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Summary

The allegation I investigated was that the Member had used a House of Commons' Committee Room for an inappropriate meeting.

5 I found that by using a Committee Room for an event of a commercial nature on 19 October 2017, the Member had acted in breach of the rules for use of Committee Rooms, Conference Meeting, and Interview Rooms. That breach of the rules was also a breach of paragraph 15 of the House of Commons' Code of Conduct for Members.

10 The Member accepted my finding, apologised and agreed to arrange a refund to the House authorities of an amount equivalent to the commercial charge for a room of a similar capacity. Given that there had been no catering provided in the Committee Room, I did not consider it appropriate to include in that amount the usual minimum charge for refreshments.

15 I considered that to be an appropriate outcome and concluded the inquiry using the rectification procedure available to me under House of Commons' Standing Order No 150.

Mr Virendra Sharma MP: Resolution Letter

Letter from the Commissioner to Dr Neeraj Patil, 20 March 2018

5 The then Commissioner wrote to you on 20 November 2017 to tell you she had begun an inquiry into your allegation of a misuse of parliamentary resources by Mr Virendra Sharma MP on 19 October 2017. The Commissioner also explained that she did not intend to investigate the other allegations made in your letter of 24 October 2017. In the interim, you have written to this office several times asking about progress and expressing your dissatisfaction with the time taken to conclude the inquiry.

10 I am writing today to tell you my decision on the conclusion of this inquiry. I found that Mr Sharma should not have used a House of Common' Committee Room for the meeting on 19 October 2017. However, it would have been possible for him to hold the same event in one of the House's private dining facilities - for which a charge would have been incurred.

15 Mr Sharma accepted my decision promptly when I shared that finding with him. He apologised and agreed to arrange a refund to the House authorities of an amount equivalent to the commercial charge for the hire of a room of a similar capacity to the Committee Room. Given that there had been no catering provided on 19 October, I did not consider it appropriate to include in the amount to be refunded
20 the usual minimum charge for refreshments.

The breach of the rules about the use of Committee Rooms put Mr Sharma in breach of paragraph 15 of the Code of Conduct, which he accepted and for which he has apologised. Actions on the part of Mr Sharma's guests contributed to his breach of the Code. Mr Sharma accepted his accountability for their actions. He told me that
25 he has discussed the matter with the relevant individuals and he passed on their apologies.

Mr Sharma has given an assurance that his team will seek advice when booking Committee Rooms and I have provided him with the contact details of an appropriate House official for that purpose.

30 Evidence of the enquiries made during the investigation and the evidence relevant to my findings is reproduced in the enclosed evidence pack.

I consider the outcome described above to be appropriate and the matter is now concluded, 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
35 outcome. I have written to Mr Sharma today and the matter is now closed.

Written evidence

1. Extracts from a letter from Dr Neeraj Patil to the Commissioner, 24 October 2017

5 I wish to bring to the attention of the Commissioner for Parliamentary Standards the following facts.

On 17 October Mr Virendra Sharma and his friends in India made a false press release that the British Parliament is honouring a Bollywood actor with an award on behalf of the British Government.¹

10 When things went pear-shaped (the press came to know that the award was not given by the British Parliament) he sent a mail to the Deccan Herald and other media organisations in Karnataka and clarified that the Bollywood actor was invited to the British Parliament as his private guest.²

15 Why is his private guest receiving a private award by a private company called UK-Karnataka Business Chamber in British Parliament from a private person called Mr Manjunath Vishwakarma in the House of Commons?

I discovered Virendra Sharma is one of the governing council members of this company <http://ukkbc.com> run by Mr Manjunath Vishwakarma.

20 This company only formed on 3 March 2017 and is giving fictitious awards in the British Parliament for pecuniary gains. They have named this award as the Global Integrity award, which is neither officially registered nor recognised by the British Government or any recognised institution in the UK.

What is Global Integrity Award?

Why is this award given in the House of Commons?

Who is the awarder/sponsor/presenter of this award?

25 What is the criterion to be the recipient of this award?

What is the relationship between this award and Manjunath Vishwakarma who is seen presenting this award next to him in the attached photograph?

¹ <http://www.deccanherald.com/content/638235/uk-parliament-honour-kannada-actor.html>

² <http://www.deccanhearald.com/content/638479/invited-darsha-my-personal-capacity.html>

What is the special relationship between Mr Virendra Sharma and Manjunath Vishwakarma?

5 What is his special relationship with Mr Sujit Nair who is also a Governing Council member of his company UK-Karnataka Business Chamber Limited - Incorporation n. 10651430 and was also present during this ceremony?

Mr Manjunath Vishwakarma is the Director of this company ukkbc.com and a person with significant control because he owns more than 50% shareholding.

Why is he giving his company awards and hosting Kannada Film Festival 2017 in the House of Commons? Is this authorised by the relevant authority to do so?

10 [Material about matters unconnected with this inquiry redacted.]

15 The British Parliament and the Banquet halls in the House of Commons are public property. The MP has admitted in his press release to Deccan Herald that the Bollywood actor was extended a personal invitation on his behalf. Thus he has used the public premises for his personal invitation and fictitious awards are given in the House of Commons.

Paragraph 15 - Members shall ensure that their use of public resources is always in support of their parliamentary duties. It should not confer any undue personal or financial benefit on themselves or anyone else, or confer undue advantage on a political organisation.

