



HOUSE OF LORDS

Committee for Privileges and Conduct

2nd Report of Session 2010–11

The Conduct of the Earl of Caithness

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The Committee for Privileges and Conduct

The Committee for Privileges and Conduct is appointed each session by the House to consider questions regarding its privileges and claims of peerage and precedence and to oversee the operation of the Code of Conduct. Detailed consideration of matters relating to the Code of Conduct is undertaken by the Sub-Committee on Lords' Conduct.

Current Membership

The Members of the Committee for Privileges and Conduct are:

Baroness Anelay of St Johns
Lord Bassam of Brighton
Lord Brabazon of Tara (*Chairman*)
Lord Brooke of Sutton Mandeville
Baroness D'Souza
Lord Eames
Lord Graham of Edmonton
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Lord Scott of Foscote
Lord Shutt of Greetland
Lord Strathclyde

The Members of the Sub-Committee on Lords' Conduct are:

Lord Cope of Berkeley
Lord Dholakia
Lord Irvine of Lairg
Baroness Manningham-Buller (*Chairman*)
Baroness O'Neill of Bengarve

The Code of Conduct and the up-to-date Register of Lords' Interests are on the Internet at <http://www.publications.parliament.uk/pa/ld/ldreg.htm>.

General Information

General information about the House of Lords and its Committees can be found at <http://www.parliament.uk/lords/index.cfm>.

Contacts

General correspondence should be addressed to the Clerk of the Committee for Privileges and Conduct, House of Lords, London, SW1A 0PW (telephone 020 7219 8796).

Correspondence relating to the work of the Sub-Committee on Lords' Conduct should be addressed to the Clerk of the Sub-Committee on Lords' Conduct, House of Lords, London SW1A 0PW (telephone 020 7219 8750).

THE CONDUCT OF THE EARL OF CAITHNESS

1. We have received a report by the Sub-Committee on Lords' Conduct on the conduct of the Earl of Caithness, following an investigation by the House of Lords Commissioner for Standards. The report by the Sub-Committee on Lords' Conduct is printed at Appendix 1; the report by the Commissioner for Standards is printed at Appendix 2.
2. The Commissioner has found that Lord Caithness breached the rules of the House governing the use of facilities and refreshment department functions, and has disposed of the complaints by way of agreed remedial action. The Sub-Committee has endorsed the Commissioner's conclusions, and recommends no further action.
3. **We make this report to the House for information.**

APPENDIX 1: REPORT FROM THE SUB-COMMITTEE ON LORDS' CONDUCT

Code of Conduct: complaint against the Earl of Caithness

Report from the House of Lords Commissioner for Standards

1. The Sub-Committee has received a report from the Commissioner for Standards about the conduct of the Earl of Caithness. The Commissioner's report is printed as an appendix to this report.
2. The Commissioner has found that Lord Caithness breached the rules of the House governing the use of facilities and refreshment department functions. The Commissioner has disposed of the complaints by way of agreed remedial action, as provided for in paragraph 123 of the Guide to the Code of Conduct. We consider that to be appropriate and recommend only that a report be made to the House for information.

"Remedial action"

3. The Commissioner has drawn the attention of the Sub-Committee to the usefulness of remedial action in dealing with breaches that are minor and fully acknowledged by the member concerned. We agree. In cases such as this, it would be disproportionate for the Sub-Committee to have to recommend a sanction.
4. The Guide to the Code of Conduct does not however make clear provision for remedial action beyond amendment of the Register. We will consider this matter in more detail when we start our review of the Guide after the summer recess. In the short term, we consider that future letters of apology agreed between the Commissioner and a member should be addressed to the Chairman of this Sub-Committee and included with the Commissioner's report. In such cases, it would also be desirable if the Commissioner exercised his duty to inform the complainant of the action taken at the time at which any report from the Committee for Privileges and Conduct is published.

APPENDIX 2: REPORT FROM THE HOUSE OF LORDS COMMISSIONER FOR STANDARDS ON COMPLAINTS AGAINST THE EARL OF CAITHNESS

Complaints

1.1 On 14 April 2010 Mr Niven Sinclair wrote to the Registrar of Lords' Interests to complain about the Earl of Caithness and specifically alleged that the Earl had breached the Code of Conduct for Members of the House of Lords (see Annex A). He included a copy of a website advertisement for a commercially organised trip to the United Kingdom which included a 'private tour of Parliament with Lord Caithness.'

