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Committee on Standards, HC 1569

Private sitting

Tuesday 18 November 2025

Members present: Alberto Costa (Chair); Paula Barker; Gill Furniss; Sir Francis Habgood; Professor Michael Maguire; Mehmuda Mian; Dr Rose Marie Parr; Anna Sabine; Victoria Smith; Gareth Snell; Dr David Stirling; Michael Wheeler; Carys Williams.

Questions 1-18

Witness

[I](#): Dr Neil Shastri-Hurst MP.



Examination of witness

Witness: Dr Neil Shastri-Hurst MP.

Chair: Good morning, Dr Shastri-Hurst. Is it okay if I call you Neil?

Dr Shastri-Hurst: Absolutely, Chair.

Q1 **Chair:** Thank you for seeking to address the Committee today. In a moment, I shall give you the opportunity to make a brief opening statement, and then I will call members of the Committee to ask questions about the memorandum that we have received from the Commissioner. Today's hearing is not being broadcast, but a full transcript will be made. The transcript is normally published along with any report that we may choose to make to the House.

Neil, do you wish to make an opening statement?

Dr Shastri-Hurst: Yes, please.

Chair: Please go ahead.

Dr Shastri-Hurst: Thank you very much, Chair. Can I just express how grateful I am to the Committee for extending me this opportunity to appear before you?

I am mindful that the Committee is already in receipt of and will have read what is a sizeable core bundle, alongside my relatively lengthy written submissions to the Committee. I therefore do not propose to repeat those submissions, although of course I will be happy to address any questions that may arise from them.

Instead, I intend to use my opening remarks to focus on two main points. The first is an apology. I qualified as a doctor in 2007 and was called to the Bar of England and Wales in 2018. Those represent two of the most heavily regulated professions in this country. Over the course of almost 20 years, I have never once found myself before a regulator. In addition, I have served as a medical member of the Medical Practitioners Tribunal Service, and a component of my work as a barrister was in regulatory law. I mention that merely to reassure the Committee of the importance with which I personally take regulatory matters and those pertaining to any code of conduct.

The principal reason I wish to give oral evidence is to apologise once more, but this time in person, to the Committee as a whole. I hope that the Committee would recognise that throughout this process I have repeatedly apologised for my inadvertent breach. I have attempted, with what I hope have been both timely and full responses, to be as collaborative and as co-operative as possible.

The second area on which I wish to focus is the issues before the Committee. In seeking to assist the Committee, I have set out at paragraph 15 of my written submissions what I respectfully submit are the three fundamental issues to be considered: first, whether on the natural reading of the APPG



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rules and guides to the rules, the responsibility for due diligence was non-delegable; secondly, if that was the case, whether the rules and the guides are open to misapprehension; and thirdly, mitigating factors. I do not propose to repeat what I have said in my written submissions, save to draw the Committee's attention specifically to the following points, on which I will be brief.

The first point is about the precedent for delegation, which I have set out and addressed in paragraphs 26 to 33 and 48 and 49 of my written submissions.

The second point is whether it is fair and reasonable, in all the circumstances, for a Member to read the rules through the prism of the Committee's seventh report of the 2021-22 Session when such a report is not referred to within the rules or the guide to the rules. I have addressed that in paragraphs 18 to 22 and 37 to 39 of my written submissions.

On my personal failure to register and read the advice note sent to me in December 2024, I would like to take this opportunity to profusely apologise again. I note that, had I read that advice note, my practice would of course have differed and would have worked in line with that advice note. Notwithstanding that, there is the question of what weight is to be given to that advice note, and whether it specifically proscribes delegation. That is dealt with in paragraphs 23 to 25 and 40 to 44 of my written submissions.

