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Summary

I started an inquiry on 8 June 2022, after receiving a complaint about the Rt Hon. Sir Keir Starmer MP's entry in the Register of Members' Financial Interests. It was alleged that between 6 March 2022 and 13 May 2022, Sir Keir had failed, on three occasions, to register income and hospitality that he had accepted, within the 28-day deadline set by the House.

Having received this complaint, I undertook a review of Sir Keir's register entry over the last 12 months and noted four additional late entries. I informed Sir Keir that my inquiry would include all seven of these late entries.

During my investigation I sought advice from the Registrar of Members' Financial Interests, I also sought comments from Sir Keir. In addition to providing an explanation, apology and reassurances that measures had been put in place to prevent any reoccurrence, Sir Keir also informed me he was in the process of selling a plot of land for a sum that exceeded the £100,000 threshold for registration set by the House. Sir Keir said he had been communicating with the Registrar of Members' Financial Interests on this matter, and, having had the land valued in January 2022, and put the land on the market in March 2022, he was waiting for the sale to complete so that he could register the correct value. I decided to include this matter as part of my inquiry.

Having considered the information available to me, I concluded that Sir Keir had failed to register the eight interests outlined above (including the plot of land) within the 28-day deadline set by the House and had breached paragraph 14 of the House of Commons' Code of Conduct for Members of Parliament. The interests in question fell under Category 1: Employment and Earnings, Category 3: Gifts, benefits and hospitality from UK sources, and Category 6: Land and Property.

Given the number and value of some of the registrations involved, I gave serious and lengthy consideration to the most appropriate means of concluding this matter. When making my decision, I took into account the explanations provided by Sir Keir, the content of Sir Keir's discussions with the Registrar when registering these matters, and the fact that Sir Keir has now put additional measures in place to ensure the timely management of his future registrations. I found that, based on the information available to me, the breaches were minor and/or inadvertent, and that there was no deliberate attempt to mislead.

I decided therefore, the inquiry could be concluded by way of the rectification procedure available to me under Standing Order No. 150. I have asked the Registrar to arrange for the relevant entries in the Register of Members' Financial Interests to be placed in bold italics, so it is clear they have been the subject of an inquiry. Additionally, to reflect the outcome of a similar case considered by the Committee on Standards and my previous decisions, I asked Sir Keir to meet the Registrar to discuss his obligations within the Rules and Guide to the Rules. Sir Keir has confirmed that such an appointment has been made for 25 August 2022.

The Rt Hon. Sir Keir Starmer MP: Resolution Letter

Letter from the Commissioner to the complainant, 4 August 2022

5 I wrote to you on 8 June 2022 to tell you that I had begun an inquiry into your allegation that the Rt Hon. Sir Keir Starmer MP had breached paragraph 14 of the Code of Conduct for Members, by failing to register three of his interests within the 28-day deadline set by the House. My inquiry also considered whether Sir Keir had failed to register a further five interests within the required time limit.

10 Sir Keir has acknowledged and apologised for his breach of the rules, and he has taken steps to avoid any recurrence.

15 Following serious and lengthy consideration as to the most appropriate means of concluding this matter, I have decided that this inquiry should be concluded through the rectification procedure available to me through House of Commons' Standing Order No. 150. The full rationale for my decision can be found in my letter to Sir Keir, dated 19 July 2022 (item 9 in the written evidence pack), which you can access once the evidence pack has been published.

20 I will publish my decision and the written evidence pack shortly on my webpage 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.

Written evidence

1. Email from the complainant to the Commissioner, 26 May 2022

I wish to raise an issue with regard to late registrations by Sir Keir Starmer.

5 In the most recent Register of Interests published on 16th May there were 3 instances where the registration was outside the 28-day limit.

These were:

- Copyright payments. Received on 23rd March 2022. Registered on 13th May 2022. This is 52 days and therefore 24 days late
- 10 • 2 tickets to a football match at Crystal Palace Football Club. Received on 4th April 2022. Registered on 5th May 2022. This is 32 days and therefore 4 days late
- 4 tickets to a football match at Watford Football Club. Received on 6th March 2022. Registered on 6th May 2022. This is 62 days and therefore 34 days late

15 Whilst these may seem minor, it is incumbent on the Leader of the Opposition to show leadership to his fellow Labour MPs to ensure that he complies with Parliament's rules like everyone else.

I look forward to hearing from you.

26 May 2022

20 **2. Letter from the Commissioner to The Rt Hon. Sir Keir Starmer MP, 8 June 2022**

25 I have received an allegation from [name redacted] about your compliance with paragraph 14 of the House of Commons Code of Conduct for Members. Having received the complaint, I reviewed your register entry, and, in addition to the interests identified by [name redacted] I noted a further four entries that appear to have been registered outside the 28-day deadline set by the House. In view of this, I have decided to open a formal inquiry. I enclose a copy of [name redacted] submission and the enclosures sent with it.

30

The scope of my inquiry

My inquiry will focus on whether by failing to register the following interests within the 28-day deadline set by the House, you have acted in breach of paragraph 14 of the House of Commons' Code of Conduct for Members:

5 Category 1:

- 10
 - 19 April 2022, received £18,450 from Harper Collins, the News Building, 1 London Bridge Street, London SE1 9GF, via Peters Fraser & Dunlop, 55 New Oxford Street, London WC1A 1BS, as an advance payment for a book. Hours: 1-5 hrs per week since March 2020. (Registered 18 May 2022) (2 days late)
 - Payments from the Authors' Licensing and Collecting Society, Fifth floor, Shackleton House, 4 Battle Bridge Lane, London SE1 2HX, as copyright payments for books written before my election to Parliament:
 - 15 — 29 September 2021, received £135.78. Hours: none. (Registered 15 November 2021) (20 days late)
 - 23 March 2022, received £317.23. Hours: none. (Registered 13 May 2022) (24 days late)

Category 3:

- 20
 - Name of donor: Crystal Palace Football Club
 - Address of donor: Selhurst Park Stadium, Holmesdale Road, London SE25 6PU
 - Amount of donation or nature and value if donation in kind: Directors Box hospitality for two people, value £720
 - Date received: 4 April 2022
 - 25 Date accepted: 4 April 2022
 - Donor status: company, registration 07270793
 - (Registered 5 May 2022) (4 days late)

