an interest; namely, that a financial interest should be declared if it might reasonably be thought by others to influence the speech, representation or communication in question. A declaration should be brief but should make specific reference to the nature of the Member's interest."*

10 32. I would welcome your response to this complaint taking account of this summary of the relevant rules. In particular, it would be helpful to know:

1. when you became aware of each of the nine donations registered on 19 August 2013;
2. the date when each of these donations was made;
- 15 3. for each donation, your reasons for considering that the donation was 'linked' to you in the terms set out in the Guide to the Rules;
4. how and when you first became aware that these nine donations required registration; and the actions which you took;
- 20 5. the circumstances that led to the late registration of the visit to Cadenabbia from 19 to 22 April 2013;
6. whether you considered declaring your interest when tabling three written questions and in your maiden speech, and, if so, why you did not do so;
- 25 7. whether you at any time consulted the Register of Members' Financial Interests about the registration or declaration of any of these donations;
8. any other information about the factors which may have led you not to register or declare these donations.

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

34. I enclose a note which sets out the procedure which I follow. I am writing to the complainant to let him know that I have accepted his complaint. In due course I will publish on my parliamentary webpages that I am conducting this inquiry and the general category in which it comes. I will not be commenting further on its progress.

5 35. I would be grateful if you would regard this inquiry as confidential.

36. I am most grateful for your help and if you would provide the above information by mid-day on 20 May 2014.

6 May 2014

10 **4. Letter from Ms Charlotte Leslie MP to the Commissioner,
16 May 2014**

37. Thank you for your letter of 6th May 2014 about the registration and declaration of my financial interests. I hope I am able to give the clarity you request and require in this response.

15 38. I have failed to abide by the *Code of Conduct* for MPs, and as I said in my apology to the House on 8th April 2014, I acknowledge that I failed to register donations on time and failed to draw attention to potentially relevant donations in the House. I am sorry for this breach of the *Code of Conduct* and take full responsibility for it.

Background

20 39. In my apology to the House, I apologised for further possible errors which I believed I had made, which I had identified as soon as my initial error was flagged up to me by a member of the press. I was not sure if these constituted a breach of the *Code of Conduct*, but I wished to err on the side of caution and over-apologise rather than under-apologise.

40. The further errors for which I also apologised were:

- 25
1. Not declaring an interest regarding donations to my local Conservative association from the owners of the Bristol Port Company in my mention of the Port in my maiden speech on 2nd June 2010.
 2. Similarly, failing to declare that interest in an intervention made in a

Westminster Hall Debate, regarding the Bristol Port Company, on 12th January 2011.

- 5 3. Failing to draw attention to an interest when asking a question of a witness, Theodore Agnew, at an Education Select Committee session on 14th September 2011 — Mr Agnew had previously donated to my local party.

41. On further scrutiny, I do not believe that the *Code of Conduct* required me to apologise for these, because the potentially relevant donation in each case had been made more than a year before the speech, intervention or Select Committee session.

- 10 42. Since last August, I have subsequently ensured that any further donations received by my local association have been registered on time and in the proper way in the *Register*. I believe that I am therefore fully compliant with the *Code of Conduct*.

When I became aware of each of the nine donations registered on 19th August 2013

- 15 43. I was aware of each of the following donations (which were registered on 19th August 2013) at the times the Conservative Association received the donations, and notified i.e. before they were subsequently registered with the Electoral Commission. The dates of receipt for these donations were as follows:

- Mr Theodore Agnew (£2,500) — received on 1st June 2009.
- Michael Freeman (£2,500) — received on 24th November 2009.
- 20 • United and Cecil Club (£2,000) — received on 22nd February 2010.
- United and Cecil Club (£1,000) — received on 19th March 2010.
- Mr Jon P Moynihan (£2,500) — received on 18th March 2013. - Michael Freeman (£2,500) — received on 18th March 2013.
- Lord Leach of Fairford (£3,000) — received on 18th March 2013.
- 25 • David Ord Ltd (£10,000) — received on 16th May 2013.
- United and Cecil Club (£2,500) — received on 2nd August 2013.