I respectfully ask the Committee to find that this is not a case in which there was no engagement with the rules at all. However, I fully accept that there may well have been a significant misunderstanding of those rules. Due diligence was performed. In fact, a system of due diligence was put in place, and with the exception of RUK, that proved to be successful. That due diligence included specifically asking partners whether they were funded by a foreign Government. In the case of RUK, the due diligence did not identify that link, and clearly that due diligence process failed. I humbly submit to the Committee that the issue is whether the due diligence could be delegated and whether it was reasonable of me to have done so, rather than that there has been no engagement with the rules and that no due diligence was performed at all.

The fifth point is that while the decision to delegate was, in and of itself, deliberate—it was an act, rather than an omission—for the reasons that I have sought to set out throughout my submissions, there was no intended mischief behind that decision. This was not a deliberate breach of the rules on my behalf. If the Committee were to conclude that the task of due diligence was non-delegable, which is an entirely reasonable position to reach, my act of delegating arose entirely out of a misunderstanding of the intent of those rules. I have dealt with that in paragraphs 35 to 57 of my written submissions.

My sixth point is to highlight to the Committee that there has broadly been some confusion around some of the interpretation of the rules as they currently stand. I draw the Committee's attention to the advice provided—albeit that I accept that it was retrospective—by the Deputy Registrar on



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page 42, lines 5 to 11 of the memorandum, which the Commissioner subsequently rejected at paragraphs 53 to 54 of the memorandum. I raise that merely to demonstrate that the rules are open to being read in more than way.

On the issue of due diligence, I draw the Committee's attention to the rectification decision of the Commissioner in relation to Mr Carden, which was published yesterday. That case dealt with similar due diligence matters, and it concluded that the failure to perform due diligence by the officers was inadvertent and arose due to an insufficient grasp of the APPG rules. I would invite the Committee to do the same in this case.

Finally, I point to the mitigating factors in this case, which I hope I have set out in detail in paragraphs 58 to 83 of my submissions.

I am mortified that my actions or inactions have resulted in this process. I would never intentionally act in a way to undermine the working or reputation of the House. The suggestion that this was a deliberate breach is personally mortifying to me. My integrity is the thing I hold to the highest standard, and to find that questioned is personally devastating.

Q2 Chair: Thank you, Neil. I have a question for you, and then I will invite other members of the Committee to ask questions of you. Just take your time.

The APPG for defence technology was set up in November 2024. How and why was the group formed?

Dr Shastri-Hurst: I came to Parliament with quite a varied professional background. I served in the British Army for seven and a half years as a medical officer; I then worked in the NHS, before becoming a barrister. During my time working in the health service, I worked very closely with the military community at the Royal Centre for Defence Medicine in Birmingham.

I therefore had an interest in defence and in the importance of defence technology, particularly with the global geopolitical threats that we have in this country. I felt that it was an important part of the political discourse that is the bread and butter of this place. I felt that there was an opportunity to bring together like-minded people and ensure that understanding of defence-related matters, particularly those to do with technologies, were promulgated around the House.

Q3 Paula Barker: Thanks, Neil, for your oral and written evidence, which has been very candid. You have touched on this point, but do you want to add anything about how you ensured that you were informed about your responsibilities as the chair and registered contact of the APPG?

Dr Shastri-Hurst: If I can break that into two parts, when I was first elected there was the induction process. Part of that induction process was a session with the Parliamentary Commissioner for Standards, which I think was about an hour long. That session addressed the code of conduct; it did not specifically deal with APPG matters. I have received no formal training



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on the APPG, nor have I received informal training on the workings of the APPG rules.

I accessed a copy of those rules, I read those rules, and I interpreted them in the way that led me to make what I accept may well be considered a breach of those rules in terms of the ability to delegate the responsibility for due diligence. Retrospect is a wonderful thing, isn't it? In retrospect, perhaps I should have sought a training session, although I was not aware that that was an option. I read and interpreted them in the way that I thought was naturally flowing. I did that based on my understanding of other rules, for example on the registration of interests, which can be delegated to another individual.

