

Contents

Summary	2
Resolution letter: Ms Tessa Munt MP	3
Written evidence	4
5	1. Letter from the complainant to the Commissioner, 11 November 2025 4
	2. Letter from the Commissioner to Ms Tessa Munt MP, 18 November 2025 6
	3. Letter from Ms Tessa Munt MP to the Commissioner, 29 November 2025 10
	4. Letter from the Commissioner to Ms Tessa Munt MP, 2 December 2025 13
	5. Email from Ms Tessa Munt MP to the Commissioner, 15 December 2025 14
10	6. Letter from the Commissioner to Ms Tessa Munt MP, 17 December 2025 14
	7. Email from Ms Tessa Munt MP to the Commissioner, 13 January 2026 16

Summary

Following a complaint about Tessa Munt MP's entry in the Register of Members' Financial Interests, I opened a formal inquiry on 18 November 2025. My inquiry considered whether Ms Munt had breached Rule 5 of the Code of Conduct for

5 Members by failing to register an interest.

During my investigation, Ms Munt confirmed that a second interest also had not been added to the Register. I therefore widened the scope of my inquiry to include that interest. My inquiry established that both non-registrations occurred due to a misapplication of the guidance on the scope of the registration of interests.

10 I concluded that the failures to register these interests were breaches of Rule 5 of the Code of Conduct. Ms Munt accepted my decision and acknowledged and apologised for her breaches of the Code.

15 Having considered the information available to me, I was satisfied that the two breaches of Rule 5 could fairly be described as inadvertent. I therefore decided to conclude my inquiry by way of the rectification procedure available to me under Standing Order No. 150. As part of that rectification process, I have asked the Registrar to arrange for the relevant entries in the Register of Members' Financial Interests to be annotated, so it is clear that they have been the subject of an inquiry.

Daniel Greenberg CB

20 **28 January 2026**

Resolution letter: Ms Tessa Munt MP

I wrote to you on 18 November 2025 to tell you that I had begun an inquiry into your allegation that Tessa Munt MP had breached Rule 5 of the Code of Conduct for Members.

5 I concluded that the evidence submitted did demonstrate on the balance of probabilities that a breach of the rules had occurred. This breach of the rules has been resolved by the rectification process that is available under Standing Order No. 150. As part of that process, Ms Munt has acknowledged and apologised for her breach of the rules. The full rationale for my opinion will be available in the evidence pack once it has been published.

10

I will publish my conclusions, and the written evidence pack shortly on my webpages, and I will report the outcome to the Committee on Standards in due course.

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

28 January 2026

Written evidence

1. Letter from the complainant to the Commissioner, 11 November 2025

I write to make a formal allegation that Ms Tessa Munt MP, Member of Parliament for Wells, has breached the House of Commons Code of Conduct, as approved on 12 December 2022 (HC 1083).

This allegation concerns her undisclosed role as a Director of WhistleblowersUK (Company No. 09347927), to which she was appointed on 18 June 2020, according to the public record at Companies House.

Ms Munt's entry in the Register of Members' Financial Interests, accessible via her official Parliament page (<https://members.parliament.uk/member/4089/contact>), makes no reference to this directorship or any association with WhistleblowersUK.

Although I understand the position may be unremunerated, the Guide to the Rules relating to the conduct of Members states that unpaid directorships or offices in organisations that might reasonably be thought to influence a Member's actions must be declared (Category 8 – Miscellaneous). WhistleblowersUK is an advocacy organisation that campaigns on whistleblowing, regulation, and public-interest disclosures. Subjects on which Ms Munt could engage in parliamentary debate or correspondence.

Accordingly, I allege breaches of the following provisions:

20 Section D – Rules of Conduct

Paragraph 5 – Registration of Interests

“Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests.”

Ms Munt has not registered her directorship of Whistleblowers UK, despite the clear expectation that even unremunerated offices which might reasonably be thought to influence an MP's conduct should appear in the Register. This omission constitutes a failure to fulfil the registration requirements conscientiously.

Paragraph 6 – Declaration of Interests

“Members must always be open and frank in declaring 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.”

By not declaring this directorship in her published Register or in any parliamentary context concerning whistleblowing, Ms Munt has not been open and frank about a relevant interest which could reasonably be perceived as influencing her actions.

Evidence (See Appendix A)

5 • TJM-1 WhistleblowersUK Website showing Ms Munt as Vice Chair.

