

**Review of the MP's Scheme of Business Costs and Expenses and IPSA's
publication policy**

Consultation responses

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20th October 2016

Herewith the 1922 Committee's response to the IPSA consultation entitled: ***Review of the MPs' Scheme of Business Costs and Expenses and IPSA'S publication policy / A Consultation – May 2016.***

At the outset, it is important to note that the consultation contains many sensible and proportionate proposals. IPSA is to be commended for this. However, there is a central problem that remains unaddressed. This problem is IPSA's dual role as both a regulator and provider of services to those that it regulates. It is the only regulatory organisation in the United Kingdom that fulfils these twin functions.

As exemplified below, on almost all occasions IPSA's consultation places its regulatory role ahead of its service provision role.

20. Our draft fundamental principles, which would take effect from April 2017, are as follows:

- 1. The Scheme should assure the public that MPs' use of taxpayers' money is well-regulated and that MPs are resourced appropriately to carry out their parliamentary functions.*

The theme of placing its regulatory duties ahead of its service provision duties is repeated throughout IPSA's consultation. On page 18, paragraph 41, IPSA states: *Our interests are financial, to safeguard the expenditure of public money.* This is a noble and laudable objective but one that demands the separation of IPSA's current remit. A separation that will allow IPSA to become a purely regulatory body, with services delivered by an agency focused on the needs of the consumer of those services.

In view of the above, the 1922 Committee's key recommendation is that the legislation giving birth to IPSA be amended so as to establish this organisation solely as a regulator of expenditure and not a provider of services.



Turning to the consultation's specific suggestions, the Committee makes the following observations and recommendations.

Staff Travel: IPSA rightly recognises that staff are often required to travel in support of their employer. These costs should be met upon the production of the required receipts.

European Travel: Given the results of the EU Referendum, for the purposes of travel, Europe has become a bigger place, with those parts lying outside the EU taking on increased relevance and importance. IPSA is right to suggest a removal and easing of the current restrictions in relation to European travel.

Diverted Journeys: The rules surrounding diverted journeys are complicated. The realities of the job are that when travelling from point A to point B on Parliamentary business a Member of Parliament may stop off on route to speak at an Association or Ward event. If there is no additional mileage associated with this stopover, is it still IPSA's intention to fund the full cost of getting from point A to point B? Following on from this, where there is a departure from point A to point B, for political purposes, is it IPSA's intention not to fund the additional mileage or travel costs attached to this departure?

In the main, removing and simplifying rules is to be welcomed. There are some rules that both Members of Parliament and IPSA find fiendishly difficult to interpret. This creates uncertainty and promotes poor decision-making.

Staff Redundancy: There is no "silver bullet" to the issues of staff redundancy and *pay in lieu* of notice. Members of Parliament are the employers of their staff and liability in employment matters rests with them.

Staff leaving Members' employment at the last General Election were entitled to receive redundancy pay and seek new employment, either inside or outside the House of Commons. Of those who secured new positions with Members of Parliament, each became an employee of a Member of Parliament - not IPSA or the House of Commons. Therefore, it is not clear on what basis IPSA could withhold, or clawback, redundancy payments in those cases where an employee, losing his or her job, found a new job with a different Member of Parliament. If IPSA pressed ahead in this area the matter could end up in Court. In this forum arguments would be tested as to whether, for the purposes of redundancy pay, the Member of Parliament or IPSA was the legal employer.

In relation to redundancy, IPSA suggests that Members of Parliament, who know they are leaving the House, should be encouraged to give earlier notice to their staff. The timing of redundancy notices is a matter solely for the Member of Parliament, whose decision will be influenced by his or her desire to retain established and well-motivated staff up to their point of departure from the House.



Staff Holiday Pay: IPSA expresses concern about pay in lieu of holiday. Perhaps, it may want to consider introducing an arrangement whereby a claim for pay in lieu of untaken holiday must be made at the end of the financial year for which the holiday entitlement remained unused. This would prevent untaken holiday being rolled forward from financial year to financial year.

Staff Bonuses: The payment of staff bonuses was ended in the previous Parliament. This decision greatly restricted the ability of Members of Parliament to make discretionary payments to staff in recognition of excellent service, or as a means of aiding retention. IPSA's willingness to revisit this area is one that the Committee welcomes.

Staff Subsistence and Travel Expenses During Dissolution: The Committee supports measures that will enable staff to have their expenses met when working away from Westminster during the dissolution of Parliament.

Employment of Connected Parties: The employment of '*connected parties*' is well regulated and, despite the occasional half-hearted efforts of the media to whip up a story, the evidence is that it creates little public concern. Those connected parties who work for Members of Parliament, and it is mainly spouses and partners that do, already have their salary bands published. Given this level of transparency and the lack of public concern, there do not seem to be any reasonable grounds to justify ending the ability of colleagues to employ a connected party.

Financial Support for Families: Financial support for Members' families remains a highly contentious area for colleagues, if not the public. All colleagues are different but, given the demands of working in two locations for substantial parts of the year, many are understandably keen to keep their families together. This desire to maintain family life should be recognised by IPSA, both when it is looking at housing contributions and travel allowances. In relation to travel, we have parents who, having exhausted their train ticket allowance, are then required to pile their children into the car to travel up and down to London. This is not an efficient use of time as, unlike the train, when a colleague is driving the option of working is removed. In addition to Members' travel, the Committee hopes that IPSA will recognise that colleagues often rely on either their spouse or partner to travel to and from the constituency with dependent children and that this travel should be properly funded.

Accommodation Costs: In relation to accommodation, renting remains the best and most cost effective option IPSA is willing to fund. However, the rent allowance has not increased since 2010, while the cost of renting work related domestic accommodation has risen significantly. London is an international city with high levels of competition for the available housing stock. Members of Parliament are required to spend a large part of their time working and living in London. This is a requirement of the job. Given this requirement, IPSA should fund accommodation properly. Its suggestions that Members of Parliament be



obliged to live in Zone 3 to “align them more to the experience of most London commuters”, misses the point that a) most Members of Parliament do not represent London seats and b) those most aligned with the experience of London commuters are those Members of Parliament that do represent them from Zones 1, 2, 3 and beyond. Furthermore, many Members commute very long distances on a weekly basis between their constituency and Westminster, most London commuters do not.

Those Members of Parliament using their own homes for work related accommodation should continue to receive reimbursement for running costs. The upper ceiling should be reviewed to ensure that, in the interests of fairness, colleagues are not being asked to subsidise their work as a Member of Parliament. Those Members using their own property in this way are already defraying the cost to the public purse very significantly.

As they seek to fulfil their duties as a Member of Parliament, colleagues who own a home should not, and could not, be obliged to use that home for their own work related accommodation. Beyond making the necessary declarations, the utilisation of assets by the owner is a private matter.

In relation to rental agreements, it seems reasonable for IPSA to encourage Members to negotiate, where possible, two month break clauses in their rent and office agreements. IPSA needs to recognise that the relative buoyancy of local property markets will determine how easy it is to agree a two month break clause.

Funding of Pooled Research Services: IPSA is concerned to strike the right balance between Parliamentary and political activity. All current colleagues are elected under the banner and a manifesto of a political Party. Having been elected under that banner they then take their Party’s Whip. Therefore, it is not possible neatly to separate colleagues’ Parliamentary work from their work as representatives of their Party.

Colleagues’ high take-up of pooled staffing services is an indication of the value and importance they attach to these research facilities. IPSA acknowledges that the research functions carried out by “pooled staffing services” are compliant but it remains worried about “*whether a service dedicated to the MPs of a single party can be wholly free of party political intent*”. In response to this concern, the Committee would say that Parliament is framed through a battle of ideas, with colleagues’ day-to-day engagements shaped by their politics. Furthermore, a vast proportion of colleagues’ constituency post bag demands that they provide details of either Government, Opposition or Party policy. The division between Parliamentary and political activity may be one that IPSA can define or recognise but it is not a division for which, wholly understandably, many of our constituents have much regard.

IPSA already has rules in place to prevent what it regards to be the funding of party political activities. Trying to extend these rules into other more complex areas, such as pooled research services would create a whole host of new difficulties. For example, it could potentially bring the content of all constituency correspondence into play. At the extreme,



requiring all letters generated by a Member's office to be pre-approved before onward transmission, lest they contain a political point.

Purchasing of Capital Equipment: There should be no fixed cut-off date in relation to the purchasing of office equipment. An artificial date simply skews purchasing decisions. However, in line with IPSA's preferred option, spending on capital equipment in the months preceding a General Election should be limited to essential items (naturally, the Committee would hope that during the course of a Parliament all purchases were essential). It will be for IPSA, Members, and the House Authorities to decide how best to achieve this.

Winding- Up: In the continued absence of the "resettlement grant" the "winding-up" rules need to be tweaked not redrafted. With the exception of allowing defeated Members of Parliament access to part of their "loss-of-office" payment during the wind-up period, there seems little reason to change a system that IPSA recognises works relatively well.

IPSA's desire to hurry retiring Members towards the door is flawed. A retiring Member of Parliament remains a member of the House up to the point of dissolution. During the period of the General Election, the majority of the retiree's constituents will still regard him or her as their elected representative, with the change-over occurring at the declaration on election night.

For both administrative and financial reasons, the above arrangement may not be to IPSA's liking but there is an expectation amongst constituents that their Member of Parliament will be around until a replacement is elected. IPSA's desire to accelerate the "winding-up" period for retiring Members cuts directly across this expectation.

There should be some flexibility in the handling of "loss-of-office" payments. Defeated Members are quite rightly expected to oversee the successful "wind-up" of their Parliamentary offices within two months of the General Election. Unlike his or her staff, the former Member receives no salary during this period. Once the "wind-up" is completed, with staff having received their redundancy payments, the Member then receives his or her "loss-of-office" payment. Given that defeated Members receive no salary for the period of the "wind-up", it would seem equitable for IPSA to advance them a proportion of their "loss-of-office" payment before this stage is completed. Alternatively, IPSA might consider paying defeated Members a salary throughout the two month "wind-up" period to bring them into line with the entitlements of their staff.

Reporting Repayments and Overpayments: The issue of repayments and the recovery of over-payments needs to be handled sensitively by IPSA.

IPSA's narrative around "repayments" is routinely charged with pejorative, as if, without exception, each repayment secured is money that would otherwise have been misappropriated or stolen by the Member of Parliament. The overwhelming majority of repayments are made in good faith and come about as a result of misunderstandings and



mistakes. Such misunderstandings and mistakes are not unique to Members of Parliament or, for that matter, IPSA.

There are occasions when there is a legitimate point of dispute between a Member and IPSA as to the veracity of a claim or a request for a repayment. Earlier in this Parliament, IPSA released the names of some twenty Members whom it claimed owed the regulator money. It turned out that some of the sums owed were subject to ongoing dispute. In a few cases IPSA had made a mistake in its calculations or facts. Mistakes which resulted in IPSA issuing an apology to each affected Member of Parliament. Apologies that, although welcome, came after the reputational damage to the named Member had been done.

IPSA has huge power to cause colleagues enormous reputational damage. With this in mind, IPSA should be judicious in how it exercises that power. Publishing the names of those Members who IPSA believes owe it money is not acceptable when those repayments are subject to ongoing dispute or disagreement.

Publication of Business Expenses: It does feel at times that IPSA sees its primary role as providing copy for newspapers, as opposed to acting as an impartial regulator and provider of services. Information on Members expenditure should, as far as possible, be published in real time. Payments made in relation to maternity, paternity and adoption leave should not be reported in a way that allows them to be construed as an overspend in the staffing budget. The publication of a specific receipt should be upon request, with the necessary redactions made as identified by IPSA in its consultation. The security of Members, their staff and families should never be compromised.

IPSA needs to make sure that its own business practices promote public confidence in an expenses system that allows Members of Parliament to function in a mature democracy. A democracy which rightly places great expectations on its elected representatives.

Contingency Fund: Contingency funding should continue to be looked at on a case-by-case basis. The Committee notes that IPSA no longer approves contingency applications to cover high volumes of casework. However, the Committee hopes that this decision does not preclude IPSA from making extra funding available to help colleagues meet a spike in their workload, precipitated by a one-off event of a serious or catastrophic nature.

London Area Living Payment: The two London Area Living Payments were introduced in 2010 and 2011 to assist with the costs of living and working in London. Since their introduction the value of these payments has remained unchanged. It is now time for IPSA to adjust these payments to ensure that they remain fit for purpose and relevant in relation to their stated objective.



Conclusion: The Committee is confident that its response to the May 2016 consultation will be well received by IPSA and inform its thinking on the important matters under consideration. The Committee restates its belief that, as a regulator, IPSA should not be the provider of services to those that it regulates.

Yours sincerely,
Signature Redacted

Charles Walker OBE MP
Vice-Chairman, 1922 Committee

fjw

RESPONSE TO IPSA CONSULTATION MAY 2016
FROM ALISON RAYNSFORD

Just for background I have been the child of an MP, worked for three MPs, served as a Member of Parliament for ten years, had to close my office following the loss of my seat in 2015 and subsequently assisted two new MPs establish their offices post being elected.

Question 1.

Yes - I do agree with your principles but the drive for value for money has to be tempered by an understanding of what is required for MPs to be able to discharge their duty to their constituents whilst meeting the needs and to a degree the expectations of those people they represent.

Your principles should also extend to the manner in which you handle the transparency of the information you hold and need to release. The way in which the press are alerted and the tone which you strike are important if we are to try through openness to rehabilitate to some degree the way in which those involved in politics are viewed more widely. All too often the tone of the press releases has quite frankly been 'nasty' – designed not to give information but to titillate and perpetuate the view that MPs are all in it for themselves and do not behave like everyone else. The recent publication in advance of this consultation suggesting MPs should have to use the Tube is a case in point. MPs already use the Tube and buses like everyone else. The release which went out allowed a very negative interpretation because the wording used was ambiguous. It really doesn't help and post the Jo Cox murder I do think that we all have a role to play in not simply denigrating all MPs because of the behaviour of a few and how IPSA word their press notices is therefore important.

Question 2.

On balance I agree but clearly there has to be sound evidence that there was a need for a staff member to travel. The changing ways of working including experienced caseworkers not necessarily living in either the constituency or London, working from home, does require greater flexibility.

Has consideration been given to expecting MPs and staff to declare mileage/car use etc through HMRC as happens more widely in business? I suspect the problem here has always been the fact that MPs do not make their tax returns public. The mood is changing on this and it could be that costs like their travel off sets/claims and even accommodation could in future be put through HMRC as long as there was public access to the returns. It would certainly drive cost out of IPSA. If this were to happen then it might require an uplift in the salary which would inevitably be controversial.

Question 3

I am aware that MPs do get invited to international conferences linked to their areas of interest and in a world where so much is required to happen on a global scale, where new ideas come from overseas parliamentarians and experts from other countries, that an ability to attend events from time to time is important and would help people better carry out their role in Parliament. At present acceptance of these is almost impossible unless you have private means. I think there needs to be greater discretion here and that trips should be allowed if a strong case can be made. I doubt there would be more than one or two a

year at most. There is also a case for allowing travel to specific conferences related to MPs parliamentary duties. That might include local government/health/defence etc – I know I learned a great deal from attending industry specific conferences but these were restricted often to London or places I could reach at little cost.

I do think that there needs to be a mechanism to avoid abuse but limiting journeys can in some MPs' circumstances be detrimental to family life. Staff do need to accompany their MP and I know that there were times when I paid for a staff member's accommodation/petrol.

Question 4.

I often diverted because of visiting defence sites, linked to my Shadow Ministerial brief, on the way to or from my constituency and that had a personal cost if I couldn't somehow get onto the Plymouth-London mainline. If you are travelling back to Westminster I do think it should be allowed – they can be scrutinised because a full explanation will be required and will be public.

Question 5

Yes

Question 6

There is an increasing tendency to work from home and therefore to use your own resources/ or your staff to support the work of the MP. There are a number of experienced caseworkers who are not based in Westminster or the constituency/some are temporary infills when there is pressure on an existing office or perhaps maternity/paternity cover. I suspect, but don't know, that some MPs may enhance their staff member's salary to cover running costs incurred (electricity/wear and tear on printers etc) however I suspect that not all MPs would even consider their staff could be out of pocket and not all staff members would be brave enough to ask for these to be met from the allowance.

Question 7

The situation post an election is always chaotic. After losing my own seat and clearing out my own office I came in to help new MPs set up their offices and felt that there was clearly a role for me to play. Many had no idea what to expect. It was clearly overwhelming for some initially. I do actually think there is a role for pre-election training of candidates by the parties. I would not suggest that IPSA takes on this role.

The expectation of new MPs is high and most were clearly unaware that they would have no desk/phone/computer immediately on arrival and that they would also have to start receiving mail and emails in their hundreds. I think you do need to bear in mind. In many ways this was the first full IPSA handover following the lessons learned in 2010 and there were a number of innovations you introduced which did help MPs. Most MPs I spoke to and watched were finding the process of setting up a new office in Westminster/setting up in their constituencies having to find accommodation in London etc daunting. I would actually have been interested in being on the working group looking into this issue.

Question 8.

Whilst I understand the need to bring public sector rules into line I do have serious concerns. A change could mean that staff wouldn't get any redundancy pay, despite the fact that they could find that their salary up for

renegotiation by the new MP, they would lose benefits that had built up in case of future redundancy, maternity/paternity, sick pay and holiday entitlements [which are all based on length of service] and there would be a new probationary period with the new MP which whilst wholly understandable will lead to insecurity and obviously the possibility of being out of work after 6 months. There is no carry over of service as I know having worked for four MPs now over a period of nearly 20 years. I would not have 20 years length of service should something happen to my current employer had my service been consecutive. This is an issue which has to be looked at.

I note the comment regarding PILON and MPs giving their staff notice. I would assume that if an MP is standing down then this can surely be dealt with through a conversation between the HR department and the MP. Where MPs lost their seats unexpectedly then there is always the possibility of PILON being needed. Staff of MPs who lost face uncertainty and quite naturally will want to stay in post as long as they can and MPs will also want a smooth wash up of constituency casework etc and therefore do need to have staff in their offices.

Question 9

Ensuring proper leave records are kept should be a duty for MPs – this is, from my experience extremely hit and miss. Reward payments should continue to be allowed. I know from personal experience that there are times when circumstances require existing staff to step up to the plate – for example when you go from being a back-bencher to a Shadow Spokesperson or onto a Select Committee – the pressure for additional research and diary arrangements is huge and immediate. Your existing team have to cope with this extra work. Many office cannot simply hire new people because the budget doesn't allow that. Those existing members of staff do therefore warrant some recognition of their efforts.

Question 10

There are clearly issues of concern. I support the ability of MPs to hire family/connected parties. It is often the only way in which partners can see each other but importantly family members offer a loyalty and an understanding of the pressures which is unique. Providing that they are qualified to do the job they are being paid for then I really don't see a problem. Small businesses up and down the country are family affairs. An MP's office is like a small business.

I was surprised to read that connected parties pay increases had been double that of other staff and would suggest this needs further investigation if this trend continues before we all jump to conclusions. New arrangements if they are agreed should be introduced and apply to new MPs post the next General Election.

Question 11

I am surprised that the MPs partner can only claim travel costs if he/she is accompanying children. There are circumstances where the MP may have travelled with their children and the spouse/partner travels later. This restriction should be changed – partners may well have their own work commitments which cause different travel times. There should not be an assumption that the partner can simply drop everything to travel with the MP's children.

Question 12

I note your concern about wreaths at commemorations/memorials. In Plymouth we bought wreaths on behalf of the Parliamentarians of the City, and they were signed as such. Although we never claimed that was our personal choice, I cannot see how this is political. I do think that train fares/travel back to Westminster should be covered because we are not travelling from our homes to work but from another part of our job back to Westminster.

Question 13

Pooled staff are often only doing what individual staff would have to do if the pool didn't exist or wasn't being used. All our work has a political edge to it. We all received/receive vast numbers of lobbies and some MPs feel that it does save time if there is a centrally based organisation doing the research and working up replies. Those replies have by their nature to have a political slant. I know some colleagues who find it very valuable and cost effective. If

you remove this funding then you will have to up the staffing allowance because they do fulfil the role of a researcher. I personally did not use the pool as I preferred personal research and individual responses where possible.

Question 14

No I do not think there is a simple model for accommodation in two places. When I was elected I owned a house in London, I was selected 5 weeks before the election was called and therefore had very little time to consider anything other than the campaign. My husband and I opted to sell our London home and buy in Plymouth with the proceeds with the intention of buying something smaller in London. We did purchase in Plymouth but sadly our marriage failed and so I ended up renting in London. I opted to claim my mortgage interest because it was very much cheaper than the London rent and felt this was better for the tax payer. As it turned out it was not the best deal for me because of the subsequent retrospective changes to mortgage interest arrangements. However this is one example of a situation where there was already a perfectly good home in London within in travelling distance of London which I could use. This would still have left me needing a property/home in the constituency and so we took a decision to buy, to reinvest from our London sale. We like any other family had to consider what was the best investment in our circumstances not least because being an MP is a precarious position and there was no guarantee that I would be re-elected. I don't think hotel accommodation is appropriate work well for those with caring responsibilities, with partners who are unwell, disabled or with dementia for example. It is also a very lonely existence, in my view. There are too many individual circumstances to have a homogenous set of arrangements.

Question 15

I assume this question arises because one MP was found to be charging power usage for outbuildings. This is clearly not acceptable. Most MPs do not claim excessively and come well within the budget but to restrict the budget might make it difficult for parents of small children, carers of disabled or elderly family members to meet the costs they have. They could for example have much higher water costs if they are washing clothing/bedding frequently or need to use water for bathing more frequently. There is no simple formula in my view.

Question 16

I cannot see why an MP with property in Inner London should need to also rent. They could stay in a hotel on Monday night, or other evenings when they are staying late for functions to avoid having to travel back late. Security has to be an issue here. The all night tube service and quieter roads make travel around the Capital possible. But even in this scenario there will be issues which are individual and where discretion needs to be available to IPSA because otherwise you may inadvertently be making impossible for some to consider taking on the challenge of standing for parliament.

Question 17

The existing restrictions work and therefore I would say leave it as it is.

Question 18.

Yes most certainly – it is a long way to Plymouth and expensive and if they are there supporting during the election campaign with the casework demands which are historic then that should be supported. Some may well be able to work from home but this is not always possible.

Question 19

This has to be discretionary. Perhaps asking MPs in a defined period to run their proposed purchase past an IPSA member of staff to get clearance would be sensible. Many would do this in any case. Equipment after 5 years is likely to start breaking down and so there could well be an entirely reasonable request for a new printer for example.

Question 20

This is an area which appears to be working well

Question 21

I would agree that starting the winding up process for MPs standing down earlier would make sense. It would then also perhaps help with the PILON issue. Insist that all those MPs have a one to one with your team.

The winding up budget arrangement currently works according to those colleagues I have spoken to on this issue. My problems arose from late notification from IPSA of lost paperwork (some sent three times) which caused serious worries for staff and for myself when payments on which they depended literally went up to the wire. My own redundancy payment was very nearly delayed for a further month because IPSA had mislaid paperwork. This would have put a huge burden on me and those staff members affected. Simply making sure that paperwork supplied is properly recorded would help because some of my lost paperwork was in fact there but not recorded, at least that was what I was advised. I'm sure that lessons will have been learnt from 2015.

Question 22

No comment – was not affected by this

Question 23

I would simply add it into the Budget for new MPs who are starting from scratch. One year only.

Question 24

No Comment

Question 25

I would separate the spending out when publicising the data. It is then clear that it is exceptional or necessary and not overspend.

Question 26

Yes

Question 27

No

Question 28

I would leave it as it is

Question 29

I would like to comment on the security budget and the demands being placed on MPs regarding who can carry out work. Finding a master locksmith can prove very difficult and there are cheaper but reputable other options which are the subject of warranties. Why are you insisting on expensive and sometimes scarce Master Locksmith's?

