

# Written evidence

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## 1. Letter from the Commissioner to Mr Stephen Pound MP, 10 July 2019

I am writing to seek your help with an inquiry into an allegation that you misused parliamentary facilities by accepting payment for talks and perhaps tours given on the parliamentary estate. I attach a copy of an email which I received from the Registrar about this.

### My inquiry

My inquiry will focus on whether you have acted in breach of paragraph 16 of the 2018 Code of Conduct and its predecessors.

### The Code of Conduct for Members

Paragraph 16 of the current Code states:

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

Paragraph 15 in the 2012 and 2015 Codes of Conduct used identical wording. Paragraph 14 in the 2005 and 2009 Codes was worded as follows:

*14. Members shall at all times ensure that their use of expenses, allowances, facilities and services provided from the public purse is strictly in accordance with the rules laid down on these matters, and that they observe any limits placed by the House on the use of such expenses, allowances, facilities and services.*

I would be grateful for answers to the following questions:

### Drew University

- (1) How and when did you first enter into a contract with Drew University?
- (2) Please describe the services you provided, which I understand amounted to a talk followed by email exchanges with students.
- (3) Please explain the terms of your appointment on each occasion.
- (4) Please estimate how long you spent on the talk and email exchanges each year.
- (5) Please supply any details you have about rooms which you booked.
- (6) I understand that you used the payment from the university to buy refreshments and to make charitable donations, sometimes to charities nominated by other

MPs whom you nominated to give talks. Please explain as precisely as you can how these arrangements worked, indicating the sort of sums involved, and whether the charitable donations were made before or after tax.

### **Dods**

- (7) How and when did you come to enter into an arrangement with Dods?
- (8) I understand that a typical engagement would involve your giving a talk and then provide a tour. Please explain as precisely as you can how these arrangements worked.
- (9) Please provide details of any rooms which you booked.
- (10) Please clarify whether each of the payments from Dods was given to charity, whether directly or indirectly, and whether before or after tax.

### **University of Missouri**

- (11) How and when did you come to enter into an arrangement with this university?
- (12) I understand that this engagement involved your hosting a visit and seminar. Please explain as precisely as you can how these arrangements worked.
- (13) Please provide details of any rooms which you booked.

### **Other**

- (14) Please provide details of any other arrangements which you had which involved your providing paid-for services on the parliamentary estate.
- (15) I understand that your arrangements with Dods and with Drew University have now been terminated, and that you have now returned the payment from the University of Missouri. Please confirm that this is correct.

I attach a copy of your entries in the Register of Members' Financial Interests since 2006, plus the Registrar's email of 25 June and a copy of your appointment letter from Drew University. Any further documentation you can provide would be most helpful.

Any other points you may wish to make to help me with this inquiry would also be most welcome.

### **Confidentiality**

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

## Procedure

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

This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published. (I have made a similar request of the complainant.) All the relevant evidence, including our correspondence, will be published when I have concluded my work.

While I do not, at this stage, know whether it will be necessary to interview you about this matter, it would be open to you to be accompanied at any such interview. I am, of course, very happy to meet with you at any stage if you would find that helpful.

I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry.

## Action

I would be grateful to have your response to this letter as soon as possible and no later than 31 July 2019.

10 July 2019

## 2. Letter from Mr Stephen Pound MP to the Commissioner, 24 July 2019

Thank you for your letter of 10 July and I wish to state at the outset that my intention is to cooperate fully with the Commissioner at every stage during your enquiries. I also wish to state for the record that in none of the three areas of concern have I received personal financial or political advantage and that all payments received have been donated to local charities.

Firstly;

### Drew University

My late colleague, [redacted], left the House in 2005 and on a regular basis coordinated a series of lectures for Drew University whose London office was located at [details redacted]. [My colleague] would arrange meetings between Drew University students and British parliamentarians to discuss transatlantic issues and specifically trade and banking. These sessions were held at the offices of the Trades Union Congress in Great Russell Street and took place during the evening or at weekends. I was one of the UK MPs involved and received no remuneration.

In 2010 [my colleague] asked if I would take over the programme again using off-site facilities and not during sitting hours. This involved no remuneration and again I agreed.