20 [Material about matters unconnected with this inquiry - redacted.]

I request the Parliamentary Standards Commissioner Ms Kathryn Hudson to investigate the matter and do the needful.

24 October 2017

2. Letter from the Commissioner to Mr Virendra Sharma, 20 November 2017

25 I would welcome your help with an allegation I have received from Dr Neeraj Patil about your compliance with paragraph 15 of the House of Commons Code of Conduct for Members. I enclose a copy of Dr Patil's letter for information. As you will see, I have redacted some parts of the letter. I have omitted the text relating to other allegations made by Dr Patil which I have decided not to investigate.

30 The scope of my inquiry

The scope of my inquiry will be, in essence, to establish whether you misused a House of Commons' Committee Room on 19 October 2017 by using it for a meeting unconnected with the business of the House.

The relevant rules and guidance

Paragraph 15 of the Code of Conduct (copy of Code enclosed) says that:

5 *“Members are personally responsible and accountable for ensuring that their use of any expenses, allowances, facilities and services provided from the public purse is in accordance with the rules laid down on these matters. Members shall ensure that their use of public resources is always in support of their parliamentary duties. It should not confer any undue personal or financial benefit on themselves or anyone else, or confer undue advantage on a political organisation.”*

10 The *Rules of the use of Committee, conference, meeting and interview rooms*³ set out the conditions for the use of such facilities. By way of introduction, those rules explain that *“Rooms are available for Members to book for private meetings or functions related to the work of Parliament,”*

Part 1 of the rules states that rooms can be booked:

15 *“For purposes connected with the parliamentary duties of the member booking the room, or relevant to the work of Parliament. This includes launching pamphlets or reports of a political or party political nature, but excludes events of a commercial nature or any other non-parliamentary purpose. A full list of qualifying activities is given at the*
20 *end of this leaflet.”*

In part 2 of the rules, it says

25 *“Members who book rooms through the Facilities Department for the purpose of holding a function must indicate on the booking form if they have a relevant interest. This requirement applies if the function is on behalf of an outside organisation other than the Members’ political party. Members who have such an interest must also indicate this on the invitations for the event. For this purpose a function is where food and drink is provided: a declaration is not necessary when booking a room simply for a meeting or presentation.”*

30 Under the heading *Purposes for which Members may book rooms* the rules say

“Members can book Committee, meeting, conference or interview rooms in connection with:

³ Item 5

matters intended to increase the awareness of, interest in, or promote discussion of Parliament, its history, institutions and procedures, or the constitution of the United Kingdom

5 *matters relating to the effect, or possible effect, of current or proposed legislation (including Private Bills and Private Members' Bills)*

subjects under investigation by a Select Committee of the House

local issues, especially those involving more than one constituency, or which could not more easily or readily be dealt with in a Member's regular advice surgery

10 *meetings with recognised charities, when the sponsoring Member is a trustee, governor, parliamentary adviser or other officer of the charity*

matters to raise interest in, or to encourage or facilitate movement towards the establishment of parliamentary democracies in other countries

15 *matters which are affecting, or could affect, the safety, well-being or interests of UK citizens or organisations at home or abroad, or those of EU, Commonwealth or foreign nationals resident, or organisations operating, in the UK*

20 *matters in which the UK is, or may become involved on a political, economic or military level, and relationships between the UK and any other country or countries*

25 *meetings with representatives (elected or otherwise) from the EU, Commonwealth or foreign parliaments or governments, or from the European Parliament, the European Commission or international organisations such as the UN or NATO*

meetings with representatives of Secretaries' and Assistants' Council, the Whitley Committee Trade Union Side, recognised trade unions or staff associations

any other meeting approved by the Speaker.

30 I have consulted the All-Party Notices for weeks commencing 10 and 16 October and have not been able to identify a relevant meeting of the Indo-British All-Party Parliamentary Group, of which I am aware you are the Chair.

Although I will be focusing on paragraph 15 of the Code of Conduct, I should also draw to your attention now paragraph 16 of the Code, as this may also be relevant. This says:

5 “Members shall never undertake any action which would cause significant damage to the reputation of the House of Commons as a whole, or of its Members generally.”

Next steps

10 I would welcome your comments on the allegation that you have misused public resources by holding a meeting in a Committee Room of the House of Commons, on 19 October 2017, for Mr Darshan Thoogudeep to “share [his] expertise as a leading actor in Kannada film industry with [you] and a few other invited guests” and to present him with a *Global Integrity* award.

In addition to your response to the over-arching allegation, it would be helpful to have the following information:

- 15 • the background which led to you sending the letter of 19 September 2017 to Mr Darshan Thoogudeep (copy enclosed)
- who else was invited to attend this meeting, and on what basis
- the purpose of the meeting
- whether food or drink was provided at the meeting
- 20 • in which room the meeting was held
- whether you, or your staff, sought the advice of the House authorities before or when booking the Committee Room
- the part, if any, played by the organisation *Global Integrity*⁴ in this event
- your relationship with *Global Integrity*
- 25 • the part, if any, played by the UK Karnataka Business Chamber (UKKBC) in this event
- your relationship with UKKBC

⁴ <https://www.globalintegrity.org/>

- if not already answered in the course of the above: a brief description of the award presented to Mr Thoogudeep and the citation associated with that
- 5 • whether you consider the meeting on 19 October 2017 was in accordance with the permitted uses listed in the rules and, if so, the basis for that belief
- details of any similar events you have hosted in rooms on the parliamentary estate since May 2015

10 As you can see, Dr Patil has asked a number of questions which relate in varying degrees to the event on 19 October 2017. I do not need you to answer all of his questions but, it would be helpful if you would address those of them that you think might assist my understanding of your replies to my own questions above.

