



HOUSE OF LORDS

Conduct Committee

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2nd Report of Session 2022–23

# The conduct of the Earl of Shrewsbury

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The Conduct Committee reviews and oversees the Codes of Conduct and the work of the House of Lords Commissioners for Standards. Recommended changes to the Codes are reported to the House and take effect when agreed by the House.

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# The conduct of the Earl of Shrewsbury

## REPORT FROM THE CONDUCT COMMITTEE

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### Background

1. The Conduct Committee has considered a report by the House of Lords Commissioner for Standards, Akbar Khan, on the conduct of the Earl of Shrewsbury (see Annex A). We have also considered a written appeal submitted by Lord Shrewsbury, in which he appeals both against the Commissioner's finding that he breached certain provisions of the Code of Conduct and against his recommended sanction.
2. The procedure followed by the Conduct Committee in considering reports and appeals is set out in paragraphs 192–195 of the Guide to the Code of Conduct. Under this procedure an appeal must be made in writing; the Committee may decide to hear from the member in person, though in this case we have not done so; nor have we sought further input from the Commissioner.

### Summary of the case

3. Lord Shrewsbury referred himself to the Commissioner following the publication in *The Sunday Times*, on 19 June 2022, of various allegations about his conduct. Having sought the permission of the Conduct Committee, as required by paragraph 130 of the Guide to the Code of Conduct, the Commissioner launched his investigation on 23 June.
4. The allegations related to Lord Shrewsbury's relationship with a company called SpectrumX, which in 2020 was seeking regulatory approval for various COVID-19 sanitiser products, including hand sanitisers, and a walk-in disinfectant tunnel known as the SpectriPOD. As summarised by the Commissioner, the article in *The Sunday Times* alleged "that Lord Shrewsbury had written emails to SpectrumX in which he represented that he would meet with various ministers and officials to discuss and promote SpectrumX's spectriPOD system in return for being paid a monthly retainer by the company".
5. The Commissioner wrote to Lord Shrewsbury on 28 June to confirm that he was launching an investigation. He indicated that he would be investigating whether Lord Shrewsbury's conduct had breached the following paragraphs of the Code of Conduct:
  - Paragraph 9 (which prohibits the exercise of parliamentary influence, including the provision of parliamentary advice or services, in return for payment);
  - Paragraph 12 (which requires compliance with the rules on registration and declaration of interests, and the rules on the use of the facilities of the House);

- Paragraph 16 (which prohibits members from seeking to confer an ‘exclusive benefit’ on outside bodies in which they have a financial interest, or in return for payment or reward).
6. In response, Lord Shrewsbury supplied various emails and other materials; he also gave full and helpful, if not always entirely consistent, answers when interviewed. Having considered this substantial body of evidence, the Commissioner has found that Lord Shrewsbury entered into an agreement with SpectrumX, through his personal service company Talbot Consulting Ltd, under which he was paid a monthly retainer of £3,000. The agreement lasted for 19 months, and Lord Shrewsbury was paid in total around £57,000 gross. In entering into this agreement, Lord Shrewsbury offered to provide “parliamentary advice and other matters”, and during the time he was paid by SpectrumX he directly approached ministers and officials, including the then Clerk of the Parliaments (the most senior official in the House of Lords Administration), in an effort to promote the company’s products.
  7. The Commissioner’s findings, following his investigation, focus on the more serious provisions of the Code engaged in this case, namely paragraphs 9 and 16. He finds as follows:
    - That Lord Shrewsbury, by entering into an agreement with SpectrumX, and by personally approaching ministers and the Clerk of the Parliaments on behalf of the company, breached paragraphs 9(c) and 9(d) of the Code, which prohibit members from “exercising parliamentary influence”, and from “providing parliamentary advice or services” in return for payment or reward.
    - That the evidence does not demonstrate that Lord Shrewsbury used “parliamentary means” (such as those described in paragraph 25 of the Guide to the Code of Conduct) to confer exclusive benefit on SpectrumX, and that Lord Shrewsbury thus did not breach paragraph 16 of the Code.

The Commissioner has also concluded that Lord Shrewsbury breached paragraphs 9(a) (which requires members to “comply with the Code of Conduct”) and 9(b) (which states that members should “act always on their personal honour in the performance of their parliamentary duties and activities”). In our view these breaches follow logically and automatically from the Commissioner’s findings in respect of paragraphs 9(c) and 9(d).

8. In light of these findings, the Commissioner has recommended that Lord Shrewsbury be suspended from the service of the House for a period of nine months.

### **Lord Shrewsbury’s appeal**

9. The grounds on which a member may appeal against a report by the Commissioner are set out in paragraph 195 of the Guide. The possible grounds are:
  - the Commissioner was plainly wrong in their finding;
  - points of process;
  - the emergence of significant new evidence; or

- the severity of the sanction.
10. Lord Shrewsbury has appealed both against the Commissioner’s findings (by implication, he argues that they are plainly wrong) and the severity of the recommended sanction. In appealing against the findings, he makes no criticism of the Commissioner, describing him as “fair throughout”. But having taken advice, Lord Shrewsbury now feels that in his meetings with the Commissioner he “failed adequately to explain my case”, and he seeks to withdraw or qualify admissions made earlier in the process.
  11. Leaving aside the question of whether it would be right to set aside findings that were based in part on Lord Shrewsbury’s own admissions, we have assessed the appeal on its merits. He argues that his work for SpectrumX was “openly commercial dealing”: he was helping the company to promote its products to a range of customers, including some (such as West Ham Football Club and the Jockey Club) that were entirely unconnected to Parliament. He saw his approaches to ministers and to the Clerk of the Parliaments in the same light, as approaches to “potential customers” with “substantial stakes in reopening” premises post-lockdown. He declared his interest as an adviser to SpectrumX, and never sought to “influence policy”. It “never occurred” to him that his activities might be in breach of paragraph 9 of the Code.
  12. Both Lord Shrewsbury’s activities in relation to SpectrumX and his appeal demonstrate a fundamental misunderstanding of the Code. Paragraphs 9(c) and 9(d) of the Code were introduced in 2009, following the “cash for amendments” investigation earlier that year, and the subsequent report of the Leader’s Group on the Code of Conduct. The Leader’s Group stated clearly that “The phenomenon of what were variously described to us as ‘peers for hire’ or ‘peers on the cab rank’ is not acceptable. Membership of the House should not be a source of profit.”<sup>1</sup>
  13. Paragraph 9(d) accordingly seeks to prevent members from profiting from their membership of the House by offering parliamentary advice or services to outside interests, and it applies even if they never seek to promote those interests by directly parliamentary means such as questions or amendments.
  14. The prohibition on providing parliamentary advice is explained further in paragraph 19 of the Guide:
 

“The prohibition from accepting payment in return for parliamentary advice means that members may not act as paid parliamentary consultants, advising outside organisations or persons on process, for example how they may lobby or otherwise influence the work of Parliament.”
  15. The prohibition on providing parliamentary services is covered in paragraph 21 of the Guide:
 

“The prohibition on accepting payment in return for parliamentary services means that members may not, in return for payment or other incentive or reward, assist outside organisations or persons in influencing members of either House, ministers or officials.”

Paragraph 21 gives two illustrative examples of the kinds of parliamentary services that are prohibited. The first is “participation in proceedings of the House to confer exclusive benefit upon the organisation or person”,

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<sup>1</sup> [Report of the Leader’s Group on the Code of Conduct](#), (Session 2008–09, HL Paper 171), para 45

which would also engage paragraph 16 of the Code. The Commissioner has accepted that Lord Shrewsbury did not breach this rule. The second example is “making use of their position to lobby, or to help others to lobby, members of either House, ministers or officials, by whatever means”. Such behaviour constitutes a breach of paragraph 9(d) of the Code “regardless of whether the member intends to register and declare the interest”.

16. On his own admission, Lord Shrewsbury made use of his position to promote the interests of SpectrumX by personally approaching ministers and officials on behalf of the company. He also acknowledges that “the fact that I knew the persons whom I approached derived wholly from the fact that I had met them in my capacity as a parliamentarian”. This underlines the fact that Lord Shrewsbury’s relationship with the company was based substantially if not solely upon his status as a member of the House. He cannot rely upon the limited exemption from the rule on provision of paid parliamentary advice, which allows a member to provide such advice “provided that the member can demonstrate that he or she does not receive payment or benefit in return for the provision of parliamentary advice or services [but] in return for some non-parliamentary advice or service”, and that the payment “is not substantially due to membership of the House ... and that the member was, or would have been, appointed to the position without being a member of the House”.<sup>2</sup>
17. We accept that Lord Shrewsbury did not act with deliberate dishonesty, and that he did not realise that his actions were in breach of the Code. But it is clear to us that his conduct was in breach of paragraph 9, and his ignorance of the rules, first agreed by the House in late 2009, does not justify us in upholding his appeal.
18. **We dismiss Lord Shrewsbury’s appeal against the Commissioner’s finding that he has breached paragraph 9 of the Code of Conduct.**

### Sanction

19. The Commissioner recommended that Lord Shrewsbury be suspended from the service of the House for a period of nine months. Lord Shrewsbury has appealed against this sanction, expressing the hope that the Conduct Committee, even if it finds him to have breached the Code, will accept “that any breaches were unintended and not reckless or from ill motive”. He says that he has “learned a very serious lesson from all of this”, having “embarrassed my family and this House”, and “damaged my good reputation”.
20. In considering the sanction in this case, and in the case of Baroness Goudie (which is unconnected, but which came before us at the same meeting and engages the same provisions of the Code), we are conscious that no exact precedent exists. The nearest precedents are the various cases in 2009 and 2013 relating to lobbying, where the House imposed suspensions ranging from four to six months. All the members involved in those cases were subject to ‘sting’ operations by undercover journalists, who secretly recorded conversations in which they offered payment in return for various services. Some of the members expressed willingness to take part in relevant parliamentary proceedings, for example by tabling amendments, others offered other parliamentary services, such as help in setting up All Party Parliamentary Groups. In none of the cases did money change hands, nor

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2 Guide, paragraph 20



did the members actually provide any paid parliamentary advice or services. But the House took the view that simply by indicating their willingness to provide such services, the members had committed serious breaches of the rules of the time.