1.2 On 24 May 2010, Ms Rhoda Grant MSP wrote to the Clerk of Parliaments citing the same website as mentioned by Mr Sinclair and asked the Clerk to investigate a potential breach of the relevant rules to which peers must adhere (see Annex B)

1.3 The House approved my appointment to the post of Lords' Commissioner for Standards on 2 June 2010 and I took up my appointment on 3 June 2010 when both complaints were forwarded to me. I wrote to both complainants advising them that I was now responsible for assessing their individual complaints. In compliance with the Guide to the Code of Conduct, I conducted a preliminary assessment and determined that both complaints justified investigation. For investigative purposes I treated them as a single complaint as both complainants referred to the one set of facts. On 10 June 2010, I advised the complainants of my decision. I also wrote to the Earl of Caithness, inviting him to respond in writing with a full and accurate account of the matters in question (see Annex C).

Investigation

2.1 The current Code came into force on 18 May 2010 but is not retrospective in scope. However, the enforcement process set out in the Guide to the Code of Conduct is retrospective, in that the Commissioner may investigate allegations made within four years of the conduct complained of. Both complaints refer to conduct in 2009.

2.2 Both complainants refer to a website advertisement for a commercially organised trip to the United Kingdom which included a 'private tour of Parliament with Lord Caithness.' The advertisement constituted *prima facie* evidence that there may have been breaches of the following rules:

Functions are not to be used for purposes of direct or indirect financial or material gain by a sponsoring Member, political party, or any other person or outside organisation;¹ and

Members may raise money for charity by offering private tours of the Palace but not for any other cause².

2.3 Research revealed that the Earl of Caithness had made a booking for the Attlee Room on 14 October 2009 and subsequently cancelled his booking

¹ House Committee, *Refreshment Department Functions*, 3rd Report, Session 2008-09 (HL Paper 144). Agreed by the House and effective from 20 October 2009.

² House Committee, *Rules Governing the Use of Facilities*, 2nd Report, Session 2009-10 (HL Paper 47). Agreed by the House and rules effective from 16 March 2010.

reservation on 19 January 2010. The date reserved was 17 May 2010 when a party of between 16 and 32 was expected for lunch. The website advertisement envisaged the tour party departing America on 15 May 2010 and gathering in London for a ‘private tour of Parliament.’

2.4 On 27 June 2010 the Earl of Caithness wrote to me (see Annex D) and provided an explanation in response to the complaints and supporting material supplied to him.

Consideration and response

3.1 In my view the website advertisement could, not unreasonably, give rise to the impression that the Earl of Caithness was associated with a commercial venture which involved the use of House of Lords facilities. However, his response is comprehensive and frank. A venture initially based on friendship with the potential for charitable giving, changed character with the involvement of travel agents and the open advertisement for additional paying participants. The Earl of Caithness is quite clear that this change took place without his knowledge. He then explicitly recognises that the website advertisement could be construed as suggesting that he had a financial interest in showing paying guests around the House of Lords. The trip and visit to Parliament never took place and he cancelled his booking with the Refreshments Department.

3.2 I have carefully considered the behaviour complained of and the Earl of Caithness’ response. I believe that he breached the rules governing the use of facilities and refreshment department functions agreed by the House. However, he was extremely open in his response and sets out an account which I have no reason to challenge. He specifically and explicitly apologises for not being more alert to the danger that third party action could transform what he intended as a *bona fide* booking into one which could create a false impression. He acknowledges the need to uphold the highest standards of probity as a Member of the House of Lords. I am satisfied that his letter of response is genuine and heartfelt and enables me to dispose of this matter by way of ‘remedial action’ as set out at Paragraph 123 of the Guide to the Code of Conduct. The Earl of Caithness has “put the record straight” and apologised for his actions which gave rise to the concern reported by the two complainants. Thus, no further action is required or appropriate.

3.3 I wrote to the complainants on 8 July 2010 advising them that I had upheld their complaints and agreed ‘remedial action’, namely a full explanation from the Earl of Caithness, an apology for not being more alert to how third party action could project a false impression and a commitment to ensuring no actions of his will give rise to similar concern in the future.

3.4 I consider that remedial action in the form of an apology is a valuable tool to conclude breaches such as this, but the Guide to the Code of Conduct does not say much about its operation. I would welcome the Sub-Committee’s guidance as to whether such apologies are better directed to the House or Sub-Committee rather than to me.