During 2011/12 the then Dean of the College asked if I would formally facilitate a series of four meetings during the autumn semester which drew University observed in London. I

was to be paid a gross salary of £1,100.00 and would take one of the lectures myself with a representative of the Conservative, Liberal Democrat and SNP or SDLP taking the other three. The three additional MPs were paid an honorarium of £50 each for a charity of their choice and this increased to £75 in 2018. The payment I received was subject to the higher rate of tax and the balance was paid to local charities principally in the field of Scouting and Guiding (see attached).

The services provided amounted to a talk on current Anglo-American relations and subsequent emails from the students and correspondence following up on specific subjects. In addition, as part of my contract, I would offer advice to the tutors on the content of the course and areas of interest. This was undertaken in my own time and amounted to on average 20 hours for each semester.

The terms of my appointment were an annual renewal with the gross sum of £1,100.00 in 2012, £1,200 in 2013, £1,250.00 in 2014, £1,300 in 2015, £1,350.00 in 2016 £1,400 in 2017 and £1,450.00 in 2018. Full tax was paid as per attached documentation. The net balance in 2018 was £870.00 and the same proportion applied from the beginning of the relationship. Having said that in 2018 I donated two cheques of £440.00 each to [local] Scouts, I observed that I paid out more than I received.

A variety of rooms throughout the estate were booked but where possible the Old Shadow Cabinet Room which is allocated by the Labour Whips' Office was used or sometimes my office. Other rooms were booked for a maximum of one hour. The payments made to MPs who gave talks were directed to charities of their nomination and never amounted to more than £75.00 per Member. These payments were, of course, made after tax had been paid.

Secondly, in respect of DODS, I entered into what was initially an ad-hoc arrangement with DODS in January 2015 when I was asked to give a talk to new staff joining IPSA. I conducted a tour personally and a room had been booked by IPSA without my involvement. I payment of £150 was paid to Greenford & District Scouts. Subsequently I was engaged by DODS to speak to new joiners at the Department of Business, Energy and Industrial Strategy on two occasions when I conducted the tours and they booked the room in which for use to have a Q & A session. Subsequently I was asked by the FCO via DODS to speak to a group of Parliamentarians from Bosnia and Herzegovina attending an anti-corruption conference, a room was booked through the FCO.

This and all subsequent tours and talks were declared at the time and the money paid to charity. The charity groups recorded the donations but I am unclear as to whether they paid tax on them. Most recently I have spoken to staff from the Driver & Vehicle Licensing Agency (DVLA) on over five occasions and these sessions have involved me conducting a tour and then enjoying refreshments on the Terrace on a Thursday afternoon when the House had gone up.

I am aware that I am one of a number of Members of Parliament who undertake this role for DODS and that [name redacted] of that organisation has contacted the Commissioner directly.

In view of the concerns raise during my interview in your office I have ceased this engagement.

Lastly, the University of Missouri was an informal arrangement undertaken as a favour for the Dean of that university who had a connection with the London School of Economics which I attended. Again, any payment received was made out to Scout, Guides, churches, mandirs or allotment associations in Ealing North and a proportion of the £120 received was used to buy the students refreshments. Following my interview with your office I have ceased this arrangement with immediate effect.

I hope the above adequately addresses the questions you raised and I am, of course, available throughout the summer for interview as necessary.

### **3. Extracts from Register for Members' Financial Interests**

#### **1. Register as at 13 January 2012**

Payment of £440 received on 5 November 2011 for lectures for Drew University. Address: 99 Great Russell Street, London WC1B 3LA. Hours: 4 hrs (Registered 20 December 2011)

#### **2. Register as at 18 January 2013**

Payment of £440 received on 5 January 2013 for my role as co-ordinator and for a series of lectures for Drew University. Address: 99 Great Russell Street, London WC1B 3LA. Hours: 8 hrs. (Registered 7 January 2013)

#### **3. Register as at 20 January 2014**

Payments from Drew University. Address: 99 Great Russell Street, London WC1B 3LA.