21. The present case differs markedly from these precedents. On the one hand, we acknowledge Lord Shrewsbury's expressions of remorse, and we accept his assurance that he did not act from "ill motive". We have no reason to believe that he would in any circumstances act in a way he understood to be dishonest.
22. But ignorance is no excuse, and Lord Shrewsbury's breaches of the Code were in some respects more serious than those in any previous case. He entered into a written agreement with SpectrumX, in which, while indicating that he would be unable to undertake "political lobbying or advocacy", he offered to provide "advice on Parliamentary and other matters", and to undertake "networking" on behalf of the company. Moreover, he provided parliamentary services to the company, by personally approaching ministers and officials on their behalf. The provision of parliamentary services is in our view even more serious than the provision of parliamentary advice, because it involves a member changing how they carry out their parliamentary duties and activities in return for financial consideration, whereas parliamentary advice is more about monetising their expertise. The fact that Lord Shrewsbury declared his interest in the company while providing such services is no defence, as paragraph 21 of the Guide to the Code makes clear.
23. Finally, we note that Lord Shrewsbury's agreement with SpectrumX lasted 19 months, during which he was paid some £57,000. It was a lucrative relationship.
24. The rules prohibiting the provision of parliamentary advice and services in return for payment or reward were adopted by the House to uphold the integrity of the institution of Parliament, and reflect the key Nolan Principle of Selflessness, according to which "holders of public office should act solely in terms of the public interest". As the Guide to the Code of Conduct emphasises, it is incompatible with this principle for members "to seek to profit from membership of the House". The House has consistently viewed breaches of the relevant rules as matters of serious concern, and while the Commissioner's recommended period of suspension is slightly longer than those imposed in previous cases, this is in our view justified by the seriousness of the breach.
25. **We recommend that the Earl of Shrewsbury be suspended from the service of the House for a period of nine months.**



# Annex A: Report from the House of Lords Commissioner for Standards on the conduct of the Earl of Shrewsbury

## CHAPTER 1: BACKGROUND

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1. On 9 May 2022, I published a report on the conduct of the Earl of Shrewsbury following a complaint made to me alleging various breaches of the House of Lords Code of Conduct in relation to Lord Shrewsbury's work for a company called SpectrumX.<sup>3</sup> Allegations of paid advocacy in the first investigation related to work Lord Shrewsbury undertook in relation to hand sanitisers. I had no reason to look more widely at Lord Shrewsbury's other work for SpectrumX.
2. In that report, I found that, apart from a failing to register SpectrumX as a client of Talbot Consulting in his registered interests, Lord Shrewsbury had not breached any other provisions of the Code. Remedial action was agreed whereby Lord Shrewsbury corrected the Register and sent a letter of apology to the Chair of the Conduct Committee.
3. On 19 June 2022, an article was published in *The Sunday Times* (see Appendix 1) with new allegations regarding the conduct of Lord Shrewsbury and his work for SpectrumX. These new allegations were not the subject of my previous investigation as they concerned correspondence sent by Lord Shrewsbury in relation to a sanitisation tunnel system (known as 'SpectriPOD').
4. On 21 June 2022, Lord Shrewsbury emailed me<sup>4</sup> as follows:

“Following the publication of an article about me in *The Sunday Times* last weekend, I wish to refer myself with immediate effect for examination by the Commissioner with regard to my alleged misconduct.”
5. Paragraph 130 of the Guide to the Code of Conduct, states that:

“A complaint made by a third party is the usual basis for the Commissioners to start an investigation. In exceptional circumstances however, and with the agreement of the Conduct Committee, they may start an investigation in the absence of a complaint, either at the request of the member concerned, or if by other means they become aware of evidence sufficient to establish a prima facie case that the Code of Conduct has been breached.”

In accordance with this provision, I requested permission from the Conduct Committee to launch an investigation into the new allegations. This was granted on 23 June 2022.

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3 Commissioner for Standard, *The conduct of the Earl of Shrewsbury*: <https://www.parliament.uk/globalassets/documents/lords-commissioner-for-standards/report-on-lord-shrewsbury.pdf>

4 The investigation and report were completed by Akbar Khan

## CHAPTER 2: COMPLAINT AND INVESTIGATION

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### Summary of complaint

6. The allegations against Lord Shrewsbury were outlined in *The Sunday Times* article, reproduced at Appendix 1.
7. To summarise, the article alleged that Lord Shrewsbury had written emails to SpectrumX in which he represented that he would meet with various ministers and officials to discuss and promote SpectrumX's spectriPOD system in return for being paid a monthly retainer by the company. The article did not say whether Lord Shrewsbury had met or corresponded with any of the ministers or officials he mentioned.

### Relevant aspects of the Code

8. Paragraph 9 of the Code of Conduct states:
 

“Members of the House:

  - (a) must comply with the Code of Conduct;
  - (b) should act always on their personal honour in the performance of their parliamentary duties and activities;
  - (c) must never accept or agree to accept any financial inducement as an incentive or reward for exercising parliamentary influence;
  - (d) must not seek to profit from membership of the House by accepting or agreeing to accept payment or other incentive or reward in return for providing parliamentary advice or services.”
9. Paragraph 16 of the Code of Conduct states:
 

“A member must not seek by parliamentary means to confer exclusive benefit on an outside body or person (a) in which he or she has a financial interest (including by way of salary, fees, shareholding or other arrangement) or (b) in return for payment or reward.”
10. Paragraph 21 of the Guide to the Code of Conduct states:
 

“The prohibition on accepting payment in return for parliamentary services means that members may not, in return for payment or other incentive or reward, assist outside organisations or persons in influencing members of either House, ministers or officials. This includes seeking by means of participation in proceedings of the House to confer exclusive benefit upon the organisation or person; or making use of their position to lobby, or to help others to lobby, members of either House, ministers or officials, by whatever means. A member may never provide parliamentary services in return for payment or other incentive or reward (regardless of whether the member intends to register and declare the interest).”

### Preliminary assessment

11. While I was conducting my preliminary assessment, Lord Shrewsbury provided me with a copy of an email he had written to the Chief Executive of one of his clients through his Talbot Consulting company (see Appendix

2). This set out his thoughts on *The Sunday Times* article and provided some further context.

12. I wrote to Lord Shrewsbury on 28 June to inform him that I had determined there was sufficient evidence to establish there was a *prima facie* case to be investigated. I therefore advised him that I was opening an investigation and invited him to provide me with a written response. My letter made a number of specific requests:

“1. Please can you provide me with the ‘dossier’ of emails and letters which you [allege] Oliver Morley<sup>5</sup> released to the *Sunday Times*, and which prompted the article of 19 June?

2. Please can you provide me with a copy of your contract to provide consultancy services to SpectrumX Healthcare Ltd?

3. Did you, at any stage, agree to become a non-executive director for Spectrum X?

4. Please can you provide me with the details of any contact and correspondence you had with Alex Burghart MP, Baroness Barran, Lord Bethell or the Clerk of the Parliaments, as well as the details of any meetings you may have had with them or any other government minister, parliamentarian or government/parliamentary official, regarding the use of the SpectriPOD system?

5. Did you consider whether your contact with Mr Burghart, Baroness Barran, Lord Bethell or the Clerk of the Parliaments constituted paid advocacy on behalf of SpectrumX? Were you trying to confer an exclusive benefit on them in representing their products to these individuals?

6. Please can you provide me with the details of any contact and correspondence you had with Baroness Brady at West Ham Football Club regarding the use of the SpectriPOD system?

7. Did you consider whether your contact with West Ham Football Club constituted paid advocacy on behalf of SpectrumX? Were you trying to confer an exclusive benefit on them in representing their products to these individuals?”

### Lord Shrewsbury’s written response

13. Lord Shrewsbury provided me with his written response on 11 July. It was detailed and comprehensive and relevant supporting evidence which he attached to it is reproduced at Appendix 3.

14. In response to my questions, he said:

“Dear Mr Khan,

Thank you for your letter of 28th June 2022, accepting my request of self referral. In answer to your questions:

1. I have attached a series of emails which I believe Oliver Morley arranged to have released to the *Sunday Times*. They are in chronological order and with explanation notes.

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5 Oliver Morley was the person who originally asked Lord Shrewsbury to consult for SpectrumX.

2. I did not have a contract to provide consultancy services to SpectrumX Healthcare Ltd—I had a verbal agreement with Morley and an email on his receiving my acceptance saying simply “Agreed”.

3. I did agree to become a non-executive director of SpectrumX (see emails) but was never appointed as shortly after Morley made me the offer I was made aware of his [redacted] behaviour and I told him that I wanted no more to do with either him or SpectrumX.

4. Alex Burghart MP

I had correspondence with Mr Burghart when I invited him to attend the Official Opening (which has yet to happen) of SpectrumX’s factory in Nantwich. He declined (this was all evidenced in your previous investigation into my conduct). I met him both virtually and physically I think on 4 occasions when he attended Whip’s Meetings in the House. In addition, I chaired a Zoom meeting at which he was a guest, with a firm called TAG where I was asked to join their advisory Board but never did. I was not paid by TAG, did not charge TAG fees and simply appeared as a favour for an acquaintance for some 30 years, named [redacted]. I simply chaired the meeting. No further contact regarding that meeting was had. On no occasion did I meet with, nor correspond with Mr Burghart regarding the use of the SpectriPOD system.

Baroness Barran

I wrote to Baroness Barran for advice. Letter and explanation attached.

Lord Bethell

I had no correspondence nor meetings with Lord Bethell regarding the use of the SpectriPOD system. I did meet with and have correspondence with him, and spoke on the floor of the House with regard to a Staffordshire company, Wearwell Ltd. I had no connection nor any financial dealings of any nature whatsoever with Wearwell. I saw an article on Midlands TV News and called them to see if I could help as I am a Deputy Lieutenant in Staffordshire.

Clerk to the Parliaments

I had no meetings with him or his officials, but I did speak and write to [someone in his private office] once, making [them] aware of sanitising pods and how they might be useful for the Services Committee to investigate in the context of people in large numbers returning to work in the Palace. I did not receive a response.

I had no meetings with any other government minister, parliamentarian or government / parliamentary official, regarding the use of the SpectriPOD System.

5. I do not consider that my contact with Mr Burghart, Baroness Barran, Lord Bethell or the Clerk of the Parliaments constituted paid advocacy on behalf of SpectrumX. I was not trying to confer an exclusive benefit on them in representing their products to these individuals.

