

**Summary of Findings from Report Commissioned by
the Conservative and Unionist Party from Clifford Chance into
Allegations of Bullying, Harassment and Inappropriate Behaviour
and into the Knowledge of and Response to those Allegations
by Conservative Campaign Headquarters (CCHQ)**

The Party, on 8 December 2015, commissioned Clifford Chance LLP (CC) to conduct an independent investigation and report to the Conservative Party Board.

This document sets out the findings of that report (the Report).

CC's investigative process has been certified by Lord Pannick QC, who is satisfied that the process followed to produce the Report was fair, objective, appropriate and comprehensive.

At the time the Report was commissioned, the Party committed to publishing the Report's findings. The Party respects the rights of confidentiality and privacy of those involved in the events which the Report has considered and therefore the findings are presented in a manner that ensures that, so far as possible, no complainant or witness (other than senior CCHQ staff) can be identified. In order to achieve this, it is necessary not only to omit any such person's name but also to avoid referencing any other details (such as dates, locations and details of alleged incidents) that might allow such person to be identified.

This summary of the Report's findings focuses on allegations that were reported or were alleged to have been reported to CCHQ. It does not include any instances of allegations of bullying, harassment and other inappropriate behaviour that are not alleged to have been reported to CCHQ and evidence relating to the circumstances leading up to Mr. Elliott Johnson's death, having regard to the need to protect vulnerable witnesses (especially those who have asked for their identity not to be disclosed). This summary of findings does not include details of the Party's preliminary investigation into the complaints it received in mid-August 2015 in order to protect the identity of witnesses who participated in the Party's preliminary investigation.

The Report's Terms of Reference:

CC's terms of reference were:

1. To collect, collate, review and assess witness and documentary evidence relevant to:
 - i. Allegations of bullying, harassment and other inappropriate behaviour by Mark Clarke and other members of the Party connected to him towards members and activists of the Party, from 1 January 2014 to 18 November 2015, paying particular attention to the circumstances leading up to Elliott Johnson's death.
 - ii. Allegations that, between 1 January 2014 and 18 November 2015, CCHQ deliberately ignored and/or condoned the behaviour referred to above and/or failed to respond properly or

adequately to complaints received about Mark Clarke's conduct and specifically the complaint received from Elliott Johnson on 14 August 2015.

2. To report to the Board of the Party with its findings as quickly as is reasonably possible, bearing in mind the need to complete the investigation fairly and thoroughly.

Methodology:

Before setting out the findings of the Report, it is appropriate to identify the steps taken by CC to collect, collate, review and assess the evidence recorded in the Report and on which the findings are based.

The starting point of the investigation was to collect and identify potentially relevant documents from three principal sources:

- a) hard copy records from CCHQ;
- b) documents provided by interviewees; and
- c) electronic communications gathered from CCHQ's servers and PCs.

CC also collected press reports and blog posts where these were still available and set up a news feed to alert it to articles on Mr. Clarke. The purpose of reviewing press reports was to identify further conduct falling within the terms of reference, as well as any allegations that such alleged conduct was known to CCHQ. This was in order to ensure that such allegations were discussed with interviewees who were identified in such press reports as victims, complainants or as otherwise potentially having had knowledge of the allegations.

The hard copy records handed to CC by CCHQ comprised both documents requested by CC during the course of its investigation and documents that CCHQ identified as potentially relevant. Documents provided to CC by interviewees included electronic communications, social media exchanges, hard copy documents, photographs and audio recordings. All hard copy documents provided to CC by CCHQ and all documents provided to CC by interviewees were reviewed to establish their relevance.

The identification, collection and review of electronic documents was an iterative process that lasted approximately four months. To identify relevant documents, a set of search terms was developed. Documents which were considered relevant to particular interviewees were discussed with them during interview. Although one purpose of CC's review was to identify documents to put to interviewees, some interviews were conducted before the review had been completed, so some relevant communications have been identified which have not been discussed with one or more of the parties to that communication. CC reviewed some 60,000 documents in this process.

CC confirms that CCHQ provided a high level of cooperation throughout the course of the investigation. All requests for documents, information and requests to interview current CCHQ employees received thorough and timely responses and at no stage was access to documents refused.

CC invited 99 individuals to interview, of whom 82 responded. Of those who responded, CC interviewed 62 individuals over seven months, and received written evidence from a further four individuals. Interviews generally lasted about two hours each, although some were much longer.

Of the individuals who did not provide evidence, some gave reasons. These included that they did not consider that they had any relevant evidence, or that they had concerns about confidentiality, defamation

risk or the independence of CC. Other individuals ceased to correspond with CC without providing a reason. Where individuals provided reasons, CC responded. For example, where individuals expressed concerns CC encouraged them to discuss their concerns and outlined the measures in place to address their concerns.

Potential interviewees came from a number of sources:

- a) The Party provided CC with the names of individuals who had contacted CCHQ offering to provide information relating to bullying, harassment or inappropriate conduct.
- b) The Party also provided CC with the names of individuals who had provided information to:
 - i. Mr. Simon Mort (a former Chairman of the Disciplinary Sub-Committee) in August/September 2015, when he investigated the complaint received on 14 August 2015; and/or
 - ii. the Party's external solicitor during November 2015, when he gathered further evidence.
- c) CC identified individuals from publicly available media sources.
- d) CC identified individuals through its review of documents.
- e) CC identified individuals to whom interviewees referred when being interviewed.
- f) CC set up a confidential complaints email address and received emails from individuals who had not otherwise been identified.

Of those who did not provide evidence to CC, at least 12 were individuals with whom CC particularly wished to speak. These included potential victims of bullying and harassment, as well as alleged perpetrators of bullying and harassment. In respect of seven of these individuals, CC was able to review the evidence they had previously provided to Mr. Mort's investigation or to the Party's external solicitor. Mr. Clarke declined to be interviewed. CC provided him with an opportunity to respond to a summary of potential findings and allegations relating to him but did not provide him with a copy of the full Report. Mr. Clarke's solicitor's response was as follows:

"Mr Clarke has cooperated, and will continue to cooperate with the police, the Coroner and any other statutory body charged with investigating any matters relating to the subject matter of Clifford Chance's investigation on behalf of the Conservative Party Board. The police investigation into Elliott Johnson's death and other enquiries are ongoing, and it is not appropriate to respond to allegations until the end of those processes. However, the allegations made against Mr. Clarke in the Clifford Chance report are wholly untrue and unsubstantiated. Many are based on totally fabricated media reports. All these allegations are vehemently denied."

CC notified the parents of Mr. Johnson through their solicitors that CC would like to meet with them or interview them so that they could discuss any evidence that they might have which would be relevant to the investigation. The solicitors informed CC that their clients would neither support nor participate in the investigation because they had concluded that it did not appear to be independent or transparent. Notwithstanding their position, CC told them that they remained open to consider any evidence that they might wish to submit. However, CC did not receive any evidence from them.

Interviews took place between 14 December 2015 and 20 July 2016. All interviews were conducted by a CC partner. All interviews of young female activists, e.g. members of Conservative Future (in respect of which see paragraph 6 below), were conducted by a female partner without the presence of male lawyers.

CC created a summary of each interview and sent it in draft form to the interviewee for review and comment. CC did not send copies of interview notes to CCHQ and/or the Party. Of the 62 individuals that were interviewed, 44 provided comments and the remainder did not respond to CC with any comments, or stated that they had no comments to make.

In the Report, CC has anonymised the names of activists or interviewees who alleged that they were the victims of bullying, harassment or other inappropriate conduct, sexual misconduct and/or other misconduct, as well as those who made reports to CCHQ.

Findings of the Report

Findings concerning complaints procedures:

1. Complaints about Party members may be made to Constituency Associations or to CCHQ. CC reported on how complaints were handled within CCHQ in the period up to November 2015.
2. The Party Constitution sets out how complaints to Constituency Associations are to be dealt with, but not how complaints made to CCHQ are to be considered.
3. There is no written published procedure or commonly adopted practice by which a Party member may raise a complaint with CCHQ. There is no confidential telephone line or email address to which complaints might be directed and no log is kept of complaints that are made. This places staff in the position of having to exercise discretion in how to deal with complaints that are received.
4. The practice was that CCHQ staff should forward complaints to the Secretary to the Board, who would decide whether or not to escalate each complaint to the Board. There was no written procedure and there were no criteria against which to decide whether or not to escalate any complaint. In practice, the Secretary would usually discuss complaints with the Chairman of the Disciplinary Sub-Committee before deciding what action to take and whether a complaint should be escalated to the Board.
5. A member of the Party who is a volunteer activist but not an employee of CCHQ is subject to the disciplinary and dispute mechanisms of the Party but is not subject to the disciplinary procedures set out in CCHQ's Staff Handbook. The Party's potential disciplinary sanction in respect of complaints against a member is suspension or expulsion from membership pursuant to the Party's Constitution.

Findings concerning Mr. Clarke's position:

6. By way of context, Mr. Clarke was a member of the Party. He had been an unsuccessful parliamentary candidate in Tooting in the 2010 general election. After the 2010 general election

Mr. Clarke was removed from the Party's list of prospective parliamentary candidates. He was the founder and driving force behind "RoadTrip" in 2014 / 2015 and, after the 2015 general election, was developing a proposal for Roadtrip 2020. Although by that time he was too old to be a member of Conservative Future (the youth movement of the Party made up of all members under the age of 30), Mr. Clarke involved himself in certain aspects of Conservative Future in 2014 / 2015. He supported a group of activists running for office in the July 2014 Conservative Future national executive election. He procured the support of Conservative Future for a candidate in the 2015 National Convention election (the effective parliament of the voluntary workforce of the Party). He was not an employee of CCHQ and was an unpaid volunteer. Outside the Conservative Party, Mr. Clarke was also a prominent figure (and apparently a director) within the Young Britons' Foundation (YBF, a think-tank that is not affiliated to the Conservative Party or any other political party) in 2014.