£400 received on 24 May 2013 for my role as co-ordinator and lecturer in connection with the university's post-graduate studies in the UK. Hours: 6 hrs. (Registered 13 June 2013)

£960 received on 13 December 2013 for a series of lectures and meetings in my role of political co-ordinator. Hours: 12 hrs. (Registered 13 December 2013)

19 March 2013, payment of £238 from the University of Missouri, 118 University Hall, Columbia MO 65211 for a series of political lectures. Hours: 4 hrs. (Registered 27 March 2013)

#### **4. Register as at 26 January 2015**

8 May 2014, payment of £138.00 received from the University of Missouri Curators, 118 University Hall, Columbia, USA, in respect of lecture and meeting provided to students on 15 April 2014. Hours: 3 hrs. (Registered 15 May 2014)

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

5 December 2014, £1,000 received for a series of lectures and meetings in my role of political co-ordinator for the autumn seminar. Hours: 14 hrs. (Registered 15 December 2014)

**5. Register as at 25 January 2016**

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

8 June 2015 received £300 for seminar session. Hours: 4 hrs. (Registered 03 July 2015)

20 November 2015, £1,040 received for a series of lectures and meetings in my role of political co-ordinator for the autumn seminar. Hours: 15 hrs. (Registered 27 November 2015)

Payments from DODS training, 21 Dartmouth Street, London SW1H 9BP, for speaking at Westminster Explained events. All payments were donated to charity. (Registered 15 May 2015)

25 February 2015, payment of £150 for event on 21 January 2015. Hours: 1 hr 20 mins. (Registered 15 May 2015)

8 April 2015, payment of £150 for event on 24 February 2015. Hours: 1 hr 20 mins. (Registered 15 May 2015)

22 April 2015, payment of £150 for event on 10 March 2015. Hours: 1 hr 30 mins. (Registered 15 May 2015)

29 April 2015, payment of £150 for event on 20 March 2015. Hours: 1 hr 15 mins. (Registered 15 May 2015)

29 April 2015, payment of £150 for event on 24 March 2015. Hours: 1 hr 20 mins. (Registered 15 May 2015)

29 May 2015, payment of £150 for speaking event. Hours: 1 hr 30 mins. (Registered 12 June 2015)

**6. Register as at 23 January 2017**

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

5 November 2016 received £1,080 for a series of seminar sessions in my role as political co-ordinator for the autumn semester. Hours: 15 hours. (Registered 15 November 2016)

Payments from DODS training, 21 Dartmouth Street, London SW1H 9BP, for speaking at Westminster Explained events. All payments were donated to charity. (Registered 15 May 2015)

23 February 2016, payment of £150 for event on 17 December 2015. Hours: 2 hrs. (Registered 07 March 2016)

8 March 2016, payment of £150 received for event on 3 February 2016. Hours: 2 hrs. (Registered 16 March 2016)

22 March 2016, payment of £150 received for event on 24 February 2016. Hours: 2 hrs. (Registered 22 March 2016)

13 July 2016, payment of £150 for event on 16 June 2016. Hours: 2 hrs. (Registered 14 July 2016)

24 October 2016, payment of £150 for an event on 20 October 2016. Hours: 2 hrs. (Registered 15 November 2016)

4 January 2017, payment of £150 for an event on 24 November 2016. Hours: 2 hrs. (Registered 05 January 2017)

4 January 2017, payment of £150 for an event on 29 November 2016. Hours: 2 hrs. (Registered 05 January 2017)

28 April 2016, payment of £105 from the University of Missouri Curators, Treasurers Office, 1000 W Nifong Bldg 7, STE 300, Columbia MO 65211, USA, for giving a lecture on the overview of Parliament on 31 May 2016. Hours: 2 hrs. (Registered 02 June 2016)

## 7. **Register as at 22 January 2018**

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

25 September 2017, received £1,120 for a series of seminars, acting as a political co-ordinator for the autumn semester. Hours: 16 hrs. (Registered 04 October 2017)

Payments from DODS Group plc, Level 11, The Shard, 32 London Bridge Street, London SE1 9SG, for speaking at Westminster Explained events. All payments donated to charity. (Registered 15 May 2015; updated 16 March 2017)

4 January 2017, payment of £150 for an event on 24 November 2016. Hours: 2 hrs. (Registered 05 January 2017)

4 January 2017, payment of £150 for an event on 29 November 2016. Hours: 2 hrs. (Registered 05 January 2017)

8 February 2017, payment of £150 received for an event on 17 January 2017. Hours: 2 hrs. (Registered 09 February 2017)

15 March 2017 received £150 for an event on 21 February 2017. Hours: 2 hrs. (Registered 16 March 2017)

15 March 2017 received £150 for an event on 23 February 2017. Hours: 2 hrs. (Registered 16 March 2017)

3 April 2017, payment of £150 for an event on 7 March 2017. Hours: 2 hrs. (Registered 05 April 2017)

3 April 2017, payment of £150 for an event on 21 March 2017. Hours: 2 hrs. (Registered 05 April 2017)

18 July 2017, payment of £150 for an event on 29 June 2017. Hours: 2 hrs. (Registered 26 July 2017)

2 October 2017 received £150 for an event on 18 July 2017. Hours: 2 hrs. (Registered 04 October 2017)

6 November 2017, payment of £300 for two events on 18 and 19 October 2017. Hours: 4 hrs in total. (Registered 07 November 2017)

