

## Contents

---

	<b>Summary</b>	<b>2</b>
	<b>Resolution Letter: The Rt Hon. Elizabeth Truss MP</b>	<b>3</b>
	Letter from the Commissioner to the complainant, 11 October 2021	3
5	<b>Written evidence</b>	<b>4</b>
	1. Email thread between the complainant and the Office of the Parliamentary Commissioner for Standards, 27- 29 June 2021	4
	2. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 19 July 2021	5
	3. Email from The Rt Hon. Elizabeth Truss MP to the Commissioner, 23 July 2021	10
10	4. Letter from the Commissioner to the Registrar of Members' Financial Interests, 28 July 2021	12
	5. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 29 July 2021	13
	6. Advice provided by the Registrar of Members' Financial Interests, 5 August 2021	13
	7. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 6 August 2021	14
15	8. Email from The Rt Hon. Elizabeth Truss MP to the Commissioner, 17 August 2021	15

## Summary

---

5 This reports on an inquiry I started on 19 July 2021, following a complaint received by my office on 29 June 2021, that The Rt Hon. Elizabeth Truss MP had breached the 2019 House of Commons' Code of Conduct. It was alleged that, contrary to paragraph 14 of the Code of Conduct, Ms Truss had failed to register her acceptance of a ticket to the BRIT Awards 2021 on the Register of Members' Financial Interests.

10 During my investigation, I undertook a review of the Register of Members' Financial Interests, which found no record of the event on Ms Truss' register entry. I also sought comments from Ms Truss, as well as advice from House Authorities about the rules and guidance on the Registration of Members' Financial Interests.

15 Having considered the information available to me, I concluded that Ms Truss had received the invitation to attend the BRIT Awards 2021 in her capacity as Secretary of State for International Trade. Therefore, Ms Truss was not required to register her acceptance of the ticket on the Register of Members' Financial Interests, because it will be recorded on the Register of Ministerial Interests.

In view of the above, I found no evidence of a breach of the Code of Conduct and take no further action in this matter.

## Resolution Letter: The Rt Hon. Elizabeth Truss MP

---

### Letter from the Commissioner to the complainant, 11 October 2021

5 I wrote to you on 19 July 2021, to tell you I had begun an inquiry into your allegation that the Rt Hon. Elizabeth Truss MP failed to declare her complementary ticket to the BRIT Awards 2021. In my letter, I explained that I intended to consider whether Ms Truss had breached paragraph 14 of the House of Commons Code of Conduct for Members (“the Code”), which relates to the acceptance of gifts, benefits and hospitality, rather than, as you had initially suggested, paragraph 13  
10 which relates to the acceptance of a bribe to influence a member’s conduct to support or oppose a Bill, Motion, or other matter submitted to the House.

15 Having reviewed the information available to me, including advice from the Registrar of Members’ Financial Interests, I concluded that the evidence submitted did not demonstrate that Ms Truss had breached the Code. My inquiry found that Ms Truss was invited to the event in her capacity as the Secretary of State for International Trade, and, as such, is not required to register her acceptance of the invitation on the Register of Members’ Financial Interests because it will be recorded in the Register of Ministers’ Interests.

20 I will publish my decision and the written evidence pack shortly on my [webpages](#) and I will report the outcome to the Standards Committee in due course.

25 Thank you for bringing this matter to my attention. I confirm that the matter is now closed.

*11 October 2021*

## Written evidence

---

### 1. Email thread between the complainant and the Office of the Parliamentary Commissioner for Standards, 27- 29 June 2021

**From:** Complainant

5 **Sent:** 27 June 2021 13:39

**To:** Commons Registrar

**Subject:** Breach of parliamentary standards (failure to disclose a gift)

On the 11th May 2021, Liz Truss MP received a donation of hospitality tickets to the BRIT Awards with a value of £900.

10 This has not been declared within 28 days as required by the Code of Conduct for Members of Parliament

I am sure you will look into this and take the appropriate action.

**From:** Standards Commissioner

**Sent:** 28 June 2021 14:17

15 **To:** Complainant

**Subject:** Our Reference [details redacted]

Thank you for your email to the Registrar, I have been asked to reply.