6. I did not meet with Baroness Brady with regard to the SpectriPOD System. I wrote to her privately in her capacity as Chairman of West

Ham Football Club not as a member of the House. I know her in any case. I also wrote to the Directors of The Jockey Club in the same vein. None of it was parliamentary. It was commercial. I have been involved in sport all my adult life, and especially with horse racing. I was an amateur jockey, I held a trainer's licence. I ran a racing stables. I owned and bred racehorses, and I was a racecourse Steward and Assistant Clerk of the Course. SpectrumX had already been in contact with West Ham Football Club, and I believe that the Club had trialled an inferior Sanitising System. Baroness Brady did not respond.

7. I do not consider that my contact with West Ham Football Club constituted paid advocacy on behalf of SpectrumX in the parliamentary sense. It had nothing whatsoever to do with Parliament, but approaching West Ham, The Jockey Club and others was a part of my commercial work outside Parliament. I was attempting to arrange a demonstration of the SpectriPOD System to potential users. This type of work I do in my commercial life all the time. It has no connection with Parliament.

In one of my emails to Morley, you will see that I mention that I name JCB as a client. Indeed JCB was a client—Lord Bamford is a very close friend from my teenage years and we are godparents to one another's children—but it was prior to that email. The last remunerated job Talbot Consulting did for JCB was in 2018. JCB is no longer a client.

If I can be of further assistance, please do not hesitate to contact me.

Yours sincerely,

The Earl of Shrewsbury”

15. After careful consideration, I accepted that Lord Shrewsbury's correspondence with Baroness Brady occurred separately and independently from any parliamentary relationship and therefore did not fall within the scope of the Code of Conduct. On that basis, I excluded the correspondence in relation to Baroness Brady at this point of the investigation and concluded that Lord Shrewsbury had not breached the Code of Conduct when he wrote to her.

#### **Lord Shrewsbury's oral evidence and other evidence from witnesses**

16. Having reviewed Lord Shrewsbury's written response and supporting documents, I invited him to attend an interview with me.
17. I interviewed Lord Shrewsbury on 5 September, with Donna Davidson, Standards Clerk, and Sabrina Asghar, Assistant Standards Clerk, in attendance.

#### **Background**

18. I began by asking Lord Shrewsbury how he first came to be in contact with Oliver Morley. He explained that he was introduced by a friend of Mr Morley's whom he had done some work for previously. He said that he was asked to meet Mr Morley on a Zoom call on 1 June 2020.
19. Lord Shrewsbury clarified that he was initially asked to take on Morley Estates as a client:

“He asked me to take Morley Estates on and then he told me that in fact he’d got this business start-up, SpectrumX, and that he’d put me to do—deal with that instead of Morley Estates. Morley Estates never paid me. It was Oliver Morley out of his own pocket who paid me.”

20. I asked him to expand on the arrangements, first with Morley Estates and then with SpectrumX:

“AKBAR KHAN: Okay. Let’s just put some time around this. So did you have a contract with Morley Estates?”

THE EARL OF SHREWSBURY: No, never.

AKBAR KHAN: What sort of arrangement did you have with Morley Estates to promote Morley Estates?

THE EARL OF SHREWSBURY: Just, it was very loose indeed. He would ask me for advice when he felt like asking me for advice. I would be paid monthly in advance on receipt of invoice. He offered me £2,000 a month—Sorry, I’ve got it wrong. He asked me what my fee would be and I told him £2,000 a month and he said, “That’s not enough. I’m going to make it three”. So the first bill was then eventually paid. The second bill was eventually paid after a great deal of chasing. He then wrote to me, in the email that you’ve seen, to ask me if I would be a non-executive director of his business start-up.

AKBAR KHAN: Okay.

THE EARL OF SHREWSBURY: And that will give you the dates. I accepted that and said, “Yes”. He came back to me with one word in an email which said, “Agreed”, and then I found out about his misbehaviour from [redacted].

AKBAR KHAN: Okay.

THE EARL OF SHREWSBURY: And then I had no more to do with him.”

21. Turning to a letter Lord Shrewsbury sent to Mr Morley on 11 June 2020, setting out the terms of his consultancy work, I asked Lord Shrewsbury to clarify whether this was in relation to Morley Estates or SpectrumX. He confirmed that at this stage, the agreement was in relation to Morley Estates. However, the next day, on 12 June 2020, Mr Morley asked him to become a non-executive director of SpectrumX and Lord Shrewsbury agreed.

22. I asked him what the business arrangements were at this point:

“AKBAR KHAN: Was SpectrumX Healthcare Limited also to become a client of Talbot Consulting or was it your—was your relationship with SpectrumX Healthcare only as a NED?”

THE EARL OF SHREWSBURY: My relationship with SpectrumX would have been only as a NED because at that stage Morley Estates were the people who I was billing and who were paying me.

AKBAR KHAN: Right.



THE EARL OF SHREWSBURY: And then that very rapidly changed within the course of, off the top of my head, a few weeks.”

23. Lord Shrewsbury explained that he was never formally appointed as a non-executive director of SpectrumX, despite agreeing to it in the exchange of emails, because soon after this his relationship with Mr Morley degenerated.

24. I asked Lord Shrewsbury, at the time he agreed to be a non-executive director for SpectrumX, what he understood the terms to be:

“AKBAR KHAN: So let’s turn to the same terms then. So it’s the same terms that you were representing Morley Estates in the 11 June letter, you believed were the same terms you were representing as a NED?”

THE EARL OF SHREWSBURY: Correct.

AKBAR KHAN: Okay. So the obligations in terms of what you committed to doing, advising on parliamentary and other matters, introductions, networking, non-exec, corporate hospitality, you are not able to undertake political lobbying: all of that applied to SpectriPOD in your understanding as it did to Morley Estates?

THE EARL OF SHREWSBURY: In my understanding, yeah.”

25. Lord Shrewsbury explained that shortly after the correspondence with Mr Morley on 11 and 12 June, he was contacted by a friend:

“I had a phone call from somebody in the Liverpool area called [redacted]. And he called me to say, had I been paid by Oliver Morley, and I said, “No”. And he said, “Be very careful indeed. It is alleged that Oliver Morley [redacted]”. And he said, “I suggest you look very carefully at it”. At that point I picked up the phone to Oliver Morley and I told him that I wanted absolutely nothing more to do with him. I knew about the allegations and I had no more conversations with him.”

26. Lord Shrewsbury said that a few weeks later, possibly in August 2020, he received a phone call from Damien Hancox, the Chief Executive of SpectrumX. He asked if Lord Shrewsbury would agree to work for SpectrumX to promote the SpectriPOD. Lord Shrewsbury told me:

“I agreed with him that Talbot Consulting would have SpectrumX Healthcare as a client. And it was a word of mouth contract, there was nothing written about it at all, nothing signed, it was completely between him and I as a word of mouth and that I would invoice SpectrumX Healthcare on the first of every month.”

27. Lord Shrewsbury said that although there was no written agreement, his understanding was that he would be working for SpectrumX based on the terms set out in his 11 June letter to Mr Morley.

*Terms of consultancy work*

28. Having established a rough timeline of the way the relationship between Lord Shrewsbury and SpectrumX evolved, I turned to the terms of his 11 June letter. I asked Lord Shrewsbury how his agreement stated in the 11 June letter to provide “advice on parliamentary and other matters” was in keeping with paragraph 9(d) of the Code of Conduct which says that members “must

not seek to profit from membership of the House by accepting or agreeing to accept payment or other incentive or reward in return for providing parliamentary advice or services”.

29. Lord Shrewsbury admitted that “ I am therefore guilty, I assume, of infringing 9(d) on “providing parliamentary advice”.”

*Baroness Barran*

30. I asked Lord Shrewsbury to consider what he stated in his 11 June letter that he was “unable to undertake political lobbying or advocacy but I am able to speak in generalities” and to explain whether he thought his undated letter to Baroness Barran<sup>6</sup> (see Appendix 3), was in keeping with that commitment. I also asked him to consider whether he thought his letter to Baroness Barran was in keeping with the Code’s prohibition on a member using their position to lobby ministers or officials on behalf of a company.
31. Initially, Lord Shrewsbury said he thought his letter was in keeping with his commitment to speak in generalities and was not in breach of the Code. He specifically pointed to the caveat in his 11 June letter where he stated “I must point out that, as I explained to you, I personally am unable to undertake political lobbying or advocacy, but I am able to speak in generalities”. However, on further consideration and discussion of the wording of the letter when read as a whole, he conceded that he had breached the Code:

“AKBAR KHAN: But it is promoting, isn’t it —

THE EARL OF SHREWSBURY: It’s promoting.

AKBAR KHAN: —on an objective reading, it’s clearly promoting—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN: —the use of a product—

THE EARL OF SHREWSBURY: Yeah, very much.

AKBAR KHAN: —which you are a consultant for—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN: —for, in particular, a sanitisation tunnel?

THE EARL OF SHREWSBURY: I have to say I never thought that at the time, I must say.

AKBAR KHAN: Okay.

THE EARL OF SHREWSBURY: But having read that, yeah—

AKBAR KHAN: I see.

THE EARL OF SHREWSBURY: — I put my hands up.”

32. I wrote to Baroness Barran to ask her about the letter and whether she ever met with Lord Shrewsbury. She told me:

“I can confirm that:

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6 At this time, Baroness Barran was a Minister in the Department for Culture, Media and Sport.

I did not meet with the Earl of Shrewsbury regarding Spectrum X. I am not aware of officials having met with him but you may wish to confirm with them directly since I would not normally know if an official meeting took place.

I had no further written communication with the Earl of Shrewsbury on this matter.

I did not reply to his letter. I have attached an email from the Permanent Secretary's office at DCMS confirming the information relating to this."

33. We moved on to discuss Lord Shrewsbury's email of 6 September 2020 to Mr Morley. I asked why he was in contact with Mr Morley by email at this time, after he had severed ties with him earlier in the year. Lord Shrewsbury told me that Mr Morley continued to contact him, placing him under considerable pressure and leaving him little choice but to engage with him. He explained:

"I had nothing to do with him. But, that doesn't stop him getting hold of me to say, with the Northern Powerhouse, "We should be talking to Lord O'Neill about promoting my property business and my property developments and SpectrumX". So you get a barrage of these things and I replied to them."

*The Clerk of the Parliaments*

34. I asked Lord Shrewsbury to consider the offers he made in the 6 September email:

"AKBAR KHAN: You say, "I would intend to discuss SpectrumX next week with the Clerk of the Parliaments with a view to holding a demonstration of the pod in Parliament to both his senior staff and Services Committee. I'm due to meet with him on Tuesday".