30 November 2017, payment of £150 for an event on 1 November 2017. Hours: 2 hrs. (Registered 07 December 2017)

10 January 2018, payment of £150 received for an event on 24 November 2017. Hours: 2 hrs. (Registered 17 January 2018)

#### **8. Register as at 21 January 2019**

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

31 October 2018 received £870 for a series of seminars and debates, acting as a political co-ordinator for the autumn semester. Hours: 16 hrs. (Registered 01 November 2018)

Payments from DODS Group plc, Level 11, The Shard, 32 London Bridge Street, London SE1 9SG, for speaking at Westminster Explained events. All payments donated to charity. (Registered 15 May 2015; updated 16 March 2017)

10 January 2018, payment of £150 received for an event on 24 November 2017. Hours: 2 hrs. (Registered 17 January 2018)

1 February 2018, payment of £150 for an event on 29 January 2018. Hours: 2 hrs. (Registered 14 February 2018)

3 April 2018, payment of £150 for an event on 19 March 2018. Hours: 2 hrs. (Registered 11 April 2018)

8 August 2018, payment of £300 for two events. Hours: 4 hrs in total. (Registered 09 August 2018)

28 August 2018 received £300 for two sessions on 28 June and 5 July 2018. Hours: 4 hrs in total. (Registered 29 August 2018)

9 October 2018 received £150 for an event on 20 September 2018. Hours: 2 hrs. (Registered 17 October 2018)

14 November 2018 received £150 for an event on 11 October 2018. Hours: 2 hrs. (Registered 15 November 2018)

14 November 2018 received £150 for an event on 30 October 2018. Hours: 2 hrs. (Registered 15 November 2018)

#### **9. Register as at 1 July 2019**

Payments from Drew University, 99 Great Russell Street, London WC1B 3LA:

31 October 2018 received £870 for a series of seminars and debates, acting as a political co-ordinator for the autumn semester. Hours: 16 hrs. (Registered 01 November 2018)

Payments from DODS Group plc, Level 11, The Shard, 32 London Bridge Street, London SE1 9SG, for speaking at Westminster Explained events. All payments donated to charity. (Registered 15 May 2015; updated 16 March 2017)

8 August 2018, payment of £300 for two events. Hours: 4 hrs in total. (Registered 09 August 2018)

28 August 2018 received £300 for two sessions on 28 June and 5 July 2018. Hours: 4 hrs in total. (Registered 29 August 2018)

9 October 2018 received £150 for an event on 20 September 2018. Hours: 2 hrs. (Registered 17 October 2018)

14 November 2018 received £150 for an event on 11 October 2018. Hours: 2 hrs. (Registered 15 November 2018)

14 November 2018 received £150 for an event on 30 October 2018. Hours: 2 hrs. (Registered 15 November 2018)

14 February 2019 received £150 for an event on 22 January 2019. Hours: 2 hrs. (Registered 26 February 2019)

14 February 2019 received £150 for an event on 31 January 2019. Hours: 2 hrs. (Registered 26 February 2019)

#### **4. Letter from the Commissioner's office to the Director of Customer Experience and Service Delivery, 8 August 2019**

As you know, the Commissioner routinely seeks advice from the relevant House authorities when conducting inquiries into allegations of breaches of the Code of Conduct for Members. I am writing in the Commissioner's absence to seek your advice on an inquiry she is conducting concerning the use of rooms on the parliamentary estate by Mr Stephen Pound MP.

I enclose a copy of the correspondence the Commissioner has exchanged with Mr Pound about this matter. It would be helpful to know how you would have advised Mr Pound if he had sought advice from you/your team before entering into the arrangements described with Drew University, Dods and the University of Missouri

It would be helpful to have a reply by the end of August. If that is not possible, I would be grateful if you or one of your team would let me know in advance.

#### **5. Email from the Director to the Commissioner's office, 30 August 2019**

You wrote to me with reference to an investigation [the Commissioner] is undertaking in relation to Stephen Pound MP. I hope the following is of use.