Paul Kernaghan

House of Lords Commissioner for Standards

8 July 2010

Annex A: Letter from Niven Sinclair to Brendan Keith, Registrar of Lords' Interests, 14 April 2010

The Earl of Caithness

You may recall that I wrote to you on 6th March drawing your attention the apparent connivance of Lord Caithness in a purchase which was aimed at the avoidance of Capital Gains Tax which I considered fell within the seven principles which are set out in the Code of Conduct expected from members of the House of Lords.

Your reply of the 16th March intimated that my complaint fell outside that Code of Conduct and, in consequence, the relevant Sub-Committee on Lord's Interests and Conduct had no jurisdiction to receive my complaint. As my complaint was clearly in the public interest, I found your decision to be surprising but, perhaps, the following information and attachments will fall within the Code of Conduct for which your sub-Committee is responsible for monitoring:

“Relevant financial interests

12. The following financial interests are always relevant and therefore must be registered:

(a) any consultancy agreement under which Members of the House provide parliamentary advice or services. A copy of any such agreement, and the remuneration received by Members for advice in relation to parliamentary matters, must be deposited with the Registrar of Lords' Interests, so that details are available for public inspection.

(b) employment or any other financial interest in businesses involved in parliamentary lobbying on behalf of clients, including public relations and law firms but Members of the House involved with organisations that offer commercial lobbying services are not obliged to refrain from participating in parliamentary business in connection with all clients of that organisation but only their personal clients;

(c) any remunerated service which Members of the House provide by virtue of their position as members of Parliament, and the clients of any such service.

(d) employment as a non-parliamentary consultant;

(e) remunerated directorships;

(f) regular remunerated employment (excluding occasional income from speeches, lecturing, broadcasting and journalism);

(g) shareholdings amounting to a controlling interest;

(h) provision by an outside body of secretarial and research assistance;

(i) visits with costs paid in the United Kingdom and overseas, made as a Member of Parliament, except any visits paid for from public funds” (<http://www.publications.parliament.uk/lpa/ld/ldcond/ldcond.htm>)

It now appears that Lord Caithness has been hired to conduct luxury ‘castle tours’ of the United Kingdom and of Parliament.

<http://rcrusoe.com/jomneyCastleHoppingScotlandHosted.aspx?refPage=c7>

Part of the ‘castle tours’ includes the following itinerary items:

“Meet the 20th Earl of Caithness, Malcolm Ian Sinclair: Member of Parliament, Chief of Clan Sinclair, founder of the Clan Sinclair Trust, and overseer of the restoration of an incredible ancestral castle on the north Scottish coast.

The R Crusoe and Son sales pitch advises us to:

“Come along with Lord Caithness to meet his colleagues, cousins, and friends in Scotland--- people who play a significant role in the running of today’s British Government as well as in the preservation of Scottish history.

“We gather in London, England for a private tour of Parliament with Lord Caithness, who introduces us to several colleagues over lunch. The Lord Speaker, Lady Hayman, or the Leader of the Conservative Party, Lord Strathclyde, joins us for a chat.

“Then we’re off to Scotland. Edinburgh, first, for a visit to the Scottish Parliament accompanied by the Member* who represents Caithness and Sutherland, Lord Caithness’s ancestral turf. From our home base at The Balmoral Hotel, we day-trip outside the city limits to Hopetoun House, where—after a tour of their home—we take lunch with Lord and Lady Hopetoun...”

Departures: 15 May 2010

Prices: Per person sharing room from \$10,980

Internal air per person \$260

The member who represents Caithness and Sutherland (and Easter Ross) is Viscount Thurso who was also a Member of the House of Lords until he stood for Parliament and is now known as John Thurso, M.P. He was also involved in the evasion of Capital Gains Tax as he, too, is a Trustee of the Clan Sinclair Charitable Trust which is under investigation by the OSCR (Organisation of Scottish Charity Regulators).

It is clear from the foregoing that the Earl of Caithness is being employed by R. Crusoe solely because he is a member of the House of Lords and that he, Malcolm Caithness, is using that position to show his clients around the Houses of Parliament and to introduce them to such people as Lady Hayman and Lord Strathclyde.

Last year Lord Caithness made claims on the public purse which came to £64,924. See attachment. Now he is aiming to add to that sum by showing well-heeled clients around the House of Lords privately and to give them lunch there. It is interesting to note from the Lords’ Hansard text for the 14th December, 2009 that Lord Caithness’s principal contribution to the debate was on the subject of expenses for (a) travelling and (b) for accommodation in London. See attachment. Until comparatively recently, his only accommodation was in London at [REDACTED] [REDACTED] which is less than 15 minutes from Westminster.

