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Summary

5 The allegation I investigated was that the Member had failed to declare a financial interest when writing to a public official as required by the Guide to the Rules relating to the Conduct of Members. This allegedly put the Member in breach of the requirements of Paragraph 14 of the Code of Conduct.

I upheld the allegation.

10 I concluded that the interest in question met the test of relevance and should have been declared. This is because I considered it was possible that the recipient of the letter, had they been aware of the connection between the Member's interest and the content of the Member's letter, might reasonably have considered that the letter's content was influenced by the interest. For the same reasons, I also concluded that a declaration should also have similarly been made on two earlier occasions. I decided that those omissions were breaches of the Guide and amounted to breaches of Paragraph 14 of the Code.

15 During my inquiry, I also considered whether the Member may have breached Paragraphs 11, 12, and 15 of the Code. Based on the evidence that I have seen, it was my conclusion that those paragraphs have not been breached.

20 The Member accepted my decision, acknowledged his breaches of the Rules, and apologised for the breach. The Member also undertook to review the Rules, and supporting guidance, and to consult with the Registrar of Members' Financial Interests on any future cases of doubt concerning the Rules and their interpretation. I considered the Member's apology and remedial actions to be an appropriate outcome and I have concluded the matter by way of the rectification procedure available to me under Standing Order No. 150.

Sir Robert Neill MP: Resolution Letter

Letter from the Commissioner to the complainant, 24 September 2020

5 I wrote to you on 12 May, to tell you that I had begun an inquiry into your allegation that Sir Robert Neill MP had breached paragraph 14 of the House of Commons' Code of Conduct for Members when writing to the Chief Planning Officer of Bromley Council.

10 Having investigated this matter, I found that Sir Robert breached the Code. I concluded that the interest in question met the test of relevance and should have been declared. This is because I considered it was possible that the recipient of the letter to Bromley Council, had they been aware of the connection between the Member's interest in the Substantia Group and the content of the Member's letter, might reasonably have considered that the letter's support for the Royal Bell redevelopment was influenced by the interest. I therefore uphold your allegation. For the same reasons, I also concluded that a declaration should also have similarly
15 been made on two earlier occasions.

My full decision and rationale will be published on my webpage in due course, which will include the correspondence I exchanged with Sir Robert.

20 Sir Robert has accepted my decision. He has acknowledged his breaches of the rules, apologised, and has undertaken to re-review the Rules, and accompanying Guide, and to seek advice from the Registrar of Members' Financial Interests in similar future circumstances. I have therefore concluded the matter by way of the rectification procedure available to me under Standing Order No 150. I will notify the Committee on Standards in due course of this outcome. The matter is now closed.

25 *24 September 2020*

Written evidence

1. Letter from the complainant to the Commissioner, 28 April 2020

The conduct of Sir Bob Neill MP.

1. I'm writing to you to complain about the conduct of Sir Bob Neill MP.
- 5 2. Disclosure: I write a blog at [content redacted].
3. Sir Bob, who's chair of the Commons justice select committee, appears to have breached the MPs' Code of Conduct – by failing to declare a relevant financial interest in a letter to the chief planning officer of Bromley Council. The MP wrote to the council to support a planning application within his constituency.
- 10 4. Please see “Senior Tory MP supports local redevelopment project involving firm that employs him”: [content redacted]
5. “Local news website reports Bob Neill MP exposé”: [content redacted]
6. As you can see, the MP used parliament-headed paper for his letter to Bromley Council.
- 15 7. Sir Bob is still a paid “consultant” to The Substantia Group, according to the latest register of MPs' financial interests.

Enclosure: Sir Robert's letter of 10 December 2018 to the Chief Planning Officer of Bromley Council

18/03252/FULL1 -The Royal Bell, 175 High Street, Bromley, BR1 1NN

- 20 *In advance of the Plans Sub-Committee No.3 meeting on 13 December, I write to place on record my support for the above-mentioned application, which similarly enjoys the support of a considerable number of local residents. Indeed, I understand that as of last week, over 120 supportive submissions had been received by the Council, with only 8 against.*
- 25 *Having had some involvement in previous attempts to bring this iconic, but over the last 10 years, neglected and underutilised, town centre building back into use - including those put forward by the Bromley Arts and Community Initiative (BACI) - I believe a pragmatic approach is required to this scheme. Where others have failed due to the size and condition of the premises, the current proposals under consideration*
- 30 *offer a realistic, financially sustainable plan for the site returning this historic building to its original use.*

5 *Whilst I note the concerns outlined by officers in their recommendation for refusal, I believe the significant public benefits possible through the renovation of the Royal Bell as envisaged as well as the economic activity it would generate, outweigh the reservations that have been raised. The new annex should be considered enabling development, and as the three Bromley Town ward councillors - all of whom also support the scheme - have made clear, sensible conditions can be applied to ensure other concerns are properly addressed, for example on public access.*

10 *Residents frequently raise with me their frustration that such a large, beautiful building, in the heart of our town centre, has been left vacant for so long. Against this backdrop, and mindful that proposals to take on such a considerable renovation project have to date been few and far between, I believe this application should be looked upon favourably. Ultimately, this is a scheme that would restore to a high quality a Grade II listed building, which remains on Historic England's 'at risk' register; help rejuvenate our high street; and attract business and investment, as well as create*
15 *jobs. It is an impressive application that has my full support.*

I would be most grateful if you would circulate this letter to members in advance of Thursday's meeting.

28 April 2020

2. Letter from the Commissioner to Sir Robert Neill MP, 12 May 2020

20 I would welcome your help with an allegation I have received from [the complainant] about your compliance with the rule concerning the adequate declaration of interests, and a concern that I have arising from [the complainant's] submission regarding paid advocacy. I enclose a copy of [the complainant's] email
25 of complaint, his blog post, and the screenshots taken from that post. I also enclose information from the Bromley Council website and from the online Register of Members' Financial Interests.

I am writing to you now to seek your assistance with a formal inquiry.

My inquiry

30 My inquiry will initially focus on the allegation that your actions have put you in breach of paragraphs 12 and/or 14 of the Code of Conduct for Members. Specifically, I will initially investigate the issues below, but the scope of my inquiry may reduce or expand as the inquiry progresses. If it should change, I will write to you again to update you and, if necessary, provide you with an opportunity to comment.