20 As you may be aware the [Parliamentary Commissioner for Standards](#) may only investigate allegations that MPs have broken the [rules of conduct](#), found in Section V. paragraphs 11-18 of the House of Commons' [Code of Conduct for Members](#). It is only when she receives an allegation that one of these eight rules of conduct may have been breached, as well as supporting evidence, that the Commissioner can consider opening an inquiry.

Before the Commissioner can consider commencing an investigation she requires:

- 25
- A written allegation (currently via email), explaining which paragraph of the rules has been breached and why

- Sufficient evidence to support the allegation to justify beginning an inquiry
- The name and full postal address of the individual making the allegation

5 I cannot say whether the Commissioner would be able to investigate this matter if she received additional information, but she would be unable to open an inquiry based on the contents of the email you sent to the Registrar. If after reading the rules you believe that a breach has occurred, and if you can provide evidence to support that allegation, it is open to you to write to the Commissioner again and include this information. I hope the details above are helpful to you.

10 **From:** Complainant

**Sent:** 29 June 2021 11:16

**To:** Standards Commissioner

**Subject:** Our Reference [details redacted]

15 I can confirm that paragraph 13 has been broken. It has been broken because Liz Truss MP accepted a complimentary ticket to the 2021 BRIT Awards with a value of £900 and failed to declare this.

<https://www.politico.eu/newsletter/london-playbook/politico-london-playbook-spotted-at-the-brits-the-covid-chilcot-top-billing/>

20 The above article confirms that Liz Truss MP was present at the BRIT Awards 2021. An event that was only open to people who were given hospitality invites. An event that many other MP's also attended and who correctly declared their interest (such as Dehenna Davidson who declared it correctly [https://publications.parliament.uk/pa/cm/cmregmem/210614/davison\\_dehenna.htm](https://publications.parliament.uk/pa/cm/cmregmem/210614/davison_dehenna.htm))

25 *27-29 June 2021*

## **2. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 19 July 2021**

30 I would welcome your help with an allegation I have received from [name redacted], dated 29 June 2021, about your entry in the Register of Members' Financial Interests and your compliance with the House of Commons' Code of Conduct for Members of Parliament. I enclose a copy of [name redacted]

submission for your information, along with a copy of an on-line article<sup>1</sup>, published by Politico on 12 May 2021, which [name redacted] included with her complaint.

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

### **The scope of my inquiry**

5 Although [name redacted] complaint alleges a breach of paragraph 13 of the rules, my inquiry will focus on whether you have acted in breach of paragraph 14 of the House of Commons' Code of Conduct for Members of Parliament. Specifically, I will consider whether you should have registered your acceptance of a complimentary ticket for the BRIT Awards, which took place on 11 May 2021. If the  
10 scope of my inquiry changes, I will update you in writing.

### **The relevant rules of the House**

The overarching rules are found in the House of Commons' Code of Conduct for Members.<sup>2</sup> Paragraph 14 of the Code states:

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

20 Further to the Code, the *Guide to the Rules relating to the Conduct of Members*, which is appended to the Code, states the following in *Chapter 1: Registration of Members' Financial Interests*

#### **Requirements of the House**

25 2. The House requires new Members, within one month of their election, to register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election. **After that, Members are required to register within 28 days any change in those registrable interests.** Such a  
30 change includes both the acquisition of a new interest and the ceasing of any registered interest, for example because an employment has ceased or because a holding has reduced in value or been sold. **[My emphasis]**

---

<sup>1</sup> <https://www.politico.eu/newsletter/london-playbook/politico-london-playbook-spotted-at-the-brits-the-covid-chilcot-top-billing/>

<sup>2</sup> <https://www.politico.eu/newsletter/london-playbook/politico-london-playbook-spotted-at-the-brits-the-covid-chilcot-top-billing/>

### Category 3: Gifts, benefits and hospitality from UK sources

#### Threshold for registration

5 22. Members must register, subject to the paragraphs below, any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.

#### Requirements for registration

##### 23. Under this category Members must register:

10 Any benefits which relate in any way to their membership of the House or political activities, if provided by a UK source either free or at concessionary rates, including:<sup>3</sup>

a) event or travel tickets;

15 b) hospitality in the UK, including receptions, meals and accommodation;

...