THE EARL OF SHREWSBURY: Yeah, absolutely. I was never "due to meet with him". I never had any intention to discuss it with him. What I did do was I spoke to [someone in his private office] about, "Would [the then Clerk of the Parliaments] be interested in learning about this" on the basis of trying to get people back into the Parliamentary Estate and that I'm sure that SpectrumX would put on a demonstration or—I never heard another word."

35. I asked Lord Shrewsbury to consider whether this breached any provisions of the Code and he said in hindsight, probably paragraph 9(c) which prohibits financial inducements for exercising parliamentary influence.
36. Lord Shrewsbury then emailed the Clerk of the Parliaments' private office on 7 October with a SpectrumX brochure and asked the then Clerk of the Parliaments to consider letting SpectrumX demonstrate their system on the parliamentary estate. Lord Shrewsbury conceded that this went even further than providing advice to SpectrumX on who to contact, as he made the approach directly. He received no reply from the Clerk of the Parliaments and no such demonstration ever took place.
37. I wrote to the current Clerk of the Parliaments' private secretary to see whether Lord Shrewsbury's evidence to me was correct. Her response was:

“In answering your first question on any request by the Earl of Shrewsbury to meet the then Clerk of the Parliaments [...] I can confirm that there is no evidence I have found in our office records to indicate that a meeting took place on 8 September 2020, although it should be noted that [the then Clerk of the Parliaments’] diary is no longer accessible. Having consulted [his previous private secretary] on this, she has confirmed that no meeting took place on 8 September 2020.

Our office records do however show that the Earl of Shrewsbury left a voicemail on 29 September 2020 requesting a meeting with the Clerk of the Parliaments.

The Earl of Shrewsbury emailed [someone in the Clerk of the Parliaments’ private office] directly on 7 October 2020 as referenced in your second question. [They] forwarded this email to [the then Clerk of the Parliaments]. [They] also shared his email with, and sought advice from, an official in the Parliamentary Office of Science and Technology (POST) who was supporting the Houses’ response to COVID-19 at that time. [They have] confirmed that the Earl of Shrewsbury’s email of 7 October 2020 was not responded to and that no meeting took place between [the then Clerk of the Parliaments] and the Earl of Shrewsbury.

In respect of [the current] Clerk of the Parliaments since April 2021, both [redacted] and myself have covered the role of Private Secretary during this period and I can confirm that to our knowledge no such request from the Earl of Shrewsbury for a meeting was received.

On your question regarding whether the Earl of Shrewsbury followed up further on his 7 October 2020 email, [redacted] cannot recall and has no record of any further follow up.”

*Lord Bethell*

38. The 6 September email went on to say “I’m going to meet with Lord Bethell to discuss SpectrumX in the same vein.” At that time, Lord Bethell was a minister in the Department of Health and Social Care.
39. Lord Shrewsbury told me that no such meeting took place but he did have a very short discussion with Lord Bethell in the corridor one day before oral questions in the House.
40. I asked Lord Bethell for his recollection and he emailed me to say:

“From memory, I do remember a request from Shrewsbury to meet to talk about a “miracle sanitiser” product, but I do not remember the name of the company. I had a short (2ms?) stand-up “bump-in” meeting with Shrewsbury in the “Princes’ Chamber”, as is the custom for peers and ministers, at which I told him that this was not an area of great concern for the Department, that we were sceptical of innovative solutions to a basic resource requirement but that if he had something he felt was important I would be glad to forward it to the relevant officials. My general view was that people were trying to be helpful, but suggestions for miracle sanitisers were a massive distraction from the main priority of vaccines, diagnostics and medicines.”

*Alex Burghart MP and Matt Hancock MP*

41. I asked Lord Shrewsbury about the next part of the 6 September email where he said:

“I spoke on their behalf at a Zoom meeting with Alex Burghart who is the Prime Minister’s PPS. I know Alex as he attends one of our Whips’ meetings every two weeks and I’m in touch with him. I intend to meet with him next week. He’s at the top of the feed chain and is with Matt Hancock. You cannot go any higher. I would intend that they should be persuaded to send senior colleagues to a demo of the pod in Westminster”.

42. Lord Shrewsbury responded, “I had no intention of meeting either of them. I don’t know Matt Hancock. I’ve never even spoken to him.”

43. I challenged Lord Shrewsbury on this point:

“AKBAR KHAN: —but what you are doing is, you are making an offer to do these things—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN:—on behalf of SpectrumX—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN:—who you are being paid by—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN:—to promote a specific product?

THE EARL OF SHREWSBURY: Yeah. I put my hands up to it.

AKBAR KHAN: The fact that it doesn’t come to pass—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN:—is a fact but, at the time you are making this representation to Mr Morley, in good faith he believes that these things are going to happen?

THE EARL OF SHREWSBURY: No, he doesn’t.

AKBAR KHAN: But, you’re making them—

THE EARL OF SHREWSBURY: Yeah.

AKBAR KHAN:—on the understanding that you are saying you can achieve these things for him, well, for SpectrumX?

THE EARL OF SHREWSBURY: I suppose, yeah, you could put it like that.

AKBAR KHAN: And even if you intended them to happen and they didn’t come to pass, you’ve still made the offer. That’s the point, isn’t it?

THE EARL OF SHREWSBURY: I am making the offer.

AKBAR KHAN: You made the offer.

THE EARL OF SHREWSBURY: I'm making the offer, yeah.

AKBAR KHAN: And you are saying these things can be done?

THE EARL OF SHREWSBURY: Yeah."

44. I wrote to officials who support the Permanent Secretary at the Department of Health and Social Care to ask whether there had been any correspondence or meeting between Lord Shrewsbury and Matt Hancock or Lord Bethell. They sent me copies of letters and emails, some of which are included in Appendix 4.
45. Most notably, there was a letter from Lord Shrewsbury to Matt Hancock from November 2020, promoting the SpectriPOD system and asking him to meet with SpectrumX to explore options.

*Lord Shrewsbury's intentions and actions*

46. Having considered all the offers he made in the 6 September email and his statements that he never intended to see through any of the offers he made, I questioned whether this was actually true:

"AKBAR KHAN: But you did meet with Lord Bethell albeit briefly. You did write to the Clerk of the Parliaments—

THE EARL OF SHREWSBURY: And I did—

AKBAR KHAN:—so at least in those regards—

THE EARL OF SHREWSBURY:—write to Lady Barran.

AKBAR KHAN: And you did write to Baroness Barran. So why are you saying that you didn't intend them to come through when in fact you took efforts to apprise at least Baroness Barran, Lord Bethell, the Clerk of the Parliaments as to specifically this product?

THE EARL OF SHREWSBURY: Yeah, yeah. I have no idea how to answer that. All I can say is I have no intention of writing any letters like this ever again."

47. I questioned whether Lord Shrewsbury considered he had breached his personal honour in making representations to SpectrumX which he never intended to follow through. He was clear that he did not think that was a breach of his personal honour and reiterated that he made the representations in order to "keep Oliver Morley at bay" because he was "he was having a go at my family, having a go at me".
48. Lord Shrewsbury also placed his actions in the context of the COVID-19 pandemic, which was still severe at this time:

"You see, I sit at the Whips' meeting, well, I'm no longer a Whip, but I sit at the Whips' meeting and somebody would say, "You know, if only we could do something about this. Why—Anybody got any suggestions"? And I said, "Yes". I can't just sit there and keep my mouth shut when I know damn well that there's things out there, which I'm involved with, that could be used to help the situation to get these things back. If it

hadn't have been Covid none of this would have happened. But Covid made it absolutely primarily important that we did things to get people back. I thought I was helpful.”

## CHAPTER 3: FINDINGS AND OUTCOME

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### Findings

49. Throughout this investigation, Lord Shrewsbury has been co-operative and responded fully and in a timely manner to all my requests for evidence. At times, I found his recollection of events was not always entirely consistent with the written evidence in the form of emails and letters, but I do not think he attempted to deliberately mislead me in my investigation. In my professional experience, investigations invariably create anxiety and stress on individuals to try and recall every detail of past events. This is simply not possible given that memories tend to fade with time, coupled with the fact that the documentary evidence is often incomplete due to conversations or other interactions which are undocumented or simply forgotten. Reasonable allowances must therefore be made by the investigator to accommodate the passage of time in a balanced and proportionate manner while seeking to establish the facts on the balance of probabilities.
50. I have carefully reviewed the evidence in this case and find on the balance of probabilities the following material facts to be established:
- (1) That Lord Shrewsbury was paid a monthly retainer of £3,000 by SpectrumX to consult for them through his personal service company, Talbot Consulting Limited to help promote their product called ‘SpectriPOD’.
  - (2) That SpectriPOD was a sanitisation tunnel for treating large volumes of people at events such as sporting venues during the COVID-19 period in an effort to try and get crowds back to sporting events and people back to their offices and factories.
  - (3) That the retainer was paid on a monthly basis from June 2020, when invoices to SpectrumX commenced, until 31 January 2022, when Lord Shrewsbury terminated the relationship. The period of the retainer was approximately 19 months and Lord Shrewsbury received in the region of £57,000 gross. This amount was for personal gain and was received by Lord Shrewsbury as a Consultant to SpectrumX acting through his own company, Talbot Consulting Limited.
  - (4) That in setting out the terms of what he could do in his letter of 11 June, Lord Shrewsbury listed “parliamentary advice and other matters” as one of his areas of expertise.
  - (5) That Lord Shrewsbury made representations to SpectrumX regarding ministers and officials that he could approach to promote the work of SpectrumX in respect of the SpectriPOD.
  - (6) That Lord Shrewsbury did directly approach a number of ministers and officials and asked them to meet with SpectrumX.
51. **In light of the aforementioned factual findings, I have concluded that Lord Shrewsbury is in breach of the following provisions of the Code of Conduct.**
- **Paragraph 9(c) of the Code of Conduct, which states that Members “must never accept or agree to accept any**



financial inducement as an incentive or reward for exercising parliamentary influence.” I find that Lord Shrewsbury’s approaches to Baroness Barran, Lord Bethell, Matt Hancock MP, and the Clerk of the Parliaments were a clear breach of the said Code provision. In this regard paragraph 21 of the Guide to the Code of Conduct states that “The prohibition on accepting payment in return for parliamentary services means that members may not, in return for payment or other incentive or reward, assist outside organisations or persons in influencing members of either House, ministers or officials. This includes seeking by means of [...] making use of their position to lobby, or to help others to lobby, members of either House, ministers or officials, by whatever means. A member may never provide parliamentary services in return for payment or other incentive or reward (regardless of whether the member intends to register and declare the interest).”