- 35 1. Whether, when writing to the Chief Planning Officer of Bromley Council on 10 December 2018, you should have declared your interest in The Substantia Group.

2. Whether, when writing to the Chief Planning Officer of Bromley Council on 10 December 2018, your actions sought to confer, or would have had the effect of conferring, a financial or material benefit on The Substantia Group.

The Code of Conduct

- 5 In relation to the declaration of interests, paragraph 14 of the Code of Conduct for Members states:

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

Further to the Code, the Guide to the Rules relating to the Conduct of Members states the following at Chapter 2:

15 “2. The declaration of interests ensures that Members, the public and others are made aware at the appropriate time, in proceedings of the House and on other occasions, of any interest relevant to those proceedings or to the actions or words of a Member...

20 4. Members are required, subject to the paragraphs below, to declare any financial interests which satisfy the test of relevance...

5. The test of relevance is whether those interests might reasonably be thought by others to influence his or her actions or words as a Member.

25 7. Subject to paragraphs 1 to 6 of this chapter, Members must declare a relevant interest:

30 When approaching others: Members must declare a relevant interest in any communication, formal or informal, with those who are responsible for matters of public policy, public expenditure or the delivery of public services. That includes communications with Ministers, either alone or as part of a delegation: with other Members; with public officials (including the staff of government departments or agencies and public office holders). If those communications are in writing, then the declaration should be in writing too; otherwise it should be oral.”

In relation to paid advocacy, paragraph 12 of the Code of Conduct for Members states:

“No Member shall act as a paid advocate in any proceeding of the House”

5 Further to the Code, the Guide to the Rules relating to the Conduct of Members states the following at Chapter 3:

10 “2. Taking payment in return for advocating a particular matter in the House is strictly forbidden. Members may not speak in the House, vote, or initiate parliamentary proceedings for payment in cash or kind. Nor may they make approaches to Ministers, other Members or public officials in return for such payment.

8. The rules place the following restrictions on Members:

15 When initiating proceedings or approaches to Ministers, other Members or public officials. Subject to paragraph 10 below, Members must not engage in lobbying by initiating a proceeding or approach which seeks to confer, or would have the effect of conferring, any financial or material benefit on an identifiable person from whom or an identifiable organisation from which they, or a family member, have received, are receiving, or expect to receive outside reward or consideration, or on a registrable client of such a person or organisation.

Definitions

13. Outside reward or consideration includes:

25 a) all present financial interests or material benefits which must be either registered or declared.

15. An identifiable person or organisation is a named person or organisation from whom a Member has received or is receiving outside reward or consideration...

17. Public officials include:

30 a) all those who are responsible for matters of public policy, public expenditure or the delivery of public services. The term therefore includes all staff of government departments and agencies and public office holders.

Application of the lobbying rules - matters outside the lobbying rules

19. The following fall outside the lobbying rules:

5 c) Constituency issues: Members may pursue any constituency interest in any approach to a Minister or public official, subject to the registration and declaration rules..."

Next steps

I would welcome your comments on the allegations outlined above and please can you address the following questions:

- 10 1. Did you take advice from the House authorities before writing to the Chief Planning Officer of Bromley Council on 10 December 2018? If you did, please describe the advice given and share with me copies of any correspondence you exchanged with House officials on the matter.
2. Why did you decide to write to the Chief Planning Officer about this planning application?
- 15 3. When did you decide to write to the Chief Planning Officer about this planning application?
4. Were you asked by any member or employee of The Substantia Group, or anyone else, to write the letter to the Chief Planning Officer?
- 20 5. Were you aware of the paragraph 14 of the Code, which concerns the declaration of interests, and the accompanying guidance at Chapter 2 of the Guide?
6. Did you consider whether a declaration was necessary on this occasion? If you did consider this issue, why did you decide not to make a declaration?
- 25 7. Were you aware of paragraph 12 of the Code, which concerns paid advocacy, and the accompanying guidance at Chapter 3 of the Guide?
8. Do you consider that your letter of 10 December 2018 could be interpreted as seeking to confer, or having had the effect of conferring, a direct or indirect financial or material benefit on The Substantia Group? If you do not, please let me know the reason(s) for that belief.

9. Have you made any other approaches to a Minister, another Member of Parliament, or any other public officials about this planning application? If so, please provide details and dates.
- 5 10. Further to the detail provided in your register entry, what was your specific role and duties at The Substantia Group between January and December 2018?
11. The Royal Bell project timeline document describes you, in your role as the local MP, as a party the project team worked with. What was your involvement with this project?
- 10 12. Did you receive payment from anyone connected to the project other than The Substantia Group? If so, please provide details of the payment and the terms on which it was paid.
- 15 13. The Royal Bell project timeline document states that The Substantia Group were instructed on 15 February 2018 to “manage Communications and Community involvement with the scheme and proposal”. Were you involved with this work at The Substantia Group? If so, what was the extent of your involvement?

It would be helpful to receive any supporting evidence you have at the same time as receiving your response to these questions. Any other points you may wish to make to help me with this inquiry would also be most welcome.

20 **Outcomes**

There are three possible outcomes to my inquiry:

1. I decide that the allegations concerning your conduct are not upheld and no further action is needed.
- 25 2. I decide to uphold some or all of the allegations concerning your conduct, I decide that your acts amount to a breach of the Code, and I am satisfied that the matter is suitable for rectification using the powers available to me under Standing Order 150.
- 30 3. I decide to uphold some or all of the allegations concerning your conduct, I decide that your acts amount to a breach of the Code, and I am satisfied that the matter cannot be rectified and must be put before the Committee on Standards.

Important information

As you will be aware, my inquiries are conducted in private. Following the decision taken by the House on 19 July 2018, I will not publish the fact that I am conducting an inquiry into an allegation of an alleged breach of the Code of Conduct. My office will not comment to third parties on any aspect of the inquiry. They will answer
5 direct factual questions about the processes I follow and the standards system more generally but will neither confirm nor deny that I have begun an inquiry.

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
10 changes flowing from the decision of 19 July 2018. I am also writing to [the complainant] to let him know that I have decided to begin an inquiry into this matter.

This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. Until such time as a final report is published, I must ask that you respect that confidentiality and do not disclose the
15 contents of our correspondence to any third party. I have made a similar request of [the complainant]. My decision and all the relevant evidence, including our correspondence, will be published at the end of the inquiry.

