

I write to request an investigation into the possible breach of paragraph 13 of the Code of Conduct for Members of Parliament by David Duguid MP and Douglas Ross MP.

Both Mr Duguid and Mr Ross received donations from the Scottish Unionist Association Trust (SUAT). However, their reporting in the Register of Members' Financial Interests is inconsistent. Mr Duguid [listed SUAT](#) as having "other" donor status, while Mr Ross [listed SUAT](#) as a "friendly society". Both MPs also gave different addresses for SUAT. This suggests that either Mr Duguid and/or Mr Ross have misreported details of a donor in the Register of Members' Financial Interests.

Accountability and openness are two core principles of the Code of the Code of Conduct. The potential misreporting of inconsistent information about SUAT by MPs is therefore a cause for concern. Without an accurate Register of Members' Financial Interests, the public cannot effectively scrutinise whether Members' financial interests are having an undue influence over the policy-making process. This scrutiny can only be done effectively if the public has access to information that is correct in the first place.

I ask that the Commissioner for Standards investigates whether these MPs, or their election campaign teams, misreported the status of the donor and thereby violated paragraph 13 of the Code of Conduct.

Supporting evidence:

(1) The inaccurate reporting of donations

Given that two MPs have registered SUAT with different addresses, and listed them as having different statuses, it is clear that donations from SUAT have not been accurately reported. Mr Duguid [listed SUAT](#) as having "other" donor status (first registered on the 6 July 2017), while Mr Ross [listed SUAT](#) as a "friendly society" (first registered on 7 July 2017).

When [questioned by the BBC](#) about the donation from SUAT, Mr Duguid said he had been "more focused on winning the election than where any donation was coming from." He said that every donation to his electoral campaign "went through the appropriate process" and that whether SUAT were an appropriate donor is "a matter for the party".

In Mr Ross's case, all friendly societies are supposed to be registered with the Financial Conduct Authority. But SUAT is not currently registered (as of 16 July 2018) on [the Mutuals Public Register](#).

It is a cause for concern that the MPs in question have not done sufficient due diligence on their donors. Furthermore, the apparent inaccuracy of the donor's details makes it impossible for members of the public to find out who is making donations to MPs.

A good faith interpretation of this inaccurate reporting is that it is the result of an administrative error. Nonetheless, for the register to have integrity it is vital that MPs report donations correctly.

Inaccurate reporting precludes robust scrutiny of MP's financial interests, and misreporting

undermines the integrity of the whole register. At the very least, the Register of Members' Financial Interests should be amended to include the correct information about SUAT.

(2) The unclear permissibility of SUAT donations

Given that the Electoral Commission has opened an investigation into SUAT donations following inconsistencies [reported by The Ferret](#), there is clearly a reasonable suspicion that donations from SUAT may be impermissible.

Parliamentary authorities should conduct their own investigation into whether MPs that received donations from SUAT undertook sufficient due diligence to ensure that they were in compliance with the law when they accepted donations from SUAT in light of these concerns.

The onus should be on MPs and their staff to check the source of their donations and ensure that both the source of the money and the interests of the donor are known to the public.

The recent report on MPs' Outside Interests ([July 2018](#)) by the Committee on Standards in Public Life, to which Unlock Democracy gave evidence, has already recommended that the Parliamentary Commissioner for Standards and the Commons Committee on Standards should undertake a review of the rules around registering interests.

While beyond the scope of this complaint, this particular case does suggest that MPs are currently able to misreport their financial interests with limited accountability, and that inadequate due diligence financial donors is currently happening. This is to the detriment of transparency, public scrutiny, and accountability, and has the potential to undermine public trust in politics.

I look forward to your response,

Alexandra Runswick
Director, Unlock Democracy
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