- Paragraph 9(d) of the Code of Conduct, which states that Members “must not seek to profit from membership of the House by accepting or agreeing to accept payment or other incentive or reward in return for providing parliamentary advice or services”. I find that Lord Shrewsbury’s written terms of engagement sent to Mr Morley on 11 June, and his email of 6 September in which he outlined who he could approach in order to open doors on behalf of SpectrumX constitutes a clear breach of the said Code provision.
- Paragraphs 9(a) and 9(b) of the Code of Conduct. Paragraph 9(a) states that Members “must comply with the Code of Conduct”; and paragraph 9(b) that they “should act always on their personal honour in the performance of their parliamentary duties and activities”. In the context of “personal honour” the guidance to the Code provides that “the term ‘personal honour’ is ultimately an expression of the sense of the House as a whole as to the standards of conduct expected of individual members [...] members cannot rely simply on their own personal sense of what is honourable. They are required to act in accordance with the standards expected by the House as a whole. ‘Personal honour’ is thus [...] A matter for individual members, subject to the sense and culture of the House as a whole.” I find that by reason of the aforementioned breaches of paragraphs 9(c) and 9(d) of the Code, Lord Shrewsbury is also in breach of these said Code provisions.

52. In summary, I find breaches of paragraph 9(a),9(b),9(c)&9(d) of the Code of Conduct.
53. I have also considered whether Lord Shrewsbury was in breach of paragraph 16 of the Code of Conduct. This provision provides that “A member must not seek by parliamentary means to confer exclusive benefit on an outside body or person (a) in which he or she has a financial interest (including by way of salary, fees, shareholding or other arrangement) or (b) in return for payment or reward”. In considering this matter, I have been informed by paragraph 25 of the Guide to the Code of Conduct regarding the meaning of the words

**“by parliamentary means”. In the light of the advice in the guidance, I have concluded that the evidence supporting the complaint did not demonstrate that Lord Shrewsbury had employed the “parliamentary means” outlined in the guidance to attempt to confer an exclusive benefit on SpectrumX. Accordingly, I find that Lord Shrewsbury is not in breach of paragraph 16 of the Code of Conduct.**

### Sanction

54. The Code recognises that Members of the House of Lords have a wide range of outside interests and careers and that the House thrives on their expertise. The Code makes it clear that it does not seek in any way to curtail those interests or careers, or to discourage members from drawing on the knowledge and expertise so gained in their parliamentary work.
55. However, in their parliamentary work and, whenever they act in their capacity as parliamentarians, members are required to base their actions solely upon considerations of the public interest. The Code therefore requires Members to maintain a clear distinction between their outside interests and their parliamentary work. In this context, the Code expressly provides that it is incompatible with the maintenance of this distinction for a member, by offering parliamentary advice or services to paying clients to profit from membership of the House of Lords. Accepting payment in return for parliamentary advice or services is therefore prohibited under the Code.
56. Accordingly, being paid to provide parliamentary advice and to lobby on behalf of a private company are extremely serious breaches of the Code of Conduct. Cases like this understandably cause great reputational harm by eroding public trust in politicians and in democratic institutions which exist to serve the public interest. Simply offering to approach ministers and officials on behalf of a company providing a financial incentive is a serious breach of the Code, but making those approaches personally is even more egregious and constitutes an aggravating factor.
57. In the context of aggravating factors, Lord Shrewsbury has been a senior member of the Lords for since 1981 and in fact served as a Government Whip for at least part of the period of his retainer with SpectrumX. He ought to have been modelling the provisions of the Code given the prominent role that he held in the House. I consider the receipt of remuneration to provide parliamentary advice and to lobby on behalf of SpectrumX, coupled with his seniority and experience as a member with privileged access to ministers and officials given his role as a Government Whip to all constitute further aggravating factors that go directly to his conduct.
58. Lord Shrewsbury provided me with some evidence which demonstrated that during his relationship with Morley Estates and subsequently SpectrumX he was being put under some degree of pressure by Mr Morley and asked that I should take that into account when considering the motivation for his actions. I did not consider it proportionate to extend my investigation further to confirm the veracity of these claims, but I have no reason to believe that Lord Shrewsbury has fabricated the unpleasant and at times intimidatory nature of the pressure he has described or that he has been dishonest in this respect and I have accordingly taken this into account as mitigation when deciding what would constitute an appropriate sanction.

59. I also acknowledge that Lord Shrewsbury has shown some insight and contrition regarding his behaviour during this process and has unequivocally accepted that he breached the Code of Conduct, albeit unintentionally. In this regard, he said that he genuinely believed that he was responding to the Government's call for ideas as to how to deal with COVID-19 by promoting the SpectriPOD sanitisation tunnel to help bring back crowds safely to sporting events and other venues. He has cooperated fully with my investigation and I believe has sought in good faith to answer all my questions to the best of his recollection.
60. **Having considered the seriousness of the breaches, together with the reputational harm caused and any aggravating and mitigating factors outlined above, I recommend that Lord Shrewsbury be suspended from the service of the House for a period of nine months.**

## APPENDIX 1: ARTICLE IN *THE SUNDAY TIMES*, 19 JUNE 2022

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### Peer earned £3,000 a month after offer to ‘open doors’ for Covid firm

*The Earl of Shrewsbury told the company he could get its walk-in disinfectant tunnel in front of ministers and those in No 10*

A hereditary peer offered to “open doors” at the top of the government for a company lobbying ministers for regulatory approval of its Covid-19 sanitiser products.

Charles Chetwynd-Talbot, the Earl of Shrewsbury, who at the time was a serving Conservative whip in the House of Lords, boasted that his access would enable him to get the products in front of ministers and an MP working for Boris Johnson in No 10.

A leaked dossier of emails and letters shows how the earl, 69, made it clear that his willingness to create these “very considerable” opportunities for SpectrumX, a hand sanitiser and disinfectant manufacturer, was dependent on payment.

Among SpectrumX’s products was a walk-in disinfectant tunnel, known as the SpectriPOD. Users were to walk through a cabin in which they were coated with a dry mist of solution, which the company said would “deactivate all pathogens including Covid-19”.

The earl was paid a monthly retainer of £3,000 plus VAT and worked for the company for 19 months, meaning he could have made as much as £68,400.

According to the Lords’ code of conduct, peers must not use their position to “confer exclusive benefit” on an outside body in return for payment or accept “any financial inducement as an incentive or reward for exercising parliamentary influence”.

Peers must not seek to “accept payment or other incentive or reward in return for providing parliamentary advice or services”. The punishment can range from an apology and being denied access to financial support to suspension and even expulsion from the Lords.

The disclosures about the earl’s work for SpectrumX comes just months after Baroness Mone, the lingerie tycoon and a fellow Tory peer, was placed under investigation by the Lords standards watchdog over allegations she failed to declare her husband’s interest in a company awarded public contracts worth £200 million after she recommended it to the government.

SpectrumX was founded in July 2020, near the start of the pandemic, and also developed products including non-alcohol hand gels and a sanitising mist. A month before the firm launched, the earl was hired as a consultant as part of efforts to lobby the government to secure regulatory approval for the SpectriPOD.

He was asked to join as a non-executive director to assist with the “sterilisation pod business” for the purposes of “credibility” and to “help open doors . . . at government level”.

He said he would accept the role and followed up with a letter to the director, confirming they had “verbally agreed” he would be paid a “monthly retainer fee of £3,000 plus VAT” to act in a “consultancy capacity” through his company, Talbot Consulting Ltd. He originally worked for the director on a separate matter, before

switching to represent SpectrumX. He says now he did not take up the position of non-executive director.

He also listed among his areas of expertise “advice on parliamentary and other matters”, although he stated at the time he was “personally unable to undertake political lobbying or advocacy”.

His role has already been investigated by the Lords standards commissioners, who received a complaint in January alleging he had broken the rules on paid lobbying and declaring an interest. He said he had no meetings with other ministers or officials about the production or procurement of sanitisation products.

The commissioners, who are not believed to have seen the newly unearthed correspondence, found he committed a minor breach by failing to register SpectrumX as a client between July 2020 and November 2021 but cleared him over lobbying. He apologised and claimed he had failed to make himself aware of changes to rules on declaration.

It can now be disclosed that on September 6, 2020, the earl made clear in emails to the directors of SpectrumX that he intended to use his position in the Lords to try to represent the company’s products to a number of parliamentary officials and ministers.

He said that he had connections through his previous role as a member of the services committee—a body responsible for running services in the House of Lords—to its chairman, a fellow peer, and the clerk of parliaments, whom he described as being “in total charge of the Palace of Westminster” and “all powerful, second only to the Speaker [of the House of Lords]”.

He added: “I would intend to discuss SpectrumX next week with the Clerk of the Parliaments with a view to holding a demonstration of the pod in parliament to both his senior staff and the services committee. I am due to meet with him on Tuesday.” It is understood the company hoped at the time that its products could be rolled out for use by parliament.

The earl said: “On Monday/Tuesday I have arranged to meet with the Lords’ health minister, Lord Bethell, to discuss SpectrumX in the same vein. However, I would like to go much further than that.”

He added that through his role on an advisory board for a Covid testing business in Merseyside, he had recently spoken on their behalf to Alex Burghart, who he pointed out was serving as the prime minister’s parliamentary private secretary. “I know Alex as he attends one of our whip’s meetings every two weeks, and I am in touch with him,” the earl said.

“I intend to meet with him next week. Alex is at the very top of the feed chain, and is with Matt Hancock [then health secretary], the education and policy unit at No 10, Gavin Williamson—the education secretary whom I also know well—and other members of the cabinet, on a daily basis. You cannot go any higher. I would intend that they should be persuaded to send senior colleagues to a demo of the Pod in Westminster.”

At the end of the email, the earl suggested that his ability to facilitate these discussions would be dependent on him being paid “two outstanding invoices”.

Burghart said he had met the earl regularly due to his dealings with the Lords whips but had no recollection of meeting him specifically to discuss SpectrumX.