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
20 correspondence with you.

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 speak with you at any stage if you would find that helpful.

25 Action

I would be grateful to have your response to this letter as soon as possible and no later than 29 May 2020 please. Due to the current health crisis, my team are working from home only, so I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk.

30 Thank you for your assistance with this matter.

Enclosures:

- a) The Complainant's initial letter of complaint of 28 April 2020.
- b) The Complainant's blog post of 31 October 2019 including screen shots of;

- i) Sir Robert's letter of 10 December 2018 to the Chief Planning Officer of Bromley Council;
- ii) Information from the Royal Bell redevelopment website including details concerning the involvement of the Substantia Group;
- 5 iii) Information from the Substantia Group website concerning the role of Sir Robert in the Group.
- c) Sir Robert's entry in The Register of Members' Financial Interests as of 3 December 2018.
- 10 d) A screenshot from Bromley Council website concerning the planning application for the redevelopment of the Royal Bell site.

12 May 2020

3. Letter from Sir Robert Neill to the Commissioner, 28 May 2020

Thank you for your letter of 12 May 2020.

15 I am anxious to do all that I can to assist with your inquiry. In doing so, I hope that it will be helpful if I set out some background and context before dealing with the specific questions you ask.

I would like to stress that I had been involved in seeking to bring the Royal Bell back into use for some years before the planning application which gives rise to this complaint, and, also before I had any connection with the Substantia Group.

20 The Royal Bell itself is a prominent and well known historic listed building at the northern end of Bromley High Street. That part of the town centre had become run down in recent years, despite being part of a Conservation area. Ever since my election to Parliament, regenerating that area has been a high local priority, supported by residents, including the Civic Society, businesses, including the local
25 Business Improvement District Board, the councillors for Bromley Town Ward, and the Council as a whole through its Local Plan Policies. As the constituency MP, I have always supported this objective, including lobbying for improved train services and a tube connection in 2014 and 2017 and supporting the local councillors in their submissions for the Town Centre Masterplan in 2018. (Please see Annexe 1).

30 The Royal Bell itself had been empty since 2010, was poorly maintained, and was on the English Heritage 'At Risk' Register. In 2013 I supported a local community initiative to turn it into an Arts Centre, both publicising and endorsing their campaign. (see Annexe 2). This received considerable publicity and support locally, but ultimately sufficient public funding never became available. Finding ways to

bring the building back into use would need an appropriate commercial basis. Although various ideas were floated, nothing concrete had materialised until the proposal we are concerned with.

5 I wrote my letter of the 10 December 2018, having examined the details of the proposal, including visiting the site with local councillors, because I believed it to be acceptable in planning terms and the best available way to achieve an outcome which I had already publicly sought and which I believed would be of benefit to part of my constituency, both in respect of the building itself and the wider regeneration objective I have set out above. The arguments in my letter were consistent with all
10 that I had previously said and done and were entirely in line with views advanced by local councillors and the members of the Planning Committee itself, as recorded in the minutes (please see Annexe 3).

15 I have set out the above at some length as I wish to stress that my sole motive in writing as I did was entirely that of an active constituency MP seeking the best outcome for an important issue for my local residents and businesses. I believe that was a proper and legitimate thing for me to do. I was in no way influenced by who the applicant was, and I do wish strongly to refute any suggestion implicit in the complaint made to you that might suggest otherwise. I believe that the evidence set out above supports that contention.

20 Answering the specific questions that you raise:

1. I did not, because, for the reasons I have just set out, I regarded it as an entirely proper and normal part of my constituency work. I also believed that, for the reasons set out in my answers to subsequent questions, I thought that any connection I could be thought to have with the applicants through my role with
25 the Substantia Group was sufficiently remote that I could not reasonably be regarded as having a conflict of interest.

I still believe that to be the case, but in the light of these matters, and with the benefit of hindsight, now regret that I did not do so, not least to have given myself a protection against the sort of unfair imputation I have referred to.
30 Confronted with such a situation again, I certainly would take advice.

2. For the reasons that I have set out above, but in short because I believed it would bring benefits to that part of my constituency.

3. At some point in the first week of December. I had visited the site with local councillors on 28 November when representatives of the applicants explained
35 details of the scheme to us and I to a walk around the area to try and get a sense for myself of how the height of a proposed addition to the building might impact the surrounding area. Thereafter I read the detailed report prepared by Council Officers for the Committee meeting when it was published, probably in the first week of December, and having decided that the proposal

was acceptable in planning terms, with certain conditions attached, wrote in the terms that I did on 10 December.

4. No, I was not. It was entirely my own decision, and for the reasons I set out. The only people I discussed it with were the three Ward councillors to take their views on board. As it happened, they were also all in support of the scheme.
5. Yes, I was, and I take them seriously. Because of that I had a paragraph included in my terms of agreement with Substantia specifically stating that nothing I did with them could undermine my obligations under code (please see Annexe 4 doc 1). I have the same clause inserted in my other consultancy agreements.
6. I did, but did not believe it was necessary because of (a) my previous involvement with the site, wholly unrelated to Substantia and their clients, as already set out, and (b) the limited nature of my role with Substantia and, in turn, their limited role in relation to this application, which I will deal with under Qs 10 to 13.
7. Yes, I was, as with my answer to Q.5
8. No, I do not believe that would be a fair inference given all the facts. Substantia were not the applicants and do not have any financial stake in the applicant company, and to my understanding, had been paid for two specific pieces of work: assisting in the acquisition, which had already happened (and in which I had had no involvement at all) and managing communications and community involvement (which I was aware of but not actually involved in) which I understand involved advice on the design, set up and running of the Royal Bell website, which you are already aware of, organising mail/email-shot to residents and properties in the area to make them aware of the scheme, and helping to organise visits to the site for those who were interested. Apart from going to one of those site visits, as already mentioned, I was not involved in any of this. They did not make any representations to the council on behalf of the applicants or represent them at the Planning Committee. There was no reason to think that the actual outcome of application could make any further difference to them.
9. None.
10. My specific role is set out in the letter of engagement dated 18 November 2016 (please see Annexe 4 especially clauses 2 & 8). I have no financial stake in the company and am not involved in its day to day running and do not have an office, desk or email account with them. Apart from giving general advice and updates on the political and economic situation and likely developments, my principle role is in acting as a "sounding board" and to a degree a "mentor" for

the Chief Executive on the development of the business. Actual involvement with their clients is in fact very limited, as was the position in this case. It is also worth saying that planning related work is only one part of the Group's activities.