7. "RoadTrip" was a name used for a specific type of campaigning event in the run-up to the 2015 general election, devised and led by Mr. Clarke, introduced by him to the Party and ultimately registered as a trademark by CampaignUK Limited (a company with Mr. Clarke registered as its sole director) in March 2015.
8. The first constituency to receive a group of RoadTrip activists was Cannock Chase in late March 2014. In early 2014, Mr. Clarke met an official in the Party's Campaigning Department and said that he wanted to be involved with the Party. He was encouraged to speak with Mr. Paul Abbott (then Chief of Staff to the Right Honourable Grant Shapps MP, then co-Chairman of the Party). Mr. Clarke attended a meeting at CCHQ on 16 April 2014 which was also attended by several dozen young activists who had been invited by Mr. Clarke to discuss forthcoming campaigning activity. Mr. Abbott sat next to Mr. Clarke at the meeting, which gave the attendees the impression that the meeting was sanctioned by the Party. From then onwards, Mr. Clarke hosted meetings with young activists at CCHQ.
9. On 18 June 2014, having briefly reviewed the confidential file kept by CCHQ's Candidates Department in respect of Mr. Clarke's role as a former prospective parliamentary candidate, Mr. Shapps and Mr. Abbott met Mr. Clarke. Mr. Clarke's candidate file did not include allegations of bullying or harassment of young activists. It did include reports of aggressive and bullying conduct towards his campaign director and negative media coverage about his political and personal activities from four years earlier. It also contained expressions of support for Mr. Clarke from a senior member of the local voluntary Party, amongst others. During the meeting on 18 June 2014, Mr. Clarke claimed that he had settled down and wanted a second chance to get back on the candidates list. Mr. Abbott believed him and Mr. Shapps thought he had presented a very compelling case. His work on RoadTrip was discussed as a means of proving himself in this regard. This meeting was followed on 1 July 2014 by a letter from Mr. Shapps appointing Mr. Clarke "*Director of #RoadTrip2015* in CCHQ". This was a voluntary post reporting directly to Mr. Shapps through the Chairman's office (in effect, his Chief of Staff Mr. Abbott).
10. The appointment of Mr. Clarke as "*Director of #RoadTrip2015* in CCHQ" did not make him an employee of the Party or CCHQ. His appointment was not announced or publicised by CCHQ. The position of Director of RoadTrip was titular; it did not bring with it any additional responsibilities or actual authority within CCHQ. However, it provided Mr. Clarke with a title, which he used to convey the appearance of authority in some of his subsequent interactions with Party volunteers.

11. In July and August 2014, Mr. Clarke inaccurately referred to himself as a "*director in CCHQ*" on a number of occasions, including when dealing with young activists. On 21 August 2014, after this was brought to the attention of Lord Feldman (then co-Chairman of the Party together with Mr. Shapps), Mr. Shapps, Sir Lynton Crosby (then General Election Campaign Director) and Mr. Abbott, Mr. Clarke was told to stop doing so and Mr. Clarke complied with that instruction.
12. During 2014 in particular, in his dealings with young activists, Mr. Clarke led a number of them to believe that he was in a position of authority and influence within CCHQ.

Complaints about Mr. Clarke between 1 January 2014 and 14 August 2015

13. This summary of findings does not include instances of allegations of bullying, harassment or other inappropriate behaviour that are not alleged to have been reported to CCHQ. Thirteen individuals were identified who were alleged to be victims of bullying, harassment and / or inappropriate conduct by Mr. Clarke, where the conduct was alleged to have been reported to CCHQ between 1 January 2014 and 14 August 2015. For six of these alleged victims, it is unclear whether the complaint was in fact made to CCHQ. For example, the complaint is alleged to have been made orally and the alleged recipient of the complaint cannot recall it, or the conduct was raised in such a manner that it would not have been treated as a formal complaint. For seven of the alleged victims, it is debatable whether the alleged conduct should be categorised as bullying, harassment or other inappropriate conduct, because it comprised aggressive / officious communications, it was quasi-political and / or the victim was a contemporary of Mr. Clarke or more senior than Mr. Clarke. Some of the alleged victims fall into both of these categories. There were four alleged victims where both (a) some or all of the conduct alleged amounted to bullying, harassment or inappropriate conduct towards young members or activists and (b) some or all of the conduct complained about was reported to CCHQ prior to August 2015. These are set out in paragraphs 17, 19, 20 and 21 below.
14. Three of the thirteen alleged victims identified were older Party members, who have complained that they were bullied by Mr. Clarke. In respect of two of these allegations, it is unclear whether the complaint was made to CCHQ, because the complaint is alleged to have been made orally and the recipient of the complaint cannot recall it. A written complaint about Mr. Clarke was received in respect of the third individual but it did not allege bullying and it was not viewed, by those who received it, as an allegation of bullying by Mr. Clarke.
15. CCHQ also received positive feedback on Mr. Clarke from volunteers and Members of Parliament who took part in RoadTrip events. Many interviewees who attended RoadTrip events were very positive about their experiences and said that they did not personally observe or hear any complaints about bullying, harassment or inappropriate behaviour on RoadTrip events by Mr. Clarke or anyone else.

Findings as to complaints about Mr. Clarke and his associates between 1 January 2014 and 14 August 2015 that were reported to CCHQ:

16. A complaint was made by email to Mr. Abbott about the general conduct of unidentified persons on RoadTrip events. This complaint also included allegations of sexual assault on a third party (not the complainant) by a third party unconnected with Mr. Clarke or RoadTrip. Mr. Abbott responded to the complainant and forwarded the complaint to Mr. Stephen Phillips (Secretary to the Board and Secretary to the Disciplinary Sub-Committee of the Board). It did not prove possible to arrange a meeting between Mr. Phillips and the complainant. The complaint concerning RoadTrip was not investigated. Paragraph 77 below sets out how the unrelated allegation of sexual assault was dealt with.
17. A complaint was made to Mr. Abbott orally about Mr. Clarke's conduct on a specific occasion toward another Party member. Mr. Abbott met the complainant and the alleged victim. Mr. Abbott considered that what they said "*sounded quite bad*" but he did not consider them "*hugely reliable witnesses*". He advised them that a formal complaint should be made to Mr. Phillips or Mr. Gareth Fox (Head of Candidates), although the complainant could only recall being advised to speak to Mr. Fox. In any event, neither the complainant nor the alleged victim chose to make a complaint. Beyond this, the complaint was neither investigated nor was it referred to Mr. Phillips.
18. A complaint was made by email to an employee of Mr. Shapps' team about Mr. Clarke's correspondence with another Party member with regards to media activity. The employee referred this complaint to Mr. Abbott, who forwarded the complaint to Mr. Clarke. Mr. Abbott considered this to be a matter of poor judgment on Mr. Clarke's part and internal quarrelling within Conservative Future rather than bullying. Beyond this, Mr. Abbott did not investigate the complaint; nor did he refer the complaint to Mr. Phillips.
19. A complaint was made by email about alleged aggressive behaviour by Mr. Clarke towards a young activist. The complaint was made to a CCHQ employee who raised it with Mr. Abbott. Mr. Clarke had previously reported the young activist to Mr. Abbott, alleging misconduct by the activist. Mr. Abbott spoke to some colleagues about this. He accepted Mr. Clarke's assessment that it was the young activist who had behaved inappropriately. Beyond that, he neither investigated nor referred this complaint to Mr. Phillips.
20. A complaint was made orally to Mr. Abbott and Ms. Rebecca Harris MP (the Party's Vice Chairman for youth) about Mr. Clarke and some of his associates, who were alleged to have threatened another Party member in an attempt to influence the choice of candidates in a Conservative Future election. Mr. Abbott put the allegation to Mr. Clarke who denied it. Ms. Harris also spoke to Mr. Clarke about his interference with Conservative Future. No formal complaint was made. Beyond this, Mr. Abbott neither investigated nor referred this complaint to Mr. Phillips.
21. A complaint was made by email to CCHQ about Mr. Clarke and one of his associates, alleging that they had tried to bully another Party member in an attempt to influence the choice of candidates in a Conservative Future election and that Mr. Clarke had done so using the title of Director in CCHQ. Attempts were made to send this complaint to Mr. Shapps, Mr. Phillips and Ms. Harris but, initially, it was not received within CCHQ due to the size of the email. It eventually reached Mr. Phillips, who reviewed the documentation and decided that the complaint was without substance and therefore did not need to be escalated. This complaint came to Mr. Abbott's attention. He

noted that Mr. Clarke had used an inappropriate title which was an issue he had already raised with Mr. Clarke. He further asked that Mr. Clarke's use of the title Director in CCHQ (and the fact that he had told Mr. Clarke that he should not describe himself as such) be flagged to Mr. Shapps.

22. An email was sent to Mr. Abbott after he had left CCHQ about Mr. Clarke's aggressive behaviour towards a member of Conservative Future in connection with their prospects of becoming a prospective parliamentary candidate. Mr. Abbott forwarded it to Mr. Fox and asked Mr. Fox to arrange for someone to reassure the individual that Mr. Clarke did not speak for the Party. Mr. Fox met the individual to explain how the process of becoming a candidate worked. Beyond this, no further action was taken in relation to this complaint.