15 *Evidence:* Please provide any supporting evidence you have, including copies of any press releases issued in connection with the above (in your name, or approved by you and released by any third party). Please also provide a copy of any formal invitations issued to attendees. (If the latter is not now available, please provide the text used on the invitations.)

Important Information

20 I enclose a copy of the *Commissioner's Information Note*,⁵ which sets out the procedure I follow. I am writing to Dr Patil to let him know that I have decided to begin an inquiry into this matter and why I have decided not to investigate his other allegations. I will shortly update my parliamentary web pages to show the fact that I am conducting an inquiry into an allegation into an alleged breach of paragraph 15 of the Code of Conduct. My office will not comment further on any aspect of the inquiry to third parties. (They will, however, confirm that I have begun an inquiry if asked before this information is posted on my webpages and they will answer factual questions about the processes I follow and the standards system more generally.)

30 As you will be aware, my inquiries are conducted in private. This letter and any subsequent correspondence between us is protected by parliamentary privilege until such time as a final report is published. (Any such report will include all the relevant evidence, including our correspondence.) I would, therefore, ask that you respect that confidentiality. (I have made a similar request of Dr Patil.)

35 As a matter of courtesy, I should say now that I may make enquiries of the relevant House authorities in due course. If I do so, I will share that correspondence with you. While I do not, at this stage, know whether it will be necessary to interview you

⁵ <http://www.parliament.uk/documents/pcfs/New%20Website%20Documents/PCS-Information-Note.pdf>

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.

Action

- 5 I would appreciate your help and co-operation, and welcome your comments on the allegation, together with any evidence you feel may assist my investigation, as soon as possible and no later than 4 December 2017.

20 November 2017

3. Letter from Mr Virendra Sharma MP to the Commissioner, 1 December 2017

- 10 Thank you for your letter dated 20 November 2017. I am pleased to be given this opportunity to clear up any misunderstanding. I am personally content to say I believe that the meeting was within the rules as outlined in paragraph 15 and does not breach paragraph 16 of the Code of Conduct. I shall now address each of your bullet points in turn.
- 15 I was approached by a local community group, UKKBC, who requested I invite Mr Darshan Thoogudeep to Parliament for a community event. I have been a supporter of this group since its inception. I am recorded on the group's website as a 'Patron' of the group in reference to my years of support for their aims, this is an informal position, with no legal or financial link.
- 20 The event was a community event, and members of the Indian diaspora in the UK were invited, predominantly of South Indian origin, from Karnataka State. Guests were invited by UKKBC, Mr Manjunath Vishwakarma and Mr Sujit Nair. Guests were invited because of their history of support for the Indian Film Culture in the UK, and interest in Mr Darshan Thoogudeep.
- 25 The purpose of the meeting was to discuss the Indian Film Industry with one of India's leading actors. Since the release of the 'Black Prince' earlier this year there has been increased interest from India in filming in the UK. I met with Mr Darshan Thoogudeep to learn more about the way in which Indian films are made, and community members attended to hear about the process. This year is also the
- 30 UK-India Year of Culture, and as such I have been working to raise awareness of modern Indian culture in the UK in my position as Chair of the Indo-British APPG. The Year of Culture was launched earlier this year at Buckingham Palace by Her Majesty, and there is a long running series of events organised by the FCO and British Council, one of which was a season of Indian films at the BFI.
- 35 There was no catering at this meeting, held in Committee Room 5, under the title 'Kannada Film Summit', where I should also add, catering is not permitted.

No advice was sought from the House specifically, though the event name was on the booking.

There was no involvement with the organisation Global Integrity, nor do I believe I have ever been involved with that organisation.

- 5 UKKBC were involved in organising this event, which along with my involvement with the organisation has been outlined above. I would like to make clear that in January of this year I attended the 'Pravasi Bharatiya Divas' in Bangalore, an event to mark the contribution of the overseas Indian community to the development of India. I was invited by the Karnataka State Government to the event in Bangalore.
- 10 The cost of this visit was paid by Mr Manjunath Vishwakarma, which is outline in my Register of Members' Financial Interests. This is unrelated to the matter under discussion though in the interests of openness I wished to draw attention to it.

The award is from UKKBC, I was not involved in any decision making regarding this award, though I was asked to present it, which I agreed to.

- 15 I believe that the event of 19 October is within the permitted uses outlined in the Code. Firstly the event was in support of my parliamentary duties. As the Chair of the Indo-British APPG I am a visible member of the Indian diaspora in the UK, and as such high profile visitors are keen to meet me in Parliament. Often the members of the community who have supported these inward visits are keen to attend these
- 20 meetings, which I am pleased to support. I believe it is a positive development that these events make Parliament more relevant to community members and encourage those who have not been to visit Parliament.

This event did not confer any undue personal or financial benefit on me or any other person, nor did it confer undue advantage on a political organisation.

- 25 I have been assured that there was no commercial nature to the event on 19 October 2017, which was as previously stated a community event organised to raise awareness of Indian film and to educate me on the processes within the industry.