#### Next steps

20 I would welcome your comments on the allegation made by [name redacted] that in not registering this matter you have acted in breach of the rules of conduct. I would also be grateful for your answers to the following specific questions:

1. Are you aware of the requirement to register all new financial interests within 28 days of acquisition?
2. Did you consider whether you should have registered your complimentary ticket to the BRIT Awards?
  - 25 a) Please let me know your reasons for not doing so.
3. If, on reflection, you accept that this interest was not registered within the deadline as set by the House, please explain what steps you will now take to prevent any further late registrations?

---

<sup>3</sup> FN31 A concessionary rate should be valued by reference to the nearest equivalent commercial rate.

It would be helpful to receive any evidence to support your responses when you reply to this letter. Any other points you wish to make to help me with this inquiry would also be welcome.

### **Important information**

5 My inquiries are conducted in private. However, following the decision taken by the House on 21 April 2021, I will shortly publish on my webpages the fact that I am conducting an inquiry about your alleged breach of the Code of Conduct. If contacted, my office will not comment on any aspect of this specific inquiry to third parties. They will answer direct factual questions about the processes I follow, and  
10 the standards system more generally, but will not provide any comment or details about the particulars of this inquiry.

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. The same requirement extends to [the  
15 complainant].

The Members' Services Team (MST) can support and signpost you and/or your staff to appropriate support services. You can contact them confidentially on [details redacted] for a range of issues, including support with handling the impact of media attention.

### **20 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.

25 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. If I do so, I will share that  
30 correspondence with you.

Information provided to me during the course of my inquiry will be retained, and disposed of, in accordance with the House of Commons' Authorised Records Disposal Policy.



## Potential outcomes

5 Inquiries are generally concluded in one of three ways. If the evidence does not substantiate the allegation, it will not be upheld. If the evidence demonstrates a breach of the rules, I may, in circumstances defined by Standing Order No. 150, uphold the allegation and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards. Where an allegation is not upheld or is rectified, the investigation material, including our correspondence, will be published on the Parliament website.

10 If I uphold the allegation, and it is either unsuitable for the rectification procedure, or you do not accept my decision, I must make a referral to the Committee on Standards. My memorandum to the Committee will be published as an appendix to the Committee's own Report.

15 Regardless of the outcome of my inquiry, I must emphasise that all the relevant evidence, including our correspondence, will be published when this inquiry is concluded. I routinely redact the personal data of third parties unless it is relevant to my decision. Please tell me if you provide sensitive material that you think I should redact. I will consider carefully any such request.

## Action

20 I would be grateful to have your response to this letter as soon as possible and no later than Friday 30 July 2021. Please let me know before that date if you require more time to respond.

If you would prefer me to communicate with you via a different postal address, please give the details when you reply to this letter. It would also be helpful if you were willing to provide a telephone number through which I might contact you.

25 Due to the ongoing pandemic restrictions, my team are working from home only, so I would be grateful if you could send your response electronically to;

standardscommissioner@parliament.uk

Thank you for your cooperation with this matter.

30 **Extract of article from Politico 12 May 2021**

**POLITICO London Playbook: Spotted at the Brits — The COVID Chilcot — Top billing**

BY EMILIO CASALICCHIO

May 12, 2021 7:59 am

...

**FIRST WESTMINSTER NIGHT OUT:** MPs, aides and hacks were glitazing it up at the BRIT Awards last night — marking the first time a significant chunk of the Westminster bubble has found itself at one big event since the pandemic struck. The Brits formed part of the COVID-19 trials on mass gatherings, meaning 4,000 people packed into the O2 arena with no face masks or social distancing.

...

*19 July 2021*

10 **3. Email from The Rt Hon. Elizabeth Truss MP to the Commissioner, 23 July 2021**

Thank you for your email and letter of 19th June 2021 regarding an allegation made over the registration of tickets to the BRIT Awards 2021.

15 The tickets to the BRIT Awards were gifted to me in my ministerial capacity as Secretary of State for International Trade and subsequently will be registered on the Department for International Trade transparency return in due course.

Please see attached evidence to support my response.

20 Most grateful if you could confirm that as this ticket was in my ministerial capacity it does not need to go on my register of members interests and this matter can now be concluded.