Findings concerning other conduct by Mr. Clarke:

23. In August 2014, Mr. Clarke involved himself in the 2014 Conservative Future National Executive election, supporting the "RoadTrip slate" and discouraging prospective candidates from running against members of the slate. Mr. Clarke was also involved in procuring that a list of names including ineligible voters was uploaded to the Party's voter database for the 2014 Conservative Future National Executive election. This was identified by Mr. Phillips and addressed by CCHQ in advance of the announcement of the election result. Mr. Abbott sent an email to Mr. Shapps stating that Mr. Clarke had told him that he had not provided the list of names. This email was forwarded to Lord Feldman and Mr. Phillips. Although Mr. Clarke had in fact arranged for the names to be uploaded, it is unclear whether or not his involvement amounted to inappropriate conduct.
24. In July 2015, Mr. Clarke wrote to a candidate in the National Convention election claiming that he had arranged for Conservative Future's forty-two allocated votes in the National Convention election to be allocated to individuals who had first agreed to vote for that candidate. The evidence reviewed indicates that CCHQ was not made aware of this issue at the time. Having reviewed the number of votes cast for each candidate and the voting record of the forty-two Conservative Future voters, the allocation of the Conservative Future votes made no difference to the outcome of the election.

Findings concerning the 14 August 2015 Complaint:

25. On 14 August 2015, CCHQ received a copy of a letter from Mr. Johnson complaining of an incident in a public house when Mr. Clarke was said to have been rude and aggressive towards him on 12 August 2015. At the time Mr. Johnson was an employee of Conservative Way Forward (CWF, a Conservative campaigning group which is not affiliated to the Party), working for Mr. Abbott. Mr. Johnson's letter was addressed to a colleague at CWF. That letter was accompanied by a separate document written by Mr. Johnson's colleague raising a variety of allegations regarding Mr. Clarke's conduct towards a number of other activists (together, the 14 August 2015 Complaint) some of which were serious. These were handed to a CCHQ employee and raised the same day with Lord Feldman (then sole Chairman of the Conservative Party), Lord Gilbert (then Deputy Chairman of the Party Board) and Mr. Simon Day (then Chief Executive Officer, previously Chief

Operating Officer until the general election in 2015). We set out below how these individuals responded to receipt of the 14 August 2015 Complaint.

26. Following receipt of the 14 August 2015 Complaint, Lord Feldman requested that Mr. Mort carry out a preliminary investigation.
27. On 25 August 2015, Mr. Mort informed Lord Feldman of how he proposed to proceed. Mr. Mort interviewed a number of witnesses, including Mr. Clarke and Mr. Johnson's colleague who had written the document referred to at paragraph 25 above. He corresponded with Mr. Johnson, who expressed a desire to withdraw his complaint. Mr. Mort met Mr. Johnson on 7 September 2015, at which meeting Mr. Johnson repeated that desire and said that his relationship with Mr. Clarke had been good until the incident in the public house on 12 August 2015.
28. On or around 26 August 2015, Mr. Johnson informed Mr. Andre Walker (an associate of Mr. Clarke) of his complaint and of the fact that allegations were being made about Mr. Clarke by staff of CWF. Mr. Clarke heard about these matters from Mr. Walker. There are a number of ways Mr. Clarke could have become aware of the identity of individuals who had been interviewed by Mr. Mort. The evidence reviewed does not support allegations that CCHQ or Baroness Pidding (former Chairman of the National Convention) leaked the names of interviewees to Mr. Clarke.
29. On 2 September 2015, Mr. Johnson met and spent more than one hour 20 minutes with Mr. Clarke and Mr. Walker and they discussed Mr. Johnson's complaint about the incident on 12 August 2015, amongst other things.
30. Mr. Mort had not concluded his investigation when Mr. Johnson died on 15 September 2015. He presented his preliminary findings to Lord Feldman on 16 September 2015. The same day, Lord Feldman decided that a formal inquiry by the Disciplinary Sub-Committee of the Board into allegations against Mr. Clarke would be commenced. As set out above, this summary of findings does not include evidence relating to the circumstances leading up to Mr. Johnson's death.

Findings on other specific allegations:

31. Six specific allegations of sexually inappropriate behaviour relating to Mr. Clarke were identified. These included allegations that Mr. Clarke propositioned activists or tried to kiss them. In respect of five of these allegations the evidence reviewed indicates that they were not reported to CCHQ prior to the 14 August 2015 Complaint. The sixth of these allegations is dealt with at paragraph 121(b) below. Complaints made between 14 August 2015 and 18 November 2015 were dealt with during the Party's preliminary investigation and formal inquiry described above.

Findings relating to the knowledge of individuals at CCHQ of complaints made about Mr. Clarke:

32. CC's findings in relation to complaints made about Mr. Clarke included a summary of knowledge of these complaints among members of the Party's Executive Senior Management Team (ESMT) in the period 2014 / 2015 as well as Mr. Phillips (the Secretary to the Disciplinary Committee to the Party Board) and Mr. Abbott (Mr. Shapps' Chief of Staff from January 2014 to May 2015). The

ESMT comprised Lord Feldman, Mr. Shapps (until the May 2015 general election), Lord Gilbert and Mr. Day. Sir Lynton Crosby, the Party's Campaign Strategist for the 2015 general election also attended ESMT meetings prior to the election.

Mr. Abbott

33. Mr. Abbott worked as Mr. Shapps' Chief of Staff from January 2014 to May 2015 and was, in practice, Mr. Clarke's principal point of contact at CCHQ for much of that period. He worked closely with Mr. Clarke to attempt to coordinate the activities of RoadTrip 2015 with those of Team 2015 (a CCHQ initiative for mobilising volunteers in the run up to the 2015 general election). Mr. Abbott was copied into administrative correspondence by Mr. Clarke and others involved in RoadTrip 2015. Mr. Abbott also attended a number of these events, although he said he did not stay late following campaigning.
34. Mr. Abbott has been the subject of allegations in the press suggesting that he deliberately deleted his emails before he left CCHQ. Mr. Abbott said that he often dealt with the press for Mr. Shapps and was therefore on CCHQ's "*PressOfficeRestricted*" internal email list. In this connection, he said that he received an instruction from the Party's Director of Communications in January 2015 to regularly delete emails to protect against the risk of emails leaking in the run-up to the general election. He sent a copy of this communication to CC. He also told CC that he regularly deleted emails to reduce the size of his inbox (having regard to mailbox size limits) and for fear that, after leaving CCHQ, someone might review his emails to identify material with which to attack him. Despite the deletion of his emails, CC were able to locate and review a significant number of emails involving Mr. Abbott. However, Mr. Abbott referred to some internal CCHQ emails that CC was unable to locate.
35. Based on the evidence reviewed, it appears that Mr. Abbott had a greater understanding of Mr. Clarke's involvement in RoadTrip and more interaction with him than members of the ESMT or Mr. Phillips. This is consistent with the 1 July 2014 appointment letter, which stated that Mr. Clarke would report to Mr. Shapps, through the Chairman's office, and that Mr. Abbott would be Mr. Clarke's point of contact in CCHQ.
36. In early 2014, Mr. Abbott was involved in a number of exchanges about RoadTrip 2015 and Team 2015. It appears that Mr. Abbott first met Mr. Clarke in early April 2014. Having attended a RoadTrip event in Enfield North which Mr. Clarke helped to organise, Mr. Abbott was impressed and mentioned Mr. Clarke's efforts as part of his weekly Team 2015 report to Sir Lynton, Lord Gilbert, Lord Feldman and Mr. Shapps on 9 May 2014.
37. Mr. Abbott was involved in the discussions that led up to the 1 July 2014 appointment letter and the arrangements made as a result of those discussions between Mr. Shapps and Mr. Clarke.
38. Mr. Abbott wrote to Mr. Fox on 30 May 2014 to highlight Mr. Clarke's campaigning in the Newark by-election. He recommended that the positive feedback Mr. Clarke had received might be worth putting on his candidate file to balance out his history in the Party. Mr. Abbott was also forwarded emails from a Party donor who expressed optimism about the RoadTrip project and hoped that the Party would work with Mr. Clarke in the future. This feedback was not retained on Mr. Clarke's candidate file.