This event was not a 'function' under the terms of part 2 of the rules.

- 30 The purpose of the event was further allowed under 'Purposes for which Members may book rooms', firstly since it was related to 'local issues', my local community are keen for me to host this event. Secondly since it was in connection with 'matters in which the UK is, or may become involved on a political, economic or military level, and relationships between the UK and any other country or countries'. The link between the UK and India is an important one, and of increasing importance over
- 35 the coming years, all sectors of the economy are part of our relationship with India.

I have enclosed a list of events I have hosted since the General Election 2015 and highlighted events which I believe have been organised in conjunction with

Mr Manjunath Vishwakarma, Mr Sujit Nair and organisations they are involved with.⁶

5 I feel I have addressed the salient points contained in Dr Patil's letter. If there are any points you do not think I have adequately addressed then I would appreciate an opportunity to do so at the nearest opportunity.

I have also enclosed print-outs of messages and invitation that were issued regarding the 19 October event.

Thank you for giving me an opportunity to respond to these accusations. I would be pleased to meet with you to discuss any further points at your convenience.

10 *1 December 2017*

Enclosure: Whatsapp message sent inviting journalists in Karnataka to a press conference to discuss the event, sent by Manjunath Vishwakarma and not seen by Mr Virendra Sharma

15 Press conference invitation to unveil the art and culture relationship details between United Kingdom and Karnataka through UK Karnataka Business Chamber

20 Recently we had invited an actor Darshan Thoogudeep to speak during our Film Summit at British Parliament. During the film summit, we also recognised Darshan with the "Global Integrity Award" for his contribution in promoting Karnataka's art and culture globally. During this visit, Darshan also inaugurated the Kannada Bhavan in London, which intends to be a place to promote Kannada arts, culture, cuisine in UK.

We would like to share the details about our chamber activities as well as memorable moments during Darshan's visit.

25 As a chairman of UK Karnataka Business Chamber, inviting you to attend this friendly press conference.

Thank you.

Undated

Enclosure: Text of invitation

⁶ List not reproduced - information not relevant to the Commissioner's decisions

To [name]

Hon Virendra Sharma MP and UK Karnataka Business Chamber is hosting "Kannada Film Summit with Mr Darshan Thoogudeep" (Kannada Film Start) and request the pleasure of your presence.

5 Date: Thursday 19 October 2017

Time: 4.00pm to 6.00pm [entry details redacted]

Venue: Committee Room 5, UK Parliament, London [travel details redacted]

Admittance by this invitation.

Enclosure: Agenda

10 Extracts only

3.45 pm Registration

4.05 pm Welcome to Kannada Film Summit 2017

Mr Virendra Sharma MP (Ealing Southall)

4.05 UK Karnataka Business Chamber - An overview

15 Chairman, UK Karnataka Business Chamber

4.10 Award ceremony

4.20 Chit chat with Darshan Thoogudeep

Actor, Kannada Film Industry

5.00 Short trailer screening of news film - An Officer and His Holiness/

20 India-UK cooperative production arrangements

5.15 Utilising British Expertise in Indian Movies

5.25 Closing remarks and note of thanks

5.30 Networking

4. Letter from the Commissioner to the Director of Accommodation and Logistics Services, 11 December 2017

I would like to ask for your advice on a complaint I have received about Mr Virendra Sharma MP, and into which I have begun a formal inquiry. In essence, the complaint
5 from Dr Neeraj Patil is that on 19 October 2017 Mr Sharma breached paragraph 15 of the Code of Conduct for Members, by using a Committee Room for a meeting unconnected with the business of the House.

I enclose the relevant correspondence, together with extracts from the papers that led to the inquiry. (Dr Patil provided a considerable amount of material which was
10 unconnected with the matter now under inquiry.)

Please would you let me have your advice on whether you consider the meeting on 19 October 2017 met the conditions for the use of Committee, conference, meeting and interview rooms and whether, if your advice had been sought, you would have recommended any changes to the arrangements Mr Sharma has outlined and/or to
15 the invitation and publicity material associated with that meeting.

I appreciate that the list of meetings that Mr Sharma has kindly provided gives only a small amount of detail but I would be grateful if you would tell me if any of those highlighted on his list would have prompted advice from you or your team.

It would be helpful to have your observations on the factors you have taken into in reaching a view on these matters and to have your response by 22 December, if
20 possible.

Thank you for your assistance.

11 December 2017

5. Letter from the Commissioner to Mr Virendra Sharma MP, 11 December 2017

Thank you for your letter of 1 December 2017. The information you have provided is very helpful.

I said at the outset that I might seek advice from the House authorities. In accordance with my usual practice, I have today written to the Director of Accommodation and Logistics Services, [name redacted], to seek her advice. I
30 enclose a copy of that letter (minus enclosures, as you have seen them already) for information.

You will be given an opportunity to comment on the Director's advice before any final decision is made on the allegation. (You may be aware that my term of office comes to an end on 31 December 2017. If I am unable to share [the Director's] advice
35

with you before then, my successor Kathryn Stone, will do so.) We will write to you again as soon as possible.

11 December 2017

6. Letter from the Director to the Commissioner, 22 December 2017

5 Thank you for your letter dated 11 December 2017 concerning a complaint you have received from Dr Patil regarding Virendra Sharma MP's use of stationery.