That was the process that I went through, in terms of reading the rules. Clearly, as I have set out in my written submissions, I missed the advice note. I have been racking my brains as to how I did that. My normal practice is that I read an email and, if I think there is an action point, I mark it as unread so that I know to go back to it. I can only imagine that, on this occasion, that process failed. That was a human error, and it was an error on my part, for which I take responsibility.

Q4 Paula Barker: I think you stated in your written evidence that the APPG has now been wound up, so it is not now in existence. Is that correct?

Dr Shastri-Hurst: That is correct. It is not on the register as of, I believe, 9 September. I had, of course, resigned at that point: I resigned the day after this breach came to light. I felt that I did not have trust and confidence in the secretariat, given the mistake, but also that there was a personal responsibility on my behalf. I was at the top of the organisation; I therefore had to take responsibility. The chairmanship was then taken over by the co-chair from when I was in office. I then received an email to say that it had been wound up, and it is no longer on the register.

Q5 Chair: APPG Secretariat Services Ltd was appointed as the APPG secretariat. How was this company selected?

Dr Shastri-Hurst: James Clark is somebody I had known prior to coming into Parliament. He had worked for a previous MP here and as a special adviser for the former Defence Secretary prior to the election. We had discussions. We felt that he had the necessary skills, albeit that it would be important to have a formalised structure for the secretariat. That is why APPG Secretariat Services Ltd was set up.

Q6 Victoria Smith: There are two parts to my question. First, what responsibilities did the secretariat have? Secondly, what contact did you have with the secretariat once it was appointed?

Dr Shastri-Hurst: The secretariat was responsible for administrative tasks with the APPG. That involved organising meetings. Also, part of that was about engaging with stakeholders so that we would have speakers at those meetings, and looking for partners to support the APPG secretariat in terms of their benefit in kind. There were regular discussions, often by telephone, with me and the co-chair. I accept that perhaps those could have been more



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formalised, but there were regular discussions. There was a period when I was less involved in the APPG, and that was from January through to about March. It coincided with the time when I was absent from this Committee because I was on the Terminally Ill Adults (End of Life) Bill Committee, which of course took up a significant amount of my time.

- Q7 **Michael Wheeler:** Just on the point about the responsibilities of the secretariat, in your submission at 56.5, you say that when the APPG was conceived, both the secretariat and you as the co-chair looked at the rules and you agreed that they would undertake due diligence checks. At that point in time, what was your understanding of the process that they would put in place and the due diligence checks that they would carry out? What was your understanding of what they would be doing at that point in time?

Dr Shastri-Hurst: My understanding was that they would be identifying the organisation. They would be checking their credentials on Companies House to ensure that they were compliant within the rules. I can't recall whether at that stage we had talked about the disclaimer, but of course, prior to the instigation that a disclaimer was put on the correspondence to say that they had to declare whether they were a foreign Government, it was a check through Companies House.

- Q8 **Mehmuda Mian:** The secretariat was funded by "recruiting partners" to the APPG and there was a two-tier system. I am just wondering how and why the system was designed to that effect.

Dr Shastri-Hurst: Ultimately, it was a decision that was made by the secretariat, but there were broad conversations about how this would work. It was felt that having two levels would allow a variety of different partners who may want to support the endeavours of the APPG to be involved in it. Of course, it is a complex and varied playing field with some bigger partners—some primes et cetera—and some smaller SMEs. It was to ensure that it was open to all those who had an interest in the field and wanted to support the work of the APPG.

- Q9 **Mehmuda Mian:** Who decided who could be a partner? Was it the secretariat or was it whoever contributed—whether it was £1,500 or £5,000?

Dr Shastri-Hurst: The secretariat administered it. Of course, the purpose was that people would approach. There was access through the website, or they could do it through correspondence. The secretariat would then check the due diligence that they were eligible before they were onboarded.