39. On 9 June 2014, Mr. Abbott asked if Mr. Fox could bring Mr. Clarke's candidate file to a catch up meeting between Mr. Fox and Mr. Shapps. By this time he had received the complaint referenced at paragraph 18 above and he had been told by a member of the CCHQ Press Office that Mr. Clarke was dangerous to have around because he wasn't to be trusted. The member of the CCHQ Press Office told CC that this related to Mr. Clarke's trustworthiness in his dealings with the media. Mr. Abbott had responded to say that he agreed with this concern generally.
40. Mr. Abbott attended the meeting on 18 June 2014 as described at paragraph 9 above, when Mr. Shapps and Mr. Clarke discussed Mr. Clarke's candidate file and his involvement in future campaigning. Mr. Abbott told CC that Mr. Clarke explained that at the time of his candidature in Tooting in 2010 he had been immature but had since grown up, got married, become a father and settled down. Mr. Abbott told CC that he believed Mr. Clarke. Mr. Abbott also explained that Mr. Clarke was clearly interested in regaining a position on the Candidates List and that Mr. Shapps had indicated that, if Mr. Clarke did a good job on RoadTrip, his work would not go unnoticed and would be placed on his candidate file. However, Mr. Abbott recalled that Mr. Shapps made it clear that Mr. Clarke would not be on the Candidates List for the 2015 general election. Mr. Abbott also recalled that Mr. Clarke was aware that Mr. Shapps' existing role as co-Chairman would cease after the 2015 general election and that the Candidates Committee made decisions about who was on the Candidates List.
41. Mr. Abbott followed up on the meeting of 18 June 2014 by sending Mr. Shapps an email, dated 23 June 2014, which summarised the detail of Mr. Clarke's appointment and set out other matters for Mr. Shapps to consider.
42. Mr. Clarke followed up on the meeting of 18 June 2014 by sending Mr. Abbott an email, dated 24 June 2014 asking whether Mr. Abbott could expedite the appointment as director. Mr. Abbott forwarded this to Mr. Shapps, who agreed. Mr. Abbott went on to confirm this to Mr. Clarke but said that they also needed to discuss other matters.
43. Mr. Abbott also sent an email to Mr. Clarke dated 25 June 2014, in which he said that he had spoken to Mr. Fox, who agreed to keep the candidate file open and active rather than archived. He said that it would be helpful if Mr. Clarke sent all positive letters and other correspondence to Mr. Fox directly and that Mr. Fox would ensure they were put on the top of Mr. Clarke's file.
44. Mr. Abbott was subsequently referred to in the 1 July 2014 appointment letter as a point of contact for Mr. Clarke.
45. Mr. Abbott was copied into a large number of exchanges involving or about Mr. Clarke, many of which related to logistical arrangements for RoadTrip events. For example, he was involved in exchanges about expenses claims, debriefings about particular RoadTrips, and the organisation of RoadTrip events.
46. Initially, Mr. Abbott and Mr. Clarke appeared to have a constructive relationship. However, by the autumn of 2014, Mr. Abbott and Mr. Clarke were involved in several relatively heated exchanges, for example:

- a. On 14 October 2014, an activist drafted an email to be sent by Mr. Shapps about a campaign initiative. Mr. Abbott replied to say that this was not possible because another campaign event had been arranged elsewhere on the same day. Mr. Clarke responded that, in that case, the campaign initiative would be cancelled and accused Mr. Abbott of “hanging us out to dry”.
 - b. In another example, dated 3 November 2014, Mr. Clarke sent Mr. Abbott a heated email complaining that he, rather than Mr. Abbott, was often blamed for problems on campaign events. Mr. Abbott responded to say that Mr. Clarke should leave the internal diplomacy to him.
47. Mr. Abbott’s emerging views about the difficulties of dealing with Mr. Clarke were apparent from his communications with colleagues within CCHQ:
 - a. On 12 January 2015, he wrote to a colleague that Mr. Clarke was a very good campaign organiser but that he was also highly erratic and needed to be controlled. Mr. Abbott said that, to keep Mr. Clarke focused, he had been putting off implementing any of his suggestions.
 - b. In February 2015, an email about RoadTrip was sent without CCHQ approval. In an exchange with a colleague about this email, Mr. Abbott wrote that he loved Mr. Clarke’s ambition but that he did not help himself sometimes.
48. Mr. Abbott wrote to a former colleague at CCHQ, in November 2015, that his relationship with Mr. Clarke deteriorated following an email he sent to Mr. Clarke on 11 November 2014 informing him of tough spending caps that would apply to campaign activities from mid-December. He told CC that Mr. Clarke took this badly and personally, but that the relationship improved to a small extent in the run up to the general election in 2015 because he had to work with Mr. Clarke and had become hardened.
49. Right up until his departure from CCHQ in May 2015, Mr. Abbott appears simultaneously to have been concerned about Mr. Clarke’s behaviour, while at the same time acknowledging his contribution to campaigning. On the night of the general election, Baroness Pidding emailed Lord Feldman to ask whether Mr. Clarke and another activist could be allowed to join others present at CCHQ. Lord Feldman forwarded the email to Mr. Shapps and Mr. Abbott. Mr. Abbott emailed Lord Feldman to say that Mr. Clarke and the other activist had done a huge amount for the campaign effort, that it would be a shame to exclude them and that he would make sure that they behaved.
50. Mr. Abbott told CC that he sent two communications to Mr. Fox stating that Mr. Clarke should not be put on the Candidates List. He said that the first of these was sent around autumn 2014 and outlined that Mr. Clarke was very capable, but that aspects of his personality meant that he should not be put on the Candidates List. Mr. Abbott said that Mr. Fox replied to note that he agreed with Mr. Abbott’s view. Mr. Abbott said that the second communication was sent around the day of the general election in 2015 and reaffirmed what he had outlined in his previous communication. CC found no evidence of these communications in Mr. Clarke’s candidate file or in their review of email communications between Mr. Abbott and Mr. Fox. CC also asked Mr. Fox, who did not recall either communication. However, as set out at paragraph 38 above, CC did

locate communications containing positive feedback on Mr. Clarke that Mr. Abbott had asked to be put on Mr. Clarke's candidate file, but which did not appear on the file. Mr. Abbott also recalled preparing a manuscript note for Mr. Shapps of the pros and cons of allowing Mr. Clarke to lead the BattleBus campaign in spring 2015, and said that he advised against this.

51. Mr. Abbott received the email complaint outlined at paragraph 16 above raising concerns about RoadTrip 2015 events amongst other things. Mr. Abbott did not recall meeting with the complainant but he did respond to the email itself stating that HR problems must be reported to Mr. Phillips and his team so they could investigate them properly. Mr. Abbott passed the complaint on to Mr. Phillips. Paragraph 77 below sets out how Mr. Phillips dealt with the email.
52. Mr. Abbott was also involved in dealing with the complaint set out at paragraph 19 above about Mr. Clarke. Mr. Clarke had reported concerns to Mr. Abbott about the young activist. Mr. Abbott then emailed others within CCHQ to raise the concern that the activist had behaved inappropriately. Mr. Abbott told CC that Mr. Clarke had been unnecessarily rude to the activist but that at the time he had taken Mr. Clarke's email, which raised concerns about the activist, at face value.
53. Mr. Abbott recalled being informed about Mr. Clarke discouraging a prospective candidate from running against a particular slate in the run up to the Conservative Future National Executive election in 2014, as referenced at paragraph 20 above. Ms. Harris said that she phoned Mr. Abbott because she had been told about Mr. Clarke's alleged actions and formed the view that he was interfering with Conservative Future's National Executive election in 2014. However, Mr. Abbott's recollection was that he did not become aware of the issue until he was informed by the complainant in late 2014. He did not consider it to be a formal complaint but did put the allegations to Mr. Clarke, who denied them. Mr. Abbott had also previously exchanged emails with Mr. Clarke and separately with colleagues at CCHQ expressing concerns about the complainant's involvement in negative press coverage.
54. Mr. Abbott was copied into correspondence regarding the complaint outlined at paragraph 21 above initially addressed to Mr. Phillips. Mr. Abbott informed his colleagues that he had already told Mr. Clarke not to describe himself as a "*Director in CCHQ*" and asked a colleague to make Mr. Shapps aware of this. Mr. Abbott correctly assumed that Mr. Phillips had received the complaint.
55. Mr. Abbott was involved in dealing with the written complaint made by a senior Party member as referenced within paragraph 14 above. The letter had been addressed directly to Mr. Shapps. Mr. Shapps enquired about the status of the complaint to see if it had been dealt with. Mr. Abbott replied stating that it was being deliberately delayed until after the election. This matter is unlike others that Mr. Abbott dealt with relating to Mr. Clarke in that the letter of complaint came from a senior Party member and was addressed directly to Mr. Shapps.
56. Mr. Abbott received a complaint as referenced at paragraph 17 above and dealt with it as referenced within that paragraph.
57. In August 2014, Mr. Clarke and Mr. Abbott exchanged emails about whether an email could be sent to all Party members so close in time to the Conservative Future National Executive election. In that context, Mr. Abbott sent Mr. Clarke an email on 19 August 2014 describing the Returning Officer for the election (Mr. Phillips) as someone who Mr. Abbott had to remain friendly with, to

“crush complaints” against Mr. Clarke. When CC asked Mr. Abbott about this statement, he said he was referring to complaints about the uploading of names to the Party’s voter database in August 2014 in connection with the Conservative Future National Executive election (see paragraph 23 above). However, the complaint about the uploading of names was first raised in an email by Mr. Phillips two days later, on 21 August 2014. Mr. Phillips told CC that he did not raise these concerns with Mr. Abbott before this date.