Finally, by any criterion (whether written or otherwise) Lord Caithness’s arrangement with R. Crusoe & Son is a clear abuse of his privileged position.

I trust action will now be taken to stop this further erosion of the parliamentary Code of Conduct for which your sub-Committee is responsible and which has become the subject of much public debate and concern in recent months.

Appendices: T. Crusoe’s castle-hopping (and parliamentary) tour with Lord Caithness.

Hansard text for 14th December, 2009 with Lord Caithness's contribution highlighted (Submitted but not printed).

The Lords of Excess (Submitted but not printed)

The Seven Principles of Conduct for Members of the House of Lords (Submitted but not printed).

OSCR letter confirming that the Trustees of the Clan Sinclair Charitable Trust have not acted in the best interests of the charity (Submitted but not printed).

Appendix

Pricing

Departures: 15
May 2010,

Prices:
Per person sharing
room from \$10,980

Internal air per
person \$260

For more information, to
book, or to speak to an
R, Cursoe & Son tour
specialist, please call us
at 800-585-8555

Local Flavor

Roman emperors
who conquered
much of Europe
found the
ancestors of the
Scottish people too
fiercely
independent to be
subdued. Today, in
this land of rugged
beauty, wind-swept
mountains, and
deep green valleys,
ancient castles
bring to mind
legends of honor
and passionate
heroes.

In the company of
one such
Scotsman, a
Member of
Parliament who
traces his lineage
back many
centuries, we
explore the north of
Scotland in all her
glory.

Don't miss this truly
unique insider's
tour of London and
Scotland.

Castle-Hopping through Northern Scotland. Hosted by the Earl of Caithness. 11 Days.



Meet the 20th Earl of Caithness, Malcolm Ian Sinclair: Member of Parliament, Chief of Clan Sinclair, founder of the Clan Sinclair Trust, and overseer of the restoration of an incredible ancestral castle on the north Scottish coast.

The man does have a full plate.

Not too full, however, to host a journey for R. Cursoe & Son. Come along with Lord Caithness to meet his colleagues, cousins, and friends in Scotland—people who play a significant role in the running of today's British of government as well as in the preservation of Scottish history. There are ancient tales to hear, castles to see, people to meet....

We gather in London, England for a private tour of Parliament with Lord Caithness, who introduces us to several colleagues over lunch. The Lord Speaker, Lady Hayman, or the Leader of the Conservative Party, Lord Strathclyde, joins us for a chat.

One simply cannot miss the recently renovated Churchill Museum and War Rooms. We take a private, before-hours tour in the company of the museum's senior curator.

On a specially arranged private visit, step inside the U.S. Embassy for a discussion of current British-American relations with embassy staffers.

While you're in town, consider taking in a play in London's legendary West End. We can help you secure tickets.

Then we're off to Scotland. Edinburgh, first, for a visit to the Scottish Parliament accompanied by the Member who represents Caithness and Sutherland, Lord Caithness's ancestral turf. From our home base at The Balmoral Hotel,



we day-trip outside the city limits to Hopetoun House, where—after a tour of their home—we take lunch with Lord and Lady Hopetoun.

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8100 Toll Free: 1-800-585-8555
info@rcrusoe.com

Then north to Perth, where Scone Palace has long played an important role in Scottish history. Scottish kings came here for their coronations, seated upon the Stone of Scone (now on display in Edinburgh Castle). During our visit, we take morning coffee with Lady Stormont, daughter-in-law of the present Earl and overseer of the residence.

Blair Castle, next, home of the dukes of Atholl. Once again, history runs deep at Blair. Hear stories of the castle's families, the Stewarts and the Murrays, whose 19 generations have just about done it all. At the end of our tour, sit down to lunch at the castle.

On to Inverness, capital of the Scottish Highlands. Nearby, on the very site of the Battle of Culloden, hear the story of the decisive showdown in 1746 between the Jacobites and the royalists.

Cawdor Castle was built as the private fortress of the Thanes of Cawdor (consider rereading Macbeth). A massive exterior belies the cozy rooms of this 600-year-old beauty. We hope to spend time with the Countess of Cawdor, while we're here.

No visit to the Highlands is complete without a lesson on *uisgebeatha*, the "water of life," Scotch whisky. Have a taste, and see how it's made, at Glenmorangie Distillery.