44. Additionally, there was a donation recorded on the Electoral Commission under "Bristol North West" but made to "Bristol and South Gloucestershire Conservative

Association" from First Corporate Shipping (£2,000) on 13th September 2012. I do not believe I was aware of this donation until I took steps to register late donations in August 2013.

The date when each of these donations was made

5 45. I have provided the date that each donation was cashed or 'received' as listed on the Electoral Commission above.

For each donation, my reasons for considering that the donation was 'linked' to me in the terms set out in the Guide to the Rules

- 10 • Mr Theodore Agnew (£2,500) — received on 1st June 2009. I personally met with the donor and sought a donation.
- Michael Freeman (£2,500) — received on 24th November 2009. I personally met with the donor and sought a donation.
- 15 • United and Cecil Club (£2,000) — received on 22nd February 2010. I personally pay an annual membership fee to the United and Cecil Club, with the agreement and understanding that the club will periodically provide a donation to its members' associations in marginal seats, of which Bristol North West is considered one.
- United and Cecil Club (£2,000) — received on 19th March 2010. (as above)
- 20 • Mr Jon P Moynihan (£2,500) — received on 18th March 2013. I personally met with the donor and sought a donation.
- Michael Freeman (£2,500) — received on 18th March 2013. I personally met with the donor and sought a donation.
- Lord Leach of Fairford (£3,000) — received on 18th March 2013. I personally met with the donor and sought a donation.
- 25 • David Ord Ltd (£10,000) — received on 16th May 2013. I personally met with the donor and sought a donation.

- United and Cecil Club (£2,500) — received on 2nd August 2013. (as above)
- First Corporate Shipping (£2,000) — received on 13th September 2012.

46. On further analysis, I do not consider that this donation was 'linked' to me in the terms set out in the Guide to the Rules. My reasons are as follows:

- 5 • The £2000 donation was explicitly a donation to support the Conservative candidate, Councillor Geoffrey Gollop, in the Bristol Mayoral Election (on 15th November 2012) and noted internally at the time by Bristol and South
- Gloucestershire Conservative Association as designated for the mayoral campaign.
- Cllr Gollop represents the Westbury-on-Trym ward, which falls within my
10 constituency — I believe that the registration with the Electoral Commission as "Bristol North West" derives from this.
- I had no involvement in soliciting this donation and in no way benefitted from it personally.
- The donation was paid into the overall bank account for Bristol and South
15 Gloucestershire Conservative Association (which covers six parliamentary constituencies), rather than the specific account for Bristol North West.
- I understand that at the same time First Corporate Shipping also made donations of the same value to the local Labour and Liberal Democrat parties, to support their candidates in the Bristol mayoral election.

20 47. On this basis, I do not believe the donation was 'linked' to me. I registered the donation last year as I registered all donations above the threshold value which were recorded as "Bristol North West" donations with the Electoral Commission, unless I was specifically advised otherwise.

25 48. Therefore on further scrutiny, I do not believe it was necessary under the *Code of Conduct* for me to register the £2,000 donation from First Corporate Shipping when I did

so last August. As a result, I do not believe it was necessary for me to declare an interest when asking the three written parliamentary questions on the Severn Barrage.

49. My desire to ensure that I made up for my failure to register donations in a timely fashion by doing so as quickly as possible meant that I did not check the status of this
5 donation more fully at the time, nor did I seek the Registrar's advice, as the *Code* advises, to clarify whether or not I needed to register it.

How and when I first became aware that these nine donations required registration; and the actions that I took

50. **When:** 11th August 2013. **How:** A member of my staff attended a seminar on the
10 *Register* for MPs' staff on 6th August 2013. She then checked my entry on the *Register* with my researcher, and they both noticed that no donations to my local Conservative Party appeared on it.

51. My researcher found out that there were indeed past donations that I ought to have registered and telephoned me to let me know on August 11th. I was on holiday but
15 immediately asked him to get in touch with the Registrar to discuss the issue and obtain the relevant forms (category 4a). He did so on 12th August 2013 and sent them to my constituency office in Bristol for me to sign. I signed them and sent them back to my researcher in my London office, who checked them and sent them to the Registrar on 16th August. The donations were then registered on 19th August 2013.