10 In responding to this complaint, I have used as guidance: the Committee Rooms, Conference, Meeting and Interview Rooms Use of rooms for private meetings and events document, dated October 2016, which is available on the parliamentary [intranet].

15 If my advice had been sought it would have come in two parts. Firstly, on the enclosed invitation and list of events I would have advised Mr Sharma that the rules state that any events of a commercial nature or any other non-parliamentary purpose should be held in the House's commercial private dining facilities which have been provided for these purposes.

However, the rules also state that meetings relating to:

"Matters in which the UK is, or may become involved on a political, economic or military level, and relationships between the UK and any other country or countries;"

20 are permissible on the estate. The meeting invitation itself does not state that selling goods or services or charging of a fee for public access will take place in connection with the meeting. If Mr Sharma was able to provide information on how his meeting fulfilled the criteria above, the meeting would not have been contravention of existing guidance.

25 I hope this response is helpful.

22 December 2017

7. Letter from the Commissioner to Mr Virendra Sharma MP, 9 January 2018

30 My predecessor, Kathryn Hudson, wrote to you on 11 December and enclosed a copy of a letter she had sent to [named redacted], the Director of Accommodation and Logistics. I have now received a response from [the Director] and a copy of her letter is enclosed.

As you can see, [the Director] does not provide definitive advice. I understand that, had you sought her advice at the time, she would have needed more information from you before recommending the most appropriate venue for the "Kannada Film

Summit". Having reviewed very carefully your letter of 1 December and [the Director's] comments, I would find it helpful to have the following information.

Background

- 5
- The formal status of the UKKBC and a brief outline of the nature of that organisation's activities
 - The background to the event on 19 October 2017
 - Who determined the agenda and date for the event
 - Who decided the guest list
 - Who sent out the invitations
- 10
- The extent of your/your office's, involvement in the above
 - Who decided to invite Mr Thoogudeep and to screen a trailer for the film *An officer and His Holiness*
 - What was the purpose of screening the trailer for the film
- 15
- Was Mr Thoogudeep already in the UK or did he visit especially for the summit
 - If this was a special visit, by whom was it funded
 - How any other costs associated with the event were met

The nature of the event

20 From the photographs, there appears to be a banner displayed advertising a firm of tax accountants (name redacted) in Committee Room 5

- Why the banner was displayed
 - What links you and UKKBC have with that firm
 - [the tax accountants'] role in the proceedings on 19 October 2017
 - Whether there was any other commercial promotion or activity during the event
- 25

The UKKBC website refers to *“This event to honour Darshan ...organised by UK Karnataka Business Chamber, an independent body which is striving to promote the art and cultural relationships between United Kingdom and Karnataka.”* You describe it as a “community event” in the second and third paragraphs of page 1, and in the seventh paragraph of page 2 of your letter you say it was a *“community event organised to raise awareness of Indian Film and to educate me on the processes within the industry”*. In the final paragraph of that page you say that it “related to local issues”. The invitations describe the event as a “film summit”. A summit normally involves a meeting between senior officials or politicians, and it is therefore hard to see how a community meeting could also be a summit.

- Please let me know which of the descriptions you believe most accurately describes the event you hosted, and why. (If none of the above are completely accurate please say and give the full explanation.)
- Please provide a copy of the guest list, with brief notes explaining why each person was invited (for example, those employed in the film industry in the UK/India, film enthusiast, etc.).
- Please annotate the list to show which of the guests were your constituents
- Please describe how the event was to be used to “raise awareness” of Indian film

The Global Integrity Award

You said that your involvement was limited to presenting the award

- Who suggested giving it
- On whose behalf was it given (UKKBC or someone else)
- What was the award intended to recognise

The use of a parliamentary Committee Room might give the impression that the award carried the authority of the Westminster Parliament. For example, I see that the UKKBC website says “Darshan Thoogudeep has been honoured with the ‘Global Integrity Award’ in the British Parliament by British Member of Parliament Hon Virendra Sharma”.

- Your comments on this point would be helpful

Please explain the consideration given to whether holding such a ceremony in a Committee Room (to which access is not generally available to non-parliamentary

bodies) might have the potential to cause significant damage to the reputation and integrity of the House as a whole or of its Members generally.

Publicity

5 Photographs, which appear to have been taken in Committee Room 5 on 19 October, including photographs of the presentation of the award, appear to have been made available to the media and have appeared on various websites. Although the rules on the use of Committee Rooms (from which Kathryn Hudson quoted on 20 November) do not say explicitly that photographs may not be taken in Committee Rooms the circumstances in which they may be taken are limited (paragraph 15 of 10 the rules) and permits are required. The explanatory leaflet published by the House authorities (copy enclosed) is more explicit.⁷ It says

“Committee Rooms are primarily for accommodating formal business of the House and broadcast of Committee business if conducted by the Parliamentary Broadcast Unit.

15 *Filming, photograph and audio recordings are not permitted in Committee Rooms when booked for other meetings or events.”*

Please let me have your comments on how photographs came to be taken and distributed after the event.

20 I must stress that I have not yet reached a view on whether there has been a breach of the rules. I am seeking further information from you in order to assist my understanding of the purpose of the event and the benefits, if any, derived from holding it in a Committee Room. It is likely that I will need to take further advice from [the Director] before reaching any decision on the alleged breach of the rules.