58. Mr. Abbott left CCHQ after the general election in May 2015. Mr. Abbott told CC that, before leaving CCHQ, he was aware that Mr. Clarke was rude, difficult and prone to exaggeration, but did not think that Mr. Clarke was capable of the alleged behaviour which he became aware of after leaving CCHQ.
59. Many of the complaints by activists that Mr. Abbott became aware of did not become known to him until after he left CCHQ following the May 2015 general election. In relation to this period, CC looked at the evidence relating to whether Mr. Abbott’s knowledge was passed on to CCHQ.
60. Between June and October 2015, Mr. Abbott worked as volunteer Chief Executive of CWF. There was a further deterioration in relations between Mr. Clarke and Mr. Abbott, perhaps attributable in part to Mr. Clarke’s perception that CWF was in competition with Mr. Clarke’s RoadTrip 2020. Mr. Abbott told CC that CWF was not vying with RoadTrip for control of the Party’s 2020 general election campaign. In his statement to the Coroner’s inquest, Mr. Abbott said that “*by...June 2015, Clarke’s dislike of me had become bitter and entrenched...Mr. Clarke was on the warpath trying to attack me through his contacts [at CCHQ]*”. This coincided with Mr. Abbott hearing, from other activists who had been associated with RoadTrip 2015 but were now associated with CWF, complaints they had made about Mr. Clarke’s conduct. During this period, Mr. Abbott forwarded the email referred to at paragraph 22 to Mr. Fox.
61. As a result of the 14 August 2015 Complaint, Mr. Abbott met a former CCHQ colleague and heard about there being a secret internal investigation in CCHQ and, in this connection, sent an email to his former colleague dated 21 August 2015, in which he wrote that he felt largely to blame for bringing Mr. Clarke into CCHQ in late 2014 and financing his RoadTrips. Mr. Abbott then identified four female activists, two male activists and a male former RoadTrip intern as people who would be prepared to come and talk privately to CCHQ. Mr. Abbott told CC that he persuaded a number of individuals who worked for CWF to meet with Mr. Mort following Mr. Johnson’s letter, in order to bolster the number of complaints against Mr. Clarke. He also wanted to ensure that the complaints were treated seriously, as Conservative Future had a reputation for internal quarrels.
62. An article *The Times* published on 27 November 2015 alleged that Mr. Abbott raised concerns in a memorandum to Mr. Shapps and Lord Feldman that Mr. Clarke was rude, difficult to work with and had an incredibly short temper. Mr. Abbott said that the main thrust of *The Times* article was correct; however, he believed the article conflated two separate events. First, Mr. Abbott referred to a manuscript note to Mr. Shapps listing the pros and cons of bringing Mr. Clarke back to lead the BattleBus campaign in spring 2015. Second, he reported a conversation with Lord Feldman before he left CCHQ in May 2015, during which Lord Feldman asked for Mr. Abbott’s advice on whether to install Mr. Clarke on a panel to review the Party’s campaign efforts. Mr. Abbott said he told Lord Feldman not to include Mr. Clarke on this panel. CC has not identified any evidence to corroborate these claims. CC has not found any note that Mr. Abbott may have prepared for Mr. Shapps and none of the ESMT members CC has spoken to told CC about there being such a

note or of a discussion about Mr. Clarke's involvement in BattleBus. In his interview, Lord Feldman said that he had never given any consideration as to whether Mr. Clarke should be a member of the review panel.

Mr. Abbott - Summary

63. Based on the evidence reviewed, it appears that Mr. Abbott had a greater understanding of Mr. Clarke's involvement in RoadTrip and more interaction with him than members of the ESMT or Mr. Phillips.
64. Mr. Abbott and Mr. Clarke appear to have had a good relationship up until around autumn 2014. Mr. Abbott dealt with a number of the issues that arose in relation to Mr. Clarke's behaviour by discussing them directly with Mr. Clarke. For example, Mr. Abbott's response to the complaint at paragraph 18 above was to forward that complaint to Mr. Clarke and to give him some advice as to his future conduct.
65. Mr. Abbott knew from his early dealings with Mr. Clarke that Mr. Clarke could be aggressive and rude in his communications with activists and others. He was also aware of the contents of Mr. Clarke's candidate file for the 2008-2010 period, which included negative publicity and reports of abrasive conduct towards colleagues. Indeed, in an email sent regarding the events of August – September 2015, Mr. Abbott said that he viewed Mr. Clarke in this early period of their relationship as an irritant and difficult to work with, and as a loud mouth who was rude. Mr. Abbott experienced this firsthand in his dealings with Mr. Clarke from around autumn 2014 onwards.
66. As set out at paragraph 11 above, Mr. Abbott was aware that Mr. Clarke described himself, in August 2014, as a Director in CCHQ. On Mr. Shapps' instructions, he told Mr. Clarke to stop doing so. Mr. Clarke appears to have stopped describing himself as a Director in CCHQ as a result.
67. Mr. Abbott was aware of Mr. Clarke's involvement in the 2014 Conservative Future National Executive election and the fact that he was supporting the RoadTrip slate. He did not regard the issue as particularly serious. He told Mr. Shapps in an email at the time that there had been a few complaints and grumbles on the blogs online about Mr. Clarke taking an active interest in Conservative Future elections, including supporting some candidates over others.
68. CC identified one instance when Mr. Abbott appeared not to have been full and frank with members of the ESMT about Mr. Clarke's involvement in potential misconduct. This was in relation to the uploading of names onto the Party's voter database for the 2014 Conservative Future National Executive election (as set out at paragraph 23 above). Mr. Abbott told Mr. Shapps that the names had been uploaded onto the Party's voter database without the involvement or authority of Mr. Abbott and his team, and that Mr. Clarke insisted that the list of names did not come from him. However an earlier email exchange between Mr. Clarke, Mr. Abbott and a third party showed that Mr. Abbott was aware of how the names came to be uploaded into the Party's voter database and that Mr. Clarke had arranged for the names to be uploaded, purporting to act on behalf of CCHQ. As set out at paragraph 23 above, it is unclear whether or not Mr. Clarke's involvement amounted to inappropriate conduct.

69. With one exception, there is no suggestion that Mr. Abbott knew of the allegations of sexually inappropriate behaviour by Mr. Clarke whilst Mr. Abbott was at CCHQ. One activist told the Party's preliminary investigation that Mr. Clarke acted inappropriately towards young female activists and bragged that he got females drunk in order to sleep with them. The activist said that this was reported to Mr. Abbott and Ms. Harris in July 2014. Neither Mr. Abbott nor Ms. Harris could recall this, although they recalled other concerns reported by this activist. CC noted that Mr. Abbott attended several RoadTrips. For the avoidance of doubt, CC did not see any suggestion or evidence of inappropriate conduct towards activists by Mr. Abbott.
70. As set out at paragraph 57 above, Mr. Abbott commented in an email to Mr. Clarke on 19 August 2014 that Mr. Abbott had to remain friendly with Mr. Phillips in order to "crush complaints" against Mr. Clarke. CC only identified five alleged victims where there was evidence that complaints about Mr. Clarke reached Mr. Abbott during his period of employment at CCHQ. There were four alleged victims where it was unclear whether any complaint was made to Mr. Abbott as there was no written record of the complaints and Mr. Abbott did not recall receiving them. Of the five alleged victims that Mr. Abbott was aware of:
- a. Mr. Abbott suggested that the complaint at paragraph 17 should be communicated to Mr. Fox (and, he believes, Mr. Phillips), but the complainant did not do so.
 - b. The complaint at paragraph 18 was a comparatively minor complaint about aggressive / officious / overbearing behaviour towards a volunteer activist. Mr. Abbott addressed the issue by suggesting to Mr. Clarke that he communicate in a more courteous fashion in the future.
 - c. Mr. Abbott spoke to Mr. Clarke about the complaint at paragraph 19 and accepted Mr. Clarke's assessment of the complainant. When Mr. Clarke set out his assessment of the complainant, he copied another activist who had been present that evening, who Mr. Clarke said agreed with this assessment. Mr. Abbott replied to thank Mr. Clarke and say that he understood.
 - d. Mr. Abbott told CC that he spoke with Mr. Clarke about the complaint at paragraph 20 and Mr. Clarke denied the allegations.
 - e. The complaint at paragraph 21 was dealt with by Mr. Phillips. Mr. Abbott asked a colleague to flag to Mr. Shapps the fact that Mr. Clarke should not describe himself as a "director in cchq", and that Mr. Abbott had relayed this message to Mr. Clarke already.
71. Mr. Abbott told CC that he formed the view around the end of 2014 that Mr. Clarke had a personality issue which he thought made Mr. Clarke unsuitable to be a prospective parliamentary candidate. Mr. Abbott said that he provided a manuscript note to Mr. Shapps listing the pros and cons of bringing Mr. Clarke back to lead the BattleBus campaign in spring 2014 and that he advised against this. He also told CC that he reported his concerns to the Candidates Department in the autumn of 2014 and again before he left CCHQ. He also said that he warned Lord Feldman before he left CCHQ in May 2015 not to appoint Mr. Clarke to a panel to review the Party's campaign efforts. CC did not identify any evidence to corroborate these claims.

72. As set out at paragraph 34 above, Mr. Abbott said that he regularly deleted his emails for a number of reasons, including that he had been instructed to do so by the CCHQ Press Office. CC does not believe that Mr. Abbott's practice of deleting emails had anything to do with the matters that CC has been asked to investigate.
73. After leaving CCHQ in May 2015, Mr. Abbott said that he learned more about the alleged behaviour of Mr. Clarke, including allegations of serious misconduct by Mr. Clarke towards young activists. He perceived that Mr. Clarke's RoadTrip 2020 would be endorsed by CCHQ and was concerned to ensure that CCHQ was aware of the allegations of serious misconduct. He provided support for and encouraged a number of individuals, including Mr. Johnson, to complain to CCHQ, particularly after the incident involving Mr. Johnson in the public house. He was of the view that the complaints recorded in the accompanying document referred to in paragraph 25 above were exaggerated, but that they reflected a great deal of emotion and a fear that CCHQ would ignore the complaints.
74. During his time at CCHQ, Mr. Abbott was aware of the matters set out in paragraphs 17, 18, 19, 20 and 21 above. He was also aware of the written complaint referred to in paragraph 14 above.