- Name of donor: Watford Football Club

Address of donor: Vicarage Road Stadium, Stadium way, Watford
WD180ER

5 Amount of donation or nature and value if donation in kind: Four
tickets for Watford vs Arsenal, value £1,416

Date received: 6 March 2022

Date accepted: 6 March 2022

Donor status: company, registration 104194

(Registered 6 May 2022) (34 days late)

- 10
- Name of donor: Just Eat

Address of donor: Fleet Place House, Fleet Pl, Farringdon, London
EC4M 7RF

Amount of donation or nature and value if donation in kind: A ticket
to Taste of London given to a member of staff, value £192

15 Date received: 8 July 2021

Date accepted: 8 July 2021

Donor status: company, registration 04656315

20 (Registered 23 December 2021) (not registrable alone, but the
threshold was met as a result of the following entry and the need for
registration triggered) (28 days late)

- Name of donor: Just Eat

Address of donor: Fleet Place House, Fleet Pl, Farringdon, London
EC4M 7RF

25 Amount of donation or nature and value if donation in kind: A ticket
to the British Kebab Awards given to a member of staff, value £522

Date received: 29 October 2021

Date accepted: 29 October 2021

Donor status: company, registration 04656315

(Registered 23 December 2021) (28 days late)

If the scope of my inquiry changes, I will update you in writing.

5 The relevant rules of the House

The overarching rules are found in the [House of Commons' Code of Conduct](#) for Members. Paragraph 14 of the Code states:

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

15 The Guide to the rules relating to the conduct of Members, which is appended to the Code, contains more detail about registration. Chapter 1 states:

Requirements of the House

20 2. The House requires new Members, within one month of their election, to register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election. After that, Members are required to register within 28 days any change in those registrable interests.

...

Category 1 Employment and Earnings

Threshold for Registration

25 *6. Members must register, subject to the paragraphs below, individual payments of more than £100 which they receive for any employment outside the House. They must also register individual payments of £100 or less once they have received a total of over £300 in payments of whatever size from the same source in a calendar year.*

30 ...

Requirements for registration

7. Under this category Members must register:

Any of the following received as a director or employee or earned in any other capacity:

- 5 a) *Salaries, fees and payments in kind; gifts received in recognition of services performed;*

...

Category 3:**Threshold for registration**

- 10 *22. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.*

15 **Requirements for registration**

23. Under this category Members must register:

Any benefits which relate in any way to their membership of the House or political activities, if provided by a UK source either free or at concessionary rates, including:

- 20 a) *event or travel tickets;*
- b) *hospitality in the UK, including receptions, meals and accommodation;*

...

Next steps

- 25 I would welcome your comments on the allegation that your alleged actions have amounted to a breach of paragraph 14 of the Code of Conduct for Members. I would also be grateful for your answers to the following specific questions:

1. Are you aware of the requirement to register all new financial interests within 28 days of acquisition?

2. Please outline the circumstances that caused the seven interests listed above to be registered late.
- 5 3. Are you satisfied that your current entry in the Register of Members' Financial Interests is complete and accurate in all other respects and in line with Chapter 1 of the Guide to the rules? If it is not, please contact the Registrar now to bring it up to date. If it is, please describe the steps you have taken to satisfy yourself of this.
- 10 4. If, on reflection, you accept that these interests have been registered outside of the House's deadline, please explain what steps you will now take to prevent any further late registrations?

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

Important information

- 15 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 your 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
20 the standards system more generally, but will not provide any comment or details about the particulars of this inquiry.

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 [name
25 redacted].

The Members' Services Team (MST) can support and signpost you and/or your staff 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.

30 Procedure

I enclose a copy of the Commissioner's Information Note, which sets out the procedure for inquiries. Please note that this has not yet been updated to reflect the changes flowing from the decision of 19 July 2018.

35 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.

5 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

10 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
15 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
20 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
25 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 22 June 2022. Please let me know before that date if you require more time to respond.

30 If you would prefer me to communicate with you by 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.

I would be grateful if you could send your response electronically to; standardscommissioner@parliament.uk

Thank you for your cooperation with this matter.

8 June 2022

3. Letter from The Rt Hon. Sir Keir Starmer MP to the Commissioner, 13 June 2022

5 I am writing with regards to the letter I received regarding the late entries to my register of members interests.

These late declarations were as a result of an administrative error within my office. I take full responsibility for my register, and I apologise. I will reply in full shortly with the full facts.

10 *13 June 2022*

4. Letter from The Rt Hon. Sir Keir Starmer MP to the Commissioner, 21 June 2022

Thank you for your letter regarding the late entries to my Register of Members' Financial Interests.

15 As I said in my letter on 13th June, these late declarations were as a result of an administrative error within my office. I take full responsibility for my register, and I apologise.

You asked me to confirm whether I am aware of the requirement to register all new financial interests within 28 days, which I am and I am sorry for these oversights.

20 My office and I have carried out a review of the process to ensure that this does not happen again.

In terms of the entries you have brought to my attention I have numbered them and provided further details below, which I hope is helpful clarification.

25 1. My office was in touch with the Registrar to confirm the amount to be declared from the book advance and the entry details well before the deadline of 28 days (5 May 2022). There was an anomaly with one of the invoices where we needed to seek clarification from the publisher and my office remained in close contact with the Registrar's team throughout, which delayed the process. We have supporting correspondence and documentation to verify this if required.

30 2. These payments relate to copyright payments in relation to legal books I had written before becoming an MP. Payments relate to where pages from these books are photocopied, and small sums are accrued and then paid sporadically into an account for which I don't receive bank statements. In this instance it was £135 and £317.23. This was obviously my oversight for which I sincerely
35 apologise.

My office has been in touch with the Author's Licensing and Collecting Society which makes the payments and we have established a process to avoid this happening in future.

- 5 3. I apologise for the delay in registering this declaration for these tickets but the person who gave the gift in kind was overseas and my office was trying to obtain the accurate details of the amount in order to declare it.
4. This was an administrative oversight by my office.
- 10 5. A member of my staff received a ticket to an Awards Ceremony on the 29th October 2021. It took some time to establish the value of the ticket from the Company. As soon as this was established my staff member contacted the Registrar's team with the value and to agree the declaration wording.
- 15 6. The same staff member then took the appropriate action to declare the food festival ticket received on the 8th July in line with the guidance because his annual declaration was above the £410 threshold. I would welcome your views as to whether this is late or whether this was adhering to the calendar threshold rules.