- Q10 **Chair:** Just a quick supplementary from me, Neil. You said that the secretariat made the decision on the tiering levels. Is that an appropriate delegation of responsibility?

Dr Shastri-Hurst: Retrospectively, one can argue that maybe it wasn't. I have churned over lots of things and asked whether I would do them differently or whether I gave sufficient oversight. Were I to do it again, I would of course change my practice. Because I didn't consider these to be APPG funds—they were support for the secretariat in order to provide their benefit in kind to the APPG—ultimately, my concern was about whether the



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secretariat was able to support our services and be compliant with the rules. I have to say, I didn't consider their setting of a tier in the context of a broader discussion about whether having a tiered system was an inappropriate thing to do. I am not aware of a rule that says that is against the rules, but, in retrospect—and I will be absolutely clear: I have tendered my notice for every officer role that I have with an APPG, and I am not the chair or registered contact of any other—were I to do it again, I suspect I would be much more interventionist than in this case.

Q11 Dr Parr: Neil, thank you for your oral statement and written evidence. This follows on a wee bit from that. Can you tell us what your understanding was of the APPG rules of accepting and registering funds for the secretariat?

Dr Shastri-Hurst: Are we referring to the importance of due diligence of those funds?

I read that rule as in, funds that are received by the secretariat must go through a due diligence process. I took that it was incumbent upon the officers to ensure it goes through a due diligence process, but much in the way that the registration of interests states that a Member must conscientiously fulfil their registration, it is accepted and there is precedent that that can be delegated to a member of their staff.

Because I saw the secretariat as an administrative role, I considered it was reasonable for them to do that due diligence to ensure that the money that was received was acceptable—much in the way, I think I used the example in my written submissions, that a CEO would sit at the top of an organisation, but there would be a delegation of roles to a CFO. It may be part of my previous military experience or in medicine—you would often delegate tasks to other members of the team.

Ultimately, and I don't shy away from it, if there has been a breach, that sits on me. I trusted the secretariat to do it. Reading things through the prism of the advice note and the seventh report of the Committee in 2021-22, I could see how a different view of that rule may be reached, but it was my honest interpretation of that, given the precedent as I have already said and given what I would consider the normal course of practice in many other fields, that that was a reasonable thing to do. It was not a case that we said, "We will just take money, and we won't have any due diligence process."

Dr Stirling: I am going to ask a slightly different question, if I may, as I think the previous one has been answered already.

Chair: Of course.

Q12 Dr Stirling: In your written evidence, you state that once the system of due diligence had been agreed, I think the phrase you used was, "I did not turn my mind to it any further". You also use the comparison of the registration of interests being delegable to members of staff. Do you accept that if a member of your staff fails to register an interest, the responsibility for that sits with you rather than with that member of staff?



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Dr Shastri-Hurst: Absolutely, and I think I said that a moment ago—ultimately the buck stops with me. You can delegate, but if there is a failure of that process, whatever you are delegating, as the head of the organisation, you are ultimately responsible. I take full responsibility.

The issue I was trying to convey, hopefully, was that once a decision had been made, I did not then go back and reconsider that each time there was a need to do the due diligence, because I felt that there was a robust system in place.

In retrospect, one can say maybe that system wasn't right, and certainly one may say that actually my understanding and interpretation of the rules in terms of the ability to delegate was misplaced. But I fully accept that I am responsible for any error or breach that has occurred.

Q13 Dr Stirling: I think you said that were you to find yourself in this position again, although to some extent you said that you have had enough of APPGs for a while, you would take a more interventionist role in perhaps auditing the process of what was going on by the secretariat.

Dr Shastri-Hurst: Certainly in terms of the due diligence. Having now been aware of the advice note, which I very candidly have said that I failed to register at the time—the due diligence I would do personally. I think in terms of other functions of the secretariat, I would be much more interventionist in terms of auditing things that were done to ensure that I was confident that they were fulfilling the requirements of the rules. I think that is probably appropriate reflective practice.