25 I would be grateful to have the information above, and any other information you consider might assist me, as soon as possible and no later than 23 January 2018.

9 January 2018

8. Letter from Mr Virendra Sharma MP to the Commissioner, 18 January 2018

30 Thank you for your letter dated 9 January and congratulations on taking up your new position. I am happy to provide the information requested.

The UKKBC is a private company, limited by guarantee without share capital. The organisation exists to promote Karnataka, a state in India, in all spheres. This means that they not only promote business but culture too. Their main programme of events has consisted of connector events, which aim to expose British audiences to

⁷ <https://intranet.parliament.uk/Documents/access-buildings/offices-rooms/hoc-meeting-room-guide-feb2017.pdf>

the opportunities of Karnataka. They focus on establishing an understanding of major business challenges and opportunities in the UK and Karnataka and promoting the exchange of knowledge, ideas and experiences among current and future business and political leaders from the UK and Karnataka.

5 The agenda was arranged by UKKBC, the date was by mutual agreement and I invited Mr Thoogudeep by letter (attached). The guest list was decided by UKKBC, who sent out invitations. I/my office was asked when I could host Mr Thoogudeep, which we agreed to do on 19 October, and have no recollection of further involvement with invitations. My office were asked on 18 October to "please request
10 for mikes, projector and laptop for our event tomorrow" [sic], which they booked.

I was asked to invite Mr Thoogudeep by the UKKBC.

The film 'An officer and his Holiness' was shown as part of the discussion around the Indian Film Industry. The maker, [redacted] was speaking as part of the summit, and a short clip was shown, the film was made by a British production company in India,
15 they discussed the benefits and pitfalls of filming in India.

Mr Thoogudeep was in the UK for a number of events, thought they were mainly organised by Mr Karma of UKKBC. Mr Karma organised and funded Mr Thoogudeep's travel, mostly, at his own expense. All event costs were met by Mr Karma and UKKBC.

20 I will have to admit that I did not at the event pay any attention to the banner, I can now see, was displayed. Having consulted Mr Karma and Mr Nair about its presence, I am content to admit that it was displayed inappropriately, it should not have been displayed. I apologise for this mistake and oversight.

25 I have no link with [the tax accountants]. Mr Karma, one of the UKKBC directors is the sole director of [that firm].

[The tax accountants] had no link with the 19 October event. By way of explanation, but not excuse, Mr Karma spent time and money organising the event and felt entitled to display his company's banner. This was wrong. I have discussed this with him, and explained why it should not have happened. He understands and has
30 apologised to me and asked me to pass on his apologies.

Neither Mr Karma, Mr Nair nor I have any recollection of any further commercial promotion or activity taking place at or during the event. I do not believe the [tax accountancy firm] was mentioned at the event.

35 In my first letter I explained the purpose of the event was to "discuss the Indian film industry with one of India's leading actors" "to educate me on the processes within the industry" "and community members attended to hear about the process". It was described as a summit due to the international nature of Mr Thoogudeep, and his meeting a British MP. It was also a community event because members of the Indian

Diaspora in the UK were invited, predominantly of South Indian origin, from Karnataka State. Neither description encompasses the event on its own, but neither would be misleading.

5 Please find a guest list attached with comments on where they are from and why they attended.⁸

The event raised awareness of Indian film and the Indian film industry through different parts of the agenda. Firstly was an overview from UKKBC Chair, Mr Karma, he outlined topics for discussion and why the UK-India relationship is so important. Secondly Mr Karma and Mr Thoogudeep discussed his career, his experiences of making film and how the industry has changed. There were questions from the audience, and these took much longer than scheduled. Secondly, as outlined above, 10 [name redacted] spoke about his experience as a British filmmaker working in India. This involved showing an excerpt from his film 'An Officer and his Holiness'. Also on the agenda, but cut on the day when they ran out of time, was a session with [name 15 redacted], in which he was going to discuss his experience of utilising British expertise in Indian movies. [He] trained in the UK, but took his skills back to India.

The award was suggested by Mr Karma and UKKBC, and it was awarded on behalf of UKKBC.

20 The award was recognising Mr Thoogudeep's long and amazing career in film. He rose from 'light-boy', one of the lowest roles in filmmaking, to major star in Karnataka and India. He has maintained throughout this process a great integrity to his art. The award was to recognise and commend his for this, his professional achievements.

25 The statement on the UKKBC website is I believe factually accurate, though I would accept it is not clear and may well, while remaining within the letter of the rules, not quite embrace the spirit. I would contend that there is unlikely to be 'potential to cause significant damage to the reputation of the House as a whole or of its Members generally' though I would not wish to cause any damage to either's reputation. As such I will be sure to at any appropriate point remind organisations we cooperate 30 with that they should be mindful of how any events in Parliament can be perceived.

I was not aware of the strictness of the rule that no photography at all may be taken in Committee Rooms. I am always clear with events, and at the start of all events, this one included, when setting out the 'House rules' I state that no photographs may be published or use in the press. I am sorry if people are not even allowed to take 35 photographs for their personal collection. I will make that clear in future. Again, I have discussed the publication of the photographs with Mr Karma and Mr Nair and made clear that it is not permissible. I apologise for the oversight. I am sure you will understand that visitors are often keen to remember their visit to the Palace.

⁸ Not included: personal data and names not relevant

Thank you for giving me this opportunity to answer your questions. I will be pleased to in the future answer any more you may have.