20 In your letter of 8 June 2022, you asked if I am satisfied that my current entry in the Register of Members' Financial Interests is complete and accurate in all other respects and in line with Chapter 1 of the Guide to the rules. In that light I wanted to bring to your attention the sale of land I own in Oxted, Surrey (a field bought for my parents). On 4th May 2022, I accepted an offer in excess of £100,000 and it will be sold in the near future. I will update the register accordingly. If the date of declaration should have been the date of when I accepted the offer rather than the forthcoming date of sale, I sincerely apologise.

25 Can I please assure you that I take these matters very seriously and I thank you for drawing this to my attention.

21 June 2022

5. Letter from the Commissioner to The Rt Hon. Sir Keir Starmer MP, 24 June 2022

30 Thank you for your letters dated 13 and 21 June 2022, the answers you have provided are very helpful. However, there are a couple of points I would like to clarify, and it would be useful to have your answers to the further questions below.

Tickets for the Taste of London event and the British Kebab Awards.

35 In my letter to you dated 8 June 2022, I set out the relevant rules on registration for interests under Category 3: Gifts, benefits and hospitality from UK sources. In your letter dated 21 June 2022, your answers numbered 5 and 6 explained the

circumstances around the registration of two different Category 3 interests; both accepted from the company, Just Eat.

You said that:

5 *5. A member of my staff received a ticket to an Awards Ceremony on the 29th October 2021. It took some time to establish the value of the ticket from the Company. As soon as this was established my staff member contacted the Registrar's team with the value and to agree the declaration wording.*

10 *6. The same staff member then took the appropriate action to declare the food festival ticket received on the 8th July in line with the guidance because his annual declaration was above the £410 threshold. I would welcome your views as to whether this is late or whether this was adhering to the calendar threshold rules.*

15 Having reviewed the relevant Registers, I note that, in addition to the tickets in question being registered on your own Register entry, your staff member also appears to have registered two tickets for the same events on their entry in the Register of Interests of Members' Secretaries and Research Assistants. In view of this I would ask that you provide further clarification on the points below:

20 In your entry on the Register of Members' Financial Interests, you have recorded the tickets to the two events were, "...given to a member of staff." However, in response to the Commissioner's questions you said member of staff received the tickets.

- Please can you confirm whether these tickets were benefits given from you to the member of staff? Please also confirm that you did not attend this event.
- 25 • If the tickets were given to your staff member directly, please can you explain why you registered them on your own entry of the Register of Members' Financial Interests?
- 30 • You have explained that your staff member contacted the Registrar's team with the value and to agree the registration wording. Did you or your staff member also seek advice on where the tickets should be correctly registered?
- If you or a staff member did seek advice from the Registrar, please provide copies of the correspondence exchanged with the Registrar's office and include any advice you received.

35

Land and Property in Oxted Surrey

Regarding the sale of the land that you own in Oxted, Surrey. In your most recent letter to me you state that, *“On 4th May 2022, I accepted an offer in excess of £100,000 and it will be sold in the near future.”*

- 5 I would like to take this opportunity to remind you of the rules on the registration of interests under **Category 6: land and property**¹, which sets out the following:

Threshold for registration

47. Members must register, subject to the paragraphs below, any land or property in the UK or elsewhere which:

- 10
- i) has a value of more than £100,000; or forms part of a total property portfolio whose value exceeds £100,000; and/or*
 - ii) alone or together with other properties owned by the Member, provides rental income of more than £10,000 in a calendar year.*

Requirements for registration

- 15 **48. Under this category Members must register:**

a) Land or property which they own or hold, either by themselves or with or on behalf of their spouse, partner or dependent children.

49. Members should not register under this category:

- 20
- a) Any land or property which is used wholly for their own personal residential purposes, or those of their spouse, partner or dependent children.*

50. Members are required to provide the following information:

- a) The type of property; e.g. whether business or residential, and if land, the type of use to which it is put; and*
- 25 *b) Its location, for example the relevant local authority area; and*

¹ https://publications.parliament.uk/pa/cm201719/cmcode/1882/188204.htm#_idTextAnchor017

c) Whether the holding falls to be registered under (i) and/or (ii) of paragraph 47 above. If the rental income is paid to another person or organisation, this should be stated;

5 *d) The date on which the land or property was acquired, or when the value of the property (or the rental received) achieved registrable value.*

Based on the information in your letter to me, that on 4 May 2022 you accepted an offer in excess of £100,000 for the land you own, it would be helpful if you could provide answers to the following questions:

- 10
- On what date did you originally take ownership of the land in Oxted, Surrey?
 - Why you have not previously registered this land as an interest under Category 6: Land and property.
- 15
- If the land in Oxted, Surrey had previously been valued below the threshold required for registration, please set out the steps taken to satisfy yourself this was the case.
 - Whether you have at any time sought advice from the Registrar regarding your ownership of this land and the requirements around registration.
- 20
- If you have, please provide copies of the correspondence exchanged with the Registrar's office and include any advice that you have received.

It would be helpful to receive any evidence to support your responses when you reply to this letter. It would be helpful to receive your response at the earlier opportunity and at the latest by Friday 1 July 2022.

25 When I wrote to you on 8 June 2022, I said that I may seek the advice of the House
authorities as part of my investigation. Today I have written to the Registrar of
Members' Financial Interests and a copy of that letter is included for your
information, minus the enclosures previously shared with you. Once I have received
the Registrar's reply, I will write to you again sharing his advice with you. In the
30 meantime, this matter remains protected by Parliamentary Privilege and should
continue to be kept confidential.

24 June 2022

6. Letter from the Commissioner to the Registrar of Members' Financial Interests, 24 June 2022

5 I would like to ask your advice on a complaint I have recently received about the Rt Hon. Sir Keir Starmer MP. In essence, the complaint is that Sir Keir has acted in breach of paragraph 14 of the Code of Conduct for Members, by failing to register a number of his financial interests within the 28-day deadline set by the House.