5 The use of the designation "Non-Executive Chairman" made no material
difference to this role (see letter of 30May 2017 in Annexe 4). It did reflect the
increasing focus of the Group on Management Consultancy work, particularly
with smaller, often family run firms, which are looking to expand or
restructure but lacked expertise in corporate governance and risk
10 management or accessing capital markets, and also are not of a scale to be
afford the big firms in that field. The Chief Executive of Substantia has a
background in financial services, and my legal background plus my experience
as an NED (including chairing the Risk Management Committee for an NHS
Trust before entering Parliament) was felt to offer an attractive package to
15 potential clients, and hence the greater prominence that this designation gave.

[material not relevant to the inquiry redacted]

11. I think this must refer to the 16 January 2019 post on the Royal Bell website,
where Mr Hillman includes me in the same sentence as "the public, community
20 groups and local councillors." who had supported the application, clearly
referring to those who had written in or spoken in support of the application -
in effect thanking third parties or their endorsement, and I cannot see anything
improper in that.

My involvement was to attend a site visit, discuss the plans with Mr Hillman in
the company of others and subsequently write the letter of 10 December in the
25 circumstances which I have already described. I was aware of the Substantia
Group work on communications but not a part of it.

12. No.

13. Please see my answer to Question 11.

30 I apologise for the length of this letter, but, as you would expect, I take the matter
very seriously and wish to deal with it in as much detail as I can. I have never had an
allegation of this kind made before during my time in Parliament, or during the 24
years of my previous service in local government.

35 I can only reiterate that I acted at all times in good faith, particularly wish to refute
any suggestion of an improper motive for my actions and have honestly
endeavoured to comply with the Code and guidance.

I hope that I have provided sufficient information to assist with your inquiry but please be assured of willingness assist further if need be.

Enclosures:

- 5 a) Miscellaneous pieces of constituency correspondence sent by Sir Robert to various parties.
- b) The Royal Bell (a briefing paper) prepared by the Bromley Arts and Community Initiative dated May 2013.
- c) Correspondence inviting Sir Robert to a photoshoot outside the Royal Bell with the Bromley Arts and Community Initiative dated July 2013.
- 10 d) A series of documents concerning Bromley Council's planning committee decision relating to the redevelopment of the Royal Bell including;
- i) Undated minutes on from a planning committee agenda item concerning application 18/03201/LBC;
- 15 ii) Sir Robert's letter of 10 December 2018 to the Chief Planning Officer of Bromley Council;
- iii) Various social media screenshots posted by local Councillors in support of the redevelopment of the Royal Bell.
- e) Sir Robert's contract of employment with the Substantia Group dated 18 November 2016.

20 *28 May 2020*

4. Letter from the Commissioner to Sir Robert Neill MP, 2 June 2020

Thank you for your thorough letter of 28 May 2020, in response to my initiation of the inquiry into the allegations concerning your compliance with the rules on paid advocacy and the declaration of interests.

- 25 As you will recall, in my first letter to you, of 12 May 2020, I explained that I might seek the advice of the House authorities as part of my inquiry. In accordance with my usual practice regarding inquiries relating to advocacy and declaration, I have today written to the Registrar of Members' Interests, [name redacted], seeking her advice. I enclose a copy of that letter for your information.

I will write to you again when I have the Registrar's advice and to give you an opportunity to comment on that advice. 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.

5 Thank you for your continued co-operation with this matter.

2 June 2020

5. Letter from the Commissioner to the Registrar of Members' Financial Interests, 2 June 2020

10 I would welcome your help with an inquiry that I am conducting in relation to Sir Robert Neill MP concerning allegations regarding his compliance with the rules on paid advocacy and the declaration of interests. For reference, I enclose a copy of the correspondence that I have exchanged with Sir Robert to date on this matter.

15 Sir Robert has indicated that he did not seek advice from the House authorities before writing to the Chief Planning Officer of Bromley Council on 10 December 2018. If Sir Robert had approached you for advice, please can you tell me what advice you would have provided and why. Please could you return your comments to me by 19 June 2020. I intend to share a copy of your advice with Sir Robert for his comments in due course.

Thank you for your assistance with this matter.

20 *2 June 2020*

6. Email from the Registrar of Members' Financial Interests to the Commissioner, 16 June 2020

Thank you for your letter of 2 June.

25 You ask what advice I would have given Sir Bob Neill before he wrote on 10 December 2018 to the Chief Planning Officer of Bromley Council in support of the proposals to develop the Royal Bell site in his constituency. At the time Sir Bob was paid by the Substantia Group.

I would have advised Sir Bob that he was entitled to make his approach to Bromley Council, by virtue of paragraph 19c of Chapter 3 of the Guide to the Rules. This says

30 *c) Constituency issues. Members may pursue any constituency interest in any approach to a Minister or public official, subject to the registration and declaration rules...*

In my view he would not have been in breach of the rules on paid advocacy.

I would have advised Sir Bob to declare (make an ad hoc disclosure of) this interest when he wrote to the Council and in any related correspondence and discussion. MPs are expected to declare an interest whenever someone else might reasonably consider it to influence them. In my view this was such an occasion. Sir Bob has told you that neither he nor Substantia stood to gain from the planning application, but other people reasonably might have thought that he had a financial stake in its success. He could have used some wording such as “I am a Non-Executive Chairman [or Senior Adviser] to the Substantia Group. Substantia helped N Hillman & Sons with buying this site and with managing communication and community engagement”. If accurate, he could have added that Substantia’s role had already ended.

Finally, Sir Bob’s register entry shows that his role at Substantia from June 2017 to 7 June 2020 was that of “Non-Executive Chairman”. Sir Bob is not a Board member and I have suggested to him that this title could be misleading. At my suggestion he has now described his role (as set out in the Register of Members’ Financial Interests) as Senior Adviser.

Please let me know if you need anything else.

16 June 2020

20 **7. Letter from the Commissioner to Sir Robert Neill MP, 18 June 2020**

As promised in my earlier letter of 2 June 2020, I am now able to share with you the response from the Registrar of Members’ Financial Interests, [name redacted].