Bethell stated only that: “A very large number of parliamentarians from all parties sought to be helpful and I’m very grateful for the recommendations that they tried to put into the system.”

The earl, who stopped working for the firm around the time the commissioners’ investigation was launched, insisted he did not meet Burghart, Bethell or the clerk of parliaments.

The peer, whose title dates back to the 15th century, is one of the country’s most senior aristocrats and carries the rank of “premier earl”. He is the former president of the Gun Trade Association and Building Societies Association, a retired director of Britannia Building Society and previously served as chancellor of Wolverhampton University.

While his family’s ancestral seat was Alton Towers, a neo-gothic country estate in Staffordshire, its huge wealth and assets have been sold off over the centuries. The remaining estate and house were sold in 1924 by the earl’s father to a group of businessmen. It is now a major theme park and the earl lives in a house near Ashbourne in Derbyshire.

The earl said: “The parliamentary commissioner had access to everything I sent to various departments and everything else. I have no further comment to make whatsoever on that. I haven’t been involved with SpectrumX since January.

“It was looked into very thoroughly indeed. I was completely exonerated and in my view that was the end of it.”

He added that he was never a non-executive director of SpectrumX and that all of the information contained in the correspondence was known to the commissioners during their investigation.

Asked specifically to confirm whether he had shared the correspondence with them, the earl said: “Knowledge of all those issues was given to the commissioners, of my association with SpectrumX and with [a director] prior to that. That is all I’m prepared to say.”

SpectrumX is trying to float on the London Stock Exchange at a value of approximately £50 million. However, in April 2021, the Health and Safety Executive issued it with a cease and desist letter over its pods, warning that spraying people with disinfectant was “not recommended under any circumstances”. The watchdog said it had “specific concerns that the product you are supplying for use in your disinfecting tunnel/portal/booth is in breach of legislation.”

Lawyers for Damian Hancox, the company director, said the pods were “designed... at the outbreak of the pandemic with a view to preventing the spread of Covid” and had been used in “good faith”. They added that as soon “as our client received the letter referred to he ceased and desisted”.

## APPENDIX 2: EMAIL FROM THE EARL OF SHREWSBURY TO THE CHIEF EXECUTIVE OF ONE OF HIS CLIENTS

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Dear [redacted],

I trust that you are keeping well.

I am sure that you may well have seen an article about me in the Sunday Times last weekend. I wanted to take this opportunity to explain the situation and hopefully assuage any concerns you might have with regard to my relationship with [your company]. I have spoken at length with [redacted] about the matter and he has most kindly given me his full support. I have also put [redacted] in the picture.

Some two years ago a former client asked me to take part in a Zoom meeting with a property developer contact of his who had encountered severe business problems in the last property crash, and had been under the wing of RBS GRG. The man, Oliver Morley [...].

Morley then told me about a business start up (SpectrumX Healthcare Ltd) which he was involved in with a business partner - Damien Hancox. He asked me if I would take them on as a client. I agreed, and when I told him the fee, he said it wasn't enough and he expanded the figure by 50%. He asked me to help promote and publicise by word of mouth the product called SpectriPOD which was a sanitisation tunnel for treating large volumes of people at events such as sporting venues. Covid had started. I suggested to Morley that the system could be used at not only sporting events in order to get the crowds back, but also at large offices and factories including Parliament and her Civil Servant community. From the outset I made it crystal clear to Morley - as I do to all my business contacts - that I could not, and would not lobby politicians, ministers or their Officials in any circumstances whatsoever. I told him that I could provide him with contacts but it was up to his Company to approach them.

The only people I directly approached to ask whether they would be prepared to be given a demonstration of the SpectriPOD System was the Jockey Club at Haydock Park and West Ham Football Club through Baroness Brady. Morley asked me to offer a cost free demonstration to the Clerk of the Parliaments. I did no such thing. I did discuss the subject with a friend of mine, Professor James Calder - who is the foremost below the knee sports injuries specialist in Europe, and who was instrumental in setting up the Nightingale Covid Hospitals. However, I did write to Baroness Barran at DCMS suggesting that such systems might have a role in bringing large crowds safely back to sporting venues. That went nowhere, and shortly after that, the SpectriPOD System was turned down by the HSE on World Health Organisation guidelines.

However, Morley had by then offered me a non executive directorship in the Company. I accepted but then was informed by a very reliable contact in Liverpool that Morley had [redacted]. I immediately wrote to Morley informing him that I wanted no more to do with him. And that, I thought, was that. I have to say that I constantly had problems with having my accounts settled.

A while later, Morley's business partner Damien Hancox contacted me and asked if I would help SpectrumX with a new product. He told me Morley was no longer involved, he was the CEO and my bills would be paid on time. I agreed. I've had a good relationship with them ever since, until I stood down in January this year.

[...] A [...] financial blogger named Tom Winnifrith (he calls himself Shareprophet) then made a complaint to the House of Lords Commissioner of Standards about me, alleging that I had been Commercial Director of SpectrumX and that I had been asking Parliamentary Questions for payment. He described me on his blog and website as “that thieving scumbag earl” amongst other comments. Both [redacted] and [redacted] know about this. It was a very serious allegation indeed and completely fabricated. [...].

The Commissioner investigated the complaint thoroughly and in March this year I was totally exonerated of any misconduct. However, I had committed a minor infringement of the rules to which I admitted immediately, which was to inadvertently fail to provide the name of my private Service Company’s clients as required by a rule change in July 2020.

I duly apologised to the Committee Chairman, which apology was accepted and I was thanked by her for being honest and most helpful, and told that I had a fine blemish free record over the 42 years that I have been in Parliament. The Report into my conduct stated that my infringement of the rules was very minor.

[...] He is fully aware that the Company has started production, received licences and is in the process of negotiating supply contracts with customers. They intend to go for an IPO when the market conditions improve. All this will have added fuel to Morley’s ire at no longer being involved it would seem.[...] . The cash for questions and influence issue was raised again. All is without foundation. I have received very great support from many who know me, both inside and outside Parliament. I have referred myself to the Commissioner.

The reason I feel it necessary to impart all of this to you, and to my various colleagues at [your company] is to be 100 % honest and straight. I would hate any of this to impact on our working relationship - a relationship of which I am proud, and I believe to be mutually beneficial.

Should you wish to discuss this, please do not hesitate to call me.

With best wishes.

Yours ever,

CHARLES

The Earl of Shrewsbury & Talbot DL



### APPENDIX 3: EVIDENCE INCLUDED IN THE EARL OF SHREWSBURY'S WRITTEN RESPONSE

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#### 11 June 2020, Email from Lord Shrewsbury to Oliver Morley

On 11 Jun 2020, at 10:27, Lord Shrewsbury wrote:

Good Morning Oliver,

As promised, please find my proposal attached.

Best wishes

Charles.

#### 11 June 2020, Letter from Lord Shrewsbury to Oliver Morley

FAO Oliver Morley Esq.,

Morley Estates

By Email

Dear Oliver,

I trust that you're well. The speech went well on Tuesday and was supported by a senior figure (Lord Liddle) on the Labour benches. We had our times cut from 5 to 4 minutes so I had to trim a few of my comments. Nevertheless, from the feedback I have received, it hit the right spot! I'll call you later to discuss.

When we spoke last week, we agreed that I would act in a consultancy capacity for you. We discussed fees, and I undertook to write to you, proposing the way forward. We verbally agreed a monthly retainer fee of £3,000.00 plus VAT. I have a number of other clients of my business, Talbot Consulting Limited, including [redacted].

I invoice clients monthly in advance. My terms are payment on receipt of invoice. I charge expenses only by agreement for large amounts such as major travel and overnight accommodation. The initial term of engagement is for one calendar year, renewable by agreement. My areas of expertise are

- Advice on Parliamentary and other matters
- Introductions, representation and support to you and your business in agreed areas
- Networking on your behalf
- Non-Executive functions
- Corporate hospitality hosting

I must point out that, as I explained to you, I personally am unable to undertake political lobbying or advocacy, but I am able to speak in generalities.

Should you agree and wish to proceed on this basis, perhaps you would be kind enough to inform me as to what entity should invoices be addressed.

In conclusion, I look forward to building a mutually successful and beneficial working relationship with you.

With kind regards.

Yours sincerely,

Charles

The Rt Hon The Earl of Shrewsbury and Talbot DL

Director - Talbot Consulting Ltd

**11 June 2020, Email from Oliver Morley to Lord Shrewsbury**

On 11 Jun 2020, at 11:27pm, Oliver Morley wrote:

Dear Charles,

Agreed!

I would like you also to be a non exec director of my new business SpectrumX

The sterilisation pod business.. for credibility sakes and to help open doors for this too at government level.

Hope you agree

Please invoice;

Morley Estates

Best regards

Oliver

**12 June 2020, Email from Lord Shrewsbury to Oliver Morley**

From: Lord Shrewsbury

Date: 12 June 2020 at 6:40:53 am BST

To: Oliver Morley

Subject: Re: Retainer Proposal

Good Morning Oliver.

Thanks for that. Much appreciated. Also, I would be pleased to act as a Non Exec Director of SpectrumX as you suggest. I will call you later today. I'm due to be in Virtual Whip's meetings for most of the morning, so I'm unsure what time it will be, I fear.

Best wishes

Charles

TALBOT CONSULTING LIMITED

**14 July 2020, Email from Lord Shrewsbury to Oliver Morley**

From: Lord Shrewsbury

Subject: My Account

Date: 14 Jul 2020 at 11:53:01 am

To: Oliver Morley

Cc: Lord Shrewsbury

Dear Oliver,

I trust that you are well.

I would be grateful if you would settle my June account by return, please. You will recall that we agreed my fee would be payable on receipt of invoice, and the invoice was dated June 11th. I am due to send you the July account today.

However, should you not wish to continue our arrangement, perhaps you would let me know immediately.

**27 July 2020, Email from Lord Shrewsbury to Oliver Morley**

From: Lord Shrewsbury

Date: 27 July 2020 at 12:12:27 pm BST

To: Oliver Morley

Cc: Lord Shrewsbury

Subject: SpectrumX and other matters.

Dear Oliver,

[...]

Re SpectrumX. I spoke with [redacted] at the end of last week to discuss the current situation of potential marketing. I made a couple of suggestions to him, and he's getting back to me in the next few days. We agreed to have a weekly telephone update, and to meet when the House returns in early September (it resumes on the 2nd).