**Enclosure: Email from the Chief Executive, BPI, BRIT Awards & Mercury Prize, to The Rt Hon. Ms Elizabeth Truss MP, 27 April 2021**

**From:** [details redacted]

**Sent:** 27 April 2021 11:22

25 **To:** Secretary of State for International Trade [details redacted]

**Subject:** Events Research Programme: Invitation to the BRIT Awards 11 May 2021

30 We are delighted that the BRIT Awards, taking place on 11 May 2021, will take part in front of a live audience as part of the Government's Events Research Programme (ERP). We would like to invite you to join us at this special event as a guest of the BPI.

Most of those attending this celebration of live music and British talent will be an audience of invited key workers, recognising the extraordinary contribution of those working on the frontline during the COVID-19 emergency. A ballot for the 2500 tickets being gifted by record labels has been run.

- 5 The BRIT Awards – always a great celebration of British music talent – will be the first major indoor music event to welcome back a live audience. We hope that by running this pilot event we will support the return of live music at scale, after a year in which live music has been so badly hit.

- 10 We hope that you will be able to join us to share in this significant moment for British music and for the reopening of the economy. We will be able to brief you on the work we've done to ensure the BRITs can take place safely, and what we're doing to help the Government's ERP learn from the event so that more live events can return safely.

- 15 **The event is on Tuesday 11 May 2021 at the O2 Arena. Detailed joining instructions will be shared closer to the event;**

**Doors open: 1800hrs // Show end: 2230hrs**

- 20 Please RSVP to [REDACTED] confirm your attendance. Regrettably, given capacity issues, we will be unable to extend this invitation to friends or family and it is non-transferable.

I look forward to hopefully seeing you there.

**Enclosure: Email from The Rt Hon. Ms Elizabeth Truss MP to the Chief Executive, BPI, BRIT Awards & Mercury Prize, 30 April 2021**

- 25 **From:** Secretary of State for International Trade [details redacted]

**Sent:** 29 April 2021 13:26

**To:** [details redacted]

**Subject:** RE: Events Research Programme: Invitation to the BRIT Awards 11 May 2021

- 30 Thank you for the invite. The Secretary of State would be delighted to attend the BRIT Awards on Tuesday 11 May.

Please could you confirm if the Secretary of State may be accompanied and, if so, by how many?

**Enclosure: Email from the Office Manager & Executive Assistant to CEO at BPI, to The Rt Hon. Ms Elizabeth Truss MP, 1 May 2021**

**From:** [details redacted]

**Sent:** 1 May 2021 17.30

5 **To:** Secretary of State for International Trade [details redacted]

**Subject:** Response Req. before 12pm Tue 4th May: BRIT Awards - Dietary & Access reqs.

10 We're delighted you're able to attend the BRIT Awards 2021 as part of the Events Research Programme. **Please could you let me know before midday on Tuesday 4th May if you have any dietary or access requirements?**

Early next week I will send over the details regarding the processes in place but in the meantime all details are also on the FAQ page here: [details redacted]

We're looking forward to seeing you there.

*23 July 2021*

15 **4. Letter from the Commissioner to the Registrar of Members' Financial Interests, 28 July 2021**

I would like to ask your advice on a complaint I have recently received about The Rt. Hon. Elizabeth Truss MP. In essence, the complaint is that, contrary to paragraph 14 of the Code of Conduct for Members, Ms Truss failed to register her acceptance of a ticket for the BRIT Awards 2021 in the Register of Members' Financial Interests under Category 3: "Gifts, benefits and hospitality from UK sources" as required by the House.

25 I enclose a copy of my letter to the Member, dated 19 July 2021, and her reply of 23 July 2021. I have also enclosed a copy of the supporting evidence which led to me initiating this inquiry for your information.

30 In response to my enquiries, Ms Truss said the tickets had been gifted to her in her capacity as the Secretary of State for International Trade. Ms Truss said the ticket would be declared on the transparency register in due course.

Given the above, I would welcome your view on the following:

- 35
- Was Ms Truss required to register her acceptance of the ticket in the Register of Members' Financial Interests?

- Is any additional information required regarding Ms Truss' ministerial register entry?

5 It would be very helpful to have your reply by 11 August 2021. Please note that, in accordance with the investigation process, your advice on this matter will be shared with Ms Truss.