18 January 2018

9. Letter from the Commissioner to the Director, 22 January 2018

5 Thank you for your letter of 22 December providing advice on a complaint I have received concerning Mr Virendra Sharma MP and the use of a House of Commons' Committee Room. As you know, I routinely share your advice with the Member concerned. I sent a copy of your letter to Mr Sharma on 9 January and, in light of your advice, I also took the opportunity to seek some more detailed information
10 from Mr Sharma about the circumstances surrounding the event on 19 October 2017.

A copy of Mr Sharma's reply to me is enclosed. I would be glad to receive your comments on how you and your team might have advised the Member had he consulted you in advance and provided the details he has now sent to me. The
15 information provided by UKKBC suggests that only a few of the invitees are likely to have been constituents of Mr Sharma's.

If this information would have prompted further questions, please let me know what else you would have needed to ask in order to give advice on whether the planned event would be permissible within the rules.

20 It would be helpful to have a response by 6 February 2018, if possible. Thank you for your assistance.

22 January 2018

10. Letter from the Commissioner to Mr Virendra Sharma MP, 22 January 2018

25 Thank you for your letter of 18 January 2018. The additional information you have provided is very helpful.

As you know, I routinely seek the advice of the House authorities on such matters and I have today written to the Director of Accommodation and Logistics Services, [name redacted], to ask what she/her team would have advised if you had approached her before this event took place on 19 October 2017. I enclose a copy
30 of that letter (minus enclosures, as you have seen them already) for information.

As before, I will give you an opportunity to comment on [the Director's] advice before making any final decision on the allegation. I will write to you again as soon as possible.

22 January 2018

11. Letter from the Director to the Commissioner, 2 February 2018

Thank you for your letter dated 22 January 2018 with some additional queries concerning a complaint you have received from Dr Patil regarding Virendra Sharma MP's use of a House of Commons' Committee Room.

- 5 In responding to the complaint, I have used as guidance: the Committee Rooms, Conference, Meeting and Interview Rooms, Use of Rooms for private meetings and events document dated October 2016 which is available on the parliamentary [intranet].

- 10 As I stated in my 22 December correspondence the rules set out that any events of a commercial nature or any other non-parliamentary purpose should be held in the Houses' commercial private dining facilities which have been provided for these purposes. If I had been asked to advise on a location for the event; and had the further information relating to the event in correspondence between Mr Sharma and you dated 18 January 2018 I would have advised that the event be hosted not in
15 a Committee Room but in one of the Houses' commercial private dining facilities.

I hope this response is helpful.

2 February 2018

12. Letter from the Commissioner to Mr Virendra Sharma MP, 5 February 2018

- 20 When I wrote to you on 22 January 2018, I said I would give you the opportunity to comment on the advice from the Director of Accommodation and Logistics before I reach a final decision on the allegation I am investigating.

- I enclose a copy of the advice I received from the Director today. As you can see, having taken into account all of the additional information you have kindly provided about the event on 19 October, she has told me that she would – if asked – have
25 advised against using a Committee Room for that purpose. She would have recommended using one of the House's commercial private dining facilities.

I would be grateful to receive your comments on that advice as soon as possible and no later than 19 February 2018. If you disagree with the Director's advice, it would be helpful to explain clearly the reasons for that disagreement.

- 30 *5 February 2018*

13. Letter from Mr Virendra Sharma MP to the Commissioner, 7 February 2018

Thank you for your letter dated 5 February 2018, copying [the Director's] letter of 2 February and for giving me the chance to respond.

I am disappointed by [the Director's] response and I apologise wholeheartedly if I have made a mistake and this event should have been held in the 'commercial private dining facilities'. I have explained previously why I believed at the time that this event was appropriate for the venue it was booked into, but naturally accept your judgement and that of [the Director]. I don't think I can add anything further.

From now on I will ensure that wherever a potential conflict exists, I or my staff will consult the Accommodation and Logistics team. I would be grateful if [the Director] would recommend the best way to do this.

I await your final decision and thank you for your letter.

10 *7 February 2018*

14. Letter from the Commissioner to the Director, 14 February 2018

Thank you for your letter of 2 February concerning the advice you would have given Mr Virendra Sharma MP had he sought it before booking a Committee Room for the "film summit" held on 19 October 2017.

15 I shared your advice with Mr Sharma to give him an opportunity to comment before I reach a final decision. He accepts your advice and has offered his apologies.

20 However, it would be helpful to know a little more about the implications of the advice you would have given. In particular, if Mr Sharma had booked a more appropriate room on the estate would a charge have been levied, and approximately how much would that charge have been? I appreciate that the facilities may not have been not directly equivalent and that the most appropriate might not have been available on the relevant date, but it would be helpful to have a sense of the likely charge for alternative facilities for a meeting with approximately 50 attendees and with no refreshments.

25 Mr Sharma has asked that you recommend the best way for his team to consult yours before booking similar events in the future and I would be grateful if you would provide that information at the same time as providing the estimate.

14 February 2018

15. Letter from the Commissioner to Mr Virendra Sharma MP, 14 February 2018

30 Thank you for your letter of 7 February 2018, accepting the Director's advice that it would have been more appropriate to hold the event on 19 October elsewhere on the Parliamentary Estate. I accept that the Committee Room was booked in the belief that it was a permissible use of the facilities.

