

GREATER LONDON AUTHORITY

Please provide us with details of your complaint and the part(s) of the Code of Conduct you consider have been breached. The code can be found here <https://www.london.gov.uk/media/96442/download?attachment>

Alleged part of the Code that you say has been breached	Details of Complaint
Appendix 5, para. 1.6 (Gifts and Hospitality Policy and Procedure, 5.1)	<p>On 15 August 2024, Sadiq Khan was gifted six tickets to a concert.</p> <p>A declaration of the gifted tickets from 15 August 2024 should, therefore, have been registered with the Monitoring Officer by 12 September 2024. The GLA's Gifts and Hospitality Policy and Procedure states: <i>"Within 28 days of receiving gift(s) and/or hospitality in connection with your official duties with a value of £50 or more, you must register those items with the Monitoring Officer."</i></p> <p>Sadiq Khan did not register an initial declaration for the gifted tickets until 22 September 2024, thereby contravening the Gifts and Hospitality Policy and Procedure, 5.1.</p>
Appendix 5, para. 1.6 (Gifts and Hospitality Policy and Procedure, 5.1)	<p>On 18 October 2024, Sadiq Khan updated his initial declaration of 22 September 2024, with the following changes:</p> <p>1 - The value was changed from £194 per ticket to £500 per ticket</p>

	<p>2 - The tickets were paid for by LS Events, rather than the Football Association</p> <p>The GLA's Gifts and Hospitality Policy and Procedure states: <i>"You must include within the form/declaration the actual value of the gift"</i> and that must include <i>"the source of the gift or hospitality, and your reason for accepting it"</i>.</p> <p>In his initial declaration of 22 September 2024, Sadiq Khan did not include the actual value of the gifted tickets or the source of the gifted tickets. Furthermore, the updated declaration of 18 October 2024 states that the reason for acceptance was <i>"Attended as a guest of LS Events"</i>. This description does not explain the reasoning for accepting the tickets and raises questions about why the event took place and who was present. Together, these actions contravene the Gifts and Hospitality Policy and Procedure, 5.1.</p>
<p>Appendix 5, para. 1.6 (Gifts and Hospitality Policy and Procedure, 11.1)</p>	<p>On 18 October 2024, Sadiq Khan updated his initial declaration of 22 September 2024. The source of the gifted tickets of 15 August 2024 was changed to LS Events.</p> <p>On 23 October 2024, David Holley, Head of Events at the GLA, confirmed at a meeting of the GLA Oversight Committee that LS Events has live contracts with the GLA to organise the 2024 Diwali celebrations in Trafalgar Square and the next St Patrick's Day celebration in the capital.</p> <p>The GLA's Gifts and Hospitality Policy and Procedure states: <i>"Particular caution should be taken where any gift and/or hospitality</i></p>

	<p><i>is offered from any company that holds a contract with the GLA or who is likely to bid for a future contract with the GLA.”</i></p> <p>It is reasonable to interpret from the above policy that accepting gifts from a company with a GLA contract is not best practice and should be avoided.</p> <p>It is unclear what level of caution, if any, Sadiq Khan applied when he accepted the 15 August 2024 tickets from a company with live contracts with the GLA.</p> <p>Considering the high value of the tickets accepted by Sadiq Khan (£500 x six), the recent press reports from The Standard suggesting 22 tickets in total were accepted by City Hall staff¹, as well as the value of the GLA contracts awarded to LS Events (present and past), it is not unreasonable to apply the interpretation of the Gifts and Hospitality policy above and question i) whether any caution was applied at all and ii) whether it was appropriate to accept the gifted tickets under these circumstances.</p> <p>Did Sadiq Khan or his office seek advice from the Monitoring Officer or a relevant Executive Director on the propriety of accepting the tickets?</p>
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¹ [Taylor Swift freebies: Sadiq Khan and City Hall aides were gifted 22 tickets to Wembley Stadium shows | The Standard](#)

Appendix 5, para. 1.6 (Gifts and Hospitality Policy and Procedure, 11.2, 11.3)	<p>As above, On 18 October 2024, Sadiq Khan updated his initial declaration of 22 September 2024. The source of the gifted tickets of 15 August 2024 was changed to LS Events.</p> <p>On 23 October 2024, David Holley, Head of Events at the GLA, confirmed at a meeting of the GLA Oversight Committee that LS Events has live contracts with the GLA to organise the 2024 Diwali celebrations in Trafalgar Square and the next St Patrick's Day celebration in the capital.</p> <p>The GLA's Gifts and Hospitality Policy and Procedure (11.2, 11.3) states: <i>"During the planning and tendering phases of a contract award process, no member of the GLA, or their partners should accept any gifts or hospitality from an organisation likely to tender for the contract to avoid any inference of preferential treatment. Similarly, caution should be applied in connection with any planned acceptance of gifts or hospitality associated with the awarding of a contract (as this may create the impression of preferential treatment or favouritism). Staff should seek advice from the relevant Executive Director in these circumstances, who can authorise (or not) such activity.</i></p> <p><i>"11.3 From time to time during the normal course of a contractual relationship, it may, however, be appropriate to accept gifts or hospitality from an established provider in order to develop and</i></p>

	<p><i>maintain good working relations. But this should not take place at a point in time that is reasonably close to the commencement of any contract renewal process and as long as other criteria in this document are satisfied (especially that you do not feel that it will put you under any obligation to the provider)."</i></p> <p>Whilst confirmation has been made that LS Events hold current contracts with the GLA, a number of questions remain unanswered with regards to the above policy:</p> <p>i) Were LS Events being considered for any future contracts at the time the gifted tickets were accepted?</p> <p>ii) On which dates did the GLA confirm contracts with LS Events for the aforementioned Diwali and St Patrick's Day events (and any other confirmed, upcoming events for the GLA not publicly declared)?</p> <p>iii) Were LS Events likely to bid for any future contracts with the GLA at the time the gifted tickets were accepted?</p> <p>iv) Was the GLA considering awarding a contract to LS events at the time the gifted tickets were accepted?</p> <p>v) On what date were the tickets first offered to the Mayor by LS Events, and were there any relevant tender processes for GLA events underway during this period?</p> <p>vi) Given the serious nature of potential impropriety involved, who were the other five guests who accepted the gifted tickets and were any representative from LS Events present with the Mayor at the concert?</p> <p>This matter should be investigated to establish if there was any possible wrongdoing or contraventions of the above policy.</p>
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