Mr. Phillips

75. Mr. Phillips said that he had very limited contact with Mr. Clarke, although he knew of him. He was aware that Mr. Clarke had been the former Chairman of Conservative Future and a prospective parliamentary candidate in Tooting during the general election in 2010. Mr. Phillips had not seen his candidate file. He first recalled having contact with Mr. Clarke in August 2015, in relation to a proposal for RoadTrip 2020 / Team2020 to appear at the 2015 Party Conference.
76. In his capacity as Secretary to the Disciplinary Committee, Mr. Phillips received complaints from two activists which were relevant to the investigation. The first, set out at paragraph 16 above, did not complain about Mr. Clarke but did raise allegations about RoadTrip. The second was the complaint at paragraph 21 above.
77. The complaint referred to at paragraph 16 above included allegations about unidentified persons on RoadTrip events. It also included an allegation of sexual assault involving two people unconnected to Mr. Clarke, RoadTrip or this investigation. Mr Phillips said that he discussed this particular issue with Ms. Harris. They agreed that it was best for the author of the email to come to CCHQ to speak to Mr. Phillips in person. In his view, this was necessary to establish the correct approach for dealing with the complaint. Mr. Phillips invited them to a meeting to discuss the email. The meeting did not take place, because they were unable to meet during weekday office hours and Mr. Phillips was unable to meet after hours. He also preferred to meet face to face. As a consequence no meeting took place and the complaint was not investigated by Mr. Phillips or his team. However, Ms. Harris had taken steps to investigate the allegation of sexual assault and encouraged the alleged victim to make a formal complaint to CCHQ, although in the event no formal complaint was made. As noted above this allegation had nothing to do with Mr. Clarke.
78. Mr. Phillips also reviewed the complaint set out at paragraph 21. Subsequently, Mr. Phillips responded to the complaint to state that the matter had been considered and that they would not be pursuing it further because there was nothing in the allegations. When CC spoke to Mr.

Phillips he stood by his decision. He said the matter was not something with which the Party should be concerned. He said that exchanges like those that had been attached to this complaint were not uncommon within youth politics and were relatively unimportant.

79. In relation to the matter set out at paragraph 23 above regarding the 2014 Conservative Future National Executive election, Mr. Phillips, as Returning Officer, elevated the issue of ballot papers being sent to those who were not entitled to vote to Lord Feldman. Mr. Clarke was not identified as possibly being involved in the conduct that gave rise to the issue until Mr. Abbott provided his account of events to Mr. Shapps, by which time Mr. Phillips had raised the concern with the ESMT and had discounted any votes cast by the ineligible voters.

Mr Phillips - Summary

80. Mr. Phillips was aware of the matters set out in paragraph 16 and 21 above. There is no evidence that Mr. Phillips was otherwise aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

Mr. Day

81. Mr. Day was aware that Mr. Clarke and RoadTrip were working with the campaign team but he was not aware, at the time, of the details of RoadTrip's financing.
82. Mr. Day recalled that, during an ESMT meeting in August 2014, Sir Lynton raised concerns about Mr. Clarke holding himself out as a Director in CCHQ. He recalled that Mr. Shapps had said that he would deal with the issue and later Mr. Shapps confirmed that he had done so.
83. Mr. Day said he was not aware of any allegations of bullying, harassment or inappropriate behaviour by Mr. Clarke in advance of the 14 August 2015 Complaint. He had not previously heard of complaints about RoadTrip from activists and was not aware that Mr. Clarke was difficult to deal with.
84. Mr. Day reacted to the 14 August 2015 Complaint by saying that CCHQ needed to consider very carefully how to proceed. He considered that the accusations set out in the document written by Mr. Johnson's colleague were very similar to those reported in respect of Lord Rennard and that this meant that the leadership at CCHQ needed to deal with them.

Mr. Day – Summary

85. There is no evidence that Mr. Day was aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

Sir Lynton Crosby

86. Sir Lynton was not involved in direct communications with either Team 2015 or RoadTrip 2015 but, through discussions with others such as Lord Gilbert, he would encourage them to target particular constituencies. He did have some contact with RoadTrip volunteers, for example when asked to appear in photographs or when he attended the action day during the Party Conference in Birmingham in September 2014. Sir Lynton worked primarily with the paid campaign staff at CCHQ who were not involved with the RoadTrip project. Sir Lynton's work with CCHQ finished on the day of the 2015 general election.
87. On 13 August 2014, as set out at paragraph 107(a) below, Sir Lynton passed to Mr. Shapps concerns he had received from the press team about the fact that Mr. Clarke had an official title which he was using on his email signature and that he was not discreet. The email exchange set out at paragraph 107(b) below regarding Mr. Clarke's inappropriate use of the title "Director in CCHQ" took place later in August 2014.
88. During the time he attended ESMT meetings, Sir Lynton said that he was not aware of allegations of bullying, harassment or other inappropriate behaviour by Mr. Clarke. He did not receive any complaints about Mr. Clarke. Having read the press coverage following Mr. Johnson's death, Sir Lynton told CC that he was not aware of Mr. Clarke's reputation during the time he attended ESMT meetings.

Sir Lynton - Summary

89. Sir Lynton was aware of inappropriate behaviour on the part of Mr. Clarke in relation to him holding himself out as a Director in CCHQ, but this was acted upon after which the behaviour ceased. There is no evidence that Sir Lynton was aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

Lord Gilbert

90. Lord Gilbert first became aware of Mr. Clarke in 2008, when Mr. Clarke was a candidate in Tooting for the 2010 general election. Lord Gilbert was responsible for the target seats campaign for the 2010 election and believes he would have met Mr. Clarke individually from time to time. His awareness of Mr. Clarke prior to the 14 August 2015 Complaint related mainly to matters prior to 2014. In particular:
 - a. He was aware of an article published in the *Mail on Sunday* in 2008 which made a number of allegations about Mr. Clarke's private life. Lord Gilbert understood that Mr. Clarke was called into CCHQ to discuss the article at the time, in particular the unhelpful negative publicity which had been generated.
 - b. He was copied into emails from Mr. Howlett (then Chairmen of Conservative Future) to Baroness Warsi (then co-Chairman of the Party together with Lord Feldman) and Lord

Feldman in 2011 and to Baroness Warsi, Lord Feldman and Baroness Pidding in 2013, raising political concerns about YBF.

- c. He was aware that Mr. Clarke fell out with his local association Chairman and local association members before the 2010 general election. Lord Gilbert recalled that someone in Mr. Clarke's association had complained that Mr. Clarke was rude and difficult to get on with. However, he told CC that it was not unusual for there to be disagreements between candidates and their local associations. Lord Gilbert told CC that he discussed this complaint with the local association Chairman at the time and contemplated deselection of Mr. Clarke as a candidate. However, Mr Clarke had more supporters than detractors, so in the event he was not deselected.
 - d. He recalled a heated altercation between a member of Party staff and Mr. Clarke at a conference, although he had forgotten about this until press coverage following Mr. Johnson's death reminded him of it.
91. Lord Gilbert recalled raising issues related to Mr. Clarke's conduct before the 2010 general election with Mr. Shapps and Mr. Abbott in 2014. Mr. Shapps' recollection in relation to discussions concerning Mr. Clarke is set out at paragraph 105 below.
 92. When Lord Gilbert first heard about RoadTrip, he understood that it involved a group of young activists (mostly graduates) who campaigned in constituencies. He heard only positive comments about RoadTrip and, although it did not always campaign in target seats, he thought it was harmless. In mid-April 2014, Lord Gilbert discussed how RoadTrip and Team 2015 might coordinate the locations they visited with the target seat campaign.
 93. Lord Gilbert spoke regularly with Mr. Abbott about directing Team 2015 and RoadTrip campaigners to target seats. He sometimes received emails from Mr. Clarke about campaigning events but rarely saw him in CCHQ and never attended meetings with him. He attended some RoadTrip events, although he did not stay on after the campaigning had finished. He did not witness or hear rumours of any inappropriate behaviour by activists during these events.
 94. Following the general election in 2015, Lord Gilbert stood down as Director of Campaigning, although he remained Deputy Chairman of the Party Board. He resigned from his position on the Board in December 2015. Lord Gilbert remains a part-time consultant to the Party.
 95. Lord Gilbert was involved in discussions about RoadTrip 2020. This culminated in a discussion by email about whether and on what basis the Party should work with RoadTrip 2020 on 14 August 2015. A few hours after these discussions took place, CCHQ received the 14 August 2015 Complaint. In an email at the time, Lord Gilbert said that he had been involved with the issues with Mr. Clarke before 2010. In this email, he said that the contribution of RoadTrip and Team 2015 had been overstated but that RoadTrip had not been managed properly and that they had allowed it to operate without proper scrutiny.
 96. Following receipt of the 14 August 2015 Complaint, Lord Gilbert was involved in an email exchange with Lord Feldman and Mr. Day about how to proceed. Lord Gilbert said he shared Lord Feldman's concerns about Mr. Clarke (see paragraph 119 below). He told CC that his concerns related to RoadTrip 2020 and his recollection of Mr. Clarke's behaviour before the 2010 general

election. However, he said that everything he heard about Mr. Clarke between 2010 and 2015 was positive.