If you require further information from Ms Truss before giving your advice, I would be happy for you to contact her directly.

Thank you for your assistance.

10 *28 July 2021*

#### **5. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 29 July 2021**

Thank you for your email dated 23 July 2021, and for the information you provided.

15 In my letter to you of 19 July 2021, I said that I may seek the advice of the House authorities as part of my investigation. I have written to the Registrar of Members' Financial Interests and a copy of that letter is included for your information (minus the enclosures previously shared with you).

20 Once I have received the Registrar's reply, I will write to you again regarding the next steps. In the meantime, this matter remains protected by parliamentary privilege and should continue to be kept confidential.

*29 July 2021*

#### **6. Advice provided by the Registrar of Members' Financial Interests, 5 August 2021**

25 Thank you for your letter of 28 July about the Rt Hon. Elizabeth Truss MP. Ms Truss has not registered her acceptance of a ticket for the BRIT Awards.

I shall respond to your questions in the order in which you asked them.

1. Was Ms Truss required to register her acceptance of the ticket in the Register of Members' Financial Interests?

30 Ms Truss tells you that she received the ticket in her Ministerial capacity as Secretary of State for International Trade, and she has provided evidence in the form of correspondence with her private office. On that basis I would have advised her that she was not required to register it in the Register of Members' Financial Interests. If I had spoken to Ms Truss I would have drawn her attention to paragraph

16 of the Introduction to the Guide to the Rules, which I have reproduced below. (I have highlighted the most relevant sentence.)

### Ministers of the Crown

5 16. Ministers of the Crown who are Members of the House of  
 Commons are subject to the rules on registration and declaration of  
 interests in the same way as all other Members (although Ministerial  
 office is not registrable and salaried Ministers may still speak in  
 support of Government policies without breaching the restrictions  
 on lobbying for reward or consideration). **Members are not**  
 10 **required to register either Ministerial office or benefits**  
**received in their capacity as a Minister.** But Ministers are subject  
 to the further guidelines and requirements laid down by successive  
 Prime Ministers in the Ministerial Code, available from the Cabinet  
 Office. These are not enforced by the House of Commons and so are  
 15 beyond the scope of this Guide.

2. Is any additional information required regarding Ms Truss's ministerial register entry?

I would not normally ask a Member for information about what they had disclosed to their department about benefits they had received.

20 Ms Truss has forwarded correspondence showing that the occasion formed part of the Events Research Programme, but she has not told you who paid for her ticket to the Brits.

If I had spoken to her would also have reminded Ms Truss that, whether or not she decided to register this benefit, she ought bear in mind the possible need to draw  
 25 attention to it in proceedings, in discussion or in correspondence; in fact on almost any occasion when others might reasonably consider it to influence her. Full guidance on such ad hoc disclosures (declarations) is in Chapter 2 of the Guide to the Rules (link below).

*5 August 2021*

30 **7. Letter from the Commissioner to The Rt Hon. Elizabeth Truss MP, 6 August 2021**

In my letter of 29 July 2021, I explained that I would be seeking the advice of the Registrar of Members' Financial Interests. I have now received the advice, and I  
 35 enclose a copy of the response dated 5 August 2021 for your information.

In view of the Registrar's advice and comments, I would ask that, in order to assist me further, you provide the following information:

- Please can you confirm who paid for your ticket to the BRIT Awards 2021?

5 Please could you reply by 20 August 2021. In the meantime, our correspondence remains protected by parliamentary privilege, and I must ask that you continue to maintain the strict confidentiality of the inquiry.

*6 August 2021*

**8. Email from The Rt Hon. Elizabeth Truss MP to the Commissioner, 17 August 2021**

10 I have read your letter and the advice from the Registrar. As they set out under the code, Members are not required to register benefits received in their capacity as a Minister.

I received the invitation to the BRITS through my role as Secretary of State for International Trade. I have already provided this evidence.

15 You should see that I have previously declared hospitality as an MP and as a Minister as published publicly.

I used my judgement on this occasion to declare this through my holding office as a Minister, and it will be published through the Department for International Trade transparency return in due course.

20 I trust this will bring your investigation to a close.

*17 August 2021*