20 52. When I returned to London at the end of the summer recess, I discussed with my secretary and researcher the process for registering future donations and we ensured that there is a proper process in place for any further registration of interests. Subsequent donations received on 27th February 2014 and 7th March 2014 have been registered on time as a result.

25 **The circumstances that led to the late registration of the visit to Cadenabbia from 19 to 22 April 2013**

53. This was an administrative oversight. On realising the registration of this trip was late, my office chased up with the Konrad-Adenauer-Stiftung organisation, which organised the trip, to ascertain the amount which should be declared. They replied on 17th July 2013 and the trip was registered on 30th July 2013.

5 **Whether I considered declaring my interest when tabling three written questions and in my maiden speech, and, if so, why I did not do so**

54. I did not consider declaring my interest when tabling the three questions, nor in my maiden speech.

Why?

- 10
- I did not know I may be required to.
 - Because of my error in failing to realise I must register donations to my local party not only with the Electoral Commission, but also on the Register, there was no interest on the Register anyway to prompt my checking.
 - I did not associate the questions with any financial relationship my local party
- 15
- campaign historically had with the owners of the Bristol Port Company.
 - At the time of asking any of the three questions, I was not expecting any future relevant interest.
 - I do not believe I was actually aware of the £2000 donation from First Corporate Shipping at the time of asking the questions.

20 **Whether I at any time consulted the Register of Members' Financial Interests about the registration or declaration of any of these donations**

55. I failed to consult either the *Register of Members Financial interests* or the Registrar about the registration or declaration of any of these donations prior to 12th August 2013 when my staff checked the *Register* and my researcher liaised with the Registrar to register

25 my donations.

Any other information about the factors which may have led you not to register or declare these donations

56. I have nothing further to add. I hope that these answers provide the clarification you are looking for. I am, of course, happy to provide further details if required.

5 16 May 2014

5. Letter from the Commissioner to the Registrar of Members' Financial Interests, 1 June 2014

57. I would like to ask for your advice on a complaint I have received about Ms Charlotte Leslie MP and the late registration and declaration of her financial interests.

10

58. In essence, the complaints are that, contrary to the rules of the House, Ms Leslie failed to register donations to her constituency party within the 28 days determined by the House, despite links she had with the donors, and that she failed to declare two of these donations during parliamentary proceedings.

15

59. I enclose the relevant correspondence. Please would you let me have your advice on whether, under the rules of the House in relation to the registration and declaration of interests, you consider that these donations were registrable and whether you consider that Ms Leslie should have declared them on the occasions set out in the annex to this letter.

20

60. You will see that, in her letter of 16 May, Ms Leslie refers to contact her office had with you in August 2013. Please let me have a copy of any notes that exist relating to that. Any other comments you may wish to make would be most welcome.

61. It would be very helpful to have your response to this letter by 5 June. Thank you for your assistance.

1 June 2014

25

6. Annex to letter from the Commissioner to the Registrar, 1 June 2014

62. List of relevant Hansard entries:

- 2 June 2010 Column 499
 - 12 January 2011 Column 92WH
 - 9 January 2013 Column 336W
 - 13 December 2013¹ Column 461W
- 5 • 8 November 2012 Column 714W

7. Letter from the Registrar of Members' Financial Interests to the Commissioner, 5 June 2014

63. Thank you for your letter of 21 May about this complaint.

64. You ask for my comments on the allegation that Ms Leslie failed to register donations
10 to her constituency party within the 28 days determined by the House.

65. Under the Guide to the Rules Members are required to register donations to their local constituency party bodies only if they are "linked" to them in the terms set out in paragraphs 29 to 32 of the Guide to the Rules on registration. For example, registration (under Category 4(a) of the Register) would be needed if the MP has encouraged or
15 solicited the donation; or if it is a donation to their fighting fund. In her letter of 16 May Ms Leslie gives details of ten donations received by her local party body. From the information she provides I agree that she was right to register all except one. The donation which did not require registration was that from First Corporate Shipping Ltd, Ms Leslie says that this was made specifically to support a candidate in the local council elections,
20 and that it was not linked to her. Of the donations which she registered, nine were registered late and one was registered within the 28 day timescale required by the House.