Question 30

I would maintain the status quo in the interest of transparency. If we go back to those requested by the public then, although there is a cost saving, there will be loud voices who say that we are going back to 'hiding' information.

Question 31

I would maintain annual data release

Question 32

No you shouldn't publish monies repaid.

Question 33

No comment

Question 34

Annual publication

Question 35

Yes the names should be visible because they may have a relationship/connection with the MP and that therefore could be relevant.

Question 36

No Comment

Question 37

No Comment

Question 38

Ensuring that measures designed to save costs do not have unexpected consequences and understanding that MPs are all individuals, all running separate small businesses with different goals and priorities. They all have different personal arrangements and partners and families with a variety of needs. Do not bow to pressure from the media to lump them altogether because it can put people off wanting to become parliamentarians or simply make it impractical because of arrangements which are put in place.

Ann Coffey

MP

Email

Received 24/10/2016

Response to consultation on PRS

The service provided by the pooled staffing services is invaluable to me. They provide background information which enables me to respond to constituents appropriately and quickly.

I receive regularly a high number of emails from constituents who are members of campaign groups. At the moment I have over 600 constituents who email me regularly. Some of the issues they take up with me can be very specific but require me to respond in a way that shows I am listening to their concerns. Having a grasp of the detail is critical in this and shows that even if I disagree with them at least I understand the basic issues.

Without the research services provided by PRS I would have to ask my overloaded caseworkers to do this research themselves, with less time available to them to resolve difficult and complex problems such as suspension of tax credits.

I don't want to choose between the personal needs of constituents and the need to show that I am willing to listen to wider policy concerns of other constituents.

The services of PRS means that I can more effectively do my job and be seen to be doing my job.

For confidence in the parliamentary system to continue that is important.

Best wishes

Ann Coffey

Regards

Signature Redacted

Member of Parliament for Stockport



HOUSE OF COMMONS
LONDON SW1A 0AA

Mr Marcial Boo
Chief Executive
Independent Parliamentary Standards Authority
4th Floor
30 Millbank
London, SW1P 4DU

Tel: 020

16th May 2016

Dear Mr Boo,

IPSA CONSULTATION - CONFIDENTIAL

EU Scheme

Fewer MPs are travelling to learn from the experience of other countries. Fewer are getting out of the Westminster bubble. That is not good for Parliament's institutional knowledge of foreign affairs and international relations.

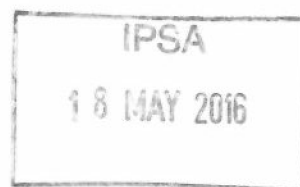
All this at a time when policy makers and legislators need to understand the international context more than ever and work together more closely.

This reluctance to go and learn from others is in part down to some parts of the media, but it also in part down to the fact that EU visits now cost all MPs out of their own pockets. This should not be the case for them just doing their jobs.

I believe the current EU Scheme is a barrier to many MPs travelling. That is not in the national or public interest.

I recommend the following:

- The Scheme should be based on Council of Europe Members, not restricted to the EU Parliaments alone.
- The Scheme should also include visiting EU Institutions. There is an EU Institution in each capital.
- The cost of additional taxis should be factored in. Currently, it is restricted to a single taxi to and from the airport. What about taxis to and from the Parliament and to meetings in other government buildings? There should be an allowance of a minimum of two taxis per day, as is the case with PACE delegations.
- The current subsistence rate is out of date. Capitals are not inexpensive even for everyday meals. The HMRC daily rates for foreign travel should apply for all meals.
- The scheme should allow for four not three visits per annum to increase Parliament's European knowledge.





An effective politician should be local, regional, national and international in their work and outlook. IPSA's current rules are hindering this.

Without these changes fewer MPs will travel as everyone is out of pocket.

Second Home Support

The scheme needs to be updated as it does not fully recognise the rise in rental prices in regions like the West Midlands. The RICS index appears to be somewhat insensitive to the differing situation in different counties in the regions. it is probably 5-8% below where the real rental values are. This means I am approximately £700 per annum out of pocket. More costs for just doing my job!

The scheme also needs to look at additional costs for second homes. An example includes:

- Cost of septic tank clearance. This is not included in my lease costs and costs me an additional £140 per annum. There should be a miscellaneous or maintenance category for hidden additional costs that are not part of any lease but are nonetheless required under the terms of the lease. These costs add up quickly

Continuing Professional Development (CPD)

This is an area that IPSA appears to be reluctant to enter into. However, Parliament as a responsible employer should be ensuring CPD for all its staff, including MPs. If civil servants and other government employees are encouraged to seek CPD, why not MPs? I hope this is an area IPSA will seek to investigate.

I hope these points are helpful to IPSA as you seek to design a scheme that is both value for money but also recognises the unique nature of the work all MPs do.

I do not wish my name to be published, but I am happy for comments to be published, as per the guidance issued under the consultation.

Yours sincerely,



Anonymous 2

MP

Email

Received 24/08//2016

I am writing to submit my views on the consultation regarding the MP's Scheme of Business Costs and Expenses. All of my comments relate to Chapter 7/Question 14 – working from two fixed locations.

[INFORMATION REDACTED]. Working as an MP has put a severe strain on my family but I have never complained, or asked for more resources, in any consultation you have done. I knew the situation I was getting into and that it would not be easy. Many jobs are hard to organise around family life, but there are some specific challenges to being an MP. Working between two fixed locations is one of them.

What I have done is always try and organise family life around your scheme rules in such a way as to be a good parent and a good MP. These has required major decisions to be taken on schooling, childcare, on my wife's occupation and where we rent in London. All of these decisions would be completely invalidated if you changed the scheme rules at this stage.

To give you a specific example **[INFORMATION REDACTED]**. If the rules of the scheme were to change I would likely have to change my daughter's school, my son's nursery, and possibly my wife's employment. If they were no longer permitted to reside with me in the week in London, I could not be an effective father and would have to seriously consider standing down from Parliament.

The possibility that you might change the scheme rules Parliament to Parliament had never occurred to me. I believed the fundamentals would remain the same and made decisions accordingly. I find even the possibility it might change to be extremely stressful, and the frequent leaking to the press of possible changes only exacerbates that.

I would ask you to please consider some stability for those MPs with young families, who are desperately trying to make a complicated situation work. At the very least, please consider only changing the rules for new people coming into Parliament. This way those of us who have had to organise our lives around the existing scheme would have some reassurance and be able to plan accordingly.

With best wishes.

Your sincerely

Anonymous 3

MP

Email

Received 05/08/2016

IPSA Consultation

In response to Question 14 I wish to suggest that you revisit the decision not to fund interest only mortgages, but instead, to pay rents.

The comparative cost differences between MPs who have been in the House who were on a mortgage and present day rents must be huge.

But more worryingly, the lack of security of tenure for MPs is appalling. A number of MPs have moved several times since the change and it means that instead of concentrating on their workload MPs are dealing with landlords, removal companies, utility companies and the hundred and one other bodies involved in house moves. It is stressful, costly, and time wasting.

What I propose is that MPs are allowed to request a property to be bought on their behalf by IPSA. This would then be theirs to use as if they were the official owner without the worry of being moved out. Any gain made over the period of their tenure would return to IPSA on the MPs retirement or defeat in an election.

This would give – almost certainly – a windfall to the state and a secure base for MPs who would not need to worry that they were being forced out of their accommodation at the whim of their landlord.

In the same vein I find it appalling that you are even suggesting that MPs move out in the summer. Apart from the obvious upheaval it also would mean that MPs would be scrambling around for accommodation if they had to come to London during recess for legitimate parliamentary duties. I also believe that the use of a permanent, secure base is much more appropriate than using hotels and I say that as someone who used hotels on a much more regular basis from 1993 to 2005 as I use my flat now.

Can I also urge you to look at the real experience of how MPs work? You assume that they are like other London commuters. You also assume that we only work during the hours that the Chamber is open, i.e. Monday 2:30pm – 10:00pm, Tuesday and Wednesday 11:30am – 7:00pm and Thursdays 9:30am – 5:00pm.

Nothing could be further from the truth. Select Committee duties, serving on delegated legislation and Statutory Instrument committees and attendance at All Party Parliamentary Groups all lead to work well outside of “opening hours”.

Additional responsibilities can also lead to longer working times. Anyone who takes additional responsibilities from chairing APPGs or taking up roles from PPS to Prime Minister will have to attend many varied meetings and events. Some of these meetings take place out of “normal hours” which means MPs have to schedule other time to carry out their usual MP duties.

Meeting constituents, lobby groups and a huge array of other responsibilities all point to a very complex timetable for all MPs and all of which make us very different from the vast majority of commuters.

With these facts in mind please look again at proposals to only fund accommodation well away from parliament. Our days are long enough without adding to them.

I support the principle of the Independent Parliamentary Standards Authority, and I think that much of what IPSA has achieved is positive, but I do have concerns about the fairness of some of the proposals.

My response should be read within the context of the recent tragic death of Jo Cox MP and the current climate of intimidation within which MPs are working.

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

The fundamental principles seem acceptable. I agree with the emphasis on value for money, but this must be seen within the context of the role of an MP and the pressures and threats which MPs live under. It is important that people from a diverse range of backgrounds and experiences should be encouraged to stand for Parliament and the funding arrangements for MPs should reflect this.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

Yes

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

Yes

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

Yes

Question 6. Do you agree that we should simplify the rules on home offices?

Yes

Chapter 4. Regulating MPs’ expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs’ staffing expenditure and the need for any consequential HR advice?



Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

I agree that MPs who know that they will be standing down in May 2020 should provide proper timely notice to their staff about the end of their employment, so as to be fair to both their employees and the taxpayers who ultimately fund this employment.

I believe however that there is cross party agreement that MPs' staff must be dealt with fairly in terms of redundancy payments. If IPSA were to directly employ all MPs' staff then it could put in place rules to reduce redundancy payments by redeploying staff where possible, or making staff redundant when not. There is no guarantee that staff employed by an MP standing down, or who loses their seat at an election will be employed by another MP. Even if they are able to gain an alternative position, this is often not on the same pay scale, for the same hours, or even in the same part of the country. MPs staff are employed on fixed term contracts and it is clearly not fair to expect them to accept worse terms and conditions than staff in other sectors of employment.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

No

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

My concern is that there should be clear guidelines and that MPs and their staff should be able to rely on IPSA to provide watertight advice in advance of expenditure. I am more than happy to be bound on this issue, but my experience is that many times I have asked my staff team to contact IPSA to ask the same question several times and they have received completely contradictory answers, or the advice is so vague and generic as to be entirely meaningless. This is not fair to MPs who are seeking advice in good faith to enable them to take the best possible decisions. It should not be the case that MPs who are seeking to do the right thing by asking advice can then still be subject to an inconsistent response from IPSA which ultimately could lead to IPSA not covering costs which had previously been advised to fall within scope.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

I am strongly in favour of this. I subscribe to one of the pooled staffing services and the cost to the taxpayer is very significantly lower than if I were to employ a member of staff to undertake this work from scratch in my office. I have estimated that it would cost at least twice as much to undertake the same level of work in my office, and the level of staff resource available within the current budget would simply not have the capacity to do this work.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

No. The arrangements for funding MPs accommodation must take into account the very long distances that many members already travel during each sitting week between their constituencies and London.

Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Yes

Publication of expense details

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

Yes

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

This should be covered by IPSA centrally held contingency budgets. MPs' staff teams are too small to have capacity to cover maternity, paternity, adoption and long term sick leave costs.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Yes

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

No

Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

I am writing my reply shortly after the tragic death of Jo Cox MP and in a context where aggressive threats are regularly being made to MPs, and where low level threats and the

deliberate misinterpretation of information about MPs expenses is commonplace (for example, statements that MPs claimed 'more than £100,000 of expenses', implying that these were expenses personally received by the MP rather than including staffing and accommodation budgets without which an MP's office could not function). There is a danger that information from redacted images could be used to try to trace MPs, that suppliers of services to MPs could be threatened, or that information could be misinterpreted to fuel further abuse.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

No. If IPSA was able to provide reliable and consistent advice then there would be an argument to be made for this. Currently I routinely ask my staff to seek advice on the validity of particular claims multiple times of IPSA and routinely receive contradictory information. Budgetary information is exceptionally poor and error ridden – under the current circumstances it would inevitably be the case that information would be published about some repayments which were not the fault of the MP, and it is not fair for MPs to be pilloried without reason.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

The security of Northern Ireland MPs is clearly critical. Nothing should be done that could undermine this.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

In the current environment of abuse and intimidation, I have significant concerns about this.

Question 37. Is there any further information that we should be publishing about IPSA?

There is a clear need to publish information on how effective IPSA are at supporting MPs in carrying out their role. As stated previously I am very much in favour of the aim of IPSA. Too often however the advice provided is inconsistent and responses are slow.

Marcial Boo
Chief Executive
IPSA
30 Millbank
London SW1P 4DU

21 September 2016

Dear Mr Boo,

Re: IPSA Consultation

Please find enclosed my response to the IPSA consultation.

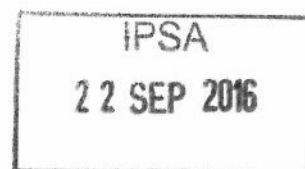
While I appreciate that IPSA have given the option for MPs to have their name redacted from their response to protect their anonymity, IPSA have shown such incompetence that I do not feel comfortable including my name at all, lest IPSA make an error and include my name in the publication of responses.

The consultation failed to touch upon a number of additional issues which I feel the need to further address.

I note that IPSA often prefers to deal with matters by telephone conversation rather than email. I and my staff have since come to the impression that IPSA do this because they do not want our office to have an audit trail for IPSA's mistakes and inconsistent responses when we call with queries. It would be far more useful for email to be used more extensively.

When an error is made at IPSA's end, IPSA seem to always try to blame myself or my staff for their error.

I find it incredibly unhelpful and unprofessional that IPSA staff members do not have individual email addresses or phone numbers, particularly given that MPs are assigned individual contacts.



Finally, IPSA have demonstrated a complete general inability to think outside the box. Given the various different setups of MPs offices, this really ought to be addressed.

Sincerely,

A Member of Parliament

Question 1

I agree with the new fundamental principles. I also agree with the concept regarding value for money. My office has consistently aimed to achieve value for money in every expense claim.

However, despite value for money being in both the new and old fundamental principles, IPSA does not seem to practice this principle itself. For example, the preferred IPSA suppliers (Banner, Commercial, XMA, SCC) are more often than not far more expensive than other online purchase options. Despite this, MPs and their staff are encouraged by IPSA, and occasionally forced by IPSA, to use these preferred suppliers, which has resulted in a number of MPs being attacked by the press. For example, one MP was criticised in the press for purchasing headsets from Banner at a higher cost than if the MP had purchased them from an alternate supplier. Similarly, another was hunted by the press for an order of chairs from Banner. Due to Banner not listing the individual chairs separately on the order, the preferred supplier made it appear that the MP had purchased one expensive chair rather than four separate, less expensive chairs

On this note, IPSA also seems to fail to adhere to the principle of transparency. Despite my staff asking on a number of occasions, the tendering process for selecting the preferred suppliers has not been disclosed to either MPs or to the public.

While I agree with the changes in the fundamental principles, I feel it is hypocritical for IPSA to require MPs follow these fundamental principles while not following them itself.

Question 2

Yes, I agree that the same rules for travel costs should apply to MPs and their staff.

Question 3

Yes, I believe that the current restrictions on foreign travel should be removed, particularly given the fact that the UK is now due to withdraw from the EU. The limit for three return journeys to Europe seems appropriate.

Question 4

No, not that unusual to have a diverted journey.

Question 5

Yes

Question 6

Yes

Question 7

I have serious concerns about the way in which IPSA has standardised contracts. I have a staff member who has a “combined” role. IPSA required that two contracts were completed, one for each “role”. Each contract was part time (to add up to a full time roll), which I found incredibly unusual.

Furthermore, I disagree with the fact that IPSA does not let MPs edit contracts for staff members. IPSA is not the employer of Parliamentary staff members, the MP is. The fact that IPSA does not let the employer amend contracts raises questions in regards to employment law.

Question 8

As IPSA is not the employer of staff, I do not feel it is IPSA's place to dictate the terms of redundancy payments, pay in lieu of notice, or payment for untaken leave. Furthermore, I do not feel IPSA fully understands the degree of sacrifice staff members make when taking a job with an MP in regards to job security. Redundancy pay, pay in lieu of notice, or payment for untaken leave may be what keeps former staff members of former MPs able to get by while they look for other work, and IPSA introducing more rules in this area could compromise the small degree of job security redundancy pay offers. Furthermore, it is my understanding that the Northern Irish Assembly, Welsh Assembly, and Scottish Parliament offer redundancy, pay in lieu of notice, and payment for untaken leave, and as such it would seem logical and fair that the UK Parliament would also offer similar terms and conditions.

Question 9

The overtime system is convoluted and cumbersome to submit and approve claims, and should be improved.

Question 10

I believe MPs should not be able to employ connected party. The system, as it stands, is unjust, and allows nepotism and the “chumocracy” to run rampant in a field in which meritocracy is already rare. I cannot think of a single reason why MPs would need to employ connected parties to fulfil their Parliamentary duties, beyond being able to give potentially highly influential jobs to family members.

Question 11

I believe the current arrangements are sufficient?

Question 12

IPSA, without question, needs to be clearer in the rules surrounding what it deems to be “party political”. As of now there is a massive grey area, and both IPSA and the Commissioner for Standards will not pre-approve expenses in this grey area, which is frankly completely absurd. If an MP uses their best judgement after being refused pre-approval by IPSA or the Commissioner, and the Commissioner for Standards determines that the claim was in breach of the rules, not only could the MP face sanctions in a Parliamentary capacity, they would also likely be witch hunted in the press. Either the rules need to be more clearly defined, or IPSA or the Commissioner for Standards need to pre-approve expenses. The current system, wherein the MP is refused pre-approval and is told to use their best judgement, to later be tarred, hung, and feathered in the press after an investigation by the Commissioner for Standards is opened, is completely unacceptable. Furthermore, claims in these “grey areas” are routinely used as a political weapon by opposing parties or by the press. Surely it would be both more clear cut, and fairer, to simply get rid of the grey areas.

In addition, the IPSA rules surrounding what is and is not party political are at variance with definitions in devolved administrations. For example, the Scottish Parliament allows MSPs to send non-party political newsletters to constituents, which are pre-approved by the allowances team.

Question 13

As MP’s staff are required to adhere to specific IPSA contracts and job descriptions, it would only be fair if pooled staff members also have to adhere to specific IPSA contracts and job descriptions, as the funding for both come from the MP’s staffing budget.

Question 14

I do not believe that any of the alternatives set out in the consultation paper are viable. Restricting the accommodation budget to when Parliament is in session would mean that MPs from outside the London area would be required to stay in hotels, rather than rent a flat. Allowing MPs to rent a flat in London gives them some sense of normalcy, as living in a hotel for long periods of time, away from your friends and family, is incredibly unpleasant and not particularly conducive to mental health. I believe lowering the accommodation budget to reflect the cost of a flat in Zone 3 is incredibly unfair- MPs’ working hours are vastly different from those of “most London commuters”, and as such MPs do need to be able to rent accommodation nearby to Parliament. In addition, the current accommodation budget and arrangements with Chambers Travel allow MPs to stay in hotels within

walking distance to Parliament, so surely those who stay in rented accommodation should be allowed to stay within walking distance to Parliament.

Question 15

Yes, you tell us.

Question 16

Yes, I believe it is a private matter.

Question 17

No, there does not seem to be a need for special rules.

Question 18

Yes, they should be able to claim.

Question 19

The current system seems sufficient.

Question 20

Yes, this seems simpler and more straightforward, and helps to eliminate “grey areas” as discussed in my answer to question 12.

Question 21

Yes, it should be amended to the normal budget for two months. However, it seems that IPSA is over-reliant on averages, and does not take into consideration the varying circumstances of MPs across a variety of constituencies. From my own personal knowledge, it took more than two months for departing MPs to wind-up in 2015.

Question 22

Yes, the restrictions currently in place seem incredibly unfair. MPs are working during the winding up period, yet not getting paid if they had not completed their financial affairs, which may be a breach of employment law. Furthermore, the sheer incompetence of IPSA means that the loss-of-office payments to MPs could be unfairly withheld due to IPSA administrative errors, which occur on a shockingly regular basis.

Question 23

No, I believe the budget as it stands is sufficient and simple enough to understand.

Question 24

Do MPs have responsibility for managing their own budgets? IPSA seems to be involved in this Budgetary process.

Question 25

The cover should be provided centrally. I do not think that the cost of maternity leave for individual MPs staff should be published, as this is incredibly discriminatory as it actively discourages hiring women and goes against the principles of equality (as MPs would understandably be afraid of press attacks if a female employee requires maternity cover). Maternity leave is a human right, and IPSA actively allowing MPs to be attacked in the press for being compliant with the ECHR is irresponsible and unfair. Rather, either a total or anonymous average spend should be published, in a similar way in which security expenses are anonymously published.

Question 26

No, I believe IPSA should cover the penalty cost of breaking rental contracts if an MP is not re-elected. The lack of support IPSA provides when it comes to constituency offices is, frankly, absolutely appalling. IPSA is completely Westminster-focused. The budget for renting in the constituency is already low, and many MPs have struggled to find office space at all within the budget. Expecting MPs to somehow be able to negotiate break clauses, when these are not at all standard in many parts of the UK, is completely absurd.

Yes, clarification of this rule would be welcome, given the general lack of clarity from IPSA as a whole.

Question 27

Yes, the payment should be uplifted to reflect inflation and the rising cost of living in London.

Question 28

The contingency funding process seems both subjective and arbitrary. Furthermore, I am of the understanding that, in the past, MPs who have had applications for contingency funding approved have continued to incorrectly receive payments from IPSA beyond the contingency period, due to an administrative error on the part of IPSA, and have then been required to re-pay this money, despite the error being on IPSA's part. This seems to be unfair.

Question 29

IPSA should re-assess both the security measures it takes itself, and the security measures scheme. I have found IPSA incredibly unhelpful when it comes to providing security measures for myself and my staff. For example, my staff preferred ordering separate security measures online, at a much lower price, than the alarm systems which were advertised on the Parliamentary estate. However, IPSA has not indicated how we are to pay for these measures, despite my office asking on several occasions.

In addition, I believe that IPSA needs to enhance security measures when it comes to expenses more generally. The fact that IPSA publishes details of which trains MPs and staff take to Westminster (which are usually regular journeys), the hotels they and their staff regularly stay at, the places at which staff members usually purchase food when traveling to Westminster, and other specific details of MPs and staff members' travel habits seems incredibly irresponsible. It is not in the public interest to know these specifics, and the publication of these details makes it easy for MPs and staff members to be targeted by those who wish to harm them. It seems more than sufficient for more general wording, such as "London Hotel" or "Train to London" and the cost of the travel to be disclosed, rather than the particular details.

Question 30

I believe IPSA should only publish images of receipts on request. As noted, 920 requests were put in between April and December 2015, and the vast majority of these were likely to be from members of the press on a witch hunt. No other public servant or individual working for a Quango or largely publically owned company is open to a fraction of the scrutiny MPs are in regards to expenses. Publishing images of the receipts would only fuel the frenzy. It would also compromise security, given the level of incompetence IPSA has already demonstrated, and I do not trust IPSA to properly redact sensitive information.

Question 31

I believe IPSA should publish bi-annually (e.g. every 6 months), and that the current bi-monthly system is too frequent. As stated by IPSA on page 44 of your consultation, "Public interest can be taken into account, but data, amongst other things, must not be used in ways that have unjustified adverse effects on the individuals concerned." IPSA publication of expenses results in a feeding frenzy amongst the press, and the current rate of publication means that MPs, and their staff members, need to take undue time out of their working day to deal with the press feeding frenzy, which could otherwise be used to serve constituents. In addition, from my knowledge and personal experience, the press feeding frenzy after an IPSA release often means that staff need to work extra hours to deal with the fallout (as the press have a penchant for phoning at 5pm on the dot on a Friday), but staff often feel unable to make overtime claims, as the overtime system is convoluted

and complicated, and the fact that overtime claims may lead to further press criticism. This can almost certainly be categorised as “unjustified adverse effects on the individuals concerned”.