• TJM-2 Companies House record for Whistleblowers UK (Company No. 09347927) showing Ms Tessa Jane Munt appointed as Director on 18 June 2020 and continuing in office. These documents demonstrate a clear omission of a registrable and declarable interest.

10 Public-Interest Context

15 The Code requires Members to uphold openness and integrity so that the public may have confidence in Parliament. A failure to disclose an active company directorship — particularly with an organisation whose aims overlap with parliamentary activity — risks eroding that confidence. Transparency over such roles is fundamental to avoiding the perception of bias or undeclared influence.

Request

20 I therefore ask that your office open a formal investigation into whether Ms Tessa Munt MP has breached the Code of Conduct, specifically Section D (5 and 6). I believe this complaint meets the requirements of the Procedural Protocol and that the enclosed evidence provides a clear factual basis for inquiry. I understand my name and address are already on record with your office and therefore have not been repeated here. I am happy to provide any additional documentation or clarification if required. Thank you for your time and for your continued work in upholding the standards of the House.

25 Appendix A



TJM-1 - WhistleblowersUK Website

<https://www.wbuk.org/our-team> (accessed 6 Nov 2025)

KERR, Stephen Charles
Correspondence address: Broadhurst, Gumey Slade, Radstock, England, BA3 4TT
Role: **CEO** Director Date of birth: September 1960 Appointed on: 1 February 2021
Nationality: Scottish Country of residence: Scotland

MITCHELL, Iain Grant
Correspondence address: Broadhurst, Gumey Slade, Radstock, England, BA3 4TT
Role: **CEO** Director Date of birth: November 1951 Appointed on: 11 January 2023
Nationality: British Country of residence: Scotland

MUNT, Tessa Jane
Correspondence address: Broadhurst, Gumey Slade, Radstock, England, BA3 4TT
Role: **CEO** Director Date of birth: October 1959 Appointed on: 18 June 2020
Nationality: British Country of residence: England

FOXLEY, Ian

TJM-2 - Companies House Register

<https://find-and-update.company-information.service.gov.uk/company/09347927/officers>
(accessed 6 Nov 2025)

11 November 2025

2. Letter from the Commissioner to Ms Tessa Munt MP, 18 November 2025

5 Following receipt of an allegation I have received from [the complainant] about your compliance with Rule 5 of the House of Commons Code of Conduct for Members, I have decided to open a formal inquiry. I enclose at the end of this letter a copy of [the complainant's] submission and the enclosures he sent with it.

You will note that [the complainant] has also alleged a breach of Rule 6 of the Code of Conduct. I have decided to not proceed with that aspect of his complaint because he has not evidenced any specific occasions when a declaration by you might have been needed.

5 My inquiries

Although I have decided to open a formal inquiry, this does not mean that I have formed a view on whether a breach of the House's rules has occurred. My investigations are inquisitorial, and I will seek to establish the facts in a fair, independent, and thorough manner, taking evidence from you, and any other sources as necessary, before reaching a conclusion on the balance of probabilities. How I conduct my inquiries is laid out in the Procedural Protocol, attached, which was drafted by the Committee on Standards and has been approved by the House.

What I am investigating

I initially intend to investigate the following issues:

- 15 1. Whether your role as Vice-Chair of WhistleblowersUK should be registered in the Register of Members' Financial Interests.
2. Whether your role as a Director of WhistleblowersUK should be registered in the Register of Members' Financial Interests.
3. Why, if these roles do constitute registerable interests, they have not been added to the Register of Members' Financial Interests.

At the conclusion of my investigation, I will reach an opinion on both the facts of what has happened and whether those facts amount to a breach of Rule 5 of the Code of Conduct. As outlined above, I will use the balance of probabilities to form that opinion.

25 If during my investigation new evidence comes to light that changes the scope of my inquiry, I will update you formally in writing.

The relevant rules of the House

The overarching rules are found in the House of Commons' Code of Conduct for Members. Rule 5 of the Code states:

30 *Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current*

financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.

5 Chapter 1 of The Guide to the Rules relating to the Conduct of Members, which is appended to the Code, contains more detail about the registration of interests.