I would be happy to receive any observations that you may care to make about [the Registrar's] advice no later than 2 July 2020 please. As you may be aware, due to the current health crisis, my team are currently working from home only, so I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk.

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

18 June 2020

8. Letter from Sir Robert Neill MP to the Commissioner, 26 June 2020

Thank you for your letter of 18 June enclosing the letter you have received from the Registrar of Members Financial Interests dated 16 June and asking for my observations thereon. They are as follows:

I agree with and accept the contents of [the Registrar's] advice. As you will know, I have always maintained that I was not in breach of the rules concerning paid advocacy, for reasons which I then set out in some detail and [the Registrar's] advice supports this. I believe that the evidence I have presented clearly brings my conduct within the scope of paragraph 19c of Chapter 3 of the Guide and I urge you to adopt the Registrar's advice in this regard.

I also accept the Registrar's conclusion that I should have made an ad hoc declaration of interest when writing to the Council, in the terms she sets out. As explained in my earlier letter, I did not at the time believe that this was necessary because my public support for redevelopment of the Royal Bell was well established before either my consultancy with Substantia or the proposal then under consideration. I certainly had no intention of gaining or conferring any financial benefit by writing as I did. However, upon reflection I see the force in [the Registrar's] argument that others could nonetheless have thought otherwise.

I accept, therefore, that I made an error in this respect. I have already indicated in my previous letter, that I now regret not having sought advice on this point and [the Registrar's] advice confirms me in that view. Had I done so, I would have had no hesitation in accepting such advice and including such a declaration in my letter. I apologise unreservedly for this mistake, which did not have any improper motivation, but should have been considered more carefully by me. You have my assurance that, should a like situation arise in the future, I would seek and act fully in accordance with the Registrar's advice.

Because I am deeply concerned at the way my connection with the Substantia Group has been misconstrued by the complainant, I also sought the Registrar's upon the wisdom of being described as "Non-Executive Chairman". Again, I accept that this could, wrongly, give the impression that I am a Director of the Company or have a role in its management, which is not the case. I am grateful for her suggestion that the description "Senior Adviser" better reflects my position as an independent contractor and the nature of the work that I do, and I have amended this accordingly, with the full agreement of the Substantia Group.

May I now draw your attention to a matter that only arose on 21 June, when I was contacted by a journalist concerning an article which then appeared in the Daily Telegraph on Monday 22 June and of which I know your office are already aware, which alleges impropriety in relation to a second planning application concerning land at Flamingo Park in Chislehurst.

I note with concern that the complainant in the Royal Bell matter is referred to in this article. You, very properly, made clear in your original letter to me that I should not disclose or discuss your investigation with anyone, and I have stuck by this. You also informed me that you had made a like request of [the complainant]. However, the journalist had clearly been told of the investigation. I had not done so and I do not believe that either your office or that of the Registrar have either. The only other

person who knew appears to be [the complainant]. It is impossible to avoid the conclusion that he has not, therefore, respected your request for confidentiality. I do not know there is any sanction for this, but I would ask you to bear such conduct in mind in assessing the reliability and motivation any allegations that he makes.

5 As to the substance of the article, I recognise that there are common features with the Royal Bell but also maintain, for similar reasons, that I was not deliberately in breach of the Code of Conduct. In the circumstances, I myself wish to refer this case for your investigation.

10 The issue relates to a letter which I sent, upon House of Commons notepaper to the Mayor of London on 10 April 2018 supporting an application for development at Flamingo Park in my constituency. It was referable to the Mayor under the relevant planning legislation as the site was classified as Green Belt. A copy is attached as Annexe 1.

15 The proposal was to build a football stadium and also housing in what is known as "enabling development" to support the cost of providing the stadium. The stadium was to provide a permanent home for a local semi-professional football club, Cray Wanderers FC.

20 Cray Wanderers FC is the oldest football club in London, founded in 1860 in St Mary Cray and well known locally. It supports several valuable community projects, youth teams, coaching schemes and a youth academy which overall benefited 19 schools in the area. However, they had never owned their own ground and had rented a series of venues. In 2010, their 150th anniversary they launched a project to acquire a site for a permanent home. In December 2010, Mr Garry Hillman, the Chairman of the Club, asked to meet me at my constituency surgery to explain their plans and
25 seek my support. He did so via one of the local councillors for the Cray area. A copy of the surgery appointment is attached as Annexe 2.

30 Mr Hillman is Managing Director of N. Hillman & Sons, who are a building firm in the area but my contact with him related to his role at the football club and I have never had any business relationship with him. I was sympathetic to the club's ambitions and asked to be kept informed.

35 Originally the club was looking at a site just outside my constituency and I had no involvement in that, other than expressing support in general terms as a worthwhile local cause, but eventually that proposal collapsed. In 2015, they submitted an application in respect of Flamingo Park, which is in my constituency. The application attracted a great deal of local attention, and was strongly supported by my constituents, including a major Residents Association and other community groups, to the extent that Bromley Council received 600 letters of support and only 9 of objection. Reflecting the views of the constituents who had contacted me, and my own assessment of the potential benefits of the scheme to the area, I wrote to the
40 Chief Planning Officer in support on 8 April 2016.

The planning application was approved by the Council but had to be referred to the Mayor of London. This could not happen until after the Mayoral elections in May because of the "purdah" period. Following the election, the new Mayor directed refusal of the application, against the advice of his planning officers. I believed this
5 to be wrong and against the interests of my constituency, so I wrote to the Secretary of State and the Minister for Housing urging them to use their power to "call in" the application. This was agreed and the matter was due to go to a public inquiry in the usual way of such cases.

10 My correspondence in 2016 is attached as Annexe 3. This also included social media posts I made at the time. Together they clearly set out my grounds for supporting the scheme and the benefits that it could bring to my constituents.

I submit that the above is important, as it shows that I was an active and public supporter of this development as the constituency MP before I had any consultancy with the Substantia group which did not start until December of that year.

15 I was aware that Substantia was giving communications advice to Cray Wanderers FC but was not involved in it. In September 2017 the Club submitted a fresh application which revised elements of the scheme but did not, in my view, change the overall principles or policy issues involved or therefore my support for it. I was aware that
20 this was done after consultations with their own lawyers and planning consultants and negotiations with the GLA in order to meet the Mayor's objection to the original scheme and avoid the delay and costs of a public inquiry. This is a perfectly normal and proper approach in planning cases and did not surprise me. I was not party to any of these discussions and did no work for Substantia or their clients in relation to it. I attended an open day to view the revised proposals, having been invited as
25 the MP, along with other stakeholders, but was not there as a representative of Substantia.