Question 32

No, as it does not cost the taxpayer money should it be published?

Question 33

No, I do not think this should change. In fact, I think the system for Northern Ireland MPs should be in place for all MPs. IPSA has shown a gross lack of regard for the security of MPs in their constituencies, and given the death of Jo Cox MP, and the massive increase in the amount of threats against MPs, it seems irresponsible for IPSA to publish the travel patterns of MPs, given that many MPs take regular trains and other transport to and from Westminster. By publishing travel patterns, IPSA are putting MPs security at risk. As stated on page 44 of the consultation, “public interest can be taken into account, but data, amongst other things, must not be used in ways that have unjustified adverse effects on the individuals concerned.” Again, putting MPs lives at risk by publishing their travel patterns almost certainly counts as “unjustified adverse effects”.

Question 34

No, this should not be published.

Question 35

Yes, as much information as possible should be redacted in order to protect the safety of MPs, staff, dependents, and those they interact with.

Question 36

Yes

Question 37

I believe the details of the procurement process for preferred suppliers should be published, as should the annual cost of running IPSA.

Question 38

I believe the current maternity leave arrangements are discriminatory and discourage employment of female staff members. I do not think that the cost of maternity leave for individual MPs staff should be published, as this is incredibly discriminatory as it actively discourages hiring women and goes against the principles of equality (as MPs would understandably be afraid of media reporting if a female employee requires maternity cover). Maternity leave is a human right, and IPSA actively allowing MPs to be attacked in the press for being compliant with the ECHR is irresponsible and unfair. Rather, either a total or anonymous average spend should be published, in a similar way in which security expenses are anonymously published.



HOUSE OF COMMONS
LONDON SW1A 0AA

IPSA Consultation: MP Response

Chapter 2

1. *Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?*

The key principles of IPSA are welcomed but it is important that restrictions on MP and staff do not become so tight that that new people are not put off from getting into politics. With regards to new draft principle 3 which states that 'MPs should, where possible, be treated in the same manner as other citizens' is welcome but caution should be taken to not reduce the funding and resources available to office holders.

I also agree that the scheme should be administered by IPSA in a cost effective way. However, one improvement which could be made on this is to ensure that all IPSA staff have exactly the same understanding of the rules and guidance that IPSA offers. On numerous occasions my office and I have called IPSA with a query and it has been answered differently by different staff. It would reduce the workload of IPSA if they were able to offer coherent and simplified responses to queries from MPs offices. Also, if IPSA worked the office hours of most MPs offices this would be more effective.

Chapter 3

2. *Do you agree that the same rules for travel costs should apply to MPs and their staff?*

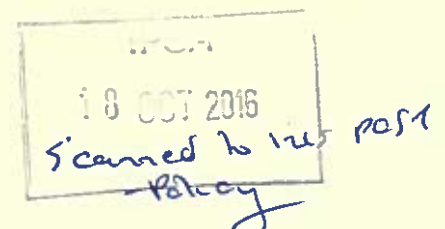
I do agree as on many cases, it is important for a member of staff to travel with their MP for administrative or indeed safety of the member when they carry out visits as part of their duties. The current limit of 96 journeys for staff is sufficient in our eyes but removing a cap will reduce the administrative burden on MPs, their offices and of course IPSA.

3. *Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?*

Yes

4. *Do you agree that we should remove the rule allowing claims for "diverted" journey, along with the cost restriction on claims for journeys back to either the MP's constituency or Westminster?*

Yes





5. *Do you agree that we should carry out some "housekeeping" of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly misunderstood?*

Housekeeping of the rules would be beneficial. At the moment there are a number of options which travel could come under. If this was simplified into basic categories, it would reduce the administrative burden on both IPSA and the MPs office.

6. *Do you agree that we should simplify the rules on home offices?*

I have no views on this.

Chapter 4

7. *Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MP's staffing expenditure and the need for any consequential advice?*

The MP should have greater flexibility to decide on this.

8. *How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for undertaken leave made to the staff of MP's who left office after the May 2015 General Election?*

IPSA should oversee this rather than the MPs.

9. *Are there any other exchanges that you think we should make to the existing rules governing MPs' staffing expenditure?*

No.

Chapter 5

10. *Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?*

I do not employ any connected parties but I understand why some MPs do and do not think that this should be changed.

11. *Do you have any suggestions about how we should provide financial support to MPs in respect of their families?*

No.



Chapter 6

- 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?*

I do not think that tightening the rules in this aspect is necessary. MPs are aware of the rules of what they can and can't do. The fact that everything is published to the public does encourage MPs to monitor their own work to ensure that they do not breach these spending rules. Further restrictions will just create more confusion – especially as some IPSA staff on the phone already have different interpretations of the rules. Adding another level of administration will only complicate the issue for both sides.

- 13. What views do you have on funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?*

Pooled services such as the PRU are important for MPs to carry out their duty. Due to the amount of campaign material which is sent in to us, MPs and their staff do not have the time or resources to be able to draw up responses to this material alone. Pooled services enable us to quickly respond to the mass mailings and allow us to focus on the important correspondence from constituents who are in actual need of our help. If this is removed then the staffing budget for MPs should be increased.

Chapter 7

- 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations?*

We understand that Zone 1 accommodation which many MPs rent is expensive. However, it is important that MPs remain close to Parliament for a number of reasons. Firstly, there is no need to worry about commuting when the House sits until very late. If the house does not rise until midnight or 1am as it may sometimes do, MPs are able to walk back to their flats. However, should they be moved out to zone 3 as recommended in the consultation document, MPs would have to incur further costs to get home as the tube will not be running during the week and night buses may have security implications for the safety of members. Security of members living in Zone 3 would also have to be considered as some areas are not necessarily as safe as the Westminster / Pimlico / Vauxhall area. Groups of MPs travelling back to their accommodation at the end of the night is an unnecessary risk to take.

Being able to get a licenced taxi for 650 members after a late vote at 1am would be incredibly challenging and would mean MPs all leaving the estate together in order to get back to their accommodation. Cars would also be an issue for MPs as, when the palace goes under refurbishment, car parking spaces would be at a premium so there will be no room for members of either house to park. This means that taxis would be the only option for that



time of night. MPs are extremely on edge at the moment and feel very vulnerable since the horrific events of June this year where our colleague, Jo Cox, was murdered. The idea of having to travel further afield late at night is not something that MPs would feel safe doing.

Also, the increased travel times will mean that MPs will have less time to focus on the increased responsibilities that the boundary changes will bring. The reduction in MPs will save over one million pounds in accommodation costs alone so the overall costs of MPs accommodation have already been significantly reduced. This does not take into account the savings from the various office, staffing and travel budgets on top of that.

15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties they own? If so, what should the budget be?

Yes – the current budget works fine but should increase in line with inflation.

16. What are your views on MPs, who own property in London, also claiming for a rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

IPSA should treat all MPs equally.

Chapter 8

17. Do you think there is any need for travel rules for MPs and their dependents which are specific to the Dissolution period? Should more general exclusions on campaign expenditure and funding of party political activity suffice?

The current rules are fine.

18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the dissolution period?

Yes – allowing Westminster based staff to claim for travel to and from the member's constituency would be highly beneficial and would not leave staff out of pocket for carrying out their responsibilities to their MP.

19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

The current rules are fine.

20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?



21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

It would be better for the start-up budget to be added to the original office costs. This way, MPs would not have to worry about which Budget a cost is coming out of. This would not only make monitoring the budgets easier for MPs and their staff but it would also reduce the amount of times an office had to contact IPSA to ensure that something came out of the correct budget. I think having Office, Stationary, Accommodation and Travel budgets are enough to monitor.

24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Clarity from IPSA is always welcome.

27. Do you think any adjustment should be made to the London Area living payment?



28. Do you have any suggestions about how to improve the process for contingency funding?

29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

Chapter 9

30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

Receipts should only be published if they are requested and even then, should be redacted to the extent where, in the case of hotels or transport, any information that could give away the address of the MP is removed for security reasons.

31. How frequently do you think we should publish information on MPs' claims and other aspects of their funding expenditure?

Information should be published in line with the tax year.

32. Should we publish information on transactions on MPs' payments cards which are eventually repaid by MPs?

No. Information on the IPSA cards should only be published should an MP not be able to pay it. If this information is published regardless, this can often cause unnecessary interest and sometimes criticism from the public.

33. Are there any changes we should make to the publication of information about Northern Ireland MPs' travel claims?

34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

Yes unless this is disputed by the MP and being investigated.

35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?



37. Is there any further information that we should be publishing about IPSA?

IPSA should publish the wages of its management and staff so that it is in line with those of Parliamentary offices. It is unfair that MPs and their staff have every receipt and claim published whilst IPSA officials do not. If IPSA become fully transparent, they will understand the pressure that Parliament is under on a daily basis. I think that IPSA's annual rent and running costs should also be published.

Chapter 10

38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

Any Other Feedback:

I understand fully that measures had to be put in place following past scandals but the current system only adds a very timely, and costly, administrative burden on MPs and their staff. Systems need to be simplified and published statistics and costs need to be redacted or simplified so not to put MPs or indeed their own staff at risk. This does not seem to be a priority for IPSA at the moment and needs to be addressed.

The system needs to be simplified overall and IPSA staff need to be clear on what everything means as we often receive different answers and interpretations of the rules depending on who we speak to.

Anonymous 7

MP Staff

Email

Received 11/05/2016

Good afternoon,

Thank you for the opportunity to comment on the IPSA scheme consultation. I would appreciate my comments remaining anonymous.

As I understand it, the 'staff bonus' was removed without any consultation at all and this seems grossly unfair.

In the same way that MPs pay is increased as a matter of course, MPs staff should also receive an annual increment to reflect increasing workloads and work hours.

Staff who were employed pre-IPSA still receive an annual bonus of several hundred pounds per year, regardless of performance or whether their workload has increased – and I think this is unfair too.

The overtime system as it stands is not very useful – I did not receive any payment for overtime worked last year as “...*there was no money in the pot*” at the end of the financial year. I wonder whether a one off payment to buy us out of overtime might be an option.

The staffing budget has to take into account our salary, pension payments and employer's NI is there scope to increase this?

Also I believe there should be an increase in the budget to cover office costs. But with an increased onus on the MP to justify the spending. Constituency staff outside the Parliamentary estate have to cover rental and telephone for example, whereas those with offices solely in the House of Commons do not have to meet these costs.

I hope this is helpful to you and thank you once again for the opportunity to contribute.

Yours sincerely,

Anonymous 8

MP Staff

Email

Received 11/05/2016

Please find my response to the consultation below:

I have worked for an MP for almost five years and feel there is a lot of misunderstanding as to how MPs staff work. Firstly, I would say that it appears to be quite a unique job with very little protection or security.

I would note that working for an MP is a very busy job and would hypothesise that most who do so could easily earn more for their skills in the private sector, I believe this is something that should be reflected on. I enjoy working for an MP and feel proud of the public service I provide, yet I have none of the level of security, level of pay, bonuses or pension rate that civil servants enjoy. Indeed, many of my colleagues have moved in to the private sector after a year or two. I would also highlight here that the reason so many staff are young is that pay scales for MPs staff do not go very high (comparative to civil servants and other public sector workers) so many find that once they have to support a family the pay is no longer tenable for the work.

I realise you are looking in to the issue of staff who receive redundancy pay and then get employed by another MP at elections. I understand what you are getting at with this and realise measures have been put in place to prevent this in other public sector jobs. However, I would again highlight that most other public sector jobs enjoy far more generous pay and pensions and security. There is no guarantee of keeping your job come an election and even less guarantee you will be taken on by another MP, as such I do not see how you can implement a system which removes this right to redundancy pay without fundamentally changing the manner by which MPs staff are employed.

With regard to MPs employing family members, I am pleased to work for an MP who will not indulge in this. I do think this does not help the perception of MPs staff as professionals and though I am sure there are some spouses who do a good job in the office, I fear many of them are riding the gravy train on the highest salary available to them. In short, I would support the removal of MPs rights to employ family members.

MPs staff are generally hard working and want to make a positive difference to this country, however for the most part it is a thankless job with little recognition. I realise we are paid for by the tax payer and must provide value, but I do not wish to see us demonised. Realistically, there are maybe a couple of thousand people in the country doing these jobs and I really feel we slip through the cracks a bit, with no real formal union or representation and we are in the unhelpful position of your direct employer being your manager, judge, jury and executioner. I am very lucky to work for an MP who is an excellent employer, I fear others are not so lucky.

In addition, most do not seem to understand that MPs staff come under expenses and think MPs are spending a huge amount when actually they are just paying staff. I would suggest something could be done to make it clearer to the public what office costs are.

Anonymous 9

MP Staff

Email

Received 11/05/2016

I believe that the staffing budgets for some MPs are being used inappropriately, especially where Members have employed someone under two roles, effectively giving them two salaries.

I believe that budgets given to MPs for their staff do not allow for pay progression reflective of similar roles in other industries. The progression generally from Junior to Senior in whatever role is dependent on those above you in the 'pecking order' restricting reward for work and salary increase.

With the way in which work is increasingly becoming more remote, those based outside of Westminster should have pay reflective of this and should have salaries reviewed if they are working from home.

Many thanks for your time.

Kind regards

Anonymous 10

MP Staff

Email

Received 20/05/2016

Dear IPSA,

I would like to feed into the Consultation my frustration that extended travel for MPs staff is not allowed by the current scheme.

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

In the course of supporting the work of my Member I recently travelled to and from Westminster to an embassy in London to drop off and then collect a visa for an overseas visit they were making. I do not have a Travel card as I do not ordinarily use the bus or tube for my commute to work. IPSA informed me that I am not able to reclaim the cost of the tube journeys that I incurred.

It is very unusual, if not illegal, for employees not to be able to reclaim legitimate business expenses from their employer and I am now out of pocket.

I do wonder who my employer is – is it IPSA or is it the Member? Also I wonder whether IPSA allow their staff to reclaim legitimate travel expenses they incur?

It was suggested by IPSA staff that I could feed in to IPSA's Consultation that extended travel for staff is not possible. However as an employee I will remain financially disadvantaged on this occasion as I have not been able to reclaim these genuine business travel expenses.

Please do not publish my name or personal details.

Yours,

Anonymous 11

MP Staff

Email

Received 26/05/2016

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

The wording of principle 7 should be amended to make clear that this only relates to expenditure which is paid for by the taxpayer – i.e. not their only personal expenditure. Otherwise, I am in agreement with the principles.

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes. In particular the rule limiting the amount of staff journeys between the constituency and London has been problematic for our office in the past. As the Office Manager for both offices and Senior Caseworker, travel from my usual place of work [Westminster] to the constituency office for management purposes and surgeries was made more difficult by this rule. We have had to resort to different less effective ways of working [online by telephone and posting things between offices] as well as having to pay for journeys to the constituency myself due to this limitation. Allowing staff members to make more journeys between constituency offices and London may reduce the cost to the taxpayer by allowing the Member to employ only one member of staff who travels between both offices, instead of an additional person in each location.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

Yes, this seems sensible.

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

No – this would result in MP’s being faced with a decision between making an unnecessary and time consuming trip back to the constituency or Westminster in order to then claim for their Parliamentary journey, or making the Parliamentary trip at their own expense which is unfair. This does not fit with the new principle of MPs not being disadvantaged financially. MPs should be allowed to make a claim for the equivalent cost of having made the journey without the diversion.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

Yes.

Question 6. Do you agree that we should simplify the rules on home offices?

Yes.

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs’ staffing expenditure and the need for any consequential HR advice?

IPSA should play more of a role in relation to HR given that decision made by the MPs often have a financial implication. The MP should undertake a ‘line manager’ role with responsibility for who to hire, but IPSA should have more say when it comes to issues such as salary, job descriptions and disputes etc. For example, IPSA being involved in all salary reviews would reduce the likelihood of MPs giving large salary increases to family

members. A number of MPs also employ staff on a low pay scale job description but then require them to do work which is in the job description of a higher band job. A HR role for IPSA would help to ensure that staff members are paid for the work which they actually do.

It would also mean that MPs would have to justify large salary increases with evidence – this is particularly relevant where a staff member has been given a new job title to increase their salaries. There is currently a HR vacuum in Parliament with staff members left in a very difficult position if they have disputes with their MPs, leaving IPSA open to costs associated with employment tribunals. Many MPs do not have the relevant HR knowledge to ensure that HR matters are undertaken in the correct way and employing a small HR department within IPSA is surely more cost effective than MPs contracting out HR advice, or acting incorrectly and opening up legal challenges.

Finally, staff are currently in a very difficult position when it comes to incorrect use of Parliamentary resources where they have been directly ordered to do so by their MP. If asked to do something wrong by the MP, they are left with no HR mitigation or other authority to intervene – instead they are left with the choice of obeying the order and breaking the rules, or defying the person asking them to do so who also has full responsibility for their continuing employment. Such situations would be helped by having a HR Department to arbitrate in a confidential manner.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

Redundancy payments – these payments are entirely fair, even when a staff member is subsequently employed by another MP. The general public would expect to receive their redundancy pay from one employer even if they were then employed by a different employer shortly afterwards. It is also worth noting here that working for an MP is an unusual job – it is likely that staff may lose their employment with little warning [for example if a by-election was triggered or an MP stood down] and through no fault of their own. If IPSA were to stop such payments in the event of being subsequently employed by another MP then other contractual rights should transfer over with the staff member to the new MP's employment – the redundancy payment reflects the fact that these rights are lost when starting work with a new MP – for example, having worked for my MP for 8 years, my redundancy pay is based on the length of time I have worked for them. If I were to be made redundant and move immediately to another MP's employment [thereby sacrificing the redundancy pay under new rules], the clock would restart, and any subsequent redundancies would not take the 8 years of employment with the first MP into account. In addition starting employment with a new MP would no doubt result in a new probationary period and reduced entitlement to maternity/paternity pay and sick pay and other contractual rights. It is very clear that whilst MPs are the employer rather than IPSA, redundancy payments should apply in these circumstances.

PILON – where an MP has publically announced in advance that they intend to stand down, the MP should be responsible for giving timely notice to their staff and should be liable for the cost of not having done so, rather than IPSA. However, there are often cases where the MP did not decide to stand down until last minute or circumstances arose to change their minds about standing. Such MPs should not be penalised for having made a decision late. The question feeds into my earlier point about IPSA employing a HR department. I suspect many of the MPs in question did not realise that they had to give such notice to their staff. Given that there is a financial implication to IPSA for the MP not having done so, this strengthens the argument that IPSA should take on a bigger HR role and should take on this responsibility from the MP once a decision to stand down has been made.

Payment for untaken leave – again this highlights the need for IPSA to be involved in HR aspects. Either IPSA should take MPs at their word that staff have untaken leave that needs to be paid when their employment ceases [particularly where the staff concerned were made redundant as a result of the general election results and could have reasonably expected to have been able to take the annual leave post-election] because the MP is the employer, or IPSA should take on a more active HR role and authorise holiday in conjunction with MPs.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

No

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

IPSA should be involved in the employment process and any salary discussions relating to connected parties. MPs should have to advertise such roles and justify that their connected party was the best candidate for the job – IPSA should take on a further HR role in relation to this by being able to have a say on whether the connected party should be employed or not. MPs should not be involved in setting the salary of a connected party given that this is open to abuse – IPSA should take on this role after discussions with the MP and connected party regarding what the role involves and bearing in mind average salaries for the role across other MPs offices.

Changes should be made with immediate effect for any changes. All new connected parties taken on, or any existing staff being given pay increases should be dealt with in this manner. Existing staff should not have to have their position justified, but should be subject to IPSA involvement with any salary increases.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

No – the current situation seems to strike the right balance.

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

No – the balance here seems to be correct.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

Yes – IPSA should continue to fund this. By nature some casework results from party political policies. I.e. people write in to ask what the Party line is, or about a policy that a Party has announced. Pooled staffing services allow some MPs to better utilise staffing resources. If IPSA were to stop funding many MPs would either have to stop responding to such casework, or take on additional staff to deal with it at a higher cost to the taxpayer.

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

It would not be viable to rent serviced apartments but have to move out over summer- this would mean that the many MPs who do come into Westminster over the summer for meetings and other work would have no accommodation whilst doing so. It would also be unfair to create that level of instability – having to move out every summer would be stressful and time consuming for MPs.

Reducing the MPs accommodation budget to reflect when Parliament sits also works on the assumption that MPs are only working whilst they are sitting in the House of Commons Chamber. Other meetings and work does go on and this could cause other difficulties. For example, an MP may base their caseworker in their London office due to the advantage of being in the same office with them four days a week. Not being able to claim for accommodation over the recess periods may mean that the MP is not able to be in London for other meetings. In addition, some MPs hold surgeries from their London office – this is particularly relevant for constituencies in the commuter belt where it may be more convenient for a constituent who works in London to meet at Westminster during a lunch break instead of having to take a whole day off to meet in the constituency office.

Reducing accommodation budget to zone 3 rental costs would not be practical. By nature Parliamentary business is unpredictable and the hours are unusual. There are occasions when there is not much notice of an item of Parliamentary business for example an Urgent Question being called. This would mean that MPs working from their London home may not have the time available to get in for an Urgent Question or Statement they want to speak in due to commuting times as they had only become aware of it with a small amount of notice. There are also times when the House sits late and public transport links are not running at well or at all. The House often sits late without much notice and therefore quality of life would be affected. For example a late sitting may be followed the next day by early meetings due to not being able to foresee the late sitting. This would also have a disproportionate effect on MPs with families by adding additional commuting time and therefore reducing the amount of time an MP can be at home.

The current situation seems to be working well.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

Yes, the final option of using the same budget as for overall accommodation appears to be the best option.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

This is a private matter for MPs. Not allowing MPs to claim if they already own another London property is effectively asking them to subsidise the taxpayer. If they have privately purchased a property to rent out using their own funds as an investment then they should not be financially disadvantaged by not then being able to claim for accommodation, or being forced to sell their rental property in order to claim.