66. You also ask about whether I consider that Ms Leslie was required to declare her interest on 2 June 2010, 12 January 2011, 8 November 2012, 9 January 2013 and 13 December 2013. The first occasion was Ms Leslie's maiden speech. On 12 January 2011 Ms
25 Leslie spoke in a Westminster Hall debate on flooding in the Steart peninsula. The remaining three occasions relate to written questions about tidal power in the River Severn (on 8 November 2012) and about research and promotional activities relating to the Severn

¹ This was incorrect. The correct date is 13 December 2012

Barrage (on 9 January and 13 December 2013). Ms Leslie has told you that the donation from First Corporate Shipping was not linked to her and on this basis my advice would have been that it did not require declaration.

67. However, this is not the only donation which might have required consideration. Ms Leslie's local party body received a donation from David Ord Ltd on 16 May 2013. I see that David Ord Ltd shares an address with First Corporate Shipping, and I understand that David Ord Ltd may also be linked to the port of Bristol. Ms Leslie has told you that she personally met with the donor and sought the donation. She does not say when she met the donor, but if Ms Leslie had a "reasonable expectation" of the donation from David Ord Ltd on any of the occasions listed above, then it might have required declaration. The relevant section of the Guide to the Rules is paragraph 73, which reads as follows:

"Expected future interests, on the other hand, may be more significant. Where, for example, a Member is debating legislation or making representations to a Minister on a matter from which he has a reasonable expectation of personal financial advantage, candour is essential. In deciding when a possible future benefit is sufficiently tangible to necessitate declaration, the key word in the rule which the Member must bear in mind is "expecting". Where a Member's plans or degree of involvement in a project have passed beyond vague hopes and aspirations and reached the stage where there is a reasonable expectation that a financial benefit will accrue, then a declaration explaining the situation should be made."

68. I would like to stress that I am unable to say whether I would definitely have advised declaration of an expected donation from David Ord Ltd, without knowing more about the company.

69. You ask about our contacts with Ms Leslie's staff in August 2013. Each summer we routinely provide seminars for MPs' staff, so that that they are better equipped to support their Members through the registration process. One member of Ms Leslie's staff attended a seminar on 6 August 2013. I have no notes on the questions raised at the seminar, but I can see from our files that afterwards Ms Leslie's office asked us to send a form for registering political donations, later telling us that eight donations would be registered late. Ms Leslie's staff also enquired about a farther seminar. We received the completed forms on 19 August and sent Ms Leslie a draft Register entry for approval on 27 August. Ms

Leslie's staff replied two days later, on 29 August, to confirm that the entry appeared accurate.

5 June 2014

**8. Letter from the Commissioner to Ms Charlotte Leslie MP,
11 June 2014**

70. Following your letter of 16 May 2014, I wrote to Ms Heather Wood, the House of Commons Registrar, to seek her advice on the rules as they apply to your circumstances. A copy of my letter to her is enclosed.

71. I now have the Registrar's advice and I am writing to you to give you an opportunity to see and comment on that advice. In addition to any comments you would like to make, it would be helpful if you could tell me:

- when you met the donor from David Ord Ltd (donation received 16 May 2013);
- when you consider you first formed a 'reasonable expectation' that a donation might be forthcoming from that company;
- why you consider that to be the date that the expectation was first reasonably held; and
- about your understanding of the relationship between David Ord Ltd and the port of Bristol.

72. I would be happy to receive any other comments that you wish to make and/or additional evidence that you consider may assist with the inquiry. Once I have those comments and have considered them, I think it might be helpful for us to meet but I will make a decision on that at that stage. (If you would like to meet me, I would, of course, be happy to do that in any case.) I would be grateful to have your comments by close of business on 24 June 2014.