I enclose a copy of my letters to the Member, dated 8 and 24 June 2022, as well as Sir Keir's letter of 21 June 2022. For your information I have also enclosed copies of the correspondence and supporting evidence that led to me initiating this inquiry.

10 You will see in my letter sent to Sir Keir today that I have asked whether tickets for two separate events, provided by the company, Just Eat, have been registered on both his own entry on the Register of Members' Financial Interests as well as his member of staff's entry on the Register of Interests of Members' Secretaries and Research Assistants.

15 It would be helpful if you could provide clarification and advice to me on the rules regarding the registration of Category 3 interests.

- Please could you set out the requirements for registering tickets accepted by an MP, which might then have been passed on to a member of their staff to attend the event.

20

- If a staff member themselves receives a ticket, how would the registration of this ticket be different to the registration of a ticket passed on to them by the Member?

- Should Members and their staff be registering acceptance of the same event ticket on two different Registers?

25 Further to this, you will see that in his letter dated 21 June 2022, Sir Keir brought to my attention the sale of land he owns in Oxted, Surrey; a field he had previously bought for his parents. It would be helpful to know.

30

- Whether Sir Keir has approached you or your team at any time for advice on the registration of this land and, if he did, to know what advice he was given.

- If he did not, it would be helpful to know how you would have advised him if he had sought advice from you or your team. It would also be helpful to understand the factors you would have taken into account when giving that advice.

35

It would be very helpful to have your reply by 11 July 2022.

If you require further information from Sir Keir before giving your advice, I would be happy for you to contact him directly.

Thank you for your assistance.

5 *24 June 2022*

7. Letter from The Rt Hon. Sir Keir Starmer MP to the Commissioner, 28 June 2022

Thank you for your letter of 24th June asking for further details on two entries to my register of members interests.

10 In regard to the questions you have posed I have numbered the points for your ease of reference.

Staff member hospitality

1. I can confirm that these tickets were not given to me. They were offered to my staff member directly and I did not attend either of these events.
- 15 2. The member of staff contacted the Staff Registrar team on 10th November for advice (within the 28 days) and followed up on 17th November but received no response.²
3. My staff member then followed up with the Commons Registrar on 26th November and received a response on the 29th November advising that we
20 should also include this declaration as part of my registration entry.
4. I enclose copies of the email exchanges between my staff member and the Registrar's office as requested.³

Land in Oxted, Surrey

1. On 9th December 1996 I purchased the land in question.
- 25 2. I immediately gifted the land to my parents for as long as they should live but I did not transfer the legal title - that remained with me.

² See Appendix 1

³ See Appendix 2

3. The land was purchased for [a sum less than the £100,000 threshold set by the House]. For so long as my parents lived, it was not for sale, and I had no reason to think its value exceeded £100,000. After advice from my estate agent, it was put on the market for a sum in excess of £100,000 on 15th March 2022.
- 5 4. At the beginning of this year, I decided to sell the land after discussions with my family and I asked my office to contact the Registrar regarding the process of how this should be registered. In March 2022, having received two estate agent valuations I began the formal process of putting the land up for sale. In June 2022 my office contacted the Registrar to inform them that the sale was progressing, and I would be in touch once completed to update my register as the value would then be over £100,000.
- 10

It has always been my priority to register things in accordance with the rules and I am happy to answer any further questions you may have.

28 June 2022

15 **8. Letter from the Registrar of Members' Financial Interests to the Commissioner, 6 July 2022**

Thank you for your letter dated 24 June 2022, in relation to the investigation into Sir Keir Starmer. I have set out below, my responses to your questions.

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

20 **Question 1: Please could you set out the requirements for registering tickets accepted by an MP, which might then have been passed on to a member of their staff to attend the event.**

The Guide to the Rules sets out the requirement for registering gifts and hospitality under Category 3. Paragraph 22 requires Member to register:

25 *Any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.*

30 Paragraph 27 of the Guide to the Rules sets out the requirement to register gifts and hospitality received by a Member which is then passed on to a third party:

A Member must register under this category any benefit given to any third party, whether or not this accompanied a benefit for him or her, if the Member is aware, or could reasonably be expected to be aware, of the benefit and that it was given.

Question 2: If a staff member themselves receives a ticket, how would the registration of this ticket be different to the registration of a ticket passed on to them by the Member?

5 If a Member receives a ticket of registrable value and passes it on to a member of staff, the Member is required to register that ticket in the Register of Members' Financial Interests. If that Member informs the Registry Office that the ticket was used by a staff member, we would add a form of words such as "used by a staff member" in the entry to indicate that the ticket had been passed on.

10 **Question 3: Should Members and their staff be registering acceptance of the same event ticket on two different Registers?**

As set out above, Members are required to register the ticket in the RMFI.

The rules on staff registering such hospitality are set out in the Introduction to the Register of Interests of Members' Secretaries and Research Assistants.

Those rules state that:

15 **Purpose and Form of the Register**

In accordance with Resolutions made by the House of Commons on 17 December 1985 and 28 June 1993, holders of photo-identity passes as Members' secretaries or research assistants are in essence required to register:

20 'Any occupation or employment for which you receive over £410 from the same source in the course of a calendar year, if that occupation or employment is in any way advantaged by the privileged access to Parliament afforded by your pass.

25 Any gift (eg jewellery) or benefit (eg hospitality, services) that you receive, if the gift or benefit in any way relates to or arises from your work in Parliament and its value exceeds £410 in the course of a calendar year.'

30 Therefore, if the ticket reaches the "exceeds £410 in a calendar year" threshold, the staff member is also required to register it in the Register of Interests of Members' Secretaries and Research Assistants.

Question 4: Whether Sir Keir has approached you or your team at any time for advice on the registration of this land and, if he did, to know what advice he was given.

5 Set out below is the correspondence⁴ between the Registry Office and Sir Keir Starmer's Office in relation to the registration of the land. As you will see from the email dated 4 May 2022 and the email dated 14 June 2022, the Registry Office conducted a search of its files and did not find any previous correspondence on the land.

The only email before this year related to an HoC Enquires email to the Registry Office. I have set out that exchange at the end of this letter.

10 **Question 5: If he did not, it would be helpful to know how you would have advised him if he had sought advice from you or your team. It would also be helpful to understand the factors you would have taken into account when giving that advice.**

Please see the email correspondence provided in answer to Question 4.