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

No – the general exclusions should suffice.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Yes. Contractually staff are allocated a usual place of work. It is not fair to expect staff to fund the cost of travel to the constituency if it is not their usual place of work and no other options are available to them, nor is it reasonable to require staff to take all of their annual leave during an election period due to a lack of office accommodation. It is the employer's responsibility to provide a place to work. MPs and staff should explore all options such as working from home where possible, but if this is not feasible then they should be allowed to claim for travel, subsistence and accommodation to work from the constituency office [provided that they do not then undertake campaigning activity]. IPSA should also consider providing a London office space for staff to work out of doing Parliamentary work which may be cheaper than hotel costs and travel, particularly to further away constituencies. Travel costs should be limited to the cost of a journey from their usual place of work [Westminster] to the constituency office i.e. not the cost of the journey from their home to the constituency office if this is higher.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

This rule was not practical nor enforceable. Guidance should be issued, but ultimately it should be up to the MP to decide whether an item is needed. The rule gave rise to difficulties in many offices – we were effectively asked to guess what we may need to continue to function normally and then made to do without or pre-approve items if we

had guessed incorrectly. In particular this was a problem for our office when our constituency office all in one photocopier/scanner/fax machine broke. This is an essential piece of kit for the constituency office and we were unable to replace it immediately due to the need to pre-approve the purchase with IPSA. This rule may also in fact have led to higher claims by creating anxiety over what could or couldn't be ordered. People may have ordered things 'just in case' that they did not then turn out to need during the dissolution period because they knew this rule would prevent ordering during dissolution.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

Yes, this seems reasonable.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

Yes, and I agree that those MPs who know they are standing down should start the winding up process earlier. Staff in these cases should be given notice prior to the election and offices should be wound down to the deadline of the General Election if the MP knows they are not standing.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

These are two separate issues. IPSA should not be blackmailing MPs into winding up quicker by withholding such payments. If it is IPSA's view that winding up could be more efficiently handled then this could be achieved by creating a shorter deadline for winding up. The loss of office payments should not come into it. In addition, some of the financial affairs that are being 'wound up' during this period are not within the control of the MP – an example of this would be notice to staff. MPs are contractually obliged to give notice to staff and it may therefore not be possible for an MP to wind up in a shorter timeframe. This rule unfairly penalises MPs whilst they comply with their legal obligations.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

There is no need for a start-up budget. The same result could be achieved by making clear that new MPs could claim from the contingency budget for such items if they overspend on their office budget.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

The current system seems to work well.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

Such cover should be provided from a central contingency fund specific to cover of maternity, paternity, adoption and long-term sick leave. The full spend on the contingency fund should be published by IPSA centrally as one figure, alongside the number of MPs who have made claims from this pot. The individual MPs should not be named in relation to this fund given that it is a legal obligation for them to provide the leave and the claim is not within the control of MPs i.e. they cannot control when a staff member may need to take maternity/paternity/sick leave etc.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Yes, this should be made clear to MPs at the time of negotiating a contract. This should not be retrospective and any current contractual agreements which do not abide by this rule should be honoured.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

This payment should be abolished. The general public do not receive assistance for living in London and it is not right that MPs do. London area MPs should not have any need to claim for accommodation costs given that they are able to travel back to their main home. Transport in London – particularly the tube is readily accessible and there should be no additional costs to the MPs that would warrant this payment given they already have their main home based in London.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

The current process is sufficient. It allows the necessary flexibility to cater for exceptional circumstances which not every MP will experience, but requires an adequate amount of justification to ensure good value for the taxpayer.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

No

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

In order to reduce IPSA's workload and the cost to the taxpayer, IPSA should continue to only publish the redacted images of receipts which are requested by the public. IPSA also owe a duty to MPs to ensure that personal data is effectively redacted – the volume of publication increases the risk that IPSA will miss something which should have been redacted and therefore harm the MP or staff member in question.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

Monthly, provided that this allows MPs the opportunity to check what is being published in advance of publication.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

Yes. MPs should only use these cards for claimable transactions.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

Yes. All MPs are naturally more 'high risk' when it comes to security. It is not fair or consistent to allow Northern Ireland MPs extra secrecy in this regard in order to enhance their security when other MPs could be evenly at risk. IPSA should instead publish all claims in the same manner, but make provision for MPs to apply to have their journeys redacted if they can show a legitimate security concern as a result of the publication of their travel claims.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

Yes, this should be published monthly after an initial warning letter to the MP allowing them the opportunity to repay by the next pay day. IPSA should charge interest on any amounts outstanding after this time.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Yes, every care should be taken by IPSA to ensure that this information is removed so as not to disadvantage or put at risk any other individuals who have details mentioned on receipts.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

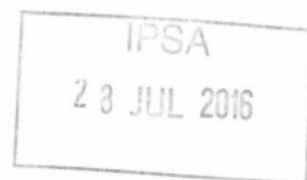
No

Question 37. Is there any further information that we should be publishing about IPSA?

No

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

No



IPSA CONSULTATION – response from an MP's staffer.

Question 2

Yes but I'd also like clarification on what these rules are, as they are like nailing jelly to a wall. If you are going to endlessly 'tighten up' (your phrase) on taxis and mileage, then you should issue clear and fresh rules about what is, and is not, allowable.

Question 4

No – you've already changed it once, for goodness sake, now you're suggesting changing it back again. MPs often lead complicated lives, particularly those who do not live in London and/or do not have traditional relationships. So long as the diverted journey doesn't cost more, what difference does it make if the MP is still going to Westminster or the constituency to pursue her parliamentary duties? Why make life even more complicated?

Question 8

I would like to point out that I gave up my previous long standing and more advantageous contract for an IPSA contract, on the clear understanding that I would be entitled to better redundancy terms and conditions. If you decide to renege on that arrangement, I shall take legal advice about getting my former contract reinstated. I don't, after all, work for the likes of British Home Stores or the Maxwell Group, or do I?

Question 10

I don't understand why you keep revisiting these issues every couple of years – hasn't IPSA got enough to do or something? The system works perfectly well and no, I don't think it should be changed and workers thrown out of their jobs just because a few ill-informed people think it's dodgy. Or, why not employ connected parties (any everyone else if you like) directly by IPSA? And no, I am not a connected party, but I do see several around the place who seem to work as hard as anyone.

Question 13

If you do away with these (and again, why are you revisiting an already well examined issue?), you will have to increase staffing budgets and associated costs, and provide bigger offices, more computers etc. The use we make of our pooled service is easily another member of staff, but one that doesn't take holidays, go sick, lose their key/oyster card/pass/cat, get pregnant or disappear at short notice.

Question 14

No – I hope this isn't code for the endlessly regurgitated nonsense about finding some kind of hostel for MPs and shuttling them around on a mini bus.

Question 15

If an MP isn't claiming rent, I don't see that her reasons for not doing so are anyone else's business. But if you pursue the idea of not letting MPs claim associated costs on existing properties, they will simply rent instead and it will cost the taxpayer more. If IPSA is really about saving the taxpayer money, ie, as opposed to punishing MPs, their families and their staff, which is how it generally feels, you would leave things alone.

Question 16

See above. Why is it ok to have, say, £500,000 in the bank or antiques and claim for a flat but not ok to own a property worth the same amount? The idea of means testing MPs for their expenses is abhorrent.

Question 18

Yes – casework doesn't stop just because there's an election.

Question 21 & 22

Yes. I am confident IPSA neither knows nor cares about the terrible shock it can be to an MP, her family and staff to lose at a General Election, but I think you have a responsibility to make it as easy as possible. It can even be traumatic for those standing down after a long tenure.

Question 30

Why not let us scan our own receipts? Then we wouldn't have to photocopy and post them and find them again when IPSA routinely loses them. You could still order occasional lightening audits if you wanted. Ditto petty cash – how much money does IPSA waste fiddling around with receipts for less than a fiver?

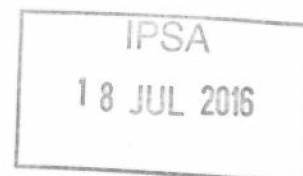
But details of suppliers should be redacted in some instances. For example, a workman/supplier might come under pressure to reveal details of an MP's office layout/staff routines etc which could be of use to someone wishing to harm the MP and his staff.

Question 34

You shouldn't publish anything until you've checked your facts, which doesn't seem always to be the case.

To IPSA

Re: Consultation

**Redundancy payments, pay in lieu of notice and untaken leave**

45. The 2015 General Election was IPSA's first. We successfully set up the budgets and provided support for 182 new MPs while simultaneously winding down the financial affairs of 182 MPs who left Parliament. On 12 April 2016 we published a report on the administrative lessons we learned during the General Election, and the results of a survey of MPs on IPSA's work during this period.

46. We also saw that there were significant staffing costs related to the General Election, as can be seen in our report at Annex B. The redundancy payments for the staff of MPs leaving office were £4.4 million; the cost to the taxpayer of pay in lieu of notice (PILON) paid to MPs' staff was almost £650,000; and payments for untaken leave amounted to just over £743,000. All of this expenditure was compliant with the rules, but three significant concerns emerged:

- Of the redundancy cost, £975,000 was paid to 125 staff who were re-employed by other MPs within 10 weeks, sometimes in the same constituency in the same role. They were not obliged to return any redundancy payments. This is because each MP is a separate employer, so there is a legal break in the employment of the staff concerned. In some parts of the public sector, such as in local government and the NHS, rules have been changed to ensure that people cannot receive redundancy payments on losing a job if they are soon re-employed in another part of the sector.
- Of the cost of PILON, we estimate that between £380,000 and £435,000 of the cost to taxpayers could have been avoided if the former MPs had given their staff more timely notice. This especially applies to MPs who knew in advance of the General Election that they were to stand down.
- As for untaken leave, IPSA is unable to verify the payments made to MPs' staff because we do not have records of MPs' staff members' holidays. This is a matter for MPs who are the legal employer. Nonetheless, IPSA made payments to some individuals for unpaid leave as high as £5,500. Our role as a regulator of public money requires us to assure ourselves that these sums are properly spent. On the basis of the current arrangements, we cannot do so.

47. By highlighting these concerns, we do not in any way imply wrongdoing by individual MPs or their staff. However, in terms of value for money for the taxpayer, we believe these concerns need to be addressed. We seek views on how we should do so.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

Response from a connected party, so wishes to remain anonymous.

Dear IPSA

In defence of staff (both connected and unconnected), you report this as if these staff members had any say in the matter.

MP's staff don't plan for their employing members to lose an election and neither do they persuade the member to stand down. These events and outcomes are out of the control of MPs' staff.

An arrangement that may help, could be, that staff members' "accrued" rights to redundancy payments through length of service, should be transferrable between employments (MPs' offices) and in the event of a collapse of their new employment arrangement, for whatever reason, they should still have an option to take their redundancy at a later date, should the new MP or new-employing MP agree that the role wasn't working (Within a reasonable timescale of course).

Working for an MP is not necessarily a standard job, and while a staff member may be well suited and ideal for the working of one member, they may not necessarily fit into the desired way of working for another/ new MP.

By highlighting this in the consultation you are victimising staff for being re-employable and a ready-fit for a new or another MP.

Employing new staff every time an MP changes could add delay in the ability of a new member's office to be up and running. Employing experienced staff allows for a smoother flow of work for the benefit of constituents. New MPs receive little enough support as it is.

Why "reinvent the wheel" every time when many constituency office functions such as admin and casework carry on the same despite a change of MP.

Re Holidays

why don't you set up a "holiday request/record" spread sheet - like the staff time sheets on the IPSA system - so that holiday can be managed and recorded by IPSA independently? Authorised by the MP and confirmed as taken by the staff member of course.

A similar system for TOIL as we used to call it could be set up if necessary.

These should be accessible for any individual staff member to fill in also, and MPs to authorise.

Correct relevant holiday allocation, earn and accrual could be automatic.

Thank you

PLEASE FIND BELOW AN ANONYMOUS RESPONSE TO THE IPSA CONSULTATION FROM A MEMBER OF PARLIAMENT. THE MP WISHES TO REMAIN ANONYMOUS FOR THE PURPOSES OF THIS CONSULTATION.

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes. All should be encouraged to use the most cost-effective travel options, where possible. I also believe staff should be able to claim for diverted journeys, as it would be useful, on occasion, if my staff could attend events outside my constituent either with me or on my behalf.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

I have no strong opinion on this, as any overseas travel I have undertaken thus far has been due to committee or APPG work, and is therefore not something I have claimed for.

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

I believe the removal of ‘diverted’ journeys would be workable, so long as there is a provision for MPs to be able to claim for a journey to Westminster or back where they are not returning to their constituency directly.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

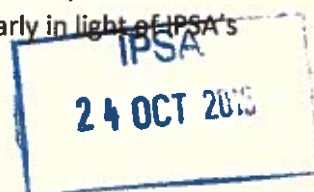
No. Precise definitions - even ‘over defining’ – remove the element of risk of having misinterpreted rules. Some rules may seem obvious, but removing them could lead to a return of grey areas which would then be open to exploitation. It acts as a layer of protection by removing any doubt as to what is intended by the scheme.

Question 6. Do you agree that we should simplify the rules on home offices?

Not applicable.

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs’ staffing expenditure and the need for any consequential HR advice?

I believe, from discussion with my staff, that it would be useful to streamline the two services. At the moment, there appears to be a real lack of HR support for staff – both as individuals and in their roles in managing my team. I had reason to ask my office manager to speak to the HR team but they would not speak to my office manager without my express permission which, given the situation was urgent, was inconvenient and potentially placed my office manager in a difficult position with regards to the behaviour of another staff member. I believe staff are entitled to access an effective and supportive HR system, which currently seems to be lacking as the current system appears to support MPs but does not provide much support for their staff. There is a lack of clarity in the current system, and I believe it would be helpful if this was streamlined, particularly in light of IPSA’s evidence of difficulties and grey areas when it came to the last election.



Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

I believe that it is for the MP to determine what level of PILON is appropriate. The MP, and not IPSA, are ultimately the employer, according to the current contractual arrangements, and as long as that remains the case, I believe this is for the MP to decide, not IPSA – as is normal with any employer and member of staff relationship.

With regards to the length of notice, again, that is something that is dealt with internally by most businesses and again, I believe it should be for the MP to determine what period of notice to give staff.

I am also not convinced of the case to introduce a new rule regarding redundancy pay. Working for an elected member is not necessarily a secure job – Parliament may have a 5 year term but there is no guarantee that each term will last that length of time (indeed we saw significant speculation of an early election this year which was deeply unsettling for staff of MPs). I do not believe roles in other public bodies are comparable to those of MP staff, as individuals in those organisations are not faced with the very real prospect of redundancy on the same regularity as MPs' staff and I believe current redundancy arrangements are sufficient.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

I believe there should be some changes in terms of the publication of the data. Where MPs choose to employ contractors for additional services, that amount is listed on the IPSA data as if it were a separate cost which led to some criticism in the media in recent weeks of MPs for being 'expensive' as these staff costs were listed as if an additional amount had been spent by the MP. In reality, this amount came from the MPs' staffing budget. But because staff salaries are not disclosed (and indeed should not be), this is not obvious from the publication of the data. I believe IPSA needs to change the way contracted staff are accounted for in the listed expenses to make it clear that these costs are met from an existing budget, are not over and above what other MPs are spending and are incurred in a fashion that is not detrimental to the tax payer.

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

The current rules are sufficient.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

No.

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

I believe the current rules are sufficient.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

I believe this is a sensible structure and provides MPs with a research base which is reliable. A non-partisan service already exists in the form of the House of Commons Library. The Parliament recognises, via short money, that some funding of research is required for large political parties and pooled staffing arrangements compliment this, particularly for smaller parties which do not receive vast amounts of short money funding.

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

No

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

Yes.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

I believe the current position is appropriate.

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

Current rules appear sufficient.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Yes. If they are required to travel for work, they should be compensated in the same way that constituency based staff are compensated for their travel and accommodation costs when travelling to Westminster.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

MPs should be required to return equipment bought with parliamentary allowances. The Scottish Parliament, I believe, operates a scheme where phones, laptops and tablets are provided to the members and upgraded every two years. However, Members are required to return these items to the Scottish Parliament at the end of their term. The same rule applies to staff – they retain the item until they leave employment. This system works well, controls the amounts being spent on such items, and ensures that they continue to be used for parliamentary purposes.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

Current rules appear sufficient.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

Current rules appear sufficient, but I do think greater guidance needs to be provided to offices which are in the 'winding up' process.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

I am not familiar with these payments.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

I believe simply awarding new MPs an extra £6000 on their office costs could be useful. However there is a danger some MPs could get 'used' to having that amount and it could cause accounting difficulties. The benefit of the extra, separate budget is that it is very clear that this is a one-off amount and should be excluded when calculating on-going income and expenditure.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

The suggestion that there should be clearer information on the expectation for MPs to manage their budgets is a sensible one – however, I think it is important that IPSA is transparent with MPs about how it will seek to recoup overpayments – this in itself may act as a deterrent.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

I believe publishing this information as an uplift is unhelpful, given the potential issues outlined in the consultation document. I feel it would be better if this information was published separately, rather than as a part of the MP's account of spending.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Yes.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

Yes. I think it needs to keep pace with current London costs which are significantly higher than in other parts of the country.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

No.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

I am deeply uncomfortable with the current payment arrangements to MPs and their staff. I am not happy that, where my staff have to claim for costs incurred in the office (e.g. recycling, cleaning, etc) that cannot be put on the payment card, they either have to make the payment themselves, or wait for a claim to be processed by IPSA. It means staff are often out of pocket and I feel this places an unfair burden, particularly as I cannot always be there to make payment.

In addition, I think any system which results in payments being made to the MP's account prior to being paid to external organisations is very inappropriate. IPSA should either provide an account for each MP from which BACS can be made to external bodies, or direct payments should be introduced. I understand this has been raised by staff at training courses with IPSA and has been rejected out of hand. This is very surprising – most comparable large organisations would never dream of using a system involving a member of staff's private bank account, yet this is what happens routinely with IPSA payments. Most comparable organisations would also use a system of direct payments and I do not accept that the Parliament is too large to make this happen. The Scottish Parliament's Allowances Department employs a small team (much smaller than IPSA) yet manages to operate an effective direct payment system for all 129 MSPs, reducing the burden on staff and MSPs alike. I simply do not understand why this option is not being actively investigated and explored.

I also feel that the IPSA system is difficult to navigate and not responsive to the needs of MPs when it comes to being able to interrogate it for our current finances. The processing of receipts, requiring the originals to be supplied instead of scans or copies, is very out of date and can cause significant challenges for staff in processing them. The proxy system is poor – my proxy has had issues from day one with signing in and so I have to sign my staff member in, which is cumbersome and can slow things up.

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public? Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

I believe the current quarterly cycle is sufficient, and I believe redacted receipts should only be provided where requested. Given all receipts are supplied to IPSA, it is for IPSA to determine what would be appropriate in this regard.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

No.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

No opinion.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

I believe once the money has been outstanding for a reasonable period (eg a quarter) without being settled, publication is appropriate on a quarterly basis. Obviously, it should be updated as soon as the repayment is made.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Guidance on how much information to provide is, at times, poor. It has led to situations where my office have provided what was deemed 'too much' information, particularly in relation to constituency mileage, which then meant all claims had to be checked to ensure no personal details were published. It would be helpful if IPSA could identify where an address has been supplied and automatically redact where it is more information than required.

Otherwise, I believe individuals' names and addresses should continue to be redacted on claims.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

None, other than that raised above about how outsourced staffing costs are published as an apparently additional figure. I understand it is necessary to be transparent where such an arrangement is in place, but I do not believe it is fair that MPs who choose to use such an arrangement then appear to have spent more than their counterparts.

Question 37. Is there any further information that we should be publishing about IPSA?

No.

Anonymous 15

MP Staff

Email

Received 15/09/2016

I am a member of staff working in an MP's constituency office and am familiar with the operation of IPSA systems

Q1 I agree with the fundamental principles and that value for money is important.

Q2 I agree the same rules for travel should apply to staff as apply to MPs. It is wrong that staff can be disadvantaged and have to cover work travel costs from their own pockets.

Q3 No view

Q4 Agree that this rule is confusing. Principle should be that the 'diversion' is not refundable but normal journey is, so any additional cost to the regular Westminster to constituency cost is not claimable

Qs 5 & 6 No view

Q7 In my view the current arrangements work pretty well - will be interested to see the working group proposals

Q8 Redundancy payments should not be made if a member of staff is employed immediately or very soon afterwards by another MP, particularly if it is in the same constituency. This plainly constitutes continuing employment to the public, even if the employer has changed. Where MPs are standing down and do not give timely notice of redundancy to their staff they should have to fund any excess costs themselves. IPSA and the HoC give good guidance to MPs on this matter so there would need to be exceptional circumstances to warrant the public purse carrying additional cost. The situation is of course somewhat different where MPs lose their seats at a general election. On the question of unpaid leave, IPSA could require MPs to provide records of leave taken by employees before sanctioning such payments. Whilst this could not be incontrovertible, it would at least give some reassurance.

Q9 I agree that the ban on bonus payments should be lifted.

Q10 No view. I think it is reasonable to allow one connected party to be employed but that the current additional scrutiny of this is vital.

Q11 Only where an MP is the sole carer for a dependent (of any age) should it be necessary to give additional financial support such as uplift in rental costs. I do not think that taxpayers should have to pay additional amounts for rental or travel costs of family members relating to the second home. However, where partners are required to attend parliamentary events with the MP it seems to me to be reasonable to fund their travel.

Q12 This is a difficult area but my experience is that when faced with an actual example it is generally quite easy to decide what constitutes parliamentary and what party political expenditure. Where MPs rent office space from a political party and the costs are lower as a result it clearly makes sense to allow this arrangement.

I think the current arrangements are reasonable except in relation to wreaths at memorial services. MPs attending remembrance services do so in their capacity as Members of Parliament, not as private individuals. In my experience the organisers do not allow wreaths to be laid by political parties at the formal ceremony nor do they invite political parties to participate in any way at these services. The wreaths are badged with the crowned portcullis, not with party logos. In my view the whole purpose of the MP laying the wreath is that they are doing it on behalf of Parliament - and demonstrating the respect of our legislators for the sacrifice of individuals for their country. Wreaths laid by local Mayors are funded by councils, not by the councillors themselves. As many MPs attend several such services around their constituencies they have to buy several wreaths and incur considerable cost. This is an instance where MPs are quite clearly acting in a parliamentary capacity on behalf of all their constituents - and indeed their colleagues and MPs from earlier days - and in my view they should be able to charge this to their office costs. This should apply only in relation to national memorial services.

Q13 Provided the pooled funding is available to all parties to support their work in Parliament I have no problem with this.

Q14 I believe that there should be a scheme where it is possible - where it represents value for money - to purchase property provided the costs are within the limits set by IPSA but that the property in question would not belong to the MP but to IPSA or some other public body. It could be for the exclusive use of that MP during his or her term of office but would be given up at the end of their term with them being responsible for any repairs etc. Incoming MPs could take over such properties or choose another, with those no longer required being sold on the open market and any profits returning to the public purse. In this way there would be a supply of publicly owned property which - whilst needing some administrative support - would in the long term offer far better value for money than the current arrangements.

I do not support a scheme of hotel accommodation. Too much staff time would have to be used to make and manage bookings as inevitably late changes would have to be made, incurring unnecessary charges. I think in practice it would be a difficult approach for some MPs in terms of personal possessions etc. I agree that the widely embraced scheme of a hall of residence is ridiculous.

In practice MPs' families live in the main home and I do not support public funding for them to travel with the MP between London and the constituency except where and when exceptional circumstances can be demonstrated or where the MP is the sole carer. I can't think of many private businesses that would pay for a family or partner to travel with an employee in such circumstances.

Does the £0.9 m saved by restricting rental costs to Zone 3 equivalents take into account travel costs? If not then this simply passes another item of expenditure to the MPs themselves.

Q15 Associated costs should be the same for rental properties and for owned properties, although this would need to have references to services provided by landlords which are paid through the rental charges.

Q16 Agreed. However, the public are understandably outraged by the notion that two MPs who both own properties could rent them to each other and both claim rental costs. This sort of abuse needs to be investigated.

Q17 No view

Q18 Yes, agree

Q19 A rigorously enforced pre-approval system should be applied. It is important to be able to replace broken equipment, but new expenditure should be closely scrutinised.

Q20 Don't know.

Q21 Yes I agree with the proposed change.

Q22 I think the scheme is fine as it currently stands

Q23 Agree with this proposal

Q24 No view

Q25 I don't think it really matters how the additional costs are funded and can see that the system used makes sense. The reason should be clearly stated when the expenditure is published. Personally I don't think that staff costs should be confused with MP expenses. They should be published separately with explanations where unusual circumstances have resulted in higher than expected costs.

Q26 Yes and yes.

Q27 No view

Q28 No suggestions

Q29 No

Q30 Favour continuing with current practice. It's not an enormous additional expense, but one that is unnecessary and carries a slight risk of revealing confidential information.

Q31 No view

Q32 When this has been done in error and is repaid quickly I do not think it should be published. If a great deal of effort is spent recovering the sum then perhaps there is an argument for publishing. It is possible that an error is made by a staff member and it does not seem right that the MP is 'punished' for a simple staff error.