Next steps

In order for me to progress my inquiry, I require the following from you:

1. Write to me immediately in confidence if you are not currently well enough to participate in my inquiry. If you need to write to me about your wellbeing, please ensure you outline the nature of your current health issues and if you are currently receiving medical care. This correspondence will not form part of the information published at the end of my inquiry but will enable me to decide whether to suspend my inquiry or to make adjustments to enable your participation. If your health and wellbeing changes during my inquiry, please let me know at that time.
2. Ensure that you understand what I will be investigating. If you do not understand, please let me know immediately.
3. Read carefully the appendices attached to this letter and the “Rules relating to upholding the Code” set out in section E of the Code, as these contain important information about your obligations during the investigation. If you have any questions about the content of those appendices, please let me or a member of my team know as soon as possible.
4. Reply to this letter, by 28 November 2025, with:
 - a) Your general comments on the allegation that your alleged actions have amounted to a breach of Rule 5 of the Code of Conduct for Members.
 - b) Your answers to the following specific questions. Please submit any relevant evidence to support your responses when you reply to this letter.

30 Question 1: Please can you confirm if your role as Vice-Chair of WhistleblowersUK is paid or unpaid? If it is paid, please confirm the amount of payments you have received since entering Parliament from this role and when those payments were received.

Question 2: Please can you confirm the specific duties you undertake in your role as Vice-Chair of WhistleblowersUK?

5 Question 3: Please can you confirm if your role as Director of WhistleblowersUK is paid or unpaid? If it is paid, please confirm the amount of payments you have received since entering Parliament from this role and when those payments were received.

Question 4: Have you previously considered whether to register either of these roles in the Register of Members' Financial Interests? If you have, please can you provide your conclusions and reasoning.

10 Question 5: Are you otherwise satisfied that your entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules?

- i) If it is not, please inform me of any omissions or errors and also contact the Registrar to bring it up to date.
- ii) If it is, please tell me the steps you have taken to satisfy yourself of this.
- c) Any other points you wish to make to help me with my inquiry.

5. If you would like to request a meeting under paragraph 35 of the Procedural Protocol, please let me know by return.

20 **Important information**

Attached to this letter are several appendices which provide important information on:

- Appendix 1: Support for you
- Appendix 2: Confidentiality
- 25 • Appendix 3: How my investigations are conducted
- Appendix 4: Possible outcomes from my inquiry

Contact details

If you would prefer me to communicate with you by a different email address, please provide details when replying. I would be grateful if you could send your response by email.

Thank you for your cooperation with this matter.

5 **Appendix 1: Support for you – not included here**

Appendix 2: Confidentiality – not included here

Appendix 3: How my investigations are conducted – not included here

Appendix 4: Possible outcomes from my inquiry – not included here

10 **Enclosure 1: Letter from the complainant to the Commissioner, 11 November 2025 – see item 1 above**

18 November 2025

3. Letter from Ms Tessa Munt MP to the Commissioner, 29 November 2025

Thank you for your letter of 18 November 2025.

15 I wish to apologise if any action or omission may have amounted to a breach of Rule 5 of the Code of Conduct for Members.

These are my responses to your questions:

Question 1:

20 My role as Vice Chair of WhistleblowersUK, a not-for-profit organisation, is unpaid and has always been so. Additionally, I have not, do not and will not receive any payment or reimbursement for any expenses incurred in the course of undertaking this function.

Question 2:

25 The specific duties I undertake in my role as Vice Chair of WhistleblowersUK is to attend meetings of whistleblowers on an occasional basis, to listen to their concerns and contributions. I have attended conferences very occasionally, always at my own expense. I do not receive any payment or reimbursement for any expenses incurred in the course of undertaking this function.

Question 3:

My role as a Director of WhistleblowersUK, a not-for-profit organisation, is unpaid and has always been so. I have not, do not and will not receive any payment or reimbursement for expenses incurred in the course of fulfilling this role. For clarity, I do not have any 'share' in the Company.

5 **Question 4:**

I remember reviewing the categories numbered 1 to 10 in the list of Registered Interests after I was elected. I viewed my roles as the Vice Chair and a Director of WhistleblowersUK, a not-for-profit organisation and which were and are undertaken as a volunteer, and as such, did not 'fit' the categories numbered 1 to 10 10 in the list of Registered Interests, as I was neither 'employed' nor in receipt of 'earnings'.

I am a member of the Justice Select Committee. At the beginning of almost all public sessions of that Committee I have explained my connection to WhistleblowersUK so as to be clear to my Committee colleagues, anyone giving evidence, listening to the 15 proceedings online or reading the transcripts.