[information not related to the inquiry - redacted]

6 July 2022

15 **9. Letter from the Commissioner to The Rt Hon. Sir Keir Starmer MP, 19 July 2022**

Thank you for your letter of 21 June, and the additional information you have provided acknowledging and apologising for the late entries in your Register of Members' Financial Interests.

20 I have now received the information I requested from the Registrar. I attach his response for your consideration.

25 Having considered the information available to me, I now have sufficient information to make a decision on the allegation that you acted in breach of paragraph 14 of the Code of Conduct for Members of Parliament, by failing to register seven interests within the 28-day deadline set by the House.

In addition to the above, I also considered the information you provided regarding a plot of land that you are in the process of selling at a value in excess of the £100,000 registration threshold set by the House.

My decision

30 I have considered our correspondence, the published rules and guidance, and the additional evidence provided by the Registrar. I have decided that, by not registering the interests outlined above in accordance with the Rules, you have

⁴ Enclosed in full at Appendix 3

breached paragraph 14 of the Code of Conduct for Members. However, for the reasons outlined below, I do not intend to refer this matter to the Committee on Standards for consideration. Instead, I have decided to conclude this matter using the rectification process provided by Standing Order No. 150.

5 The House of Commons Code of Conduct and Guidance

Paragraph 14 of the Code of Conduct states:

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

15 The Guide to the Rules states that Members are required to register any new registrable interests within 28 days. Chapter 1, Category 1 states that Members should register individual payments of more than £100 which they receive for any employment outside the House. Category 3 states that Members must register any gifts, benefits or hospitality with a value over £300 which they received from a UK source. Finally, Category 6 states that Members must register any land or property
20 portfolio whose value exceeds £100,000.

Rationale

Late Registration

- The book advance

25 You explained that you had contacted the Registrar about this matter within the 28-day deadline set by the House. However, there was an anomaly with the invoice provided by the publisher which required clarification and caused a 2-day delay in the registration. You said that you have reviewed your process to ensure that this does not happen again.

- The copyright payments

30 You explained that these payments related to books you had written prior to becoming an MP. You said that the payments were sporadic and as a result there had been an oversight on your part resulting in the registrations being 20 and 24 days late respectively. You said that you had contacted the Author’s Licensing and Collecting Society which makes the payments, and a process has been established to
35 avoid reoccurrence.

- The football tickets

5 With respect to the tickets from Crystal Palace Football Club, which were registered 4 days late, you said that you had experienced some difficulty in getting the information needed in order to register the interests because the donor was unavailable to provide the information.

You said that there had been an oversight in the registration of the tickets from Watford Football club, which was 34 days late.

- The award/food festival tickets

10 It appears from the evidence, that the tickets in question had been gifted directly to a member of your staff, and, having sought advice from the Registrar who clarified the relevant sections of the Code of Conduct,¹ the tickets were registered on both your Register of Members' Financial Interests and the staff members' register.

15 In making my decision I have taken into account all of the information available to me. I accept that you have acknowledged that the breaches of the Code of Conduct occurred, you have taken responsibility for your registration and apologised accordingly. I also note the action that you have taken to prevent reoccurrence. It is my view that the breaches are minor and/or inadvertent, and although there are a significant number in a short space of time, based on the evidence available to me, there does not appear to be an intention to deceive.

20 Interests that have not been registered

- The plot of land

25 You explained that you had purchased the property in the 1990's and gifted it to family members to use. You said that you did not register the land on the Register of Members' Financial Interests because you did not believe the value of the property to be in excess of the £100,000 threshold set by the House. You said that you have since placed the property on the market, and it had been your intention to register the interest once it had been sold and you had a definitive value. Finally, I note that you have been corresponding with the Registrar on this matter since January 2022, with a view to correctly updating your register entry.

30 Having considered the evidence, including the advice of the Registrar, it is my view that you have failed to register your interest within the 28-day deadline set by the House. Given the value, the timeframe and your failure to fully engage with the Registrar in a timely manner about this matter, I cannot determine that this is a minor breach of the Code of Conduct. However, I accept that this was a plot of land
35 that you had gifted to your family members, and was, in your view worth far less than the threshold of £100,000 set by the House. I also accept that you held a genuine belief that the property should be registered after it was sold. I have

therefore determined that, on this occasion, your failure to register this interest was inadvertent.

Next Steps

5 This has been a finely balanced decision, given the number and value of the interests concerned I gave serious consideration to referring this matter to the Committee on Standards. However, in making my decision I have taken into account the circumstances around the late registrations, your contact with the Registrar about these matters, the fact you have put measures in place to prevent reoccurrence, the promptness of your replies to my inquiries, and previous decisions that I have made
10 as well as those made by the Committee on Standards.

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. Rectification requires the entry in the current Register to be amended to bold italic type and include an appropriate explanatory note. The
15 amended entry will remain on the Register for a period of one year.

In view of the above, I have decided that I can resolve this breach of the rules through rectification. To do so, the Committee would generally expect the Member to provide the following:

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

25 The above can be provided by way of your formal response to this letter. In cases concerning the registration of interests, I would usually ask the Registrar to arrange for the relevant entry to be italicised in the Register of Members' Financial Interests, to indicate to the reader that entry has been the subject of a rectification.

30 You have already acknowledged and apologised for your breach of the rules, for which I would like to thank you. In order to progress this through rectification, I will require the following from you:

- a) Carefully review my decision and confirmation in writing that you accept it;
- b) An undertaking that future registrations of financial Interests will be made in line with the requirements of the Guide to the Rules;

- 5
- c) Evidence of the changes you have implemented to prevent any future failure to or late registration of interests;
 - d) Confirmation that you shall arrange to meet with the Registrar to discuss the Rules and the Guidance in order to ensure there is no recurrence of any breaches.

If you are content for me to conclude the inquiry in this way, or have any comments you wish to make about the advice provided by the Registrar, please write to me with the above information by 26 July 2022.

- 10
- If you agree to my proposal, I will share my written evidence pack with you, so that you can check its factual accuracy before publication. I will also report the outcome to the Committee on Standards in due course as a matter of routine. I will ask the Registrar to arrange to annotate the relevant information in the Register.

- 15
- 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 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.