Lord Gilbert - Summary

97. Lord Gilbert was aware of issues related to Mr. Clarke's conduct before the 2010 general election and recalled discussing these with Mr. Shapps and Mr. Abbott in 2014.
98. There is no evidence that Lord Gilbert was aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

Mr. Shapps

99. In early 2014, Mr. Abbott made Mr. Shapps aware that Mr. Clarke was organising Party action days which were attracting large numbers of volunteers. Mr. Robert Halfon MP emailed Mr. Shapps on 9 April 2014 about the success of the Harlow RoadTrip on 5 April 2014. Mr. Shapps attended his first RoadTrip event in Enfield North on 26 April 2014. The Enfield North RoadTrip event was the first time Mr. Shapps could recall having seen Mr. Clarke for some time.
100. In early summer 2014 Mr. Shapps briefly reviewed Mr. Clarke's candidate file. Mr. Shapps recalled that he spent around ten minutes reviewing the candidate file. The file did not include allegations of bullying, harassment or inappropriate conduct towards young activists. It did include a series of other reports, including reports of aggressive and bullying conduct towards his campaign director and negative media coverage about his political and personal activities from four years earlier. Mr. Shapps noted that there were also some extremely positive comments from a senior member of the local voluntary Party.
101. Mr. Shapps and Mr. Abbott met with Mr. Clarke on 18 June 2014. During their discussion Mr. Shapps said that Mr. Clarke's candidate file made chequered reading with strong opinions in favour and against him during his time as a candidate. Mr. Clarke indicated that he would like to re-join the Candidates List. Mr. Shapps told Mr. Clarke that to get back onto the Candidates List he would have to build bridges and that now was not the right time for Mr. Clarke to join the list. He said that Mr. Clarke needed to work hard, prove himself and show that he could get on with other people.
102. Mr. Clarke emailed Mr. Shapps, copying Mr. Abbott, the following day and thanked him for meeting with him. Mr. Clarke said Mr. Shapps' analysis of his "personal journey" over the last few years was "spot on" and that he looked forward to working with Mr. Shapps on "marrying" his "personal goals with their "shared political goals". He said he would be delighted to join Mr. Shapps' team and "take campaigning to a scale never before seen in this country".
103. On 24 June 2014, Mr. Clarke emailed Mr. Abbott to ask him to expedite his appointment as Director. This was forwarded to Mr. Shapps, who agreed.
104. Mr. Shapps subsequently signed the 1 July 2014 letter in which Mr. Clarke was appointed as a "*Director of #RoadTrip 2015* in CCHQ". As set out at paragraph 9 above, in this letter Mr.

Shapps said that Mr. Clarke would report directly to him through the Chairman's Office (in effect, his Chief of Staff Mr. Abbott).

105. Mr. Shapps told CC that the decision to review Mr. Clarke's candidate file, an oral report on the candidate file and a draft of the 1 July 2014 letter were all shared with and / or agreed by the ESMT during their weekly meetings. The recollection of the other members of the ESMT is different. None of the other members of the ESMT recalled discussing Mr. Clarke's candidate file, his appointment as director of RoadTrip or a draft of the 1 July 2014 letter at any ESMT meeting prior to August 2014. Mr. Shapps told CC that he discussed the allegation in Mr. Clarke's candidate file about his treatment of his campaign director with Lord Gilbert and recalled that Lord Gilbert, characterised the incident as a clash of personalities.
106. CC found no documentary records relating to ESMT discussions about Mr. Clarke's reputation or title prior to August 2014. ESMT meetings were not minuted. The ESMT did discuss the RoadTrip project, but it appears that the discussions were not extensive and concerned RoadTrip's place in the Party's overall campaign efforts, such as where campaign activities should be directed. CC took the view that nothing turned on the issue of when the ESMT became aware that Mr. Clarke had been appointed "*Director of #RoadTrip2015*". The fact that Mr. Clarke was appointed or described as such was either known to the ESMT prior to 1 July 2014 or in any event shortly afterwards, in August 2014. Mr. Clarke was known to be the founder of, and principal force behind, RoadTrip. Mr. Clarke and RoadTrip's closer association with Team 2015 and CCHQ was apparent to those working at CCHQ.
107. There were two email exchanges involving members of the ESMT concerning Mr. Clarke's appointment as Director of RoadTrip in August 2014.
 - a. The first email exchange was between Mr. Shapps and Sir Lynton on 13 August 2014. Sir Lynton passed to Mr. Shapps comments he had received from the press team about Mr. Clarke concerning Mr. Clarke's use of the title "*Director of RoadTrip*". Mr. Shapps' initial response stated that they were all well aware of Mr. Clarke's reputation. He added that Mr. Clarke's candidate file made interesting reading, but that the view had essentially been taken that Mr. Clarke was a difficult individual who delivered, thus if there was anything specific that the press team at CCHQ knew, then Mr. Shapps needed to be made aware of it in order to speak to Mr. Clarke about it. However, if the press team's concerns only entailed that which they already knew then that was the "*calculated risk*" to be taken to help build the campaign network up. Sir Lynton's response was that it was the fact Mr. Clarke had a title that the press team was nervous about, and that anyone who added it to their email signature made him nervous. Mr. Shapps agreed with this concern and said that for Mr. Clarke, RoadTrip 2015 was an opportunity for rehabilitation, that and Mr. Clarke had something to lose if he failed.
 - b. The second email exchange was between Mr. Shapps, Sir Lynton and Lord Feldman on 21 August 2014 and concerned Mr. Clarke describing himself as a Director in CCHQ instead of Director of RoadTrip 2015. Sir Lynton's suggestion was that it would be better to call Mr. Clarke what he was, namely the Volunteer Coordinator of RoadTrip 2015.
108. It appears from the email exchange of 21 August 2014 and the recollection of Mr. Day (who was not copied on the email exchange, but who recalled a discussion about Mr. Clarke's role

in August 2014) that when Mr. Shapps, Sir Lynton and Lord Feldman learned that Mr. Clarke was describing himself as a Director of CCHQ, they agreed that this was inappropriate. Mr. Shapps asked Mr. Abbott to instruct Mr. Clarke to stop describing himself as Director of CCHQ. The following day, Mr. Shapps reported to Sir Lynton and Lord Feldman that this had been fixed. Mr. Abbott told Mr. Clarke on 21 August 2014 not to describe himself as a Director of CCHQ. CC has not found evidence that Mr. Clarke described himself as a “*Director in CCHQ*” after 21 August 2014.

109. As set out at paragraph 23 above, Mr. Shapps received emails in August 2014 which implied that Mr. Abbott and Mr. Clarke may have been involved in inappropriate behaviour involving the Conservative Future National Executive election namely the uploading of ineligible voters to the Party’s voter system. Mr. Shapps asked Mr. Abbott for a full explanation. Mr. Abbott’s explanation referred to Mr. Clarke but did not identify any misconduct by Mr. Clarke. Mr. Shapps was away on holiday when he received these emails and they did not cause him to reconsider the potential risks inherent in Mr. Clarke’s appointment as Director of, and involvement in, RoadTrip. As described in paragraph 23 above, this issue was addressed by CCHQ in advance of the announcement of the Conservative Future National Executive result. In this context, Mr. Abbott told Mr. Shapps that there had been a few complaints and grumbles on the blogs online about Mr. Clarke taking an active interest in Conservative Future elections by supporting some candidates over others.

110. In an article in the *Daily Telegraph*, it was alleged that Mr. Shapps was “*personally warned by a senior Conservative MP about three cases of alleged bullying by the “Tatler Tory” Mark Clarke a year ago – but indicated he would do nothing about it, according to a former Tory minister*”. The article went on to state that the former Party minister passed on to Mr. Shapps “*allegations of “verbal and sexual” bullying against two young women and a young man, one of whom was linked with Conservative Central Office*”. Mr. Shapps could not recall any such warning. He said that, as a matter of practice, he asks anyone who makes a verbal complaint to him to follow up with an email and that he had found no trace of an email to show this was raised with him. CC has not found any documentary or other evidence to substantiate the allegations made in this article or to identify the source(s).

111. Although Mr. Shapps demonstrated by his resignation that he was prepared to accept responsibility for Mr. Clarke’s appointment to the voluntary position of Director of RoadTrip 2015 in CCHQ, he maintained that he was not aware of the serious allegations against Mr. Clarke which emerged in the second half of 2015. In this regard, his resignation letter stated the following:

“Although neither the Party nor I can find any record of written allegations of bullying, sexual abuse or blackmail made to the Chairman’s office prior to the election, I cannot help but feel that the steady stream of those who raised smaller, more nuanced, objections should have perhaps set alarm bells ringing sooner, in the end, I signed that letter appointing Mark Clarke ‘Director of RoadTrip’ and I firmly believe that whatever the rights and wrongs of a serious case like this, responsibility should rest somewhere. Over the past few weeks – as individual allegations have come to light – I have come to the conclusion that the buck should stop with me.

Given the very serious nature of what has subsequently occurred and my role in appointing Mr. Clarke, I cannot help but conclude that the only right course of action is for me to step down as a Minister in your government.”

Mr. Shapps told CC that, to the best of his knowledge, no-one raised bullying allegations about Mr. Clarke with him before Mr. Johnson's death and that he did not personally witness any aggressive behaviour from Mr. Clarke.

Mr. Shapps - Summary

112. It is clear from Mr. Shapps' email exchange with Sir Lynton on 13 August 2014 that by that date Mr. Shapps recognised that there was a potential risk in incorporating RoadTrip within the campaign structure. This was because he was aware of Mr. Clarke's reputation during the 2010 election campaign from his review of Mr. Clarke's candidate file. Mr. Shapps met with Mr. Clarke to discuss these issues in June 2014. Mr. Clarke gave him the strong impression that he had settled down and wanted a second chance.