Q14 Professor Maguire: I think I will ask a slightly different question as well, because the one I planned to ask has been covered.

Neil, what steps did you take to ensure there was a robust system in place with the secretariat?

Dr Shastri-Hurst: As I say, I had known James Clark previously. We had had discussions about the importance of compliance with the rules, talked about the importance of registration and discussed the process that would go forward in terms of how due diligence would be done. I thought that that was a sufficiently robust process, within the framework of my understanding of the ability to delegate the rules. As I say, in retrospect—having seen the Committee's seventh report and having now seen the advice note—of course I would have made different decisions, but I felt that we had had that discussion, confirmed that we had all read the rules and understood the importance of compliance with the rules.

In fairness, the due diligence steps that were put in place almost mirrored those of the advice note, except for the fact that I or one of the officers did not carry them out personally. There is the slightly complex bit about the sub-tab in Companies House, and I have to say that it did not occur to me at the time of setting this up that we must check that. Clearly, in retrospect, I am now much more informed that that would be a step that you would take.

Q15 Professor Maguire: Chair, if I may, I have a second question, on a slightly



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different subject. You talk about the parallel with delegating responsibilities with regard to the registration of interests to staff—staff you have appointed, work with and trust. Do you see a difference in substance or in kind between that and this situation, where you are dealing with defence, which is one of the most sensitive areas of Government activity, with rules that are designed to stop exactly this happening—funding by a foreign Government?

Dr Shastri-Hurst: In hindsight, I can see the point you are making. I suppose I would make the argument that you should not be appointing a secretariat that you do not trust and have confidence in, in the same way that you would not be appointing staff you do not have trust and confidence in. Clearly, the system failed; I cannot deny that. While I am not saying that it is on all fours with the example of delegating to your staff member, I think there are sufficient similarities that I certainly felt at the time that that was a reasonable thing to do. I accept that my interpretation of the rules may ultimately be incorrect.

Q16 **Chair:** Neil, do you have any general reflections on the value and role of APPGs in Parliament?

Dr Shastri-Hurst: I suppose I am looking at it through a slightly distorted prism, because of the experiences that have found me before this Committee. I think that the intentions of APPGs are good. They are there to explore debate and improve the knowledge base, and that is why we are in Parliament: to understand issues with greater clarity and be able to therefore scrutinise the decision making of Government. I have to say that I am not inexperienced, through a variety of careers, in versing through rules and regulations. Looking back at this now, I can see how confusion could arise out of it.

I have made the personal decision to step back from APPGs. I have found this an incredibly humbling experience. I think you can tell from my voice that it has been extremely challenging and deeply upsetting. I would certainly not go out of my way to deliberately breach the rules of a place that I have a huge amount of respect for. But I felt, because of this experience, that it was not an avenue in Parliament that I was going to avail myself of, and therefore that I would seek to get that information elsewhere.

Q17 **Chair:** Can you just confirm, for the benefit of the Committee, that you were not remunerated for your role as chair of the APPG, that it was additional work and that you received no benefit in kind of any substance?

Dr Shastri-Hurst: No, absolutely. APPG events took place, but I had no remuneration out of it.

Q18 **Chair:** Thank you. Would any members of the Committee like to ask any other questions? No.

Neil, do you wish to make any other comment?

Dr Shastri-Hurst: Just to reiterate my absolute and profound apology for finding myself before you. As I said before, this has been a very humbling experience. I take this process with the utmost seriousness, and I hope that



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you can see that from the manner in which I have approached it throughout. While I fully accept that you may well consider there has been a breach of the rules in terms of the delegation of due diligence, it was never my intention to breach that rule. I acted with what I thought were good intentions, albeit that I accept, in retrospect, that it may have turned out to have been the wrong decision to have delegated. I thank you for your time.

Chair: Thank you very much for your time, Neil. I now ask that you withdraw.