Since the principles which led me to support the application were unchanged and the scheme continued to enjoy overwhelming local support, including that of the Ward Councillors, who were going to speak at the relevant committee meeting, I did
30 not make representations to Bromley Council as I concluded that I had nothing to add to the points that I had made before.

After the Council's development control committee had approved the application (by 11 votes to 3, with support from members of all parties) I did write a letter to the Mayor of 10 April 2018, to make clear that, as the local MP, I supported the
35 changes that had been made to accommodate his previous concerns particularly the increase in affordable housing. I wrote in similar terms to the then Secretary of State, to whom the decision was also referable. The decision to write was mine alone. I was not asked to do so by Substantia, Cray Wanderers FC or Mr Hillman.

40 This correspondence and subsequent social media posts I attach as Annexe 4 and examples of independent support for the application are at Annexe 5.

I submit that I was entitled to write these letters as a constituency MP concerning a matter of clear relevance to the area I represent and, on the basis of the Registrar's advice to you, that, as with the Royal Bell, I was acting within the scope of paragraph 19c of Chapter 3 of the Guide to the Rules and was not in breach of the rules on paid advocacy.

In the light of the second part of [the Registrar's] advice to you, however, I accept that I should, again, have included an ad hoc disclosure in these letters that I was now a consultant to Substantia in similar terms to that which she suggests in respect of the Royal Bell. I in fact had no financial stake in the outcome and did not seek to confer any, but, upon reflection, I accept again the logic of her advice that others might have thought otherwise. I should have sort advice in this instance too. My reasons and motives were as I have set out, but I was wrong not to have checked that and I again apologise unreservedly for doing so.

I wish also to deal with what seems to me to be an innuendo in the Daily Telegraph article (and some of [the complainant's] blog posts) that there is some connection between the Royal Bell and/or Flamingo Park and a payment of £10,000 to me from Substantia, which I registered on 21 June 2019. There is none.

The payment which I received was for additional work done advising Substantia about potential expansion and restructuring of their business and supporting the Chief Executive in meetings with a potential investor into the firm. That person had no connection whatever with any of the people or businesses referred to in the Telegraph article. It did not involve any existing clients of the firm. I have already described this part of my role in paragraph 10 of my letter to you of 28 May 2020.

Because of the extra work and time involved above my normal commitment, and the importance of the issues concerned to the business, an extra payment was agreed, as provided for in my consultancy agreement, a copy of which you already have. This was invoiced, paid and duly declared on the Register. The invoice is attached as Annexe 6.

Finally, and for completeness, as well as having no business connection with, or interest in either N. Hillman & Sons or Cray Wanderers FC, neither do I have any such connection with Paye Homes or their Chief Executive, Michael Paye, who are also mentioned in the article.

As before, I have endeavoured to give you as full account of this matter as I can, given the seriousness with which I take this allegation. I can only repeat my unreserved apology for having failed to make the additional "ad hoc" declarations identified but also strongly refute the broader imputations of impropriety that the complaint makes.

Once again, please be assured of my willingness to assist further if necessary.

Enclosures:

- a) Letter from Sir Robert Neill to the Mayor of London regarding the development of Flamingo Park, 10 April 2018.
- b) Sir Robert Neill's constituency surgery list for 10 December 2010.
- 5 c) Letter from Sir Robert Neill to the Chief Planning Officer of Bromley Council regarding the development of Flamingo Park, 8 April 2016.
- d) Letter from Sir Robert Neill to the Secretary of State for Communities and Local Government regarding the development of Flamingo Park, 21 June 2016.
- 10 e) Letter from Sir Robert Neill to the Minister of State for Housing and Planning regarding the development of Flamingo Park, 21 June 2016.
- f) Letter from Sir Robert Neill to the Secretary of State for Housing, Communities and Local Government regarding the development of Flamingo Park, dated 10 April 2018.
- 15 g) Various social media posts made by Sir Robert Neill regarding the development of Flamingo Park, dated between 12 April 2016 and 4 November 2019.
- h) Various social media posts made by local councillors regarding the development of Flamingo Park, undated.
- 20 i) Letter from CRA20TEN, a local residents' association, to Bromley Council regarding the development of Flamingo Park, 20 November 2017.
- j) Email from the Chair of CRA20TEN, a local residents' association, to the Mayor of London regarding the development of Flamingo Park, 13 April 2018.
- 25 k) Invoice from Sir Robert Neill to the Substantia Group regarding work undertaken between March and May 2019, 3 June 2019.

26 June 2020

9. Letter from the Commissioner to Sir Robert Neill MP, 21 July 2020

- 30 Thank you for your letter, and attachments, of 26 June 2020 in reply to the earlier advice provided by the Registrar of Member's Financial Interests.

I am also grateful for your submissions in relation to the issues raised by the Daily Telegraph article of 22 June 2020 (reproduced below). As the issues in that news story are substantially similar to those already under investigation, I intend to include those matters as part of my current inquiry. I hope that you will agree that this is a proportionate way forward that minimises duplication and overlapping correspondence.

In light of this additional information, I also need to consider whether the following paragraphs of the Code of Conduct for Members may have been breached:

10 11. Members shall base their conduct on a consideration of the public interest, avoid conflict between personal interest and the public interest and resolve any conflict between the two, at once, and in favour of the public interest.

15 15. Information which Members receive in confidence in the course of their parliamentary duties should be used only in connection with those duties. Such information must never be used for the purpose of financial gain.

To assist in moving my inquiry forwards, please could you address the following questions by 29 July 2020.

- 20 1. For the avoidance of doubt, did you raise the redevelopments of the Royal Bell and/or Flamingo Park in the House? If so, please provide details including whether anyone asked you to raise these matters.
2. Have you at any time received any payments, donations, gifts, or hospitality from any of the following:
- a) N. Hillman & Sons Ltd,
- 25 b) Cray Wanderers FC,
- c) Paye Homes Ltd,
- d) or from anyone else in connection with the Flamingo Park redevelopment?

If so, please provide details.

- 30 3. Were you responsible for introducing any of the above organisations to the Substantia Group as potential clients? If so, please provide details.