- 20
- I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk

19 July 2022

10. Letter from The Rt Hon. Sir Keir Starmer MP to the Commissioner, 20 July 2022

- 25
- Thank you for your letter of 19th July regarding the late entries to my Register of Members' Financial Interests.

I fully accept your decision which I have read carefully, and acknowledge your conclusion that the late entries constitute minor and / or inadvertent breaches of the Code of Conduct for Members of Parliament.

- 30
- Since the entries were drawn to my attention, I have apologised and have taken full responsibility for the oversight. However, I'll take this opportunity to apologise again.

I can confirm that I have put stringent measures in place to address processes in my office to prevent reoccurrence. My office and I are firmly committed to ensuring all future registrations are made in line with the requirements of the Guide to the rules.

5 Members of my private office senior team have received training on registering interests and donations, and we now have a series of meetings in place with the Registrar's team, as recommended.

Thank you for your advice on bringing this matter to a close.

20 July 2022

Appendix 1:

10 **Emails from staff member for The Rt Hon. Sir Keir Starmer MP to the Members Staff Register, November 2021**

From: [Staff member name redacted]

Sent: 17 November 2021, 6.25pm

To: Members Staff Register

15 Subject: RE: Declaration

Good afternoon,

I am following this up and would appreciate some guidance.

Thanks

From: [Staff member name redacted]

20 Sent: 10 November 2021, 3.35pm

To: Members Staff Register

Subject: Declaration

Good afternoon,

I was recently the guest of an awards dinner and I would like to register the price of the ticket. Would you be able to talk me through the process please?

Appendix 2:

5 **Emails between the office of The Rt Hon. Sir Keir Starmer MP and the Office of the Registrar of Members' Financial Interests, 26 November 2021 to 29 December 2021**

From: [Office of the Registrar of Members' Financial Interests]

Sent: 29 December 2021, 3.57pm

To: [The Rt Hon. Sir Keir Starmer MP]

10 Subject: RE: Register

Thank you for this further update, which will also be included in the online version of the Register dated 4 January 2022.

Please could you let me know if you would like to change the wording, e.g. "given to a member of staff", or if you are happy for this to be published as is?

15 Kind regards

Starmer, Keir (Holborn and St Pancras)

1. Employment and earnings

Payments for legal advice given before 2020:

20 7 December 2020, received £2,399.58. Hours: approx. 10 hrs.
(Registered 23 December 2020)

16 December 2020, received £5,936. Hours: approx. 25 hrs.
(Registered 23 December 2020)

24 August 2021, received £17,598.60. Hours: approx. 70 hrs.
(Registered 31 August 2021)

25 29 September 2021, received £135.78 from the Authors' Licensing and Collecting Society, Fifth floor, Shackleton House, 4 Battle Bridge Lane, London SE1 2HX, as copyright payments for books written before my election to Parliament. Hours: none. (Registered 15 November 2021)

3. Gifts, benefits and hospitality from UK sources

- Name of donor: Premier League

Address of donor: Brunel Building, 57 North Wharf Road, London W2 1HQ

5 Amount of donation or nature and value if donation in kind: Two tickets to the Euros Final, total value £1,628

Date received: 8 July 2021

Date accepted: 8 July 2021

Donor status: company, registration 02719699

10 (Registered 19 July 2021)

- Name of donor: Rugby Football League

Address of donor: Quay West, Trafford Wharf Rd, Trafford Park, Manchester M17 1HH

15 Amount of donation or nature and value if donation in kind: Two tickets to the Challenge Cup Final, total value £618

Date received: 7 July 2021

Date accepted: 7 July 2021

Donor status: company registration 03845473

(Registered 26 July 2021)

20 • Name of donor: Premier League

Address of donor: Brunel Building, 57 North Wharf Road, London W2 1HQ

Amount of donation or nature and value if donation in kind: Four box tickets with lunch for Arsenal vs Watford, total value £2,160

Date received: 7 November 2021

25 Date accepted: 7 November 2021

Donor status: company, registration 02719699

(Registered 22 November 2021)

- Name of donor: Tim Benson

Address of donor: private

5 Amount of donation or nature and value if donation in kind: Oil painting, value £1,500

Date received: 23 November 2021

Date accepted: 23 November 2021

Donor status: individual

10 (Registered 20 December 2021)

- Name of donor: Just Eat

Address of donor: Fleet Place House, Fleet Pl, Farringdon, London EC4M 7RF

15 Amount of donation or nature and value if donation in kind: A ticket to Taste of London given to a member of staff, value £192

Date received: 8 July 2021

Date accepted: 8 July 2021

Donor status: company, registration 04656315

(Registered 23 December 2021)

20 • Name of donor: Just Eat

Address of donor: Fleet Place House, Fleet Pl, Farringdon, London EC4M 7RF

Amount of donation or nature and value if donation in kind: A ticket to the British Kebab Awards given to a member of staff, value £522

25 Date received: 29 October 2021

Date accepted: 29 October 2021

Donor status: company, registration 04656315

(Registered 23 December 2021)

5 **6. Land and property portfolio: (i) value over £100,000 and/or (ii) giving rental income of over £10,000 a year**

Until 29 April 2021, co-owner of a house in Surrey, inhabited by family members: (i). (Registered 09 June 2015; updated 01 June 2021)

8. Miscellaneous

10 Member of the Youth Justice Legal Centre's advisory board. The centre was set up by Just for Kids Law. (Registered 05 June 2015)

Leeds University Law Faculty Advisory Board. (Registered 05 June 2015)

Director of The Death Penalty Project. (Registered 05 June 2015)

From 1 October 2015, Member of Advisory Board, European Institute, University College, London. (Registered 06 January 2016)

15 From 1 December 2015, Patron, Sante Refugee Mental Health Project, 12 Salcombe Lodge, Lissenden Gardens, London NW5 1LZ. (Registered 06 January 2016)

From 1 May 2015, Associate Tenant, Doughty Street Chambers. (Registered 06 January 2016)

20 From: [Office of the Registrar of Members' Financial Interests]

Sent: 23 December 2021, 12.51pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

Thanks again [name redacted].

25 I'll get a draft to you and Sir Keir as soon as I can. And I really appreciate you getting back to me when you're supposed to be on leave.