Q33 No view

Q34 No view

Q35 Must be in line with Data Protection rules otherwise no further concerns

Q36 No

Q37 No view

Anonymous 16

Member of the public

Written

Received 19/08/2016

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

Yes I agree with the new principles. They are easy to understand and the emphasis is clear.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes, to an extent. I do not feel that staff should be able to travel abroad. However, they should be able to travel beyond the constituency for solely constituency matters.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

I don't see how travelling beyond Europe helps with their parliamentary functions. I feel the current ruling is fine.

Question 5. Do you agree that we should carry out some "housekeeping" of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

I feel that the travel rules are too complex. They should be simplified whilst allowing publication to clearly state the purpose of the journey.

Question 6. Do you agree that we should simplify the rules on home offices?

With the current rules it seems that figures are guessed and estimated for part time staff. For example, someone working 8 hours a week but claiming 100% of all their bills should not be allowed, but it is. I feel that we should consider restricting claims to a percentage that relates to the hours they work.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

I feel that HR advice is difficult to give whilst also considering value to the tax payer. It would be a conflict of interest to advise MPs in circumstances of PILON, for example, whilst also considering cost effective solutions.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

All staff should be on IPSA contracts. IPSA should also be stricter in making MPs give notice as PILON is often avoidable. PILON should always be paid as the staff are entitled to it, but if it was avoidable it should be listed as money owed against the MP.

I also feel that holiday should be logged and noted with IPSA payroll staff, so that they know it is legitimate.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

I feel that the budget should be higher. Staff salaries are low and a higher salary would result in a higher calibre of personnel. An investment the tax payer and constituents would benefit from.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

I do not think connected parties should be employed. This would reassure the public whilst also saving money, we know from the work carried out for this consultation that connected parties cost more than other staff. We also know that the increase in their salaries occurs at a faster rate than other staff. The only argument in favour of connected parties is the trust element. But signing disclosure contracts or things of a similar nature will protect MPs. Employing a connected party directly influences the MPs household income and should not be allowed. The only alternative, to ensure funds are being used correctly is too intrusive and is disproportionate. Only banning them altogether ensures that MPs cannot gain a financial advantage.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

I agree that more could be done to make life easier for MPs with families, particularly women. However, I am not sure that this is as a result of the funding, more the culture. It is not in IPSA's remit, however they could possibly look at funding childcare and the implications of this freeing up time for MPs.

Chapter 6. The boundary between parliamentary and party political activity

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

This is, in my view, political and should therefore not be funded.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

I feel that IPSA should keep the rules as they are, with one change. If the MP already has a home in London they cannot rent another one with tax payer's money.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

No. If an MP has a property they should not be allowed to rent another with tax payer's funds. This gives the MP an direct financial advantage and is against principle 3.

Chapter 8. Other issues relating to the Scheme

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Yes. Provided there is still a restriction on the number of staff journeys.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

They should have to requested pre approval.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

I think 2 months is sufficient times to wind up their affairs. I do feel that the budget itself is too large (on average MPs only spending 58.7%) and that as a result some MPs took advantage of paying staff large PILON and unclaimed holiday amounts. IPSA should consider a smaller budget with a contingency element for very large costs.

The budget should be reduced and large costs, such as PILON, should have to be granted through contingency.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

They should be made once the MP has wound up their affairs and amounts should be deducted from it if anything is owed.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

Yes. It should not run for 365 days, instead within a financial year. A simple uplift to the OCE budget should be applied.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

The payment card should be managed differently. The MP should use the card, to ensure they are not out of pocket, then claim expenses for the costs incurred and use the money to pay off the credit card. They would have at least 30 days to do this, as the normal citizen would.

The current process of asking them to reconcile causes a huge amount of money owed, that actually is solved with the submission of evidence.

The payment cards rightly allows MPs to have a cash flow, but they should be responsible for ensuring it is repaid. This would reduce amounts owed as well as times for IPSA, ultimately saving money.

Secondly, MPs and their staff should be provided with forecasting tools and training to ensure they are able to self-serve. Possibly provided by IPSA, or the House of Commons Learning and Development department.

Finally, the Scheme should give IPSA more authority to recover amounts via salary deductions. This allows for a quicker recovery.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Yes, this could not only be clearer, but enforced better.



HOUSE OF COMMONS
LONDON SW1A 0AA



Dear Sirs,

I would like to make representations on the current MPs' Scheme of Business Costs and Expenses.

My specific concern relates to Accommodation and Travel Expenditure. In my view, the London area has been ill-defined to include a large number of constituencies that are not actually in the London area. Indeed, an MP can live a sizeable distance from Westminster, within his or her constituency and still be defined as a 'London area' MP. The consequence of this is to prevent these MPs claiming hotel accommodation or taxi fares even when the House is expected to sit late.

Often MPs have a rough idea of how late the House is likely to sit but these timings can be uncertain and the current scheme does not adequately cater for this. Neither does it cater for situations when the House rises well before an MP's Parliamentary commitments conclude.

When the House is expected to sit late, a hotel room cannot be booked as a non-refundable cost will be incurred if the House adjourns earlier than expected. It therefore leaves the MP in an impossible situation where they cannot book a hotel even when they reasonably expect the House to sit late. In addition, the £80 limit on taxi fares does not cover the journey home for many of these MPs. This leaves these MPs in a situation where they are forced to travel home on public transport late into the night. This is also the case if the House does not sit late, but an MP's other Parliamentary commitments keeps them in Westminster late in to the evening. The security implications of this are obvious.

It is worth noting that Commons staff are able to claim for accommodation when they live more than 25 miles from Westminster and the House sits beyond 10.30pm. This is clearly felt necessary for them for their own health and safety reasons, yet MPs do not have an equivalent arrangement.

There have been some very positive steps carried out by IPSA and the house authorities to provide extra security for MPs in the form of personal alarms and assessments of household and office security. These changes, however, should not be undermined by an expenses system that forces MPs to place themselves in vulnerable situations leaving the Commons late at night.

I am seeking a common-sense approach by IPSA so that the Scheme recognises the current situation is failing to provide adequate provision for 'London area' MPs when the House sits late or their parliamentary commitments keep them in Westminster late into the night.

Anonymous

Anonymous 18

Member of the public

Email

Received 16/10/2016

Dear Sirs,

I am responding to this consultation in my own personal capacity, although I am director in industry with directorships registered at Companies House. I am also a senior lawyer. I have experience of managing UK and international ethics and compliance schemes and am experienced in the private sector in terms of what is usual for expenses and allowances, both domestic and in relation to foreign travel. I am not responding question by question, but rather have five high level observations on the matter I would like to set out to you:

1. MPs Salary

The MP salary is too low - we are a leading nation and it is not inappropriate for our MPs to earn as much as others in similar leading democracies. I believe the current low level is extremely off-putting for the key ranks of professionals (lawyers, business leaders, headteachers, doctors etc) who would otherwise like to engage in politics as elected MPs. Continuing with such a low salary level means that only career politicians, the poor or the wealthy can become politicians. It is fine for the likes of David Cameron etc to make a big show of how they are forgoing pay increases and bonuses etc when they already have millions in the family / bank etc, but for the average professional this is not at all realistic.

An MP may represent 100,000 people - it is right that they receive salaries that approach similar positions of responsibility in the civil service and across health and education and also NGOs. You need to find the courage to recognise a better salary level, rather than the recent trend of being seen to espouse a low level that promotes mediocrity and privilege in candidates. We need to attract the best people based on merit, and they should be paid a proper salary for it, rather than having to rely on private family wealth.

The reality is that many of these persons will be earning salaries of 100k/150k+ and having to reduce their income to the current MP levels make it impossible for such persons to enter politics. For a long time, as an unwritten policy and promoted by the likes of Margaret Thatcher etc, MP salaries were kept low for public consumption, on the basis that expenses would be liberal. Now that MP expenses are controlled, the historic error on salary serves to promote mediocrity and privilege, not merit.

2. MPs Expenses

MPs must be given proper allowances and expense policies - their submissions should also be audited. But it is a very sorry state of affairs when each MPs' individual expenses amounts and also individual receipts are published. MPs need to travel - it is right they should be allowed first class travel on trains to allow a degree of convenience for their important work. MPs may need to travel abroad regularly as part of their job - it seems absurd that they are criticised in the press for running up large travel and overseas costs when such travel is crucial for their work and our country. In short, I do not believe that individual expense items or totals should ever be published as a matter of routine, it allows immediate partisan and ill-informed criticism, without any recognition of the true purpose of the visit, cost or trip.

A procedure based on excessive transparency can ultimately impact and damage the business the official is supposed to be carrying out - for instance they may forego an important visit or face-to-face meeting, simply to avoid undue criticism based on the ill-informed scrutiny of the incumbent costs.

3. MPs Second Homes

It is hard enough nowadays to run the cost of one family home, let alone two. MPs must be given full cover for the cost of a London apartment, with additional rooms depending on their family size so their family can visit.

A proper allowance with potential for genuine costs subject to strict guidance policies and audit is all that is needed, this is what any corporation will have in place, supported by disciplinary procedures in response to any breaches.

Audit results could be published, allowing guidance and sometimes castigation of individuals to follow where the policy has been breached - however it is entirely inappropriate to publish as a matter of course those individual expense items that are clearly within policy guidelines - again it promotes ill-informed partisan criticism and is extremely off-putting for successful professionals who would like to enter politics.

You must find the courage to adopt a more sensible practice than that which we have seen in recent years, which seems to have allowed MPs to be criticised for matters such as buying a bath plug for their necessary second home - such levels of transparency are excessive and damage our democracy.

4. Publication of private Tax Returns

We have laws regarding privacy and data protection - it is absurd and unfair to require party leaders to publish their own private returns. Sometimes persons may have sensitive family matters such as inheritances and unforeseen costs and losses in their businesses - the timing of these events in general cannot be foreseen, and it is not fair to expect an individual to ever have to make public their private personal financial / family affairs - although the requirement does not come from you, I believe you should set out guidance that recognises that no politician or civil servant should ever be required to do this outside of a court or official regulatory process, nor should they seek to set a precedent or make political capital by publishing their own.

Yet again, such practices serve as a strong deterrent to anyone considering entering politics - the financial privacy and personal data of the individual is becoming compromised, despite being protected in law, and public figures are becoming exposed to those with no income or assets who wish to make political capital by setting unfair precedents in publishing their own financial affairs, demanding publication of matters properly protected as personal data.

5. Personal Security expenses

You must set generous and undisclosed expense levels to protect the personal security of all MPs and their families.

Thank you for taking the above into account.

Anonymous 19

MP

Email

Received 21/10/2016

I am writing in a personal capacity. I am pleased that IPSA have offered to preserve the anonymity of representations and in the interest of frankness I would prefer my observations to remain anonymous.

Overview

The establishment of IPSA against the backdrop of the MPs expenses scandal set a tone which has shaped relationships between MPs and IPSA ever since. IPSA have held MPs in low regard. While ever we continue to be so diminished, our ability to act on behalf of constituents is undermined. This is bad for parliamentary democracy and accountability. I would like for IPSA to reflect on this. While ever IPSA continue to have policies and public facing messages which cause MPs to continue to be held in low regard, no amount of expenses will strengthen our ability to represent our constituents.

It should be remembered that two thirds of the House of Commons were not elected in 2010. The MPs expense scandal has nothing to do with us. Yet we routinely receive jibes an abuse about our expenses. My expenses are for my staff and the running of my office. Nothing more. The National Audit office has found that 90% of MPs subsidise their job. You would not know this from the tone of IPSA's communication

Against this background I was very disappointed by the tone taken in this consultation document. It is unnecessarily negative and hostile. Repeatedly using the phrase 'we found no evidence of misuse' reflects an attitude that MPs are guilty till proven innocent.

A Member's individual reputation is of high importance to us. We live in the public eye, we have to offer ourselves for election and judgement by the public we serve on a regular basis. Reputational damage is destructive to our careers. We would not wilfully inflict reputational damage on ourselves. IPSA should remember that the damage caused to Parliament by the expense scandal was as much about the system and the rules. As the rules are now stricter and clearer there is much less risk of any questionable expense claims. Consequently there is absolutely no need for the unremitting negativity from IPSA which is fuelling ongoing cynicism on the part of the public.

IPSA's role is "to assure the public that MPs use of taxpayer's money is well regulated and their MPs are resourced appropriately to carry out their Parliamentary functions." **I think that IPSA ought to do more to make the case that on the whole we are well regulated and highly compliant and that on the rare occasions something is wrong it will not go unpunished.**

London Area MPs

I am an MP whose constituency lies just outside the London boundary. It is classed by IPSA as a London area constituency. The London area constituencies were conceived on the basis that many constituents commute therefore why shouldn't MPs? Consequently for those whose constituencies are less than 20 miles away from Westminster, London Area Living Payment is paid and Members are not entitled to second home allowance.

As a principle this is reasonable. It is fair to say that around normal working hours the train service from my constituency to London is good, but MPs do not work normal hours. The rules around London area MPs give rise to some anomalies which means some Members are not treated fairly under the scheme.

I spend 2-3 hours a day commuting. Since I do not like to be traveling home alone late at night at a time when MPs need to be conscious of their personal safety, I usually commute by car. The crude 20 mile limit is not based on connectivity. I know of colleagues who live further away but as their connections are better they spend considerably less time travelling than I do largely because connections going west are infinitely better than going east by either rail or road. Indeed I know of some colleagues who are entitled to claim second home allowance but whose journey time is less than mine. Equally I know of some colleagues who live further out and choose to commute.

Where there is a particular problem is on Mondays and Tuesdays. Business doesn't complete until 1030 and the House resumes at 11 am the following morning. However Bill Committees, Select Committees and DL committees all sit from as early as 855 on the Tuesday, with business going on until after 7pm. It is physically gruelling to go home, sleep, and return in time to prepare for the days business. Since London's roads are routinely closed after 10pm for roadwork I can find myself getting home some time after midnight on a Monday with a need to leave at 6am the following morning and not returning home before 9pm. On these occasions I choose to sleep in my office. I do not believe we should expect MPs to experience working conditions which would not be tolerated elsewhere and are arguably unsafe. They ought to be compared with other public servants whose working hours might require long hours. By way of comparison, House of Commons staff who are required to be on duty after 11pm are entitled to a taxi to take them home. Furthermore, the House of Commons provides bedrooms for staff who have a need if they are on duty after 730 pm and are required for duty before 830 am.

IPSA should look at the rules as they affect 'London area MPs' who live outside London. It would make a considerable difference to my quality of life if I were able to claim a hotel on those occasions when business continues after 10pm. This would be broadly consistent with the terms and conditions for House of Commons staff

Employing connected parties

Employing connected parties is good value for money. Every MP does the job differently and their jobs generate different needs based on the needs of their constituents and the interests of the Member. This is not a 9 to 5 job and it needs much evening and weekend working. Given the efforts that MPs take to get there, the personal investment and the impact that has on their own lives it would be most unusual if families were not involved in many cases.

[INFORMATION REDACTED]

[INFORMATION REDACTED]. He is also responsible for managing relationships in the constituencies. It would be difficult to find anyone better qualified to do so as he knows the patch and the people as well as both of the members he works for. As a Member in a

high profile marginal seat my political opponents have often tried to get the press excited about the fact I employ my partner but the local press are simply not interested because they see at first hand that he does a real job.

There should be no change in the rules for employing connected parties.

Pooled resources

I subscribe to the PRU. There is no doubt that this is good value for money. Without it the efforts would be replicated in 650 MPs offices at substantially greater cost.

Payments for pooled services should continue to be approved business expenses

MPs owning property in London & claiming second home allowance

I own one home and it is the home in which I live. It is located in my constituency outside London so I have no interest in this point. However I think it very unfair that MPs who own property in London which is rented out should be criticised for claiming for a second home. At the time that IPSA was created there was a change in terms and conditions of employment which left many sitting MPs with properties with large mortgage liabilities. It is entirely appropriate that they should move them to the rental market. Furthermore, MPs should be entitled to invest their money just like anyone else and if they have chosen to invest their income in the London property market then that is no less appropriate than investing in anything else. **If MPs are expected to have a home in London and one in the constituency and it is a term of employment that the costs of one of those homes should be met by IPSA, then MPs are entitled to that regardless of their personal circumstances.**

Employment of Staff

MPs remain responsible for their staffing arrangements with the salaries paid by IPSA. It should be noted that IPSA is not the employer.

The consultation raised a number of issues regarding the employment of staff and turnover following a general election. Overall I do not believe there should be any changes to the terms and conditions of staff. There is a case however for MPs to be reminded of their responsibilities to ensure value for money for the taxpayer.

When Parliament is dissolved there are no MPs and consequently no Parliamentary duties. Staff based at Westminster cannot attend their place of work. I cannot see any legitimate reason why staff would claim expenses or have any work during this period, unless they were concerned with winding up the office of a retiring MP. In truth staff are being given a month's gardening leave as there is no work once Parliament is dissolved. My Westminster based staff were employed on one year contracts and were given notice ahead of dissolution.

The turnover of staff at a general election does raise some issues with regard to payments in lieu of notice and redundancies. IPSA note that some staff were employed by other MPs after receiving a pay-off. However, although these people are still being paid by IPSA they do not retain the same employment rights. Legally they have joined a new employer.

In order to secure the value for the taxpayer we should not be looking to weaken employment rights of staff. We should however hold MPs responsible for upholding value for money. MPs should be reminded of their obligations to secure money for the taxpayer when leaving office and that this can be investigated by the Parliamentary Commissioner for Standards.

So, MPs standing down have no excuse for not giving notice to their staff. Clearly those who lose their seats are in a different position. There is no doubt that staff there have become redundant. In truth staff are being given a month's gardening leave as there is no work once Parliament is dissolved.

MPs should be reminded of their obligations under the code of conduct for value for money and suitable advice ought to be given to those MPs who are standing down voluntarily about how they should manage the exit of their staff

Conduct of IPSA re 'naming and shaming'

IPSA have adopted a policy of publicly naming MPs who they say owe IPSA money. In practice, these monies are sums which have been paid by IPSA and then reclaimed. The reclaim can be for any number of reasons. It could be a wrongful claim. It could be a typo. Quite often these claims are disputed by the Member.

It is quite wrong then for IPSA to name those MPs where there is an ongoing dispute. Being named by IPSA is most injurious to a Member's reputation.

In my own case a claim was submitted in June this year with a typo which led to an overpayment of £6. In July IPSA demanded repayment. The repayment was immediately made and the payment banked by the Finance team. However the compliance department was not advised. I picked this up when reviewing my financial statement but had IPSA named and shamed me for overclaiming as it had done with colleagues before, I would have suffered reputational damage for an error in IPSA's own systems. This would have been most unfair and quite wrong.

Ultimately non-compliance with IPSA rules is not compatible with the MPs code of conduct. Where an MP is in dispute with IPSA over whether something is a legitimate expense, the matter should be referred to the Parliamentary Commissioner for Standards

I hope these observations are helpful and I look forward to seeing the outcome of the consultation

Anonymous 20

MP Staff

Email

Received 21/10/2016

IPSA Consultation response

I would like to include the following as my response to the consultation on the review of the scheme of business costs and expenses;

Question 1. Yes, particularly that the principles note that MP's should be resourced appropriately to carry out their duties effectively and hopefully this will be more balanced with the value for money principle.

Question 2. I agree, it is important now more than ever that MP's travel on Parliamentary business is not done alone as much as is possible therefore staff should be accompanying visits etc which will obviously incur costs.

Question 3. I think removing the restrictions will make the scheme easier to understand.

Question 4. I agree, the current rule for diverted travel is confusing so it will clarify the rules going forward if removed.

Question 5. I agree, any work which can be done to simplify the rules will help make them clearer and easier to adhere to.

Question 6. No comment.

Question 7. I feel strongly that the current level of involvement that IPSA has in staffing is enough and that IPSA should not go further. IPSA are able to set the overall budget and even now have parameters as to how much each individual staff member can be paid. I feel that further involvement is not necessary and that gaps in HR advice should be met by the House of Commons rather than IPSA.

Question 8. I do not think that this area of the rules should be changed at all. Staff are at risk at each election of losing their employment, as are MP's, and they are only entitled to redundancy for the number of years they have been employed by that particular MP as the MP is the employer. If changes were made to prevent these members of staff from receiving redundancy payments then changes would be required to ensure that they receive tenure for all their years working in an MP's office regardless of the MP. This would entail a change to the current employment situation where staff would be employed by IPSA centrally which quite rightly has been considered and dismissed. Staff who lose their employment with one MP are most likely to seek employment with another MP due to their work experience and interests therefore it is not surprising that many of those who lost their job found a role in another MP's office. However, when they did they would have done so as a new member of staff, with no years tenure, possibly on a probationary period, probably without the full annual leave entitlement they enjoyed previously, and if this was in the same constituency as previous there is a high risk that they may not be employed permanently. It would be interesting to look at how many staff who remained employed in constituency after a change of MP lasted more than 6 months. Established staff can often be used to ensure a smooth changeover but once the new MP's office is set up and running they are let go. These members of staff have no protection of tenure once they are employed by a new MP and they would lose their right to any redundancy at all if this was to happen under suggested new rules. In other agencies such as the civil service and the NHS redundancy payments would not be paid but this is because staff are essentially redeployed, they would be re-employed whilst retaining previous tenure and the benefits that brings such as pay scale increments levels, amount of annual leave entitlements and future possible redundancy payments. This model would not fit due to the fact that the MP as an individual is the employer. I feel strongly that the current model of employment by the MP directly should stay as it is and if it does then changes to the redundancy, PILON and unpaid leave cannot be made without seriously affecting staff. Surely the cost of having a pool of staff administered and controlled by IPSA centrally would be much higher and therefore would not give the tax payer value for money.

Question 9. I think that the rules regarding use of volunteers are useful and clear. The reward and recognition payments rules are not very clear in terms of the difference between them and a bonus therefore to remove the ban on bonus in the new rules, or specifically the term bonus, and simply have the rewards and recognition rule standing alone will be helpful. The overall staffing budget could be looked at in terms of the different needs of different constituencies as some constituencies seem to generate a great deal more work than others therefore would require more staff to manage this work and a larger budget.

Question 10. No comment.

Question 11. No comment.

Question 12. I feel that currently the rules are too tight in areas such as newsletters and constituent surveys where it can be useful to keep residents updated on issues being raised or addressed by an MP yet would be considered as party political even if not politically branded. As the cost would be published and the MP is therefore accountable surely this could be allowed.

Question 13. The ability to tap into pooled staffing services is vital for the effective and efficient running of MP's offices. To lose the ability to use PRS, PRU or PST would be severely detrimental and would lead to additional pressures on the remaining staff. However if the staffing budget was increased this could possibly be absorbed but it would require a hefty uplift.

Question 14. I feel that the consideration of using a rental cap to zone 3 is a ridiculous idea when security is such a high priority. If MP's are leaving the House of Commons after 10pm which is quite frequently, then it is not acceptable to have them travel so far out. The concept that all MP's could move out of London for the summer will also not work based on the fact that landlords will not accept that therefore it would be impossible to find accommodation. Hotel accommodation is unacceptable as some MP's have young families and this type of accommodation would not accommodate families.

Question 15. I would agree to using the same budget for overall accommodation for simplification and clarity and agree it would be unlikely to incur additional costs to current.

Question 16. No comment.

Question 17. The current rules need to be clearer rather than change.

Question 18. I agree as this would make more sense than having staff working from home or on extended enforced leave as they have no workplace.

Question 19. Possibly pre approval of spend would help ensure genuine needs.

Question 20. I feel the current rules are acceptable.

Question 21. Yes, it would be much easier by continuing the office costs budget beyond the general election.

Question 22. Could the loss of office payment be paid in instalments with the final payment being given at the conclusion of winding up.

Question 23. Merging the budgets would make the start up budget easier to use.

Question 24. I think that overpayments should be addressed to MP's initially with an option as to how they may repay, either on invoice, via salary, possibly a contingency fund application or via another budget if appropriate. If they are not repaid within an allocated amount of time then further claims blocked.

Question 25. Surely sick pay, maternity, paternity or adoption leave could be published as a separate figure.