WhistleblowersUK Declarations 2024-2025

Justice Committee

- Parliamentlive.tv - Justice Committee Tuesday 25th November 2025 starting at 14:32:35
- Parliamentlive.tv - Justice Committee Tuesday 18th November 2025 starting at 14:36:14
- Parliamentlive.tv - Justice Committee Tuesday 11th November 2025 starting at 14:16:42
- Parliamentlive.tv - Justice Committee Tuesday 28th October 2025 starting at 14:34:59
- Parliamentlive.tv - Justice Committee Tuesday 2nd September 2025 starting at 14:31:37
- Parliamentlive.tv - Justice Committee Tuesday 8th July 2025 starting at 13:31:23
- Parliamentlive.tv - Justice Committee Tuesday 1st July 2025 starting at 14:28:55

- Parliamentlive.tv - Justice Committee Tuesday 10th June 2025 starting at 14:35:07
- Parliamentlive.tv - Justice Committee Tuesday 13th May 2025 starting at 14:43:10

5 • Parliamentlive.tv - Justice Committee Tuesday 29th April 2025 starting at 14:35:10

- Parliamentlive.tv - Justice Committee Tuesday 8th April 2025 starting at 14:32:20
- Parliamentlive.tv - Justice Committee Tuesday 18th March 2025 starting at 14:32:33
- Parliamentlive.tv - Justice Committee Tuesday 11th March 2025 starting at 14:34:02
- Parliamentlive.tv - Justice Committee Tuesday 4th February 2025 starting at 14:34:50

10 • Parliamentlive.tv - Justice Committee Tuesday 28th January 2025 starting at 14:43:22

- Parliamentlive.tv - Justice Committee Tuesday 17th December 2024 starting at 14:32:07
- Parliamentlive.tv - Justice Committee Tuesday 10th December 2024 starting at 14:35:03
- Parliamentlive.tv - Justice Committee Tuesday 3rd December 2024 starting at 14:33:05
- Parliamentlive.tv - Justice Committee Tuesday 26th November 2024 starting at 14:32:32

15 • Parliamentlive.tv - Justice Committee Tuesday 19th November 2024 starting at 14:36:00

30 Additionally, I have explained my connection to WhistleblowersUK in the House of Commons at the start of debates and interventions with relevance to the matters under discussion, again so as to be clear about my relationship to WhistleblowersUK.

Commons Chamber

3rd November 2025: Second Reading of Public Office (Accountability) Bill

16th January 2025: Child Sexual Exploitation and Abuse

Westminster Hall

5 3rd September 2025: Duty of Candour for Public Authorities and Legal Representation for Bereaved Families

Question 5:

10 I am not completely satisfied that my entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules and I have today left a message on the Registrar's answerphone to update the records if that is necessary.

I hope to resolve this matter speedily and look forward to hearing from you.

29 November 2025

4. Letter from the Commissioner to Ms Tessa Munt MP, 2 December 2025

15 Thank you for your letter of 29 November 2025.

In my initial letter of 18 November 2025, I asked:

Question 5: Are you otherwise satisfied that your entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules?

20 *i. If it is not, please inform me of any omissions or errors and also contact the Registrar to bring it up to date.*

ii. If it is, please tell me the steps you have taken to satisfy yourself of this.

In your response to this question, you write:

25 *I am not completely satisfied that my entry in the Register of Members' Financial Interests is complete and accurate and in line with the requirements of Chapter 1 of the Guide to the Rules and I have today*

left a message on the Registrar's answerphone to update the records if that is necessary.

5 Please can you outline the concerns that you have about your current entry in the Register of Members' Financial Interests and share with me any correspondence that you subsequently exchange with the Registrar about your entry. This will enable me to decide whether my current inquiry needs to be expanded.

Please can you write to me with this information by **12 December 2025**.

10 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.

2 December 2025

5. Email from Ms Tessa Munt MP to the Commissioner, 15 December 2025

15 I have today filed three updates to the Register, two relating to WhistleblowersUK where I am a Director and a Vice Chair, and one relating to Inaura School, where I was a Director / Trustee at the School and a Governor – albeit on sabbatical from my roles - until February this year.

20 On 20 February this year during a conversation with the Chair of Governors, I was made aware that I was still on the Register at Companies House. It had been agreed previously that I would depart immediately should I be elected, and as a result of that conversation, my resignation paperwork was filed the next working day.