One suggestion I have is this: When both Houses return, they are going to try to get back to as near normal as possible, though this in my opinion will take some while. At a Whip's Meeting the other day when this was discussed, I raised the subject of testing. To safeguard both members and staff there will more than likely be some form of testing. I suggested to [redacted] that this might well provide an opportunity for SpectrumX. If that worked, then all the way around Westminster are thousands of civil servants and their departments - opportunity.

All food for thought ?

Best wishes

Charles.

Shrewsbury

**Lord Shrewsbury's covering explanatory note to the Commissioner re 6 September email**

Email to Morley dated 6th September 2020.

[redacted]—Morley asked me to work with him telling me that [redacted] did a lot of work with YouGov and knew a great many political people at a high level.

I suggested that I should meet with the Clerk of the Parliaments as stated. I was never due to meet with him on “Tuesday”. I never intended to take the matter further, but I did speak with [someone in the Clerk of the Parliaments’ private office]. [They] did not respond. I had no further communication with [them] or the Clerk.

I further suggested that I had arranged to meet Lord Bethell. I had not and did not intend to talk with him or correspond with him regarding SpectriPOD or SpectrumX. I saw Lord Bethell socially on many occasions as he is a friend.

Further, I stated to Morley that “I intend to meet with him (Alex Burghart) next week”. I had no intention of so doing, and did neither meet nor correspond with him with regard to either SpectriPOD or SpectrumX. The only time I corresponded with him was in Autumn 2021 when as you will be aware, I invited him to visit SpectrumX’s new factory for its official opening, as previously stated. Alex Burghart was at that stage the Prime Minister’s PPS and as such attended Lord’s Whips Meeting every now and again.

Finally, I think the potential to open these door etc”—should have read “ ..... for [redacted] to open these doors .... “

I was having very considerable problems yet again with Morley regarding payment of my accounts rendered, and my email was sent to him to attempt to enthuse him and get him to settle the accounts as you will see in the penultimate paragraph.

### **6 September 2020, Email from Lord Shrewsbury to Oliver Morley**

On 6 Sep 2020, at 10:18, Lord Shrewsbury wrote:

Good Morning Oliver,

Firstly, apologies for not being able to get back to you by email on Friday and yesterday. I’ve had broadband issues at home which have now been fixed. Asia, as you will see from the contents of this email, I felt it necessary to conduct a fair amount of research into the various documents you WhatsApp’d me, and give it. very considerable thought.

Firstly, I would be pleased to write to Lord O’Neil at the Northern Powerhouse, as you suggest. Please let me have a suitable script which I will then convert into my own words to make it appear more personal.

Second, I found all your WhatsApp enclosures extremely interesting. My only regret is that they are what I asked [redacted] for when I first spoke with him and I was under the impression from him that he was working on them - back in July- and that he would send them to me soonest. It didn’t happen, but if it had, I could have started the process with the Parliamentary contacts back then. Sounds like buck passing, but that was what he told me.

Allow me to give you a little background with regard to the management team in Parliament. I know it well as until 18 months ago I was on a Select Committee (The Services Committee) which deals with all issues concerning the running of both Houses of Parliament i.e. Staff, Infrastructure, Catering Outlets, Medical—in fact just about everything. Lord Laming is the Chairman, and the Clerk of the Parliaments sits on the Committee. He is in total charge of the running of the

Palace of Westminster. He advises the various Committees which run the whole affair, and he is all powerful, second only to the Speaker.

After very considerable thought, my suggestion is as follows:

I would intend to discuss SpectrumX next week with The Clerk of the Parliaments with a view to holding a demonstration of the Pod in Parliament to both his senior staff and the Services Committee. I am due to meet with him on Tuesday.

On Monday/ Tuesday I have arranged to meet with the Lords Health Minister, Lord Bethell to discuss SpectrumX in the same vein. However, I would like to go much further than that;

I am on the Advisory Board of a Merseyside Covid testing and tracking business called TAG. Last week, I spoke on their behalf in a Zoom Meeting with Alex Burghart MP who is the Prime Minister's PPS. I know Alex as he attends one of our Whip's Meetings every 2 weeks, and I am in touch with him. I intend to meet with him next week. Alex is at the very top of the feed chain, and is with Matt Hancock, the Education and Policy Unit at No 10, Gavin Williamson—the Education Secretary whom I also know well—and other members of the Cabinet, on a daily basis. You cannot go any higher, I would intend that they should be persuaded to send senior colleagues to a demo of the Pod in Westminster.

Also, it might be of interest for you to have a conversation in due course with TAG. Their Board is made up of very eminent and highly respected academics and physicians, Senior retired members of the Military and suchlike. They are based in Knowsley.

In addition, you mentioned to me that you would be in London next week (Wednesday or Thursday). I think it would be important in fact essential that we meet then to discuss everything, going forward.

Finally, I think the potential to open these doors is very considerable indeed. However, my two outstanding invoices need settling in full by close of play tomorrow Monday 7th September, in order for me to progress this.

I am available all day today on the phone to discuss. If I don't pick up I will call back. Kind regards

CHARLES

**6 September 2020, Email from Oliver Morley to Lord Shrewsbury**

From: Oliver Morley

Date: 6 September 2020 at 9:31:16 am BST

To: Lord Shrewsbury

Cc: [redacted]

Subject: Re: SpectrumX

Dear Charles,

Many thanks for this I will get my team onto all this for you immediately and send you the 'draft' letters for you to forward on ..

Kind Regards,

Oliver Morley I Co-Founder

**7 October 2020, Email from Lord Shrewsbury to the Clerk of the Parliaments' private office**

From: Lord Shrewsbury

Date: 7 October 2020 at 1:30:33 pm BST

To: [Clerk of the Parliaments' private office]

Subject: SpectrumX

Good afternoon [redacted],

You will recall that I had a conversation with your colleague regarding the attached, suggesting that Ed might like to have a look at it with a view to further protecting the Parliamentary Estate and those who work on it.

SpectrumX would be delighted to have the opportunity to demonstrate and present the system. I am in the process of arranging a demonstration and presentation to The Jockey Club for potential use on their racecourses.

I will contact you when you have had an opportunity to look at it.

Kind regards.

SHREWSBURY

The Earl of Shrewsbury

**February 2021, Letter from Lord Shrewsbury to Baroness Barran**

FAO: The Baroness Barran

DCMS

Dear Diana,

I fully support HMG's desire to re-introduce the public to sports venues. It goes without saying that spectators are the lifeblood of all sporting events. Key to their return is that they are protected from the spread of COVID-19. Whilst proven in their usefulness, hand sanitizers and facemasks together with social distancing can only help to protect so far.

I advise a business based in St Helens, near Manchester—SpectrumX Healthcare Ltd. The company has developed a hand sanitizer and a Tunnel Misting system both of which use the same formulation of sanitizing fluid known as Spectricept—a stabilised solution of Hypochlorous acid (HOCl). Following exhaustive evaluation, the formula has received excellent reports from Johns Hopkins University in the United States and was judged to be “an ideal solution for use in rapid walk-through sanitisation units”, and it is currently undergoing an independent evaluation by Imperial College London.

The Tunnel Misting System has been tested and is ready to deploy at sporting events, in order to better protect the public from the possible exposure to

COVID-19. Considerable interest has been expressed by those who run major sports including football, professional boxing, snooker and horseracing.

However, although advice from the Health and Safety Executive (HSE) and Public Health England has discouraged use of Sanitization Tunnels and pods, the basis of this advice has lacked clarity and consistency. HSE has been concerned rightly with the efficacy and safety of disinfectant solutions, emphasising the legal requirement that they should be authorised under the EU Biocide Product Regulations (BPR), unless Article 55 derogation has been granted. The Spectricept solution is in the process of receiving Article 55 derogation to authorise for use in hand sanitizers.

The HSE could use Article 55 derogation to approve Sceptricept or other disinfecting solutions in tunnels or pods but they are unwilling to sanction or encourage use of tunnels based on World Health Organisation advice. In response to an FOi request from SpectrumX, it was established that this advice is based on studies relating to very different and much more basic technologies used during the Ebola outbreak some years ago. These processes involved spraying people with disinfecting solutions (5% bleach / hypochlorite) that were found to be potentially harmful to humans causing skin and eye irritations. The Johns Hopkins study has already established that Sceptricept is an entirely safe solution with no harmful effects on human health.

HSE and Public Health England have also justified their discouragement of Sanitizing Tunnels on the basis that they do not prevent airborne infection. Sanitizing Tunnels that eliminate 99.99% of germs and viruses, including COVID 19 from the entire body envelope, are clearly a more effective and efficient way of protecting people attending and leaving sports and entertainment events from infection via touch and surfaces than the mass deployment of hand sanitizers. Clearly, neither option by itself protects against airborne infection, but it seems illogical and paradoxical that current HSE advice should only sanction the least efficient application of a powerful and safe disinfectant solution.

It is significant that following extensive evaluation of the product by a consortium of Lloyds of London insurance syndicates, the appropriate insurance cover has been granted. Such a decision by those syndicates to extend cover would not have been taken lightly. Should there have been any concerns regarding the safety of the product and its delivery system for human use, cover would not have been forthcoming.

It is my understanding that Government can authorise the use of disinfecting solutions in Sanitization tunnels using derogation powers under Article 55. I would suggest there are strong grounds for considering use of these powers, and for reviewing general guidance on the use of Sanitization Tunnels, where there is demonstrable evidence that individual products and processes are both effective and safe.

In conclusion, SpectrumX deployed its tunnel system for demonstration purposes at the Anthony Joshua Boxing Match at Wembley Stadium shortly before Christmas. It was used by a number of attendees on a voluntary basis, and was highly acclaimed by the organisers and Sky Sports.

I would welcome the opportunity to discuss further with you and your Officials.

With my best wishes.

Yours ever,

CHARLES

The Earl of Shrewsbury & Talbot DL

**11 February 2021, Email from Lord Shrewsbury to Oliver Morley and Damien Hancox**

On 11 Feb 2021, at 09:32, Lord Shrewsbury wrote:

Dear Damien and Oliver,

I refer to Oliver's conversation with me regarding SpectrumX last evening.

I am fully aware of Sir Charles Walker's views and he would have a good deal of support. However, that is not the issue. What is, was Oliver's statement that in the development of the Pod and Walk Through system evaluation process, nothing is progressing and he wants it to be evaluated by Porton Down. I have to say that I have never heard anything so plainly ridiculous. It is not what that establishment does.