A range of meeting rooms is available throughout the Parliamentary Estate for use by Members of Parliament. Rooms can only be booked for purposes connected to their parliamentary duties. Bookings can be made via a self-service tool (since April 2014) or by contacting a dedicated team (currently part of the House of Commons Access and Services Team).

Since 2013 (the year from when room booking data is available), Mr Pound has sponsored 102 events where rooms on the Parliamentary Estate have been utilised. (These do not include the Old Shadow Cabinet Room or Mr Pound's office, neither of which are the responsibility of the Room Bookings Team.)

Sponsors are not required to give the specific purpose of a meeting but they must provide a brief title for each room booking. Records show "Drew University" listed 18 times; "DODS" (or "Westminster Explained") 11 times; and "University of Missouri" 3 times. On no occasion did Mr Pound seek guidance from the team regarding the rules relating to the use of rooms.

If advice had been sought, it would have come in two parts:

The purpose of the meetings—as set out in Mr Pound's letter of 24 July 2019—were permissible, being "matters intended to increase the awareness of, or interest in, or promote discussion of Parliament..."; and "matters in which the UK is, or may become involved on a political, economic or military level, and relationships between the UK and any other country or countries".

However, rooms cannot be used to host events of a commercial nature (ie where goods and services are sold); or any other non-parliamentary purpose. If Mr Pound had indicated that he was charging for his services whilst hosting these events, then he would have been told that this was not a permissible use of the rooms.

## **6. Letter from the Head of the Parliamentary Unit at DODS Training**

I met with Mr Pound last week and he informed me that you had spoken with him concerning his guest speaker slots for Dods Parliamentary Communications and the groups of Civil Servants who are attending training events on how Parliament works.

As you may know we at Dods always offer our guest speakers a £150 standard fee for their time. The usual guest speaker slot covers a maximum of one to one and a half hours of the Members time and is paid to a charity of the Members choice.

The fee is specifically for the time that a Member would spend with a group of civil servants and not a payment for a tour of Parliament. We know and fully understand the very clear ruling of the Palace of Westminster that MPs tours are free.

Our invitations to guest speakers are always done on an ad hoc basis and depending on the make-up of the group, Mr Pound sometimes very kindly offers a free short tour (20–30 minutes) for the group before sitting with them and talking to them about his role as a Member of Parliament.

All of the groups that Mr Pound has met have been civil servants from the DVLA in Swansea and other Government Departments in Whitehall and even Indian civil servants from [details redacted] New Delhi. Each group has really appreciated him spending this time with them and taking questions. It puts the training sessions into context when they have the chance to questions an MP of Mr Pound's long standing and calibre about his time in Parliament and helps them to gain a real insight to the political Westminster.

I noted that Mr Pound has offered to conduct these guest speaker slots free of charge for the foreseeable future but we would still like to continue making the donation on his behalf to a charity of his choice. Perhaps there is some way we can come to an agreement on how best to do this whilst at all times ensuring we are not breaking any Parliamentary rules?

## **7. Letter from the Commissioner to Mr Steve Pound MP, 26 September 2019**

My Complaints Manager wrote to you on 8 August to inform you that I would seek the advice of the House authorities as part of my inquiry. When considering matters relating to the use of House-provided resources, I routinely seek the advice of the Director of Customer Experience and Service Delivery. As explained in the previous letter, I asked him what advice he and his team would have offered you had you asked them about using rooms on the parliamentary estate as described in the correspondence.

I now enclose a copy of the emails I have exchanged with [redacted], Director of Customer Experience and Service Delivery. I would welcome any comments you wish to make on the above by 10 October. Once I have your comments, I hope to be in a position to decide how to conclude my inquiry and to begin drafting my decision. I will share a draft of that with you in confidence to give you an opportunity to comment on its factual accuracy before it is published.

## **8. Letter from Mr Stephen Pound MP to the Commissioner, 30 September 2019**

Further to our recent correspondence, I am writing to confirm that I said farewell to Drew University at 11.30 this morning, having booked the Grand Committee Room for the occasion. I have also arranged to meet a number of Drew students individually to discuss transatlantic issues.

I can confirm that no payment was made nor were any benefits received by me.

I should also confirm that with regard to the other occasions on which I have met with Drew University, University of Missouri or civil servants, any payment received was donated in full to charities in [redacted]. It never was my intention to gain financially from these meetings nor did I do so.