I hope that the above is clear and helpful. I am, of course, happy to explain in more detail should the Commissioner require clarification.

25 I am deeply sorry for omitting to straighten my record keeping until now. I have been reviewing my interests on a monthly basis but as nothing had changed since my original registration, I mistakenly believed I had a complete record.

I realise now I had not, and am truly sorry for my error.

15 December 2025

6. Letter from the Commissioner to Ms Tessa Munt MP, 17 December 2025

30 Thank you for your email of 15 December 2025 and the additional information you have provided. Having considered the evidence carefully, I now have sufficient information to decide whether there has been a breach of the Code of Conduct.

My decision

I have considered our correspondence, the published rules, and guidance concerning the registration of interests. I consider that there have been two breaches of Rule 5 of the Code by a failure to register your current role at WhistleblowersUK and your past role at Inaura School. However, for the reasons outlined below, I do not intend to refer this matter to the Committee on Standards. Instead, I have decided this matter is suitable for the rectification process provided by Standing Order No. 150.

Reasoning

10 As you know, Rule 5 of the Code of the Conduct states:

Members must fulfil conscientiously the requirements of the House in respect of the registration of interests in the Register of Members' Financial Interests. New Members must register all their current financial interests, and any registrable benefits (other than earnings) received in the 12 months before their election within one month of their election, and Members must register any change in those registrable interests within 28 days.

Chapter 1 of the Guide to the Rules states:

Category 8: Miscellaneous

20 *Requirements for registration*

54. Under this category Members must register:

a) Significant, formal unpaid roles such as an unpaid directorship, a directorship of a company not currently trading, or a trusteeship.

25 You have explained that your role as Vice-Chair and Director of WhistleblowersUK is unpaid. However, by virtue of paragraph 54(a), above, it is a registerable interest and should have been added to your entry in the Register upon your election to Parliament in July 2024. Similarly, your former role as a Trustee and Director of Inaura School should have been registered upon your election to Parliament and then should have been removed from the Register when the role formally ended in 30 February 2025. This means that Rule 5 of the Code has been breached on two occasions.

As outlined above, I do not need to make a report to the Committee on Standards about a failure to register an interest if it is my opinion "...that the interest involved

is minor, or the failure was inadvertent". Given that you misapplied the guidance about the scope of the registration of interests, which led to a mistaken belief that your register entry was correct and complete, I am content that the failure to register these roles was inadvertent. As such, I am satisfied that offering you the 5 opportunity to rectify these two breaches of Rule 5 is appropriate. In reaching this decision, I have also taken into account your active declaration of your role at WhistleblowersUK in the Chamber and at sessions of the Justice Select Committee.

Next Steps

As I explained above, Standing Order No. 150 makes provision for me to conclude 10 an inquiry using the rectification process, rather than by making a referral to the Committee on Standards. The Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken 15 any steps necessary to rectify their breach. You have already acknowledged and apologised for your breaches of the rules. Therefore, in order to use the rectification process to conclude this inquiry, I will only require the following from you please:

- a) Confirmation that you have read and accepted my decision.

If you are content for me to conclude the inquiry in this way, please write to me with 20 the above information by **12 January 2026**. In cases concerning the registration of interests, I also ask the Registrar to arrange for the relevant entries to be italicised in the Register of Members' Financial Interests to indicate to the reader that the interests has been the subject of an inquiry and rectification process.

If you agree to my proposal, I will share my draft written evidence pack with you in 25 due course, so that you can check its factual accuracy before publication. I will also report the outcome of the inquiry at its close to the Committee on Standards as a matter of routine.

If you do not accept my opinion, you should tell me the reasons for that by reply. After which, I will prepare a memorandum to the Committee on Standards, so that 30 they may consider the matter. I would give you the opportunity to see and comment on a draft of the memorandum, but the content of it would, in the final analysis, be for me alone.

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.

17 December 2025

7. Email from Ms Tessa Munt MP to the Commissioner, 13 January 2026

35 I am writing to ensure the content of my earlier email has reached Mr Greenberg.

In that email, I confirmed that I had read and accepted his decision in relation to my two breaches of Standards.

[content not relevant to the inquiry redacted].

5 I understand email correspondence I have sent to others has not arrived safely, so I'd rather write more than once than appear not to have written at all.

I am again grateful for your help.

13 January 2026