Ackergill Tower is our 15th-century home-away-from-home for the remainder of the journey. Have dinner here with Lord Caithness's cousin, the Viscount Thurso, and his wife. The Viscount, a Member of Parliament, is the driving force behind northern Scotland's push for renewable energy.

Tour Dunbeath Castle, one of Clan Sinclair's ancestral homes with a story that stretches back to the early 1400s. See Neolithic remains that dot the Caithness countryside. Sit down to lunch with Jonathon Clark, the senior

archaeologist overseeing the restoration of Castle Sinclair Girginoe, Clan Sinclair Trust's most important project.

Contrast the life of the farmer with that of Scottish royalty on a visit to a croft cottage and then to Castle Mey, ancient seat of the Sinclairs of Mey and, more recently, beloved home of the Queen Mother.

Finally, to Castle Sinclair Girnigoe, where Lord Caithness spends much of his time directly involved in the rescue of this castle complex from the ravages of time. Accompanied by Lord Caithness and Jonathon Clark, we take in views of the castle from a boat on Bay Sinclair, then tour the site itself. During our examination of the site, we hear about the archaeological discoveries already made as well as the preservation work currently being carried out.

Join Lord Caithness for a formal farewell dinner at Ackergill Tower. Don't bother packing your tux—the hotel supplies our kilts and sashes.

Post-Tour Possibilities in Scotland

Not quite done with Scotland yet? Who could blame you. We suggest that, following this once-in-a-lifetime tour, you continue on in one of two directions.

Love to golf? If so, play some of the world's finest courses. Gleneagles. Aberlady. St. Andrews. If one golfs, and other doesn't, don't despair. If touring is your thing, there is plenty to do and see in the local countryside.

Another possibility is a few utterly indulgent days aboard *The Royal Scotsman*, a 35-passenger Orient-Express train that winds through the Highlands. The onboard luxury is Edwardian through and through. We offer a two-night and a five-night departure, both leaving Edinburgh on Wednesday, 26 May 2010. All aboard!

To request a detailed itinerary for this journey (and others), [click here](#).

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Annex B: Letter from Rhoda Grant MSP to Michael Pownall, Clerk of the Parliaments, 24 May 2010

The Earl of Caithness

Conservative Benches

It has come to my attention that the Earl of Caithness, a member of the House of Lords and a working peer sitting on the Conservative benches, is allegedly involved in offering tours of the House of Lords in return for an exchange of money.

Prospective purchasers are invited to pay over \$10,000 for a tour of the UK hosted by the Earl, organised by R Crusoe & Sons, a well-known US firm. The tour includes: “a private tour of Parliament with Lord Caithness, who introduces us to several colleagues over lunch” and “a visit to the Scottish Parliament accompanied by the Member who represents Caithness and Sutherland, Lord Caithness’s ancestral turf.”

I would be grateful if you could investigate this matter as a potential breach of the relevant rules to which peers must adhere. The web site referred to is – <http://rcrusoe.com/journeyCastleHoppingScotlandHosted>.

Annex C: Letter from Paul Kernaghan, House of Lords Commissioner for Standards, to the Earl of Caithness, 10 June 2010

Allegation of a breach of the rules of the House

I am writing to you in my capacity as the newly appointed Commissioner for Standards. I have to advise you that I have received two separate complaints against you but which both involve the same allegation. Namely, that you have breached the rules of the House by reason of your involvement in tours organised by R Crusoe & Sons, a travel company based in Chicago.

One complainant [Rhoda Grant MSP] simply highlighted your connection with R Crusoe & Sons, whilst the other [Niven Sinclair] provided documentation supporting that contention. I attach copies of both complaints for your information.

I am conscious that whilst my appointment is linked to the introduction of the current Code of Conduct which came into force on 18/5/10, I also have a specific remit to investigate complaints of misconduct going back four years. However, in investigating matters which predate 18/5/10, I must apply the relevant rules of the House and associated guidance available to Members at the time of the alleged breach.

It appears on the basis of the complaints that you may have breached the following rules:

Functions are not to be used for the purposes of direct or indirect financial or material gain by a sponsoring Member, political party, or any other person or outside organisation. (*House Committee, 3rd Report of Session 2008-09, agreed by the House on 20th October 2009 with immediate effect*); and

Members may raise money for charity by offering private tours of the Palace but not for any other cause. (*House Committee, 2nd Report, Session 2009-2010, agreed by the House on 16 March 2010 with immediate effect*).