4. Have you, at any time, shared information with the Substantia Group that you received in confidence during the course of your parliamentary duties?
5. In light of the Registrar's advice of 16 June, do you need to highlight any other occasions (aside from the Royal Bell and Flamingo Park redevelopments) when writing to a Minister, or other public official, you may have failed to make the required declaration of a financial interest.

As you may be aware, due to the current health crisis, my team are currently working from home only, so I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk.

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

Enclosure: MP faces scrutiny over hotel development

The Daily Telegraph, 22 June 2020, by Anna Mikhailova

- 15 Sir Bob Neill, the MP for Bromley and Chislehurst, was a planning minister in the coalition government. The parliamentary watchdog has launched an investigation into a Tory former planning minister for failing to declare his links to companies behind a hotel development in his Kent constituency. Sir Bob Neill did not disclose he was a paid consultant for a company involved in the planning application in a letter urging the council to approve it. He also lobbied for another planning application, again without declaring his paid role, in a letter to the London Mayor.

A former Conservative planning minister is under investigation by the parliamentary watchdog for failing to declare his links to companies behind a hotel development in his Kent constituency, The Daily Telegraph can reveal.

- 25 Sir Bob Neill did not disclose he was a paid consultant for a company involved in the planning application in a letter urging the council to approve it. The Parliamentary Commissioner for Standards launched the investigation last month after receiving a complaint about Sir Bob's role in securing permission for the Royal Bell hotel redevelopment in Bromley.
- 30 The MP for Bromley and Chislehurst is a consultant to the Substantia Group, which handled the hotel planning application for a developer client and has paid Sir Bob more than £50,000 for "strategic consultancy advice" since 2016.

An investigation by The Telegraph can further reveal that Sir Bob successfully lobbied for another planning application in his constituency, also submitted by a

client of Substantia, again without declaring his paid role in a letter to the Mayor of London.

The MP lobbied Sadiq Khan to approve a stadium for Cray Wanderers FC with a residential housing complex.

5 Mike Amesbury, the shadow minister for housing and planning, last night called for the Standards Commissioner to “urgently” investigate the football stadium development. He said: “It beggars belief that a former planning minister would not be aware of the obvious conflict of interest in this case.”

10 He added: “These extraordinary new revelations come as Housing Secretary Robert Jenrick is embroiled in a cash-for-favours scandal.”

In 2016, Sir Bob supported the bid by Substantia’s client, Cray Wanderers FC, to build a stadium at Flamingo Park in Bromley. Mr Khan rejected the plan because it was on green belt land.

15 Six months later, in Dec 2016, Substantia began paying him £1,000 for six hours of “strategic consultancy advice” every month, which was declared in the MP’S register of interests.

20 In 2017, Cray Wanderers submitted a new planning application. On April 10 2018, Sir Bob wrote to Mr Khan on House of Commons notepaper saying it was “in full accordance” with the National Planning Policy Framework, which the MP introduced as planning minister during the coalition.

Sir Bob did not disclose his paid role as non-executive chairman of Substantia and its links to Cray Wanderers FC. The code of conduct says MPs must be “open and frank in drawing attention to any relevant interest” in all communications with public officials.

25 In Nov 2018, the mayor dropped his opposition to the development. Michael Paye, head of Paye Homes, another Substantia client, and Gary Hillman are co-directors of the company that bought the grounds for the stadium for £2.5million in May 2019.

A month later, Substantia paid Sir Bob £10,000 on top of his monthly fee, which the MP declared was for “additional strategic and corporate advice”.

30 Weeks later Bromley council formally approved the development.

Substantia brokered the £1.6million sale of the Royal Bell to its client, N Hillman & Sons, owned by the chairman of Clay Wanderers FC. Sir Bob was involved in the application to redevelop the Royal Bell from the start. Days before the council met

to make a decision, the MP wrote on Commons notepaper to its chief planning officer praising the “impressive application”.

Again, the MP failed to mention his paid consultancy for Substantia, its links to Hillman and its role in preparing the planning documents.

- 5 Concerns about Sir Bob and the Royal Bell project were first raised by [the complainant], a blogger, last year.

10 Sir Bob said: “Any representations that I have made in constituency planning cases have solely related to my role as the local MP and what I believe to be on the public interest. I have declared all outside interests [in the MPs’ Register of Interests] and acted to ensure that no conflict arises.”

Bromley Council said it would not be appropriate to comment on an ongoing parliamentary standards investigation.

The Substantia Group was approached for comment. The company has not been accused of wrongdoing.

15 *21 July 2020*

10. Letter from Sir Robert Neill MP to the Commissioner, 29 July 2020

Thank you for your letter of 21 July 2020 in reply to my further submissions. I agree that including the issues referred to in the Daily Telegraph article as part of your current inquiry is a sensible and proportionate way forward.

20 In relation to the specific questions you ask, my answers are as follows:

1. No
2. No, other than coffee and biscuits at the site visits mentioned in previous letters
3. No
- 25 4. No
5. No

In relation to 5 above, I have double checked my files. The only possible but tenuous instance I can find is a firm of consultants called DHA Planning, who are listed as clients on the Substantia Group website, and who were instructed by the applicants

in relation to the second Flamingo Park application where they worked with Substantia as fellow contractors. I had no personal involvement with them. I note that they were also, and quite separately, instructed to carry out some transport assessments in support of a planning application for a new secondary school in my constituency, Bullers Wood School for Boys, in respect of which I made representations in support to variously Bromley Council, the Mayor, the then Secretary of State for Education and the Planning Inspectorate between October 2017 and August 2018.

The Bullers Wood application was promoted by the Education Schools Funding Agency on behalf of the Department of Education. They in turn appointed Kier Group to deliver the school under a "Design and Build" contract and Kier would in turn have instructed DHA to provide technical evidence on transport issues in support of the application. I was not involved in their appointment and dealt with the ESFA and Kier in pressing for the delivery of the new school to be speeded up, not with them. I regard that as a normal thing for a constituency MP to be involved in and covered by paragraph 19c of Chapter 3 of the Guide to the Rules. I have no personal connection or financial interest in DHA and the Substantia Group has no financial interest in them either. Substantia was not involved in the Bullers Wood application in any way.

I set out the above for the sake of completeness and out of caution in the light of the Registrar's advice, but submit that any link that could be made is clearly no more than coincidental (it is clear from DHA's website that they do a lot of work in this field) and so remote that no one could reasonable consider that I had any financial interest in the outcome which needed to be declared.