11 June 2014

**9. Letter from Ms Charlotte Leslie MP to the Commissioner,
23 June 2014**

73. Thank you for your letter of 11th June 2014 and the enclosed correspondence between yourself and Ms Heather Wood. I have provided answers to your further questions below.

When I met the donor from David Ord Ltd

74. I met David Ord on 11th March 2013.

When I consider I first formed a "reasonable expectation" that a donation might be forthcoming from that company

5

75. The donation was not expected before it was received in May 2013.

Why I consider that to be the date that the expectation was first reasonably held

10

76. On 11th March 2013, David Ord did not say he would give me a donation, but asked if I needed financial help. I told him that in general such support for my local party was always welcome, but that I was not in need of any financial help at that time.

77. When my local party unexpectedly received the donation some weeks later, I was told by a staff member in my association office — it was only then that I was aware of the donation. I recall being surprised.

My understanding of the relationship between David Ord Ltd and the port of Bristol

15

78. I understand that David Ord is a co-owner of First Corporate Shipping Ltd, which trades as the Bristol Port Company and runs the port of Bristol. As Ms Wood observes in her letter to you, First Corporate Shipping and David Ord Ltd share an address, so I would naturally assume that there is a link between David Ord Ltd and the port of Bristol.

79. I hope that this response provides the clarity you require.

20

11 June 2014

10. Letter from the Commissioner to the Registrar of Members' Financial Interests, 26 June 2014

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80. Thank you for your letter of 5 June in which you gave your advice on a complaint I have received about Ms Charlotte Leslie MP and the late registration and declaration of her financial interests.

81. Although you were able to advise about the need for registration and declaration of a number of donations made to Ms Leslie's constituency association, there was one donation

about which insufficient information was then available. I have since written to Ms Leslie to obtain more information and my letter to her, together with her response, is enclosed.

82. Please would you let me have your advice on whether, under the rules of the House in relation to the registration and declaration of interests, you consider that the donation Ms Leslie's constituency association received from Mr David Ord in May 2013 was registrable and whether you consider that Ms Leslie should have declared it on any of occasions set out in my previous letter.

83. It would be very helpful to have your response to this letter by 10 July. Thank you for assistance.

10 26 June 2014

11. Letter from the Registrar of Members' Financial Interests to the Commissioner, 26 June 2014

84. Thank you for your further letter of today's date about this complaint. I can answer it very briefly.

15 85. You ask whether I considered that the donation from David Ord Ltd, received by Ms Leslie's local party organisation on 16 May 2013, required registration. Ms Leslie told you in her letter of 16 May 2014 that she met the donor and sought a donation. On that basis I advised on 5 June that the donation was "linked" to Ms Leslie and required registration. This remains my advice.

20 86. Ms Leslie gives a more detailed account of the meeting in her later letter, dated 23 June 2014, which you have forwarded to me. She tells you that she met David Ord on 11 March 2013. She says

25 *"On 11 March 2013, David Ord did not say that he would give me a donation, but asked if I needed financial help. I told him that in general such support for my local party was always welcome, but that I was not in need of any financial help at that time."*

87. Assuming that Ms Leslie still believes that she "sought" the donation, my advice is still that registration was required.

88. I have not considered whether the nature and interests of the company David Ord Ltd would have required this donation to be *declared*, for example when relevant occasions to proceedings in the Chamber. This is because the occasions listed in your letter were all *before* the donation was made. [The Written Question of 13 December 2013 was in fact of 5 13 December 2012.] Member have to declare donations before they are made only if there is a "reasonable expectation" that the benefit will accrue. Ms Leslie's letter makes clear that she had no such expectation. On that basis there is no need to consider whether the donation was relevant to the proceedings you list.

26 June 2014

10 **12. Letter from the Commissioner to Ms Charlotte Leslie MP,
2 July 2014**

89. Thank you for your letter of 23 June 2014 setting out your response to the questions raised in my letter of 11 June. That information was helpful.

90. In light of your comments, I have again sought advice of the Registrar. A copy of my 15 letter to her is enclosed. (The Registrar had sight of your letter to me before giving her advice.) This letter is to show you the Registrar's response and to move to consider the resolution of this complaint in the light of her advice, which I accept. (For ease of reference, I have enclosed the Registrar's letter of 5 June, in which she gave her first advice.)