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 23 December 2021, 12.27pm

To: [Office of the Registrar of Members' Financial Interests]

Subject: RE: Register

- 5 Yes, kebab awards 29th Oct and taste of London is 8th July! Apologies if I put incorrect date. My holiday brain was obviously engaged.

From: [Office of the Registrar of Members' Financial Interests]

Sent: 23 December 2021, 9.26am

- 10 To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

Thanks [name redacted]

The forms look fine. Just one thing: what was the date of the Kebab Awards, 29 October 2021?

- 15 For events, the date of attendance is usually put down as that of both receipt and acceptance. Unless you correct me, I will assume the Taste of London event took place on 8 June 2021.

From: [Office of the Registrar of Members' Financial Interests]

- 20 Sent: 22 December 2021, 7.09pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

As promised attached. Thanks again for your help. Wishing you a Merry Christmas.

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 22 December 2021, 1.37pm

To: [Office of the Registrar of Members' Financial Interests]

Subject: RE: Register

- 5 Just tried to give you a buzz back. Not managed to get through. If you could try me again on [details redacted]. Realise I had this wrong above.

From: [Office of the Registrar of Members' Financial Interests]

Sent: 22 December 2021, 12.01pm

- 10 To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

Sorry for the delay, but I have been out of the office until this morning.

I have just tried to call you back but the number keeps dropping. Please call me back on [details redacted] when you get a moment.

15

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 17 December 2021, 6.09pm

To: [Office of the Registrar of Members' Financial Interests]

Subject: RE: Register

- 20 If somebody could please give me a call regarding this on Monday on [details redacted] that would be much appreciated.

From: [Office of the Registrar of Members' Financial Interests]

Sent: 17 December 2021, 12.28pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

We need more information before we can draft an entry in the Members' Register. I have re-attached the relevant form.

- 5 There is no need to print it off, attaching the completed Word document to an email is fine. But please make sure it is submitted within 28 days of the event(s) attended.

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 15 December 2021, 2.15pm

- 10 To: [Office of the Registrar of Members' Financial Interests]

Subject: RE: Register

So sorry for my delayed response. In that case, I believe we should add to Keir's register too.

- 15 From: [Office of the Registrar of Members' Financial Interests]

Sent: 29 November 2021, 3.14pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

I am sure my colleague, [Name redacted], will be in touch shortly. [details redacted]

- 20 Whether or not Sir Keir attended is not the test for the Members' Register, the relevant section of the Guide to the Rules is:

Benefits given to other people or organisations

- 25 *27. A Member must register under this category any benefit given to any third party, whether or not this accompanied a benefit for him or her, if the Member is aware, or could reasonably be expected to be*

aware, of the benefit and that it was given because of his or her membership of the House or parliamentary or political activities.

Please let us know if this benefit also needs to be added to the Members' Register.

5 From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 29 November 2021, 9.16am

To: [Office of the Registrar of Members' Financial Interests]

Subject: RE: Register

10 I have emailed the staff registrar twice without response so thought best to email here. It is for my own entry in the staff register.

Keir did not attend either of the events.

From: [Office of the Registrar of Members' Financial Interests]

Sent: 29 November 2021, 8.33am

15 To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: RE: Register

You have not mentioned Sir Keir, but please can I check if this is an update for his entry in the Members' Register or for your own entry in the Staff Register (if you have one)?

20 Even if Sir Keir did not attend, if you received you or other staff received a ticket because you are part of his team, this will need to be included in the Members' Register (form attached).

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 26 November 2021, 6.20pm

To: [Office of the Registrar of Members' Financial Interests]

Subject: Register

- 5 I am writing to let you know that I recently attended the British Kebab Awards and therefore need to register this with you. I understand that the value of the ticket was equivalent to £522. The ticket was sponsored by Just Eat.

In addition, I also received a ticket to the taste of London event also sponsored by Just Eat which was equivalent to £192.

- 10 Please let me know if you have any questions.

Appendix 3

Emails between the office of The Rt Hon. Sir Keir Starmer MP and the Office of the Registrar of Members' Financial Interests, 25 January 2022 to 14 June 2022

- 15 **25 January 2022: Email from the Registry Office to Sir Keir Starmer's Office**

Thank you for your call yesterday. You explained that the field that appeared in Daily Mail story in May 2020 has recently been valued at around [a figure in excess of the £100,000 threshold set buy the House]. It was previously believed to be
20 worth around [a sum less than the £100,000 threshold set by the House]. You were looking on for advice on whether Sir Keir will need to update his register entry to reflect this.

I asked whether this field was attached to the property that appears in Sir Keir's
25 current entry:

6. Land and property portfolio: (i) value over £100,000 and/or (ii) giving rental income of over £10,000 a year

30 Until 29 April 2021, co-owner of a house in Surrey, inhabited by family members: (i). (Registered 09 June 2015; updated 01 June 2021)

Please could you double-check if it was? I ask because, if you see the correspondence below, we were told this property was sold on 29 April 2021. And this will have a bearing on any advice we provide.

I will also look through our correspondence to see if any advice has been sought on registering the field since Sir Keir's election to Parliament in 2015. However, if you are aware of any such requests for advice, it would be helpful if you could narrow down my search by telling me roughly when the advice was sought.

5 **23 February 2022: Email from the Registry Office to Sir Keir Starmer's Office**

Thank you for this update.

Updated entry

10 If no further changes are required, set out below is your entry. This will be included in the next online version of the Register of Members' Financial Interests (dated 28 February 2022).

Outstanding query

[name redacted] raised the attached query at the end of last month, and we do not appear to have received a reply.

15 Please could you let us know the background behind this holding, so that we can advise you on whether or not you need to update your entry to include it?

4 May 2022: Email from the Registry Office to Sir Keir Starmer

I am deleting expired entries from the Register and, from your entry, have removed:

6. Land and property portfolio: (i) value over £100,000 and/or (ii) giving rental income of over £10,000 a year

20 Until 29 April 2021, co-owner of a house in Surrey, inhabited by family members: (i). (Registered 09 June 2015; updated 01 June 2021)

25 We still have an outstanding query on whether you need to register a field that had recently been re-valued at around [a figure in excess of the £100,000 threshold set by the House] (see attached).

We do not appear to have received a response to my question, and I was unable to locate any correspondence relating to the field.