113. Between signing the 1 July 2014 appointment letter and Mr. Shapps' departure from CCHQ in May 2015, there is evidence that Mr. Shapps was informed of a few instances of potential misconduct (but not bullying or harassment) involving Mr. Clarke:

- a. He was aware of Mr. Clarke's misuse of the title Director of CCHQ in August 2014. He ensured that Mr. Clarke was told to cease describing himself in this way and received a copy of the email in which Mr. Abbott told Mr. Clarke to do so. Mr. Clarke ceased to describe himself as a Director in CCHQ thereafter.
- b. He was aware from Mr. Abbott that Mr. Clarke may have been involved in inappropriate behaviour involving the Conservative Future National Executive election, namely the uploading of ineligible voters to the Party's voter system. He asked Mr. Abbott for a full explanation. Mr. Abbott's explanation referred to Mr. Clarke but did not identify any misconduct by Mr. Clarke. Mr. Shapps considered that the issues concerning the Conservative Future elections had been resolved.
- c. In the explanation described above, Mr. Abbott told Mr. Shapps that there had been a few complaints and grumbles on the blogs online about Mr. Clarke's role in the Conservative Future National Executive election. Mr. Abbott was not referring to complaints received by CCHQ about Mr. Clarke's conduct.

114. There is therefore no evidence that Mr. Shapps was aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

Lord Feldman

115. Lord Feldman was involved in an exchange between Sir Lynton, Mr. Shapps and Mr. Abbott on 21 August 2014, after being alerted that day to a Facebook post in which Mr. Clarke described himself as a Director in CCHQ. In an email to Mr. Shapps and Sir Lynton, Lord Feldman said that Mr. Clarke must be told to stop referring to himself as a CCHQ Director immediately. He asked if Mr. Shapps could handle this.

116. Lord Feldman discussed RoadTrip 2015 and Mr. Clarke with Ms. Deborah Feldman after she was appointed to run Team 2015 in October 2014. During those discussions, Ms. Feldman mentioned concerns about the lack of competence of the activists involved and RoadTrip 2015's failure to focus. There is no evidence that allegations of bullying or harassment were mentioned during those discussions. Correspondence between Ms. Feldman and Lord Feldman shows that, after the 2015 general election, Ms. Feldman voiced her criticisms of Mr. Clarke for claiming credit for Team 2015's campaigning activities. Lord Feldman told CC that his impression of Mr. Clarke was that he tended towards self-promotion.
117. Lord Feldman was also involved in correspondence regarding complaints made about Mr. Clarke by a senior Party member in March 2015. He did not think that the complainant would characterise the incident as bullying owing to their senior position within the Party. This complaint is unlike others relating to Mr. Clarke in that the complaint was made by a senior Party member against Mr. Clarke, a volunteer activist. Lord Feldman clearly agreed with this member that Mr. Clarke should cease the behaviour complained about. It appears that Mr. Abbott carried out Mr. Shapps' instruction to tell Mr. Clarke to stop "winding [them] up".
118. CC has identified isolated instances of Lord Feldman being copied into correspondence from or related to Mr. Clarke. For example, he was forwarded an email from Mr. Clarke regarding praise for RoadTrip's work by an Area Chairman in May 2015. Following the 2015 general election, in an email dated 12 May 2015 to a former CCHQ colleague, Lord Feldman said he had been approached by Mr. Halfon about providing Mr. Clarke with a role in CCHQ. No role was offered.
119. On 14 August 2015, Lord Feldman participated in correspondence about RoadTrip 2020 and, later that day, CCHQ received the 14 August 2015 Complaint. Upon receipt of the 14 August 2015 Complaint, Lord Feldman said that he had always had the "gravest possible reservations" about Mr. Clarke, which he told CC was related to his competence as a campaign organiser. He had put these concerns to one side and agreed to proceed with RoadTrip 2020 to some degree, providing that it became formally affiliated to the Party subject to the relevant controls.
120. Once he became aware of the 14 August 2015 Complaint, Lord Feldman reacted by asking Mr. Mort, an experienced former Chairman of the Disciplinary Sub-Committee, to conduct a preliminary investigation. Immediately following receipt of Mr. Mort's note of his investigation, which coincided with Mr. Johnson's death, the Board, led by Lord Feldman, commenced a formal inquiry by the Disciplinary Sub-Committee of the Board into Mr. Clarke's conduct.
121. There have been a number of articles in the press which allege that Lord Feldman and others within CCHQ were aware of the allegations of bullying, harassment or other inappropriate behaviour by Mr. Clarke:
- a. An allegation broadcast on Newsnight on 8 December 2015 and published on the BBC News website referred to a "dossier" that was given to Lord Feldman at or around late 2010. Mr. Howlett, who is alleged to have handed the dossier to Lord Feldman, did not recall any such dossier. He recalled a meeting with Lord Feldman to which he brought a five-point agenda and nine pages of press articles concerning YBF. He provided these documents to CC. There was a reference to Mr. Clarke at point four of five of the agenda. None of the press articles referred to Mr. Clarke. Mr. Howlett believes that he mentioned

Mr. Clarke, in the context of Mr. Clarke's adjudication of the 2010 Conservative Future hustings. Lord Feldman recalled that Mr. Howlett had political concerns about YBF but could not recall any discussions about Mr. Clarke during the period that Mr. Howlett was Chairman of Conservative Future.

There is no evidence to corroborate the allegation broadcast by Newsnight that a dossier on a culture of bullying existed having been allegedly compiled and provided to Lord Feldman and Baroness Warsi by Mr. Howlett. Having spoken with the relevant individuals, CC did not consider that discussions at this time included allegations of bullying or harassment by Mr. Clarke. References to Mr. Clarke in the meeting between Lord Feldman and Mr. Howlett in early 2011 were made in the context of Mr. Howlett's political concerns about the influence of YBF on Conservative Future.

- b. The *Daily Telegraph* published an article alleging that a whistleblower had sent a letter to Lord Feldman and Downing Street alleging that Mr. Clarke told young men and women to "go as far as possible" with MPs, among various other allegations. The activist concerned claims to have lodged a formal complaint about Mr. Clarke with CCHQ by email in August 2014. CC found no evidence to support that claim. CC identified a complaint sent on 16 November 2015 (as referenced at paragraph 31 above). None of the individuals at CCHQ with whom CC discussed this matter recalled seeing such a complaint before November 2015. Lord Feldman told CC that he was not aware of these allegations at the time and that his office had found no trace of a written complaint received prior to November 2015.

CC contacted the activist who sent the 16 November 2015 complaint. The activist declined the invitation to attend an interview and stated that they wished to withdraw their evidence. CC presumed by this that the activist did not intend CC to rely on the email in question.

- c. An article in *The Times* alleged that Mr. Abbott "wrote a memo directly to his boss and Lord Feldman setting out complaints from activists about Mark Clarke". Lord Feldman did not recall receiving such a memorandum from Mr. Abbott and did not locate any such memorandum having conducted a search of his emails and files.

CC found no evidence of a memo from Mr. Abbott to Lord Feldman setting out complaints from activists about Mr. Clarke.

- d. The *Mail on Sunday* alleged that Lord Feldman banned Mr. Clarke and an activist from an election night VIP event because he was "horrificed" by their conduct.

CC identified an email showing that Lord Feldman, following discussion with Mr. Shapps and Mr. Abbott, agreed to let Mr. Clarke and the other activist attend the event at the request of Baroness Pidding. Mr. Abbott emailed Lord Feldman to say that Mr. Clarke and

the other activist had done a huge amount for the campaign effort, that it would be a shame to exclude them and that he would make sure that they behaved.

- e. In addition, there have been allegations that Lord Feldman presided over a National Convention Poll (in July 2015), in which Mr. Clarke was alleged to have used bullying tactics to ensure that those eligible to vote on behalf of Conservative Future voted for a particular candidate as Chairman of the National Convention. The role of Mr. Clarke in the 2015 National Convention election is described at paragraph 24 above. Lord Feldman said that he was not aware of this at the time.

CC found no evidence that Lord Feldman was aware of such allegations at the time.

Lord Feldman - Summary

- 122. Lord Feldman, among others, had concerns about RoadTrip 2015 both before and after receiving the 14 August 2015 Complaint, but these concerns related to the organisational competence of the activists involved and their failure to target the right seats. He had no recollection of being part of discussions during ESMT meetings in June or July 2014, in which Mr. Clarke's appointment as a Director of RoadTrip or the contents of Mr. Clarke's candidate file were discussed.
- 123. Lord Feldman was informed of a few instances of potential misconduct (but not bullying or harassment) involving Mr. Clarke prior to 14 August 2015:
 - a. Lord Feldman was aware of potential misconduct on the part of Mr. Clarke in relation to Mr. Clarke holding himself out as a Director in CCHQ in August 2014, but this was acted upon, after which the behaviour ceased. This information did not reach Lord Feldman in the context of a complaint about Mr. Clarke's conduct towards activists.
 - b. Lord Feldman received emails in August 2014 which implied that Mr. Abbott and Mr. Clarke had been involved in uploading names of ineligible voters to the Party's voter database in connection with the 2014 Conservative Future National Executive election. The role of Mr. Clarke in the election is described at paragraph 23 above. Lord Feldman asked Mr. Abbott for an explanation. Mr. Abbott's explanation referred to Mr. Clarke but did not identify any misconduct by Mr. Clarke. Lord Feldman (and others) took action to confirm that the issue had not affected the results.
- 124. There is no evidence that Lord Feldman was aware of allegations of bullying or harassment of young activists by Mr. Clarke or those associated with him prior to the 14 August 2015 Complaint.

END.