91. If you were to accept the Registrar's advice, with your agreement, I would be ready to 20 consider resolving the registration element of the complaint through the rectification procedure. Under Standing Order 150, I am able to rectify a complaint in these circumstances without submitting a full and formal memorandum to the Committee on Standards. I would instead write to the complainant, following which the matter would be closed. I inform the Committee of the outcome and my letter to the complainant and the 25 relevant correspondence is in due course published on my webpages.

92. In order for me to implement the rectification procedure, it would be necessary for you to accept that you were in breach of the Code of Conduct (paragraph 13) and the rules of the House as set out in Chapter 2 of the Guide to the Rules. As you have already made an

apology to the House in respect of your late registration, the only further action would be for me to arrange with the Registrar for the relevant entries in the Register to be placed in italics for a period of twelve months. It would also be helpful for you to tell me what steps you will take, or have already made, to avoid a recurrence.

5 93. In light of the Registrar's advice, I do not propose to uphold the complaint that you failed to declare the donations from David Ord and from First Corporate Shipping Ltd.

94. If you were to agree to the resolution of the complaint on this basis, I will prepare a letter to send the complainant. While the content is, of course, a matter for me, I would show it to you so that you could comment if necessary on its factual accuracy. I would then
10 write to the complainant closing the complaint.

95. It would be very helpful if you could let me know within the next two weeks whether you would like me to rectify the complaint on the basis I have suggested. I am most grateful for your help on this matter.

2 July 2014

15 **13. Letter from Ms Charlotte Leslie MP to the Commissioner,
8 July 2014**

96. Thank you for your letter of 2nd July 2014 and the enclosed correspondence between yourself and Ms Heather Wood.

97. I can confirm that I fully accept the Registrar's advice as set out in her letter to you of
20 26th June 2014, and I accept your proposed resolution of the complaint through the rectification procedure.

98. I also accept that I was in breach of the Code of Conduct and the rules of the House in failing to register donations to my local party in a timely manner. I am sorry for this breach of the rules.

25 99. You asked what steps I will take, or have already taken, to avoid this happening again. Since discovering last August that I had failed to register donations to my local party on time, I have ensured that there is a procedure in place whereby my local party office

informs my parliamentary office when a donation is made to my local party, in order that it can be registered quickly and in the proper way – this has led to subsequent donations being registered on time. In the light of your investigation, I will be making sure that I and my staff are fully aware of the rules and the Code of Conduct, and I will check this on a regular basis.

100. Thank you for your work in resolving this matter.

8 July 2014

**14. Letter from the Commissioner to Ms Charlotte Leslie MP,
11 July 2014**

101. Thank you for your letter of 8 July, confirming your acceptance of the Registrar's advice and my proposal for rectification. Thank you also for setting out the measures you have put in place to avoid a late registration in future. I note, in particular, that you plan to check regularly on the Code of Conduct and its associated rules. If, at any time, you are in doubt, please contact the Registrar or one of her team, who will be happy to assist you.

102. In my letter of 2 July, I said that I would give you sight of the letter I propose to send to Mr Evans in order for you to comment on its factual accuracy. I enclose a copy of that draft letter and would be grateful if you could let me have any comments you wish to make by close of business on 25 July 2014.

103. Once I have your comments, I will write to Mr Evans. Shortly after that, I will arrange for the outcome to be posted on my web-pages. I will also post my decision letter, alongside all of the relevant evidence. (In this case, that means the text of the correspondence we have exchanged, including the Registrar's letters.)

104. Thank you for prompt responses and your co-operation throughout this inquiry.

11 July 2014

**15. Letter from Ms Charlotte Leslie MP to the Commissioner,
14 July 2014**

105. Thank you for your letter of 11 July 2014 and for sight of your draft letter in reply to Mr Chris Evans's complaint.

106. I can confirm that I am satisfied with the content of your draft letter to Mr Evans.

107. Thank you for your work in resolving this matter.

14 July 2014