30 Without any further context, **all I can advise is that you need to register any land or property you own or part-own which is valued at over £100,000 (or forms part of a total property portfolio whose value exceeds £100,000)**. I have attached the relevant form should you need it.

5 If we do not hear back from you or your office, the entry covering the house in Surrey will be deleted and will not appear in the version of the Register we will publish later this week. And, to avoid bothering you needlessly, I will assume that you have already established that you do not need to register the field or require any further advice in relation to it.

4 May 2022: Email from Sir Keir Starmer's Office to the Registry Office

From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 4 May 2022, 2.00pm

10 To: [Office of the Registrar of Members' Financial Interests]

Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

let me give you a ring this afternoon if that's OK? I have something else to speak to you about.

15 **4 May 2022: Email from the Registry Office to Sir Keir Starmer's Office**

From: [Office of the Registrar of Members' Financial Interests]

Sent: 4 May 2022, 3.43pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

20 Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

Thank you for your time on the phone a few moments ago. I will reply separately, most probably tomorrow, about the advance for the book.

25 As discussed, I have reinstated the details of the property until you have had the chance to discuss this fully with Sir Keir. At the moment, the most urgent pieces of information we need are:

- the date of the of the [2022] valuation; and
- whether or not the field forms or ever formed part of the property in Surrey already detailed in Sir Keir's entry.

We look forward to hearing from you.

5 May 2022: Email from the Registry Office to Sir Keir Starmer's Office

From: [Office of the Registrar of Members' Financial Interests]

Sent: 5 May 2022, 11.51am

5 To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

Thank you for your call. Please correct me if I have taken down any of the details incorrectly.

10 You confirmed that the field is not connected to the property sold in April 2021, so this entry can be removed from the Register. It has been deleted ahead of the publication of this week's online version of the Register. We hope to publish tomorrow.

15 On the field/industrial waste-ground, you explained that this was bought for [A value less than the £100,000 threshold set by the House] and the recent valuation of around [A value in excess of the £100,000 threshold set by the House] was provided by an estate agent. The field is currently on the market but no survey has been completed on it so far. And you confirmed that, other than his own home(s), Sir Keir does not own any other property.

20 When Sir Keir is available, I think it would be a good idea for him to discuss this matter with the Registrar direct. I will update the Registrar but in the interest of time, please could you provide or confirm the following:

- the location of the field, e.g. town, city, county or local authority;
- the type of use to which it has been put (if any);
- 25 • whether it has ever generated rental income of more than £10,000 a year (or been part of property portfolio providing more than £10,000 a year);
- the date on which it was acquired; and
- the date on which Sir Keir was provided with the [2022] valuation?

13 June 2022: Email from the Registry Office to Sir Keir Starmer's Office

From: [Office of the Registrar of Members' Financial Interests]

Sent: 13 June 2022, 3.48pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

5 Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

Further to my telephone conversation with [name redacted] this afternoon, I have spoken to the Registrar about this outstanding registration.

10 It is not clear to us yet whether this interest has fallen outside of the registration timescale. The Registrar and I agree that the best course of action is to provide the information requested in the email below.

If this interest has fallen outside of the 28-day timescale, we will not be able to add it to the Register until the Commissioner concludes her investigation into the other late registrations in your register entry.

14 June 2022: Email from Sir Keir Starmer's Office to the Registry Office

15 From: [The office of Rt Hon. Sir Keir Starmer MP]

Sent: 14 June 2022, 12.41pm

To: [Office of the Registrar of Members' Financial Interests]

Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

20 In 1997, Keir Starmer, well before being elected to Parliament, purchased a freestanding field in Oxted, Surrey. It is a field that was used for grazing donkeys. It has never appeared on the register as it was purchased well below the threshold for declaration and is not related to any other property published on the register.

25 There was no rental income ever received for the land but it recently went up for sale which was agreed at [a sum in excess of the £100,000 threshold set by the House]. The sale is proceeding to completion now and Keir wishes to update his register of members interests to include this information as the monies from the sale will soon be received by him.

- 30
- the location of the field, e.g. town, city, county or local authority; Oxted Surrey

- the type of use to which it has been put (if any); previously used as a field to graze donkeys
- whether it has ever generated rental income of more than £10,000 a year (or been part of property portfolio providing more than £10,000 a year); No income ever generated
- the date on which it was acquired; 1997
- the date on which Sir Keir was provided with the [2022] valuation? January 2022 - to clarify this was only obtained for sale purposes as part of the estate agent services.

5

10 This is the suggested entry:

Field in Oxted, Surrey, purchased in 1997, pending sale at the value of [A in excess of the £100,000 threshold set by the House].

14 June 2022: Email from the Registry Office to Sir Keir Starmer's Office

From: [Office of the Registrar of Members' Financial Interests]

15 Sent: 14 June 2022, 12.48pm

To: [The office of Rt Hon. Sir Keir Starmer MP]

Subject: Re: Your Register Entry: Property query raised in January and expired entry deletion

I will discuss this with the Registrar, and one of us will respond as soon as we can.

20 **14 June 2022: Email from the Registry Office to Sir Keir Starmer's Office**

Thank you for providing the requested information and additional background.

The threshold for registering land and property since you were elected in 2015 has been:

25

47. Members must register, subject to the paragraphs below, any land or property in the UK or elsewhere which:

i) has a value of more than £100,000; or forms part of a total property portfolio whose value exceeds £100,000;

In June 2015 you registered the following property:

**6. Land and property portfolio: (i) value over £100,000 and/or
(ii) giving rental income of over £10,000 a year**

- 5 Co-owner of house in Surrey, inhabited by family members: (i).
(Registered 09 June 2015)

Based on the information provided to date, the field should also have been registered in 2015 because it formed part of a property portfolio whose value exceeded £100,000.

- 10 I appreciate that this will be unwelcome advice and, because it has already started, it means we cannot add this potential late registration to the Register until the Commissioner concludes her investigation into the late registrations in your current entry.

- 15 As I mentioned in an earlier email, I have been unable to find any requests for advice on this field before the one made in January of this year. If you have an earlier record of any such request, I advise you to forward it to the Commissioner.

Any further correspondence relating to the field or the entries being looked into by the Commissioner should be directed to her. We will not be able to offer any advice on these interests while the investigation is ongoing.