Question 26. I feel that when IPSA inspect tenancies, leases or contracts before approving payments initially they should simply not approve if there is no such clause and provide advice regarding what is required rather than penalise MP's later.

Question 27. No comment.

Question 28. No Comment.

Question 29.

Question 30. I think that the protection of sensitive information should be prioritised and redacted images of receipts only be sent if requested to avoid any security risk.

Question 31. I think it would take more time for staff within the office who are responsible for the expenses to check before publication if the data is published more regularly and with possible changes to the IT system likely to increase workload within MP offices this would add too much although would be useful to the public.

Question 32. I feel that if there is no cost to the tax payer these items should not be published.

Question 33. No comment.

Question 34. I think that is money owed by MP's to IPSA was to be published it should be only over a certain amount, say £500, to allow for the month to month repayment of such things as partners train tickets. So only substantial amounts are released.

Question 35. I would have concerns where publication may cause a security risk, for example, the name of a hotel on a receipt that may be used regularly.

Question 36. I feel that publishing the class of travel is not helpful. Quite often a train ticket can be as cheap booked in advance in first class or cheaper than a standard class ticket. It is value for money to book the cheaper ticket yet MP's would choose not to as they do not wish to publish that they have dared travel first class, there is no place to demonstrate that the ticket was cheaper than standard. If the important issue is the cost then surely there is no need to publish the class of travel.

Question 37. No comment.

Question 38. No comment.

Anonymous 21

MP

Email

Received 21/10/2016

Response to questions in consultation document.

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

In the main yes.

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

I agree that the same rules that current apply for MP's should also apply to staff for travel costs, this would simplify the system for both IPSA and the member.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

I believe the current restriction should be removed, given some of the businesses in my constituency it is quite possible that I would be expected to visit Europe in my role as MP and see no reason why this should not be funded through IPSA if there is no alternative funding provided.

Question 4. Do you agree that we should remove the rule allowing claims for "diverted" journeys, along with the cost restriction on claims for journeys back to either the MP's constituency or Westminster?

I do agree the rule for diverted journeys should be removed, it over complicates claims that are made on journeys for parliamentary business.

Question 5. Do you agree that we should carry out some "housekeeping" of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

I do think the initial rules were a reaction to the expenses scandal, quite rightly so, which could now be tidied up and replaced with much clearer guidance.

Question 6. Do you agree that we should simplify the rules on home offices?

Do not have home office so have no experience of how the rules work.

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

The initial paperwork provided by IPSA when employing a member of staff is of a good standard and very welcome. However, HR advice and paperwork would be very useful. Whilst it is important that MP's retain the employment of their staff there should be full HR support provided to members in the form of access to ongoing paperwork such as induction forms, annual reviews and access to advice on disciplinary procedures and other legal employment issues.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

With the very nature of the job staff need to feel secure in the fact that if their member loses their seat then they will still receive what is due to them in the form of redundancy and outstanding leave payment. If some of them

are fortunate enough to be able to find employment with another MP then good luck to them but if none of them came back to work for another MP you would still have the same outlay of redundancy and leave payment.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

Wage increase and the awarding of a bonus should be at the discretion of the member and I see no reason for bonuses not to be allowed if the member has good reason to pay one.

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

I feel the rules are tight enough as they are and IPSA are there to provide guidance, if needed, on what is allowable. In fact there should be more discretion given to MP's to make the decision on "would I have to do/spend this if I wasn't doing it in the role of MP", as you say the claims would be published.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

The pooled staffing services provide a timely, efficient service and I am only aware of it having been used for parliamentary services, never party political services. Whilst the Library provide a service, which we use to full advantage, it cannot be called timely service. The assumption that the pooled service MAY be misused is certainly not reason enough to remove funding of the service from members who use it as it should be.

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

The alternatives in the consultation document are certainly not viable. The suggestion of only paying rental for the days parliament sit is out of the question, no landlord would agree to those terms and what happens when parliament is recalled or a member has to be in Westminster on parliamentary business during recess? The idea of only funding zone 3 accommodation to reduce costs is false economy, this would only lead to increase travel costs and taxi fares for members when finishing late in parliament. Also the suggestion that it would give members the experience of commuting, I can assure you the majority of us experience that every week when travelling between constituencies and London. The main issue is that the allowance has not risen in line with rental property in London and this is causing problems in finding an appropriate property in London.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

If the rules in place prevent further misunderstanding during dissolution then there can be no harm in them being kept in place.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Travel and subsistence should absolutely be paid to Westminster staff who work in the constituency office during dissolution. It should in fact include travel from home to constituency as a number of staff have to make totally different travel arrangements during that period.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

I found the rules to work well at last election and see no real need to change anything unless it would make things even clearer for members.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

Continuing with the budgets would certainly make it easier to ensure claims are made correctly.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

There is little wrong with the current process for overspend and although it is the member's responsibility to ensure there is no overspend or that it is repaid promptly I would expect IPSA to raise a warning if the staffing budget were looking as though it would go over the limit.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

It needs to be made much clearer when publishing spending that part of the cost is for specific cover, it should perhaps be published in two parts, firstly the cost of normal staffing and secondly the cost of cover for sick leave etc.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

Insisting on a two month break clause in London accommodation will almost certainly make it harder than it already is to find suitable accommodation.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

As it seems to have worked well so far I see no reason to change.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

There is always the concern that not all data would be redacted, the cost of redacting and then publishing must surely high. The way IPSA currently provides data is more than satisfactory.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

I feel every quarter would be more than enough for publishing information and would surely cut down the workload for IPSA.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

No, spending on the card that is repaid can be done for a number of reasons, same items on one invoice, incorrect card used in error, uncertainty of qualifying expenditure. Publishing this information could be seen as publishing private or personal spending.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

This should only be published at the end of the financial year in which it occurs.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

Question 37. Is there any further information that we should be publishing about IPSA?

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?



[Redacted]
Member of Parliament [Redacted]
House of Commons, London SW1A 0AA

Anonymous 22
MP
Email
Received 24/10/2016

20th October 2016

Ruth Evans
IPSA Chair
Independent Parliamentary Standards Authority
4th Floor
30 Milbank
London
SW1P 4DU

Dear Ms Evans,

Thank you for giving MPs the opportunity to engage with IPSA in this in-depth consultation.

Since my election in [Redacted] my experience with IPSA has been positive and straightforward, but I welcome the chance to offer my opinion on several aspects which I believe could be improved.

The Fundamental Principles of the Scheme

I agree wholeheartedly with the Fundamental Principles of the Scheme and agree that they act as a guide to MPs and their staff when making claims. I also appreciate why IPSA is unwilling to create a rule book as it would be very lengthy indeed. However, if there are to be no clear rules, I fear that MPs offices will continue to interpret the principles differently. This creates discrepancies and unfairness so to counteract this and make MPs and staff alike feel more confident in what can and cannot be permitted, I would like to see more information publicly available.

Perhaps a FAQ section for staff or, when you phone for advice, to see if something is eligible, there should be guidance and a log made so there is a concrete record of who was told what, when and by whom. (There is a log when you phone with an IT problem, so why not something similar, so that consistent advice can be given?) Some of the current guidance is not entirely clear and I know that we as an office have had to telephone for clarification as the principles are open to interpretation so there is confusion.

Travel

As a London MP, the travel issues do not apply to me personally. However, when it comes to my staff there is confusion about what can be claimed for and what cannot,

so clearer guidance on eligibility would be helpful. In London, travel these days uses Oyster or Contactless payments, it is unrealistic to expect staff and MPs to buy individual tickets per journey, (which will be more expensive) especially when most will have monthly travel cards, or just use contactless payments. Please can we have a better system for submitting evidence of journeys?

Staffing Costs

This is the area that in my opinion, is the most problematic.

The IPSA contracts and job descriptions are very rigid and do not reflect the diversity and the variety of how each of the 650 MPs run their offices and the differing duties each will expect of their team members.

IPSA, are in a way, Parliament's only HR resource but the limited "tick box contracts", do not provide the means of putting in how an employee's performance will be measured, a guide to expected standards, process to monitor or a reward system for good performance. Thus I have had to use the IPSA Contracts with their tick box list, and then provide a fuller job description of what the role will involve and what measures of success I am expecting. If you were applying for a job in business you would have the job description in the advertisement, and then you would have a full contract explaining the purpose of the role and the requirements and expectations within it. MPs as employers, should follow normal business requirements and practices.

I would suggest that IPSA look at other regional assemblies, for example, the Greater London Authority. Their staffing pay grades, contract system, and what HR support and training they offer their employees.

In MPs offices, there are usually three to five members of staff per office, but the turnover of staff is quite high as pay is often not comparable to other institutions such as the and good members of staff move on as getting a pay rise or bonus for long service or outstanding work is not usually possible. I think IPSA's suggestion of removing a ban on bonuses is sensible as long as it continues to be completely transparent.

Perhaps MPs could be given a budget as a whole – and it is up to them how to manage it? It could help with staffing, computer and office needs if individual MPs can decide how to allocate this money within an agreed total. Some may spend more on experienced staff, others may decide fewer staff are needed but spend more on office set up and kit, giving the choice to the MP how to manage their own preferred office and staffing.

I think it should be possible to vire amounts between budgets eg: staffing and office costs, or a percentage of these costs? Say up to 20% could be vired? Could this be reviewed? All within an agreed total expenditure.

The lack of a real HR team for both MPs and particularly staff is an issue, there is no specialist resource if either the MP or a member of their staff has a problem internally. I think that MPs staff should also be eligible for some free, parliament wide training courses, and role enrichment training. If people could see there was career progression I am sure it would focus the mind, and encourage greater commitment.

Maternity, paternity and long term sick leave should ideally be paid centrally as it is a huge drain on the MPs staffing budget especially as these are very tightly controlled. MPs have no possibility of paying maternity pay, for example, *AND* a replacement member of staff. This would not be the case in a commercial environment, where there would be flexibility.

It is also very difficult to get a "job share" arrangement set up, which is becoming increasingly common, but the limit on the number of passes makes this difficult, and it does not easily fit the "tick boxes" provided by IPSA for employing staff.

Parliamentary or Political Activities

The Conservative MP's pooled research service, the PRU, is one of the most vital services we have. It is paid through our allocated staffing budget and provides additional researchers, without anywhere near the cost of employing several other members of staff. If this service was not available, I would need to employ extra members of staff to reply to all the automated, circular campaign emails, and correspondence each MP receives, and general enquiries from constituents on technical subjects that require researched political responses. The current budgets or number of staff passes permitted do not allow further sophisticated researchers to be employed.

It would be a waste of resources and indeed taxpayer money for 650 MPs to employ teams of researchers when this can be a pooled resource. It is both cost saving and highly efficient. When I worked we had a pool of Conservative researchers who would assist with correspondence, they could all deal with general correspondence and would also take on specialisms – eg taxation, transport, environmental matters, education, NHS and so forth. The complexity of legislation and the legislative process means that constituents have plenty to ask about and would be extremely disappointed if they felt their elected representatives were not able to reply in a timely and appropriate manner. Frankly if they don't get a detailed answer, they write again, so you must have a properly researched letter first time around!

IPSA do not provide sufficient money in the staffing budget to employ senior researchers, so if there were no PRU, it would mean constituents not getting a proper researched reply to their questions. If someone asks me a technical and detailed question on party policy, we get a well-researched and informative response on the Government's position, which can be promptly sent to the constituent.

The briefings provided by this service for debates and bills are superb and allow me as a MP, more time to dedicate to constituents and meetings.

Whereas in other Government departments and assemblies you would have access to several specialist researchers, MPs have only a few members of staff and this shared resource is essential, as I imagine most MPs of all parties would agree.

Communication

In order for an MP to keep all constituents up to date on their activities in Parliament and how to contact them for surgeries and so forth, MPs must use their own websites, and databases.

IPSA do NOT pay for newsletters, but not everyone has access to the internet or email. I believe there should be a small, nominal budget for a once a year 'annual review' which each MP could send out to all residents. Many residents have no idea of the work of the MP and how to contact them and seek support, no wonder we get such a bad press. We are constantly urged to engage more people in the electoral process, but we do not have the wherewithal to do this. The number of residents in a constituency is a known figure, so IPSA could make an allowance per year for an Annual Report for each MP.

There is also a cost of using "mail chimp" or emailing out to databases, and again I think that a nominal sum should be eligible to assist two way communication with constituents.

Security

I am grateful for the way IPSA now deals with security for both MPs and their staff. It is efficient and very re-assuring that IPSA takes seriously the threat and has re-evaluated what measures are available and will now be provided.

Equipment

The range of computer equipment available to MPs is rather limited and more expensive than we can buy "on the high street". For example the choice of laptops is not broad and those on the list are more expensive than the average price on the open market. I understand security is important but there must be an alternative

way of accessing equipment that allows for faster delivery, especially to new MPs post-election and that is more cost efficient to the tax payer. Flexibility on this issue would be most welcome.

I appreciate that the IT department want to ensure that people are not bringing in viruses etc, so all kit would need to be checked before it was connected to the system, but the lack of competition – ie only one supplier means that we are not buying printers and IT kit as keenly as we should, as there is no incentive NOT to buy the maximum. Again if budgets could be vired then I have no doubt it would reduce the office kit costs. Could this be re-examined?

Refreshment Budget for constituent's visits

If you go to a meeting at a business or government department you would usually be offered a tea, coffee, water or so forth. Whilst it is right that IPSA wish to keep the cost of MPs to a minimum and I agree with this sentiment, if you have a group of constituents visiting or perhaps are entertaining members of a charity or voluntary group and wish to give them all a drink (tea, coffee, water), there is no easy and inexpensive way of doing this. I recently invited a group of carers into parliament, and wanted to give them tea or coffee, but there was no simple way of doing this. Could IPSA look at some way of enabling MPs to be reimbursed, perhaps up to £2.00 per head for entertaining such visits and groups? It is very important to enable constituents to visit parliament at nominal cost to the constituent, so they have a little more idea about the work of an MP, and this continues to break down the barriers.

Maybe one of the meeting rooms could just have a coffee machine and some chairs, so that MPs could book it for say 30 minutes and then they can take their residents on a tour or whatever? Could some limited or constrained basic refreshment budget or allocation be considered or trialled?

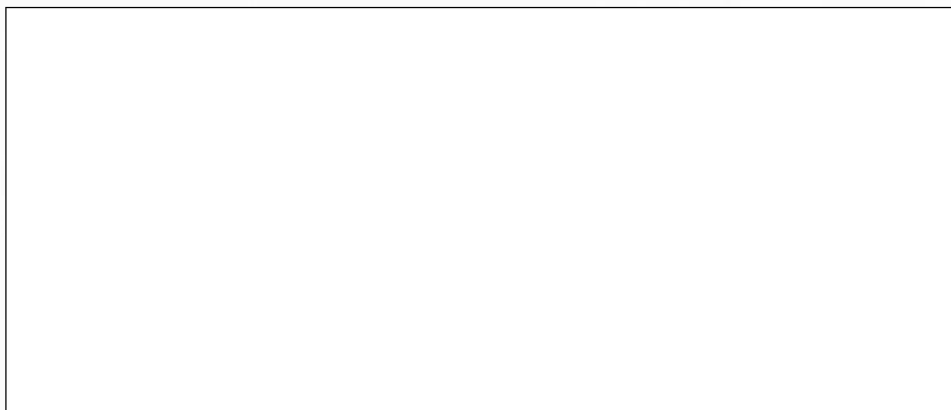
Could IPSA have a look at how they could help visiting constituents who often come in groups – even if they have paid for their own coach ride, it would be nice to offer them some basic hospitality. Many MPs cannot afford to keep buying groups expensive professionally produced catering.

IPSA Website and Submissions

The website for submitting claims and evidence has improved immensely over the last few years but my staff who use the system most frequently, still report that it can often crash and is not the most user friendly. It would be very useful if the RSA token was available on more than one user's profile or computer.

Thank you for giving us this opportunity of commenting on IPSA and what could be done to assist in the smoother running of the relationship between MPs and IPSA. I know others have contributed comments and you have also heard oral evidence from Party meetings, so I look forward to reviewing the outcome of this consultation in due course.

Thank you.



I would appreciate if you were to withhold my name when this consultation is made public.

Anonymous 23

MP Staff

Email

Received 24/10/2016

I am responding to this consultation in my role as Office Manager [Redacted]. I have experience working within the IPSA rules and this is reflected in my responses below.

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

Yes, agree largely with new principles and with emphasis on value for money. However, having worked for [Redacted] my view is that they and their staff are acutely aware of the need to minimise public expenditure. Compared to my experience working elsewhere in the public sector and in the private sector, the standard of office accommodation, furnishings and services (eg cleaning) in MPs' offices is greatly inferior, as a result of the drive to keep costs low.

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes, it is wrong in principle that staff should have to fund their own costs for accompanying MPs to events if MPs can be reimbursed for attending the same event.

I support the rejection of the lump sum for travel costs – this needs to reflect the nature of the constituency. The current rules for claiming travel costs are in my view adequate to ensure that claims is legitimate.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

I find this rule extremely confusing and would appreciate greater clarity.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which overdefine concepts, such as commuting, which are commonly understood?

Agree. This would be welcome.

Question 6. Do you agree that we should simplify the rules on home offices?

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

Agree that MPs should remain responsible for recruiting their own staff. They do need to be able to access HR advice as well as information about staff pensions etc so it is important that IPSA has some involvement in this area.

In our view it was extremely disappointing that the most recent change in staff pensions was initially poorly communicated to staff and created an impression in our office that staff pensions were regarded as less important than MPs' pensions.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

Agree that there should be better rules about what constitutes continuing employment, but it is important to recognise that the circumstances of losing a seat unexpectedly are very different from an MP stepping down.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

Agree that MPs should be able to pay bonuses to staff, within certain constraints. It would be possible for IPSA to impose a limit of a certain percentage of annual salary for example. I am aware of instances where staff have worked far beyond what would normally be expected – in the case of ill health of colleagues for example, and believe that MPs should be able to reward such efforts.

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

This seems to me to be the most difficult of areas as different people have differing views of what constitutes parliamentary work and it is an area where press scrutiny has been fierce. It is the case that MPs, by virtue of their positions, incur significant expenditure that is not reclaimable – as an example, when attending a charity event in the constituency, there is an expectation that they will contribute generously. To some extent staff are drawn into this as well - in our office, staff provide tea and coffee that is offered to visitors for example.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

It makes sense to pool some funding to provide services that are common to all MPs in a political party and means that staff in individual offices can benefit from the provision of briefings from others.

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

The current system, although not perfect, seems to work reasonably well. MPs do much of their work in London so need accommodation there. They remain MPs during the summer recess and it may be that they need to be in London for some of that time also (for example emergency recall), so retaining accommodation all year round is not unreasonable.

The cost of staff time in booking hotels would need to be added to the costs of such an option, were this to be considered as an alternative. In my view staff would not welcome having to make such arrangements!

The current arrangements mean that MPs do not have live out of a suitcase when working in London.

I would not support the suggestion of limiting costs to Zone 3 rentals. As a taxpayer I would like my MP to spend less time travelling rather than more, and more time attending to the needs of the constituency and the nation. Many already spend a great deal of time travelling, so allowing them to live within reasonable distance of their place of work seems worth paying for in my view.

Anonymous 24

MP

Email

Received 24/10/2016

24 October 2016

Scheme Consultation

Independent Parliamentary Standards Authority (IPSA)

4th Floor

30 Millbank

London SW1P 4DU

Dear Sir/Madam

SCHEME CONSULTATION

I wish to respond to Q10 regarding connected parties.

IPSA suggests that there is public concern about employment of connected parties. I would argue that most impressions about MPs and abuse of office/expenses is a lasting impression dating back to 2009, rather than any widespread experience of abuse post-2010.

Furthermore, IPSAs has not explained what the public concern is based on that leads them to the conclusion that this matter should be re-opened.

Here are the reasons why the connected party rule works.

- a) It recognises that MPs do an unusual job – spending four days of their working week in Westminster for 40 weeks of the year, travelling on a weekly basis from Carlisle, Coventry or Cumbernauld.
- b) MPs also fulfil a lot of Friday and weekend commitments in their constituencies.
- c) MPs face considerable public pressure and having their partner or close relative working with them is, for some, fundamental to the support mechanism and assists in the balancing work and family life.
- d) IPSA's own research suggests that an MP's connected employee only earns more because of the longevity and, therefore, seniority of their role in their office. Many would earn similar or greater salaries if they had not committed to this role. IPSA received examples of this during their first consultation. There is little reason to believe that the motivation of public service has been replaced by a desire for financial reward in the time since IPSA's founding.
- e) MPs fulfil parliamentary commitments that take them far and wide. One recent parliamentary commitment at the end of a working week involved a 3 hour evening journey, then the same to return. My spouse will often drive/attend with me, whatever time of the week; something I could not ask a Westminster-based researcher to do.
- f) The same applies to the wide-range of weekend visits and functions an MP performs all year round. I have no doubt this enables an MP to be more effective, and provide a better service to their constituents, at no extra cost to the taxpayer.
- g) I would argue that we want even more MPs to be drawn from a wide variety of backgrounds. Being able to rely on the support of your family, for example, having your

husband/wife/partner working alongside was a factor for me, and others, and has helped to diversify the House of Commons. In an era where London-based former advisers and party officials have a head start in gaining parliamentary seats, the participation of potential MPs from ordinary backgrounds should not be under-estimated.

- h) There is one further factor which IPSA cannot regulate without becoming big brother, and that is relationships. Over many years, MPs have formed relationships with those who work closely with them. Some go on to marry/cohabit with someone in their office. MPs would be forced to hide these relationships for fear of falling foul of IPSA's new rule, which would add an unhealthy and unseemly line of investigation into IPSA's work. If the rules remain as they are, MPs would simply register the new relationship as a connected party.
- i) If IPSA were to introduce a new rule, but leave existing connected parties in post, they will stigmatise those staff and the MP and leave them open to continual criticism and cynicism for doing something that has been accepted since IPSA's founding and long before. This would be unfair.

In conclusion, whilst there will always be members of the public who assume the worst about MPs, or who see corruption or preferment around every corner, there is no evidence that the employment of a connected party is in anyway unsavoury. Being an MP is like being a start-up small business. Many successful small businesses succeed because of the support and involvement of couples/family members. In Parliament, there is no suggestion that the employment of a relative undermines MPs' work, the relationships with other staff members, adds to the cost for the public purse, or brings Parliament into disrepute. I therefore, believe strongly that the present rules should remain in place, for the public good.

Yours sincerely

From: [redacted]
Sent: 24 October 2016 15:46
To: info@parliamentarystandards.org.uk
Subject: Chapter 2. The Fundamental Principles of the Scheme

IPSA
25 OCT 2016

Dear IPSA,

I enclose my responses to your MPs consultation.

I do not want my name published under any circumstances or in any form to reveal my identity.

Please can I have acknowledgement that my identity will be protected and withheld as promised for filling in this consultation.

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

I agree that MPs need a watchdog that process claims correctly and that is all. I do not agree that this watchdog, IPSA encroaches into every aspect of the MPs role such as travel restriction, Staff HR, MPs security. And payment of wages. The Compliance officer must be an external body linked to the Speakers office or Standards as I do not agree that such an officer should be based in an office the same as IPSA and be part of the same organisation. This officer exercises powers of a semi judicial role that can cause MPs to be arrested. To have this officer as part of IPSA is in effect being judge and jury when IPSA feel fit. This position as it currently stands is far from impartial.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

No. £2000 flat rate for travel in their Constituencies is inadequate. Some MPs have vast rural Constituencies and some are based in cities and do not drive. IPSA will be giving these MPs an extra £2000 a year. This is an example where IPSA have not thought through the job of an MP by trying to apply a one size fits all approach. The best approach would be a fuel card dedicated and accountable to mileage. This is how other expenses are administered in large organisations.

I agree with reforms to staff being allowed to travel with the MPs as outlined in 27 to 29.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

Yes.