In addition to the material provided by Niven Sinclair, I attach for your information and ease of reference copies of the following documents (not printed):

Refreshment Department Functions, House Committee, 3rd Report of Session 2008-09 [HL Paper 144] [Agreed to by the House and rules effective from 20 October 2009].

Rules Governing the Use of Facilities [HL paper 47], House Committee, 2nd Report, Session 2009-2010, [Agreed to by the House and rules and effective from 16 March 2010].

Banqueting Office Booking Confirmation Form – date stamped on 14/10/09
Banqueting Office Account Details and Costings re Attlee Room for 17/5/10

Copy Emails – Lord Caithness to Chris Hever, Banqueting Manager, dated 19/1/10

Chris Hever, Banqueting Manager, to Lord Caithness dated 19/1/10

I have conducted a preliminary assessment of the two complaints and believe it is appropriate and in the interests of all concerned that I investigate them. Therefore, I now invite you to respond in writing with a full and accurate account of the matters in question. A response by 1/7/10 would greatly assist me in investigating this matter in a timely fashion.

Annex D: Letter from the Earl of Caithness to Paul Kernaghan, House of Lords Commissioner for Standards, 27 June 2010

Allegation of a breach of the rules of the House

Thank you for your letter of 10 June and I will co-operate fully in your investigation as it is very important to get this accurate. You doubtless saw the article in a recent *Sunday Herald* in which Rhoda Grant (whom I don't know) said she would refer the matter to you. I do know Niven Sinclair well and for nearly two years he has done all he can to denigrate me.

In June last summer I was invited to open the Scottish Highland Games in Chicago. Whilst there, I addressed the Chicago Council on Global Affairs about Parliament and UK/USA relations. At the small dinner afterwards I also talked about the heritage project I run for the charity, The Clan Sinclair Trust, in the north of Scotland and for which I have done a lot of fundraising in the USA. In August some friends raised the possibility of coming over here in mid May this year, specifically to see the heritage project and parts of Scotland. Naturally I encouraged them to do so as this would potentially be a good way to raise more money for the project. As it would be more convenient to fly to London and some might want to spend some time there, it was included in the trip and I offered to give them lunch in Parliament to reciprocate the kindness they had shown me when I was in Chicago. Without my knowledge they then appointed a travel agent in Chicago, as Americans so often do, who also used travel agents in London and Edinburgh to organise the itinerary. In order to make it a viable trip they wanted

to expand the group to about twenty people which is why a brochure was produced by the travel agent. I wanted to help make the visit as interesting as possible for them so I arranged for a tour of Parliament through the Tours Office and a lunch was booked by the agent in London as your information from the Banqueting Office confirms. I also arranged for Jamie Stone, my MSP to meet them in the Parliament in Scotland and John Thurso, my MP, agreed to speak to them when they were in Caithness. I confirmed this to the main travel agents in Chicago. The rest of the programme was arranged by them.

Given my friends' interest in UK and international affairs I was asked whether I could arrange for a Peer to talk to them at the lunch here. My reply was that it would be almost impossible for anyone to commit themselves because I felt that it was likely to be just after the election. I explained that could happen at any time before June this year and if it was earlier then it might be possible. Some names were discussed but I did not approach anyone about this and I did not invite any other peers to attend the lunch.

There was discussion about how much time I would spend with the group and I agreed to be with them most of the time. As a result it was agreed my accommodation outside of London would be paid and I would receive £500 per day for any day missed in Parliament. I have never asked for nor received any financial gain for taking guests to Parliament nor would I. No part of the cost of the trip was to be paid to the charity. If anyone wanted to donate to the charity, and there was no obligation to do so, that would be a separate matter at a later stage.

I returned to Chicago in November, at my own expense, to talk more about the heritage project. The proposed visit was cancelled in January this year and no money was paid either to me or the charity. However two of my friends who wanted to come on the trip are coming over here shortly specifically to see the project but are not coming to Parliament.

I recognise that the website of the travel agency could be construed by a reasonable person as suggesting that I had a financial interest linked to showing paying guests around the House of Lords. That was not the situation as I have explained and I never received, or anticipated receiving, any payment arising out of my use of Parliamentary facilities. The visit as advertised by the travel agency never took place and I reiterate my regret that its actions raised concerns about the proper use of House of Lords facilities. I apologise for not being more alert to the danger that third party action could project a false impression. I am very conscious of the need to uphold the highest standards of probity as a Member of the House of Lords and will take every possible step to ensure that no actions of mine in future give rise to similar concerns.

I am happy and ready to discuss any of this with you.