35 My decision

I have decided, in accordance with the Director's advice, that by using a Committee Room for an event of a commercial nature on 19 October 2017 you acted in breach of the rules for the use of Committee Rooms, Conference, Meeting and Interview Rooms and that this has put you in breach of paragraph 15 of the Code of Conduct.

5 Related matters

Thank you for your co-operation during my inquiry and, in particular, for providing a considerable volume of material to assist me. Given the scope of my inquiry and having reviewed the list of the bookings you have made since May 2015, I do not think it is proportionate or appropriate for me to ask you now to provide a similar level of detail about the other "summits" which you have hosted since then.

I welcome your assurance that your staff will consult the Director's team "wherever a potential conflict exists". However, I would strongly recommend that their advice should routinely be sought before booking any Committee Room for events similar to those described as "summits" – at least until you are confident that the breach will not be repeated.

I have asked [the Director] to recommend the best way to obtain such advice. In the meantime, please ask your staff to contact the Accommodation and Facilities Manager on [redacted] in the first instance.

Next steps

I consider this matter could be concluded through the rectification procedure available to me through Standing Order No 150. Under this procedure, the Committee would normally expect the Member to have acknowledged their breach of the Code, apologised and taken any steps necessary to rectify the error. Your letter of 7 February addresses the first two of those requirements. In my view, it would also be appropriate for you to refund to the House authorities a sum equivalent to the charge which would have been levied if more appropriate facilities had been booked for the event on 19 October 2017. I have, therefore, written to [the Director] to ask her for an estimate of the charge that would have been incurred had you booked one of the commercial private dining facilities (without refreshments) for that event. I enclose a copy of my letter to her and will let you know the outcome as soon as possible.

Subject to your agreement, I would then give you an opportunity to see the letter I will send to Dr Patil to inform him of the outcome and to see the evidence which would be posted on my webpages after I conclude my inquiry. I would also explain how to make the refund to the House authorities. The content of the letter to Dr Patil will be, of course, a matter for me alone but you will have the opportunity to comment on its factual accuracy.

After concluding the inquiry, I would inform the Committee of the outcome and my decision letter, with all the relevant correspondence, would be published on my webpages in due course.

5 It would be very helpful if you would let me know by close of business on 28 February 2018 whether you would like me to rectify the complaint on the basis I have suggested.

In the meantime, this matter remains protected by parliamentary privilege and the contents of our correspondence should not be disclosed to any third party.

14 February 2018

10 **16. Letter from Mr Virendra Sharma MP to the Commissioner, 20 February 2018**

Thank you for your letter dated 14 February 2018, and how quickly you have dealt with this matter.

15 I accept your proposal to rectify the complaint by the means outlined in your previous letter. I would like to seek assurance that it would be acceptable for payment of any cost to come from the event organisers, UKKBC.

Please would you also recommend whether this payment would require registration, and if so, the most appropriate way to do so.

I will await your letter to Dr Patil.

20 *20 February 2018*

17. Letter from the Director to the Commissioner, 26 February 2018

Thank you for your letter dated 14 February 2018 with some additional queries concerning a complaint you have received from Dr Patil regarding Virendra Sharma MP's use of a House of Commons Committee Room.

25 In relation to using a private dining facility for the event, the rates are agreed by the House of Commons Administration Committee. Whilst I am not able to provide the exact detail on fees, as this area is managed directly by the catering team in the House, a link to the room specifications and rates that is available to the team is here [hyperlink to intranet].

30 I would be more than happy to provide advice on room usage to any Member and the best way to contact me is via my parliamentary email address [redacted].

I hope this response is helpful.

26 February 2018

18. Note of telephone call from the Commissioner's Office to the catering team, 27 February 2018

5 Sought advice on the private dining rooms available for hire. Established that the cost of hire (excluding a minimum spend on refreshments) at the relevant time of day for a room suitable to accommodate approximately 50 people seated was £2,250.

27 February 2018

19. Letter from the Commissioner to Mr Virendra Sharma MP, 14 March 2018

10 Thank you for your letter of 20 February 2018. As you know, I had sought advice from the Director of Accommodation and Logistics Services about the cost of hiring a suitable room through the House's private dining facilities.

15 I enclose a copy of the Director's response for your information. One of my team has since spoken with the catering team and established that the room-hire fee for a room suitable for approximately 50 people would have been £2,250, plus a minimum food spend of £900. Given that no refreshments were provided, I consider it reasonable to ask that you arrange for a refund of £2,250 to be made to the House authorities. This can be done by sending a cheque to my office, made payable to "HOC Administration 2".

20 You asked if it was acceptable for the refund to be made by UKKBC. I have no objection to that. If one of the private dining rooms had been booked originally, that would have been acceptable.

25 You also asked about the possible need to register the payment by a third party in the Register of Members' Financial Interests. That is a separate matter, which you should discuss with the Registrar of Members' Financial Interest (Heather Wood). The Registrar can be contacted on 0207 219 3277. As always, you would need to make any register entry within 28 days of receipt.

30 I enclose a copy of the written evidence pack that will be published in due course. The first item, after the summary, is the letter I propose to send to Dr Patil when the inquiry is formally concluded. While the content is a matter for me alone, I would like to give you an opportunity to comment on its factual accuracy before I write to Dr Patil. I would be grateful to receive any such comments by 21 March 2018.

14 March 2018