As before, please let me know if I can be of further assistance.

29 July 2020

11. Letter from the Commissioner to Sir Robert Neill MP, 19 August 2020

Thank you for your letter of 29 July 2020 with the further information that I requested. I have reviewed that information and consequently believe that we can now bring my inquiry, which includes the complaint from [complainant's name] and your self-referral, to a close.

My decision

I have considered the content of our correspondence, the published rules and guidance concerning the declaration of interests, and the Registrar's earlier comments, carefully before coming to a decision. I have decided that your failures to declare your interest in the Substantia Group when writing, on the three occasions detailed below, to Ministers, public officials and public office holders,

about the Royal Bell and Flamingo Park redevelopments, were breaches of paragraph 14 of the Code of Conduct for Members of Parliament (“the Code”):

5 *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.*

Rationale

10 Following the Registrar’s earlier advice, and your correspondence of 26 June 2020, I believe it is now common ground that a declaration of your interest in the Substantia Group would have been appropriate when writing to the Chief Planning Officer of Bromley Council on 10 December 2018. This is because it is possible that
15 the reader of your letter, had they been aware of the connection between the Substantia Group and the property developer, might reasonably have considered that your words of support were influenced by your interest. I consider that this meets the test of relevance as laid out at paragraph 5, Chapter 2, of the Guide to the Rules relating to the Conduct of Members (“the Guide”):

20 *The test of relevance is whether those interests might reasonably be thought by others to influence his or her actions or words as a Member.*

I also consider that your letter to the council’s Chief Planning Officer can be reasonably said to fall under paragraph 7e of Chapter 2 of the Guide:

Occasions when declaration is required

25 *7. Subject to paragraphs 1 to 6 of this chapter, Members must declare a relevant interest:*

30 *e) When approaching others: Members must declare a relevant interest in any communication, formal or informal, with those who are responsible for matters of public policy, public expenditure or the delivery of public services. That includes communications with Ministers, either alone or as part of a delegation: with other Members; with public officials (including the staff of government departments or agencies and public office holders). If those communications are in writing, then the declaration should be in writing too; otherwise it should be oral.*

35 For the same reasons, I also consider that your letters of 10 April 2018 to the Mayor of London and to the Secretary of State for Housing, Communities and Local

Government, concerning the redevelopment of Flamingo Park, also required a declaration of your interest in the Substantia Group.

5 Based on the information that you have provided, which evidences constituency work concerning both sites that pre-dates the start of your employment with the Substantia Group, I also conclude that the three letters in question fall outside the rules on paid advocacy by virtue of the exemption at paragraph 19c of Chapter 3 of the Guide (below). Based on the evidence I have seen, I am satisfied on that these letters did not amount to a breach of paragraph 12 of the Code.

Application of the lobbying rules

10 **Matters outside the lobbying rules**

19. The following fall outside the lobbying rules:

15 *c) Constituency issues: Members may pursue any constituency interest in any approach to a Minister or public official, subject to the registration and declaration rules. NB: The lobbying rules do apply, however, in respect of Members initiating any proceeding of the House on behalf of a person or organisation in their constituency from whom or from which they, or a family member receive, have received or expect to receive outside reward or consideration.*

20 Based on the information that you have provided, I have also seen no evidence of breaches of either paragraph 11 or 15 of the Code.

Next steps

25 As you may be aware, having decided that the rules have been breached, I can, with the co-operation of the Member concerned, rectify less serious breaches using the powers available to me under Standing Order number 150. For more serious breaches, or in instances where the Member rejects rectification, I would refer the matter to the Committee on Standards.

30 I have decided that a referral to the Standards Committee is not necessary and that I can resolve these breaches of the rules through rectification. To do so, the Committee would generally expect the Member to have accepted my decision, acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach. On this occasion, I consider the necessary steps to rectify to your breach to be; firstly, for you to undertake to review the rules and supporting and guidance; and, secondly, to undertake to consult with the Registrar on any future cases of doubt concerning the rules and their interpretation.

If you are content for me to conclude the inquiry in this way, please write to me to confirm that you accept my decision along with the necessary acknowledgement, apology, and undertakings by 4 September 2020.

5 If we are able to rectify and close this matter, 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. You are, of course, entitled to decline my proposed rectification, in which case I will refer this matter to the Committee on Standards for their review.

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

As you know, due to the current health crisis, my team are currently working from home only, so I would be grateful if you could please send your response electronically to standardscommissioner@parliament.uk.

19 August 2020

15 **12. Letter from Sir Robert Neill to the Commissioner, 4 September 2020**

Thank you for your letter of 19 August setting out your decision following your inquiry and proposed means of dealing with the outcome.

May I say at the outset that I accept your decision and the reasons given for it.

20 I have always contended that there was in fact no improper motive for my support of the Royal Bell and Flamingo Park applications, and nothing improper in my relationship with the Substantia Group, which I have always fully declared in the Register of Members interests. However, I also recognise the force in the Registrar's advice and the rationale of your decision flowing from it, that others might reasonably have thought otherwise, without my having made a specific declaration
25 of interest in the relevant correspondence itself.

In retrospect, I accept that I should have sought the Registrar's advice beforehand and made such declarations in the letters I wrote in addition to those which I had already put in the Register itself. I had no intention deliberately to conceal any potential interest and did not intend to breach paragraph 14 of the Code, but accept
30 that I in fact did so, for which I unhesitatingly apologise.

I welcome your conclusion that there is no evidence of any other breaches of the Code of Conduct and that I did not breach the rules on lobbying or paid advocacy. As you know, that has been my contention throughout.

As well as accepting your decision and apologising for the breaches which have occurred, you also ask that I undertake, first, to review the rules and supporting guidance and, second, to consult with the Registrar on any future cases of doubt concerning the rules and their interpretation.

- 5 I am very happy to give both such undertakings. I have already re-read the Rules and Supporting Guidance and will certainly consult with the Registrar in future. Indeed, I only wish I had done so in this case, as acting upon her advice would, I believe, have prevented this issue having arisen in the first place.

- 10 Against that background I confirm that I am content for you to conclude your inquiry by means of your rectification powers under Standing Order 150.

May I also thank you and your staff for the care and courtesy which they have shown throughout this in process.

4 September 2020