I, through my extremely high level contacts, have placed your system in front of Professor James Calder (Oliver insists on referring to him as Mr Calder, which I view as being disrespectful in the extreme) who is one of the very top and most highly respected experts in his field in the UK. He has the ear of the Sec of State and the Prime Minister. He is the principal sports medicine adviser to DCMS. He designed and organised the Nightingale Hospital in London. He is no amateur.

Professor Calder has stated openly his support for the project. He has recommended it to the Gav's Chief Scientist. He has shown you the route to progress down. Through him, you have been provided with the very best. opportunity to have a successful evaluation, but you should be aware that these matters don't happen overnight.

Oliver's "Bull in a China Shop" attitude threatens to destroy all of this good work. And it threatens my reputation.

In addition, I am fed up to the back teeth with having to chase payment of my invoices every month. There are two currently outstanding.

As I said to Damien recently, I have some serious contacts who I would be willing to approach regarding the raising of funds, but not until the project's successful evaluation is signed off by the relevant authorities.

Should Oliver insist on approaching Porton Down or any other body whilst Professor Calder is so generously supporting the project, that will finish it. I am not prepared to run the risk of being labelled as a time waster, nor am I prepared to continue chasing payments constantly. Our agreement was that my invoices would be paid upon receipt.

In the light of these matters, I intend to call Professor Calder today, put him in the picture and advise that he provides no further advice nor assistance. I shall apologise and tell him that I am guilty of poor judgement.

Regards

Charles Shrewsbury



Sent from Lord Shrewsbury's iPhone

**11 February 2021, Email from Oliver Morley to Lord Shrewsbury**

From: Oliver Morley

Date: 11 February 2021 at 10:44:14 am GMT

To: Lord Shrewsbury

Subject: Re: Phone Call last evening

Dear Charles,

I was all at 6s & 7s with regards in the same conversation talking to Lord Shrewsbury who'm I believe I've always been lucky to have a relaxed relationship with calling each other Charles & Oliver,

then we were talking about Sir Charles and I was getting myself in a complete jumble and wasn't sure if Professor Calder title was Sir, Lord or Professor so just reverted back to Mr Calder, if that was wrong or disrespectful then I apologise profusely and clearly no disrespect to you or Professor Calder was intended.

I Just wanted to further explain myself to you in that regard as I am a respectful person and do seriously appreciate your work in helping us overcome the Government regulatory challenges with your top level contacts, Advice & acumen.

Best Regards

Oliver

Sent from my iPhone

**11 January 2022, Email from Lord Shrewsbury to Oliver Morley**

On 11 Jan 2022, at 12:56, Lord Shrewsbury wrote:

Dear Oliver,

Please find my response below.

Kind regards

Charles

Dear Oliver,

It was good to have a discussion on Sunday. Thank you for arranging for various reports with regard to Damien Hancox to be sent to me. I have read them accordingly.

I can confirm what I said to you in the course of our conversation, which I assume you recorded. My involvement with both yourself and Damien has been from the outset when Roy Kenny approached me to have a ZOOM conversation with you. The subject was initially concerning your difficulties with Royal Bank of Scotland and CRG. You decided to retain my services through my business Talbot Consulting Limited. Firstly, the client was Morley Estates, then changing to SpectrumX Healthcare and then in around August last year, SpectrumX Direct.

At no stage whatsoever have I been involved in either the finances or the management of any of these businesses. Talbot Consulting has only ever had a verbal contract to provide advice and introductions to the companies. My instructions originally came from you, and after a while I was contacted by Damien who told me that he was the CEO and Co-Founder of SpectrumX and that I should accept instructions from him going forward.

I am very happy to promote and advise SpectrumX Direct Ltd and its products so long as my agreed fees are settled promptly, and I earnestly believe this business and its products to have very considerable potential and a bright future. However, my client is the Company and not individuals who purport to run it, or the shareholders. I have no wish or need to become embroiled in any altercations and allegations between the individuals involved. I act purely as an outside advisor to the Company on commercial matters.

I am, of course, aware of the allegations made concerning Damien Hancox in the reports you have provided. Until you provided me with the Report, I had no knowledge of any of these issues. In the course of my dealings with Damien in his position as current CEO of the Client, I have never had cause for alarm and my accounts rendered have always been settled on time. I shall continue to act for SpectrumX Direct Ltd so long as they wish to retain me, irrespective of whom the CEO is.

With kind regards.

Yours sincerely,

Charles

The Earl of Shrewsbury

Director - Talbot Consulting Limited

**11 January 2022, Email from Oliver Morley to Lord Shrewsbury**

From: Oliver Morley

Date: 11 January 2022 at 1:50:53 pm GMT

To: Lord Shrewsbury

Subject: Re: SpectrumX Direct

Dear Charles,

Your response is noted,

Don't say I didn't warn you of the impending situation which is about to go 'Hot & Public' accordingly.

I have tried my best to point this out and provide opportunity for you to distance yourself from the said Toxic individuals that's unfolding as is my personal honourable obligation to you as it was my introduction and at the time I was not aware of any of Damien Hancox profile that has infected the business.

May I remind you this is not about the company this is about the individual CEO.

I must say Being a eminent member of the House of Lords as you are,

I find it astounding to read the contents of your letter that you are prepared to continue to be aligned with individuals that have had a clear, continual and unequivocal evidenced History of stealing vast amounts of money from the UK public purse and from the Crown.

However Your position is clear and your prerogative as such.

Wishing you the best of luck in this regard

Oliver

Sent from my iPhone

## APPENDIX 4: EVIDENCE SUPPLIED BY THE DEPARTMENT FOR HEALTH AND SOCIAL CARE

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**24 November 2020, Letter from Lord Shrewsbury to Matt Hancock MP**

The Rt. Hon. Matt Hancock PC MP.

Secretary of State for Health

November 24th., 2020.

Private & Confidential

Dear Matt,

I declare an interest as set out in the Register.

Balancing the twin goals of saving lives and protecting the economy during the coronavirus pandemic has been extraordinarily difficult. No Government has been immune from having to make decisions that either prioritise the economy over health or health over the economy. None of these decisions have been easy. Very few, if any, of these decisions have presented what might be described as net positive outcomes.

However positive solutions are starting to emerge. As ever in a country as endlessly innovative as the UK, the private sector is coming up with answers to at least some of the problems we are grappling. One of these is SpectrumX Healthcare Limited, a company based in St Helens. I recently had a demonstration of one of the disinfectant products they are developing, which is a new generation sanitisation tunnel that eliminates pathogens, including coronavirus, on contact.

The products SpectrumX are developing and their potential application to protect the public are impressive and potentially beneficial in reducing the risk of COVID 19 infection. SpectrumX have been in recent communication with the Health and Safety Executive seeking clarification of current advice, which until now, appears to have recommended against the use of any sanitisation tunnels or pods in any circumstances regardless of the technology used or disinfectant agents applied. In a letter from Richard Bishop, Principal Inspector at the HSE to SpectrumX on November 19, it would appear that HSE advice has been significantly modified. Firstly, Mr. Bishop's letter does not propose any, in principle, objection to the use of sanitisation tunnels, but outlines concerns based on the use of unauthorised disinfectant agents, specifically solutions not authorised under the biocidal products legislation (Regulation (EU) No. 528/2012, commonly referred to as the Biocidal Products Regulation or BPR).

His letter further recognises the danger arising from surface to surface infection and the efficacy of precautions such as frequent washing, alongside measures like mask wearing and social distancing to avoid airborne infection.

Sensibly, the company is not making excessive claims about its technology. They understand that sanitisation tunnels will do little to stem airborne infection. Their argument is that the judicious use of tunnels could do an awful lot to protect people from infection through contact. Whilst testing is continually improving it is limited to detecting the presence of the virus internally. No such test exists to detect if an individual is carrying viral particles on their outer envelope. Given this limitation it seems sensible to sanitise people prior to them coming into close

contact with others. This is especially important when “releasing” individuals from a large gatherings back into the general public and specifically into our public transport network. Despite having little exposure to this kind of technology before I immediately perceived its practical potential. Other companies in the private sector are also buying into what SpectrumX has to offer. The company has deployed its tunnels at world championship boxing events, has had one of its pods at Celtic FC and I understand they are on the brink of announcing more deals with Premier League Football Clubs.

As Government continues to increase the scale and capacity of its mass testing programme, there is now real possibility of being able to re-open important areas of our economy and transport system and once again contemplate the possibility of returning spectators to our sports grounds and stadia. Clearly, in these instances, where washing and the use of hand sanitisers is not a practicable option, the use of sanitisation tunnels using safe and authorized disinfectant agents will be beneficial in reducing the risk of the surface to surface spreading of the COVID 19 virus.

In the Press during the past few days, much has been mentioned about the possibility of getting the public back into football and rugby Stadia and onto Racecourses. In addition, all those involved in Parliament need to get back to work in as safe an environment as possible. The pods and tunnels could have a real positive role to play.

However, it would seem that all this progress is being achieved not with Government support, but despite it. From very early in the pandemic Public Health England and the Health and Safety Executive published advice which specifically warns against the use of sanitisation tunnels. The official UK position is that sanitisation tunnels could be dangerous physically and psychologically. No evidence is offered to back this up, no reasons are given as to why this position has been adopted. At the very least, the HSE should specifically evaluate this product and method which could achieve much in the fight to get the economy and spectator sports back in action whilst safeguarding the public.

Given the wealth of information that now exists about the efficacy and safety of the use of hypochlorous acid and sanitisation tunnels, and the growing adoption of this technology by the private sector, it must now be time for the Government to review its position on sanitisation tunnels. In many areas, such as in the development of vaccines, we are leading the world in fighting against the virus. We should be doing the same in supporting companies that are providing innovative solutions to the problems we are facing. If these tunnels work in the way described by SpectrumX they could offer the ‘win-win’ solution of protecting people and restarting the economy at the same time. I know pilot schemes are already being organised in the private sector. Can I ask your department to engage with SpectrumX and support them in trying to get our country safely and securely back to work? I would be happy to facilitate the process, and make the introductions.

As a Party Whip in the House of Lords, I attend 4 days a week. I would welcome the opportunity to discuss this matter further with you in the House at your convenience.

Yours ever,

Charles

The Earl of Shrewsbury & Talbot DL