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

Yes.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

Yes. Why not allow MPs to have a yearly travel train ticket so they can move around at a fixed price to the taxpayer and when world events occur. It is inconceivable that MPs have to travel off peak as stated when world events are continuous. It is really like asking world events occur in off peak times which defies reality.

Question 6. Do you agree that we should simplify the rules on home offices?

Yes, even though I do not claim for one.

Chapter 4. Regulating MPs’ expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs’ staffing expenditure and the need for any consequential HR advice?

I think that IPSA should not have any other input in the responsibilities of any Member of Parliaments staff other than their payment and ancillary insurances.

My experience of IPSA in an HR role is purely of irrelevance and inconsequential interference. Often their advice has no authority and is contradictory to the HR division that already exists in the Palace of Westminster. In all cases the onus and responsibility in regard to staff issues is on the Employer who is the MP and no responsibility is ever admitted by or apportioned to IPSA when they give pontificating advice so why do they need to be involved?

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

I think that the standard employment laws of the UK are adequate. This is another example where IPSA try to overcomplicate and interfere with existing legal employment practices without any legal basis leaving the MP vulnerable to tribunal. IPSA never admit any liability for their advice so why do they need involvement.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

No.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

leave it as it is to stop further angst amongst MPs and the taxpayers as over complicating a policy that has been in place for 7 years.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

All MPs have different Constituencies of differing demographics and geographical sizes with differing needs. IPSA is of the view that one size fits all which is not appropriate to the individual MPs and their constituents. The funding of political activity on the taxpayer which is not really an issue from 2010 onwards really should not be arbitrated by IPSA but the Commissioner for Standards. IPSA in any case have no one qualified to make these decisions. The established rules of Parliamentary Standards of the past 7 years work well enough.

Apart from processing claims efficiently and on time within the normal 5 days, IPSA should not be engaging in policing the MPs activities unless they fall outside of the scheme or releasing any information unless requested.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

This is a very bad idea.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

Until a workable system of a fixed amount given to MPs to either buy or realistically rent a property in central London is enacted there always will be problems. It is interesting that IPSA equates value for money with inadequate budgets. The budget for accommodation and bills are less than that for social housing rent in London legislated for currently at around £21000. MPs cannot access social housing yet IPSA expect MPs to live in the dearest part of London and service a flat with all bills for £20,000. How can this be achieved? IPSA are failing MPs and more importantly their constituents.

A Member of Parliament should be entitled to privacy and security as any other citizen of the U.K. It can be argued that they should have more security and privacy given the sensitive nature of what their occupation entails. IPSA should not be taking it upon themselves or be involved in where MPs should live in London when they are carrying out their Parliamentary duties. The rent in London MPs are allocated should be linked to that of the average in Westminster where they work and not on the cheapest 20 miles away. This puts the MP at risk when travelling to and from Westminster.

In any case IPSA should not be in charge of any rental agreements other than confirming that the landlord is not a connected party of the London accommodation as outlined in the scheme and release no information that could detect the address of the MP other than the rent the MP claims. This sensitive information should only be covered by the security situated within the Parliamentary Authorities only.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

I cannot comment as I do not own a London address and my circumstances are different. But there should be a bigger budget for rent and bills for MPs who don't own a London home to live near where they work for security as MPs work late into the night.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

Yes. Some MPs are claiming more for rent in rented accommodation than the properties they own in London which they now have to rent out due to a very ill conceived knee jerk reaction to the expenses scandal. The rules were applied retrospectively to those who already owned properties under the previous scheme and they should have been accepted as such. I have no vested interest in stating this as I came in post expenses scandal but this vexatious move only serves costs the taxpayers more.

Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

IPSA should not interfere or be involved with Party Political funding or adjudicate on it. That's what we have the Electoral Commission for.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Only if it is to do with their duties to Constituents and within their employment remit.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

The ruling that MPs can only change computers after every election or 5 years makes a laughing stock of their professional standards. Every other Government department change on average every 3 years. Even in local Government it is the norm. So the legislators are penalised from new equipment when the equipment becomes defunct and obsolete. It also poses a question of cyber security.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

It is my experience at IPSA that no one understands the legalities of election expenditure or any of the acts involved, only self arbitrate their unqualified opinion that saves IPSA any potential embarrassment. They always unnecessarily escalate a threat to involve scrutiny by the Parliamentary Standards Commissioner on the MP.

IPSA should not have an opinion or unqualified arbitrary stance. If a matter looks to fall outside of the scheme, advice should be sort by the electoral commission and handled sensitively not to embrace the MP or publish any information until a misdemeanour has been correctly investigated and adjudicated upon and then if necessary involve the Parliamentary Standards Commissioner.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

• Yes.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

Yes.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

When an MP becomes first elected there should be no start up budget to set up two offices in two different locations in different regions of the country only the budget that is already available and it should be realistic and reflective of the market of the Constituency. The start up budget is often treated as a loan which is a ludicrous situation for a newly elected MP to be in.

If for whatever reason the budget is expected to be exceeded IPSA should help the MP before this happens to adjust the budget reasonably to reflect setting up a new operation. Bear in mind MPs service 71000 + constituents and the allocated Office costs budget is currently insufficient to reflect this responsibility.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

IPSA should not act as third rate debt collectors and penalise an MP if they feel it is appropriate without thorough investigation. IPSA should also be accountable for their mistakes and not force the MP to reimburse IPSA due to their negligence. This is more common than publicised. The scheme liabilities should also be limited to Parliaments and not indefinitely. If an investigation is signed off by an IPSA official the matter should be closed. Not reopened as I have had experienced years after the signed off event by IPSA due to IPSAs own negligence that the scheme allows them to never accept. The fact that IPSA pays

MPs means that they can recover their mistakes at source which is wrong. MPs should have an external "union style panel" to deal with IPSA and not the current one set up by the Speaker as it is ineffective.

Any matter of such sensitive nature should not be publicised and kept confidential. IPSA have recovered or agreed any outstanding overpayment in error that should be final not threaten the MP with publication of any losses perceived, and made public for the MP to clear later with IPSA which often happens.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

Follow the current legislation and do not tinker outside of it as IPSA will take no responsibility for the MP following their amended guidelines that carry no legal weight. Why do IPSA have to publish anything if it is within budgets set and lawful?

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

In reality there are very few landlords that will comply with this proposal. Elections could be called early and if not there are fixed term Parliaments. IPSA will not take responsibility with any tenancy problems, it is the sole responsibility of the MP as stated in the scheme. This is an unworkable proposal.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

I always find it amusing that London based colleges who don't claim accommodation can claim London living payment but those of us who represent constituencies outside of London and who live in London 4-5 days a week depending on responsibilities cannot be applicable. Why?

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

Yes, actually have a contingency fund and not a mythical fund that is totally nondescript with unrealistic and ambivalent criteria to access it. Set out clear guidelines other than "contact us if you think you may exceed your budget" as sometimes IPSA allocate funds wrongly to different budgets causing overspending. This is when funds are needed, not claim it back from the MP due to IPSA negligence.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

IPSA must stop trying to cut and freeze budgets in real terms. In the 6 years I have been an MP the markets have caused prices to increase at a higher rate than the budgets. We are certainly underfunded for accommodation and office costs.

Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

The whole ethos for creating IPSA was to scrutinise and take responsibility for processing correct claims. IPSA established budgets allow claims to be paid within that budget so why do they have to publish the receipts and often personal details such as what hotels we stay in and when. All is needed is to report the cost to the taxpayer within that budget.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

Once a year.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

No. Please see previous reasoning.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

Yes. Northern Ireland MPs should be given more consideration to the logistics of travel and their security. IPSA do not do this. It must be realistically addressed.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

IPSA should first agree the amount to be recovered and when it will be paid. If any publication is shown it must be in realtime and not the full amount owed from the date of overspend as the amount is often nearly paid off but this is not reflected in publication. It must be noted that no MP wants to be in the media and does not want to pay back an overspend. So why do or should they overspend? Often they get in trouble because the IPSA scheme is so complicated and rules are ever changing and in flux. IPSA should also explain if they are at fault.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Yes, all that is needed is that the items all were accountable within budget and the cost. Printing hotel bills and redacting the name and details of the hotel is a security threat

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

The league table of spending is a morally wrong situation. All MPs are different and they have different challenges and constituency demographics. To compare is irresponsible and shameful on IPSA's behalf.

Question 37. Is there any further information that we should be publishing about IPSA?

Yes. What are the increases in budgets and empire building have IPSA engaged in since 2010. IPSA have moved offices on numerous occasions costing millions but only increased each MP's office cost budget to look after their constituents by £1200 each over a 6 year period. That's £200 per year and the printer ink goes up more than that per year. It must be explained by IPSA why MPs have high office costs. For example, we have to use very expensive printers that are supplied and procured through parliament that have to come out of our budgets without any choice. We then get criticised for buying over expensive kit.

How many staff work at IPSA? What is the staff turnover? Apart from the odd report in the paper of IPSA costing too much to operate, no detail or accountability is ever forthcoming from IPSA without the newspapers doing an FOI

Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

I honestly think that this is just a PR exercise for IPSA and nothing more. This will be published to show that MPs have engaged with this process and in so, change the scheme to a more draconian and complicated one that is currently in place.

The fact that this consultation had to be cut and paste and put into hard copy to compile and is not an online survey which is the norm in 2016, indicates that IPSA do not want many MPs to engage with this survey.

IPSA should take and accept responsibility for their actions within the remit they were originally conceived; which is to scrutinise claims and stop infringing without authority on the mechanisms that Parliament already have in place to deal with MPs' security and HR.

The Speaker's committees that supposedly oversee IPSA have allowed this to happen in the spirit of fear more than fairness and in doing so have let the MPs down

IPSA in reality is an expensive expenses claims processor that is being allowed to become a police and employer of MPs. When I first became an MP I always thought that this was the sole domain of our Constituents and I still do. It is them we are accountable to not an invisible inefficient "employer" called IPSA.

Sent from my iPhone

Anonymous 26

MP

Email

Received 24/05/2016

Please find below my responses to the consultation

1) Chapter 2

- a. I really struggle to understand the rationale behind many of the proposals. In my previous work we were never able to claim for expenses and so this is very new to me. I find the whole expenses scheme very time consuming and keeps me from doing my job in parliament and in the constituency. I am not able to delegate expenses managements to staff as the consequences if the expenses are claimed wrong is too great. The staff at IPSA are very helpful but the whole scheme is very difficult to manage.

2) Chapter 3

- a. I feel if staff were paid more they would not have to claim travel at all. The staffing budget is so small it is difficult in the SE to find staff and it is very time consuming putting in their travel claims. If the staffing budget could be expanded then we would not have to do claims at all. I certainly don't want to spend more time on claiming expenses for staff
- b. I don't claim for any travel and so I am unable to comment on travel claims for MPs.
- c. However for overseas travel the restrictions are too tough. I have a ferry link to [REDACTED] where we have regular meetings with local government officials in France but I am unable to claim for these although they are vitally important for the future of the ferry in the town. Considering I claim no travel expenses these rules seem very inflexible and give the ferry fare is less expensive than a train fare to London this seems unreasonable.
- d. I don't work from home so unable to comment on these changes.

3) Chapter 4

- a. I would have liked some advice on how the changes to NI and pensions affects my staff budget. I went to a drop in session but the staff there were unable to advise me. So I am not confident this year in my staffing costs.
- b. I do not think there should be changes to staff payments after an election. Other employees outside parliament are provided with these benefits when they leave employment and as the job of a staffer is so insecure because of elections and because they are paid so poorly it is not unreasonable to offer these payments.
- c. I really think the staffing budget needs to be increased and particularly a SE allowance like London. The SE is as expensive as London and many other employers offer a SE enhancement to compensate.

4) Chapter 5

- a. I strongly disagree with changes to connected party rules. I started with no connected parties being employed but due to constant staffing difficulties which was affecting my ability to work, my partner took a £20k pay drop to work for me. I need to be confident that the person running my office is thorough and has my complete interests at heart and I could not find an office manager to do this and so after nine months from being elected I employed my partner. Previously bills were unpaid, expenses wrongly submitted and I could no longer take the risk and employed a connected party who has as much to lose if expenses are not dealt with correctly.
- b. [INFORMATION REDACTED] I need a member of staff with me at late night meetings and on Saturdays and Sundays. Given employees are paid so poorly and given that these meetings would take them well outside their contracted employment hours, employing a connected party was the only way. I work in excess of 90 hours a week and so does my partner so he does well in excess of the hours he is paid for. He manages my office, bills, tours and diary and accompanies me to all engagements. I completely resent the fact that this is seen as a way of milking the system. He has taken a huge pay cut to help me and this is often ignored [INFORMATION REDACTED] it is very common for husbands and wives to work together and no one questions their ability to do their job just because they are related. In business connected partners frequently work together and employ

members of their family. As long as a fair process has been followed for recruitment then I really don't see the issue. To refuse someone employment based on their family status would go against employment law if they are qualified to do the job.

- c. I have had death threats, tyres slashed on my car and graffiti at my office and I very much feel I need someone to accompany me on engagements. The staffing budget is so small that there are not enough hours to ask non connected parties to accompany you. You get huge value for money from employing a family member as they work well in excess of their hours and currently they cannot benefit from the bonus scheme, which I agree with, but that certainly sets them apart from other staff.

5) Chapter 6

- a. Again I ask you not to change this. We are already not able to claim for newsletters informing our constituents about local issues and keeping them up to date on the work we are doing. Other elected officials from councillors to MEPs have a budget for this. If you make it any more difficult there will be no point communicating with constituents at all. It is very frustrating currently.
- b. I would be against a pooled system as I need staff in my constituency office to help with surgeries, meeting constituents and a pooled system just would not work. They need to know the constituency inside out to respond to queries and help with casework.

6) Chapter 7

- i. I don't claim for accommodation even though I could. Talking to other MP's the system does not provide enough money to rent places in London and is difficult. I would rather commute by train. I often get home after midnight as a result and then have to leave about 6am the next day when the house is sitting. I would welcome any IPSA staff who want to experience this to spend some time with me.
- ii. I do agree if you own a property in London you should not be able to claim rent for another.

7) Chapter 8

- a. With regard to changes during dissolution if staff were paid adequately they would not need to claim travel expenses at all. The same applies to MPS.
- b. The start up budget was very helpful and simple to follow and made the process of finding an office much easier.
- c. Yes to the London living area questions. Many employers pay a SE premium, not just a London one

8) Chapter 9

- a. Yes details should be redacted on receipts due to security issues. Having had a number of death threats and tyres slashed I do not want my personal details available any more than they already are.
- b. I have no problem with the way expenses are published
- c. I don't think you should publish information where payments are repaid by MPs on their cards. The system is very difficult and if the payment was paid by the MP and not claimed then it seems unfair to publish it. Staff also use the payment card to purchase stationary etc and make genuine mistakes. The system is supposed to give transparency to claims and not be a weapon to embarrass people who make genuine mistakes.

9) Chapter 10

- a. IF you change the connected parties rule this could breach employment law as you could be denying someone a job who may be the most qualified and experienced person for that job apart from the fact they are related to you.

Final comment. As a new MP I have found the expenses system very difficult. It should be a transparent way of facilitating constituency and parliamentary business. Instead it is a system which feels like it is constantly trying to trip you up and catch you out. I do not claim many of the expenses allowed such as travel and accommodation because it is so time consuming. The system will be a big factor in whether I stand again because as someone who worked in other sectors before becoming an MP I have never known a system which takes up so much time and is

adversarial in nature. I came in to politics to work hard for my local area and instead feel the system does not work for me, my staff or my constituents.

Anonymous 27

MP

Email

Received 24/10/2016

I travel away from my family, my wife and three young daughters each week that the House of Commons is sitting. I therefore work away and by necessity live away from home, in London, to be able to fulfil the role of representing my constituents, making and scrutinising the law and scrutinising the work of Government.

To therefore even propose that MPs, who are already living away from home, should in future be forced to live in outer London is extraordinary.

These proposals fly in the face of two important things that IPSA said they would do. First of all they completely fail to understand or appreciate the reality of life for constituency MPs who travel away from their homes and families, sometimes hundreds of miles away, to attend Parliament. Secondly they show a worrying pandering to populism of trying to make changes that are not sensible or reasonable but can be used to suggest that IPSA are somehow forcing MPs to be "more like ordinary people" and to cut costs of the necessarily of being an MP.

We as a family live in a 3 bedroom terraced house in **[REDACTED]**, my children attend a local school, my wife works as a teaching assistant in a local school. We are an ordinary family, with the one exception that unlike most people I as an MP have to travel to and work in London for most of the working week, so to somehow suggest MPs are not "ordinary" unless they also then have to live in a London suburb with which they have no connection, simply because commuters in the south east have to travel into London, is absurd. These commuters (and if they have them, their partners and families) live in greater London or the south east.

So let me reiterate the basic fact that IPSA seem to have chosen to ignore: the majority of MPs commute from their homes in their constituencies and spend 3-5 days away from their families.

The Houses of Parliament are based in central London, in Westminster and therefore a basic essential part of MPs travelling from all over the UK is that we work and therefore need to be able to stay in central London.

No equivalence can be made with MPs who do travel home at the end of each sitting or day to areas of outer London or the Home Counties; they are travelling to their home and their families and I am sure are grateful to do so (and they can get to their home, which is why they don't need accommodation in central London). The rest of us clearly do.

I certainly do not ask for luxury nor would I accept it, I only ask for what is needed to do the job which is a one bedroom flat within half an hour walking distance of the Houses of Parliament. I am then able to return home.

If MPs were absurdly only able to rent a flat in zone 3 then there would be a necessity for MPs more often to get taxis when parliament sat late or for reasons of personal security. This would be the case on Mondays especially when usually the houses rises at 10:30/40pm and sometimes later. At a time when IPSA claims to be taking the issues of the personal safety of MPs seriously, to be suggesting we all have to move out to zone 3 flies in the face of that commitment.

This seems an excuse for not proposing what in the end, over time, would save a huge amount of money to the taxpayer, which is for IPSA on behalf of the taxpayer to start purchasing basic one bedroom flats for MPs within half an hour's walk of Westminster. These need not and should not be in one block, they could and should be in many different locations. Although the outlay would be considerable, the savings over time would be huge and parliament and the taxpayer would own property.

In addition, in the end if IPSA were serious about saving money it would suggest abandoning Westminster altogether and moving the UK Parliament to one of the UK's core cities!

So this proposal is clearly not really about saving money but is instead it seems to be about IPSA trying to show it is cutting the cost of politics, by wrongly and unfairly suggesting that MPs are somehow not "ordinary" useless those of us living many miles away from our homes and families have to double commute and move to zone 3!

The suggestion also that somehow costs should only be paid when MPs are in parliament is also nonsensical, as a flat can only be rented for a year. So it would force most MPs to use hotels which would not be cheaper than renting a flat, would deny MPs the opportunity to occasionally have their families in London and would take up additional time for MPs staff having to book (and often amend) bookings in hotels that were affordable, under the limit. It would mean living out of a suitcase all the time in London, when it is known which weeks the House of Commons sits and when most of us would wish to at least have some suits and toiletries in a flat rather than constantly having to travel with such items.

If it came to it I would be forced to reduce my attendance in Parliament and or travel to and from my constituency more than once in a week which shows that if these changes were brought in, they would actually undermine the roles that MPs do - precisely what IPSA said they would not do, when they clearly said they would ensure MPs were supported in their role.

My wife has said this "I am frankly disgusted that IPSA are now suggesting that MPs might be forced to move out to suburbs of London. My husband is away for most of the week leaving me to look after our children as well as work, which is very challenging with no support, but I and we accept that this is an inevitable part of the important job of being an MP. We as a family are lucky if we manage to visit him in London twice a year and when we do, the children

all sleep in the lounge of his flat but are happy to do so. To now be suggesting that he can only have a flat in a London suburb, nowhere near where he actually works is disgraceful and I would worry even more about his security. We are an ordinary family but not many ordinary people spend most of their working week in another place without having appropriate accommodation provided for them within reasonable distance from their family home. My husband IS already commuting, he already works away from his home, and it would be outrageous to insist that he has to commute from two locations just to give some false impression that MPs may not be ordinary"

Anonymous 28

MP

Written

Received 14/11/2016

Scheme Consultation

Feels generally that it 'costs a lot of money to be an MP' - feels he spends a lot of his own money on enabling parliamentary duties that he shouldn't have to such as some travel, and significant amount on meeting basic living requirements away from home that are beyond control due to the nature of parliamentary life, and being captive on the parliamentary estate. Does not expect IPSA to pay for all MPs' living costs and basic requirements, but could perhaps recognise the challenges that MPs face and offset costs on a receipted basis to address the very mobile nature of the job.

Boundary Review

MP's constituency, post proposed changes, will be approximately the same geographic size as [REDACTED]. He feels it will be very challenging to meaningfully serve constituents across such a large and rural area with poor infrastructure and an almost total lack of public transport. It is also the case that electronic communication is impossible in much of the proposed constituency due to lack of technological infrastructure. IPSA must recognise that geography proposed and the highly differentiated communities across the proposed constituency, particularly considering the rural, remote and 'spread out' locations they live in and the diverse demographic. It is the case that multiple constituency offices would be required in addition to staff to manage and maintain them. Costs of travel, equipment and postage would all increase beyond the level that is currently required. No person would seriously suggest that one MP cover the whole of Northern Ireland or Wales but that is what the Boundary Commission is now suggesting for parts of Scotland.

Anonymous 29
MP
Email
Received 17/05/2016

Here are my views.

Question 8 – Assuming a fixed term parliament I think that all staff could be put on notice 3 months' notice prior to the election. There should be rules about carrying over leave entitlement and not building it up beyond 5 days from year to year, this is beneficial to the wellbeing of the staff as well as the financial issues,. Staff should be informed not to have any more than 5 days leave remaining unallocated prior to the 3 months' notice period before a general election. I think it would also help if MPs were called to report Annual leave data quarterly to ipsa to assess if it is building up. (this system would need to remain as it is for sudden elections being called ect and will only work on the basis of fixed term parliaments)

Question 9 – I don't see the need for a bonus payment scheme. I think staff should be able to make claims for hours beyond their contracted hours as overtime but this should be preapproved before they do it by the MP.

Question 10 – I understand the public concerns and this could be open for dishonesty. I employ my husband and would find it very hard to be an MP without us doing it together. I am sure I would cope. It allows for his to work in London when we are there with my children, it allows flexibility for us to arrange our life. I think that pay rises for connected parties should not exceed those of other members of staff, although this would be very complicated to manage as their job might actually change.

11 – I think there should be evidence to prove that you are spending the uplift on your children's accommodation. I have the uplift in order to allow me to have 2 bedroom flat. I could easily prove this was their room and it was solely used for them to stay with me in London.

14 – I already live on the border of Zone 2/3 in order to afford a bigger flat for my kids to live in. I think living much further away from Parliament would be difficult especially as a woman travelling on my own on sittings until 10. Our working days are ridiculously long without the need to add an hour commute either side of it.

The option of providing us with hotel accommodation instead of a flat would be awful for my children coming to stay. It would also be terrible for our health and wellbeing. We wouldn't be able to cook food, I would never feel relaxed when in London which is often a fairly stressful working environment. I don't want to feel like a visitor for half of my life. With small children I have to try and make my life in London as normal and regular for them, as well as for me. I'm happy to Air bnb my flat in the 6 week recess and give the money to the treasury!

I think it safe to say had it not been for the option of London accommodation I would certainly not have become an MP as a younger woman with young children.

Committee on Standards

Response to IPSA's Consultation on the MPs' Scheme of Business Costs and Expenses

The Committee on Standards has been nominated by the Speaker, in accordance with section 5(4)(d) of the Parliamentary Standards Act 2009, as a statutory consultee for the IPSA annual review of the MPs' Scheme of Business Costs and Expenses.

We have not dealt with each question in the consultation but have addressed matters where we consider IPSA's proposals may have implications for standards in the House, although we have also raised the matter of security in light of heightened concerns about Members' safety.

We hope our comments assist your work. In the interest of transparency, the Committee will be making this response public.

1. Fundamental Principles of the Scheme

Simplification

We welcome the proposed simplification of IPSA's Fundamental Principles to the MPs' Scheme of Business Costs and Expenses. In the context of the Parliamentary Commissioner of Standards' review into the MPs' Code of Conduct and Guide to the Rules, the Committee has heard evidence that codes of conducts are best implemented when they are simple and user-friendly.¹ The Fundamental Principles must be easily understandable by Members as well as by Members' staff to ensure increased understanding of, and compliance with, the Scheme.

While we believe that the revised Fundamental Principles will succeed in addressing IPSA's concerns, we support IPSA's commitment to evaluate whether the revised principles, if adopted, do improve understanding among Members and their staff.²

Relationship with the MPs' Code of Conduct

The Committee is broadly supportive of the content and focus of IPSA's revised Fundamental Principles. However, while the Committee agrees with comments made by John Sills, made to the Committee in July, that IPSA and the House's standards system should "complement each other", we do not consider that IPSA should refer to matters outside of its remit of administering the MPs' Scheme of Business Costs and Expenses.³ Draft Fundamental Principle 5 states that:

¹ [Oral evidence taken before the Committee on 19 April 2016](#)

² Q3

³ Q5

5. In financial matters, as well as in other aspects of their work, MPs should adhere to the seven principles of public life.

We consider that the phrase underlined should be removed.

Additionally, we would support amending draft Principle 5 to make reference to the MPs' Code of Conduct rather than the Seven Principles of Public Life. The Committee does not intend to anticipate the results of the Commissioner's review but she has indicated that she is considering re-defining the Seven Principles to make them more applicable to the work of MPs. The Committee heard evidence in April from Philippa Foster Back (Institute of Business Ethics) who advised that understanding of the Seven Principles of Public Life is best ensured among target groups when they are adapted to specific business circumstances.⁴ We believe that better alignment of IPSA's Fundamental Principles with the MPs' Code of Conduct would increase ease of use and understanding as well as public perception.

Status of MPs

Draft Fundamental Principle 3 maintains the concept that in matters relating to the Scheme, Members, where possible, should be treated in the same manner as other citizens. As IPSA acknowledged in July, we note that determining the practicalities of this Principle is a complex issue.⁵ There is a balance to be found between treating MPs in a manner comparable to similar professionals and recognising the uniqueness of an MP's role.

The Committee on Standards has previously expressed concerns that this balance has not always been struck.⁶ Nevertheless, successful and consistent administration of this principle is essential to building trust in IPSA among both Members and the public. The Committee welcomes Marcial Boo's commitment to discussing with IPSA's board how IPSA can better recognise the role of MPs and the demands placed on them.⁷

The Committee believes it would be helpful for IPSA to make clearer comparisons with the expenses policies of similar professionals or small businesses when proposing changes to the Scheme. By subsequently explaining when and why a different approach is required, we consider that IPSA would improve understanding of the Scheme and its Fundamental Principles. The Committee would particularly support efforts to clarify the necessity of MPs having two places of work.

2. Working from two fixed locations: MPs' accommodation costs

Any viable alternatives to the current arrangements for funding MPs' accommodation must offer value for money and allow Members to adequately conduct their work. IPSA's consultation paper identifies a range of alternative options: allowing MPs to rent serviced accommodation that requires them to move out during the summer recess; reducing MPs' accommodation budget to reflect the number of

⁴ Q46, [Oral evidence taken before the Committee on 19 April 2016](#)

⁵ Q9

⁶ Q9; [Second Report of Session 2013-14 \(HC 751\)](#)

⁷ Q10

days or weeks that Parliament sits; reducing the budget in line with typical zone 3 rental costs; and funding hotel accommodation only.

Members conduct parliamentary work throughout the year in Westminster and the Committee believe that making accommodation provisions based on sitting times would misleadingly suggest that MPs do not conduct parliamentary business during recesses and does not reflect the reality of the amount of time MPs must spend in Westminster. Notwithstanding this fact, we would be surprised that options such as funding hotel accommodation would offer value for money given that the House sat for 158 days in Session 2015-16. Similarly, we are unconvinced of the feasibility of finding serviced accommodation which requires Members to move out during the summer recess and which offers value for money. We would welcome further clarification on why IPSA has identified typical zone 3 rental costs as a level to which the accommodation budget could be reduced.

Turning to the consultation's discussion of whether Members should be able to claim associated costs on properties they own, the Committee supports maintaining the current provisions. HMRC advises self-employed people, who work at home, that they are able to claim expenses for a proportion of their costs for utilities, Council Tax, mortgage interest and internet and telephone use. There is no limit to the amount that can be claimed as long as they are genuine costs which can be divided between personal and business purpose e.g. by the number of rooms used for business purposes or the hours spent working from home.⁸ HMRC also operates a simplified expenses policy where, if you live at your business premises, you can claim a flat rate per month instead of working out the split between personal and business use. The flat rate is £350 per month, based on one person, £500 for two people and £650 for more than three people. Over a year, based on one person only, the total is £4,200 which is broadly equivalent to the average claimed by MPs.

3. The Scheme during and following dissolution

Resettlement payments

The Committee supports changes to the timing of loss-of-office payments made to Members. We acknowledge that paying the loss-of-office payment after a Member has wound up their office provides an incentive for swift action. However, we share concerns with IPSA that "in a few cases there were some MPs [after the 2015 General Election] who stopped receiving their salary, still needed to do some work and still had outgoings that they needed to pay for, and it was a bit difficult for them"⁹ and that "some MPs actually experience financial hardship."¹⁰ We would support proposals to pay part of the loss-of-office payment immediately upon loss of seat with the remainder payable once the Member has wound up their parliamentary affairs.

⁸ <https://www.gov.uk/expenses-if-youre-self-employed/overview>

⁹ Q20

¹⁰ Q20

The process for winding-up affairs could be further accelerated by IPSA automatically deducting any remaining costs from the loss-of-office payments. This would reduce IPSA's recovery costs which Marcial Boo acknowledged were "time-consuming."¹¹

Staff redundancy payments

The consultation raises the issue of redundancy payments to Members' staff following general elections, and asks how IPSA should address concerns about value for money. The Committee notes that some MPs' staff, who were made redundant following the non-return of their MP and thus received double statutory redundancy payments, were re-employed by a different MP within 10 weeks of the election. However, each MP is an individual employer and therefore, Members' staff are legally entitled to redundancy pay. IPSA would have to change this central tenet of Members' staff employment practices if it were to remove redundancy payments to MPs' staff.

4. The boundary between parliamentary and party political activity

Pooled research services

IPSA's consultation paper raises questions over whether pooled research services, which are exclusively subscribed to by MPs of a single political party, solely act in support of MPs' parliamentary duties and whether they should continue to be funded by IPSA who are legally only allowed to fund parliamentary activity.

The Committee supports maintaining the current funding arrangements. IPSA conducted an internal review in 2014 which found that "in broad measure, everything is done very appropriately and those pooled services do not stray into political territory."¹² We are confident of IPSA's findings and believe that funding pooled research services this way offers significant value for money. The total cost to IPSA of such services in Session 2014-15 was £1,187,927, which breaks down to £3,453.28 per MP who uses the service, considerably less than the cost of an individual researcher.¹³

Definitions of parliamentary and party political activity

As the consultation document explores, there is a tension between parliamentary and party political activity - it asks whether IPSA should tighten its rules on what they consider to be parliamentary for funding purposes. The Committee considers that changes to the rules would be unnecessary in light of IPSA's conclusions that "the assurance work that we [IPSA] conducted about expenditure during the general election found that there were no abuses of public money."¹⁴

¹¹ Q20

¹² Q35

¹³ [IPSA Consultation on the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy](#), Annex A, Tables 3 and 4, pp. 54-56

¹⁴ Q34

5. Security

Although the consultation does not touch on the issue of security specifically, in light of recent security concerns, the Committee would like to comment on the Scheme's security provisions in response to consultation question 29.

We welcome IPSA's efforts to improve the Scheme's security provisions. In particular, we support IPSA's efforts to streamline the application process and the appointment of a full time member of staff to deal with security requests. We note that IPSA are also prepared to retrospectively approve security funding requests if there is an urgent need to put security measures in place.¹⁵

Anecdotally, there is some discontent among Members about the time it takes to process security requests despite reassurances from IPSA that they turn around applications in an average of 3.5 days.¹⁶ Nevertheless, IPSA's flexibility in responding to demands over the past few months is encouraging and we support the continued monitoring and revision of its procedures as necessary.

It is of utmost importance that Members are made fully aware of IPSA's security provisions and know who to contact if they have questions or an urgent need to install security measures

¹⁵ Q27 and Q28

¹⁶ Q27 and Q28

Committee on Standards in Public Life
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Received 21/10/2016

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21 October 2016

REVIEW OF THE MPs' SCHEME OF BUSINESS COSTS AND EXPENSES AND IPSA's PUBLICATION POLICY

SUBMISSION OF EVIDENCE BY THE COMMITTEE ON STANDARDS IN PUBLIC LIFE

Introduction

1. This paper sets out the evidence from the Committee on Standards in Public Life to the current IPSA review into the review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy.¹ The paper sets out the views of our independent members only; we have advised the political members of our Committee to abstain due to perceived or real conflict of interest.²

¹ The background to the Committee is set out at annex A.

² Currently Dame Margaret Beckett DBE MP and Dame Angela Watkinson DBE MP

2. The Committee welcomes IPSA's first comprehensive review of the Scheme since 2011 and is pleased to note that the Scheme has, for the most part worked well since its introduction in 2010. It is vitally important that the Scheme can respond to concerns from either the public or MPs. The aim of our 2009 recommendations was to strike a fair balance between giving MPs adequate resources to do their jobs and providing value for money for the taxpayer, within a framework which is transparent, accountable and free from suspicion of abuse for personal advantage, and that remains our view.³ We wanted to ensure MPs were properly supported to carry out their role on behalf of the public whilst also protecting the taxpayer's interest. We welcome IPSA's implementation of a scheme which has aimed to do that in the face of difficult challenges, and IPSA's robust application of the rules and commitment to transparency to help improve democratic accountability.

3. Our submission focuses on four areas which are most pertinent to this Committee, these are: the fundamental principles of the scheme; employment of connected parties and financial support to MPs' families; the boundary between parliamentary and party political activity; and finally questions about IPSA's publication policy. We address each of these in turn below. We have not commented on the review's other detailed questions but support IPSA's general approach of retaining a clear framework of rules supported by fundamental principles and removing existing, unnecessary detail.

Question 1: Do you agree with our new fundamental principles? Do you find them easy to understand? And do agree with our emphasis on value for money?

³ CPSL report MPs' expenses and allowances, November 2009, Cm 7724 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/336903/MP_expenses_main_report.pdf The then three political members of the Committee - Sir Oliver Heald, Baroness Maddock and Rt Hon Alun Michael decided not to take part in the 2009 inquiry because of concerns about a real or perceived conflict of interest.

4. As you note, IPSA's current principles were those proposed by the Committee in our 2009 report, *MPs' Expenses and Allowances*.⁴ They were what the Committee believed were required by the Nolan Principles in the context of the scheme of MPs' expenses at that time. Like IPSA, we continue to believe that fundamental principles are important to the Scheme, underpinning the rules and guiding MPs when making claims. We understand that seven years on, there may be a case for revisiting those principles. Whilst we broadly support the draft fundamental principles, particularly principle 5 referencing the Principles of Public Life, the Committee was surprised to see the proposed omission of the current principle 4.

5. The current Principle 4 reads: '(a) The system should be open and transparent. (b) The system should be subject to independent audit and assurance'. This strikes the Committee as being simple and clear and that it would be a retrograde step to abandon both these statements; the public needs to know that the scheme is accountable and subject to independent audit and assurance. Abandoning the statements would also seem to be inconsistent with IPSA's claim that 'transparency lies at the heart of IPSA's approach to the regulation of MPs' business costs and expenses and is crucial to its effectiveness'.⁵

6. The new principle 7 - 'All expenditure by MPs should be published and accessible to the public' is a clear and welcome statement, but does not go far enough to emphasise that transparency is what lies at the heart of IPSA's approach. Transparency is critical to the scheme's effectiveness and public confidence in the scheme will be undermined if there is a sense that transparency is not at the core and underpins all aspects of how IPSA goes about its work. As you say, 'transparency is an important regulatory tool'.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/336903/MP_expenses_main_report.pdf

5

<http://parliamentarystandards.org.uk/transparency/Current%20Consultations/Review%20of%20the%20MPs'%20Scheme%20of%20Business%20Costs%20and%20Expenses%20and%20IPSA's%20publication%20policy.pdf>, chapter 9, page 43

This has been confirmed by our recent report *Striking the Balance*, which looks at ethics for regulators and how regulators live up to public life.⁶

7. The Committee therefore regrets the lack of explicit reference to ‘transparency’ in the draft principles, notwithstanding IPSA’s wish to ensure that the principles are expressed clearly, and strongly recommends that the previous principle ‘The system should be open and transparent, and should be subject to independent audit and assurance’ should be retained.

8. We agree that value for money should be an important criterion for any MP to use in considering what claims to make on public funds.

9. The Committee notes that the new draft principles exclude any mention of sanctions. We were surprised at this omission and recommend the retention of the existing principle 6: ‘there should be clear, effective and proportionate sanctions for breaches of the rules, robustly enforced’. Even if the powers of IPSA itself are limited in this respect, IPSA does have the power to order repayment of expenses and sanctions can of course be imposed elsewhere. Given that there is perhaps a sense amongst the public that sanctions for breaches of the rules on expenses tend to be less severe for MPs than in other walks of life, we think it is important that there is an explicit reference to sanctions in the core principles.

Question 10: Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

10. We understand that IPSA will continue to honour the contracts of connected parties already in employment by MPs, and the consultation is only in respect of new staff.

⁶ *Striking the Balance, Upholding the Seven Principles of Public Life in Regulation*, Cm 9327, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/554817/Striking_the_Balance_web_-_v3_220916.pdf

11. In our 2009 report, the Committee highlighted the concern around the employment by MPs of members of their own families. Whilst the Committee received much evidence commending the dedication and hard work of many family members and about the advantages the arrangement may bring to constituents and to the family life of MPs, the Committee was of the view that it was not consistent with modern employment practice designed to ensure fairness in recruitment, management of staff and remuneration, and would always carry with it a suspicion of abuse. The Committee recommended that this practice should therefore be brought to an end and proposed transitional arrangements which would have allowed existing family members to remain in their posts for one more Parliament.

12. Nothing has changed to alter this view. Whilst we would not wish to disparage the commitment of family members and we note IPSA's safeguards around the practice of employing 'connected parties', and that the 2015 assurance review found no ground for concerns for the majority of connected parties, we still feel that the practice is out of step with modern employment practice and the perception of self gain, however unfairly, risks damaging public confidence.

13. Accordingly we maintain our long held position that the practice of employing connecting parties should be stopped. The Committee suggests that that the practice of MPs employing connected parties ends with this Parliament and new rules are introduced with the new Parliament in 2020 so that all existing and new MPs will be clear about the rules.

Question 12: Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

14. Our 2009 report commented on the potential for misuse of public funds for party political purposes.⁷ We understand IPSA's concern that the distinction between paying for claims that are necessary for MPs in support of their parliamentary functions rather than party political activities may often be a fine one. The Committee's view then was that there should be robust independent audit to ensure that resources provided out of public funds are being used only for the purpose intended and not to support party political activities.

15. We think IPSA walks a difficult line well and would continue to make the case for clear rules underpinned with principles. We are not convinced that allowing complete discretion in this area is desirable or that publication of claims is sufficient to deter potential misuse of public funds. Whilst we understand the desirability of simplifying the rules, and to allow MPs some degree of discretion, we would suggest that if there are clear areas where IPSA is in disagreement with an MP about whether or not an activity is parliamentary, those areas should be added to the list of exclusions from what is considered parliamentary.

Questions about IPSA's publication policy

Question 30: What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

16. The Committee welcomes IPSA's commitment to transparency and its review of its publication policy. We understand that the arguments are finely balanced between publishing redacted images of all receipts or just those requested by the public. We

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/336903/MP_expenses_main_report.pdf, page 58.

completely agree that the receipts should be available on request, but are mindful of the issues that may arise with the proactive publication of all receipts in addition to claims. This would go further than most other public bodies and if the redaction is not done carefully, this does risk some sensitive data being inadvertently published. It could be seen as a rather heavy-handed approach and may provoke an undesirable political backlash against the principle of transparency. On balance therefore, the Committee comes down on the side of publishing those receipts requested by the public.

Question 31: How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

17. The Committee recommends that data currently published annually, should be published more frequently where possible. When data is published too long after the event, it loses its impact; our view is that more immediate publication of data helps to encourage people not to breach standards and to abide by the rules as well as helping to maintain public confidence in the system.

Question 33: Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

18. The Committee understands the decision taken in 2010 to publish only the aggregate cost of travel claims by Northern Ireland MPs and equally that six years on it is reasonable to come back to the question as to whether there is scope to publish more detail on this category of travel claims. The Committee's view is that any further detail that may be published about Northern Ireland MPs' travel claims, should not in any way reveal, or even suggest, a pattern of travel which may lead to putting that individual at risk.

Question 37: Is there any further information that we should be publishing about IPSA?

19. The Committee welcomes the range of information that IPSA publishes as part of its publication scheme that is full and comprehensive. We have one suggested addition, which is to publish information that helps strengthen the value for money principle that the Business Scheme aims to reinforce. For example, it might not be readily apparent to the public the high cost of office hours flights and train travel between Westminster and the rest of the UK – publishing a typical/average cost might help put these costs in perspective. This small step might help to remove some mistaken assumptions about MPs particularly high travel costs.

Committee on Standards in Public Life: Background

The Committee on Standards in Public Life is an advisory Non-Departmental Public Body (NDPB). The Committee was established in October 1994, by the then Prime Minister, with the following terms of reference:

“To examine current concerns about standards of conduct of all holders of public office, including arrangements relating to financial and commercial activities, and make recommendations as to any changes in present arrangements which might be required to ensure the highest standards of propriety in public life”.

The Principles of Selflessness, Objectivity, Integrity, Accountability, Openness, Honesty and Leadership remain the basis of the ethical standards expected of public office holders and continue as key criteria for assessing the quality of public life.

The Committee’s terms of reference were updated in 2013: “...the Committee’s remit to examine ‘standards of conduct of all holders of public office’ [encompasses] all those involved in the delivery of public services, not solely those appointed or elected to public office” (Hansard (HC) 5 February 2013, col. 7WS).

The Committee’s terms of reference were further clarified in a House of Lords written Parliamentary Question on 28th February 2013 to explain that the Committee’s remit means it “can examine issues relating to the ethical standards of the delivery of public services by private and voluntary sector organisations, paid for by public funds, even where those delivering the services have not been appointed or elected to public office” (Hansard Column WA347).

Current Membership

- Lord Paul Bew (Chair)
- Dame Margaret Beckett DBE MP
- Sheila Drew Smith OBE
- Jane Ramsey
- Monisha Shah
- Richard Thomas CBE
- Dame Angela Watkinson DBE MP

The Committee's work is supported by a Research Advisory Board chaired by Professor Mark Philp, University of Warwick.

Conservative Party (Group Response)

MP

Email

Received 21/10/2016

Submission in response to IPSA's on going consultation on expenses and allowances.

This has been compiled from 4 meetings that I held with MPs. Staff from IPSA have been present at several of the meetings and the Board of IPSA were present at the final meeting. I have also included any written submissions that I have received. I have made all of the comments and submissions anonymous. It is of particular note that many MPs are unwilling to submit their own submission for fear of that their submission may end up in the public domain, and the subsequent unfavorable publicity that their submission would draw. Despite assurances from IPSA that they would make submissions anonymous, MPs remain concerned that it might be possible for their identity to be revealed.

More generally, there were strong representations that before any recommendations come before the IPSA Board, IPSA staff conduct a review of the allowance and expenses schemes that are in place for employees of the devolved administrations, public bodies and private companies.

Particularly relevant are the schemes available to House of Commons staff, the civil service and some of the broadcasters eg Sky and the BBC, the staff of whom often work away from home outside the hours of the normal working day. It was also stressed that some consideration should be made of the schemes in place in other Parliaments outside the UK. With this point in mind there has been widespread agreement from MPs that when recommendations are made to the IPSA Board these should be made with reference to the schemes that are in place elsewhere.

Whilst recognising the important role IPSA plays in the administration and regulation of the scheme, and in ensuring good value for tax payer's money, concern was expressed that IPSA do not demonstrate that their fundamental aim is to administer a scheme that enables MPs to do their job. There is a perception that the language IPSA staff use and the language that IPSA use in their consultation, supports the belief that IPSA still do not fully understand the full extent of the work and life of an MP.

There were many comments about the extent to which MPs are subsidising their work related expenses. The concern expressed was that not only will this put off people from standing for Parliament but it is increasingly becoming a job where people need to have income beyond their salary as an MP, or a job that is subsidised by their spouse or a family business

There was widespread support for the use of the words 'allowances and expenses' to be replaced with 'reimbursement of costs'. Concern was also raised that IPSA need around £5.5 million pa to operate and that a scheme could be put in place that is less bureaucratic but is also sufficiently transparent about how MPs spend taxpayers money.

Having chaired all 4 meetings, 2 of which were cross party there are clear themes: there is a serious lack of trust between MPs and IPSA; IPSA act disproportionately; there has been insufficient improvement over the years IPSA has been operating; and that the scheme and its operation need fundamental overhaul.

I am attaching and have grouped some the comments that emerged from the meetings I held. The contributions came from over 100 MPs.

Anne Milton

Government Deputy Chief Whip

MP1

- Why not give an allowance to MPs who require a second home and allow them to use the allowance, within the rules, as they wish. They could then account for how they used it but it would save IPSA money in administration whilst still being fully transparent

MP2

- I welcome the fact that IPSA has dismissed the proposal to house MPs in block accommodation
- IPSA have a minimal understanding of an MP's workload. The demands of the job extend beyond the hours when the House is sitting. MPs often need to be in London on Parliamentary business when the House isn't sitting. There appears to be no understanding of this
- It is often difficult to make hotel bookings at short notice when business appears to be running late.

MP3

- MPs are not treated in the same way as the staff of the House who are provided with taxis if the House sits beyond 10.30pm.
- Either MPs need a taxi home or they don't. To put a limit on a taxi fare late at night is a nonsense as it means that some MPs can only get a portion of their travel due to the late sitting of the House. This is not equitable.
- Existing rules mean that MPs needing to travel long distance to get home feel they must defy the Whips and leave. This impacts on their careers and means that IPSA has an inappropriate influence on the Government's majority and therefore legislation that is passed by Parliament.

MP4

- The proposal to equate the accommodation allowance with Zone 3 rental costs overlooks the fact that most MPs already undertake significant commutes from their constituencies into London each week. This shows a lack of understanding of the distances most MPs already have to travel and the impact it has on family life.
- The resettlement allowance has shrunk from the equivalent of 12 months to 6.
- IPSA should be able to tell MPs the exact figure they will receive as resettlement allowance.
- You are penalised for announcing you will be standing down and this encourages people to stand as independents. To stand and lose a general election is financially advantageous.
- MPs have no statutory right to loss of office payment.

MP5

- When the 24-hour tube becomes operational there will be public demand for MPs to use public transport regardless of the time of day/night.
- The proposals do not reflect the significant security risk to MPs following late votes when large numbers of MPs leave the Parliamentary estate en masse. MPs are therefore an easy target.
- MP's staff get little consideration in this consultation – they are paid too little.
- IPSA's tools to facilitate budget forecasts are inadequate – MPs are penalised for the erroneous advice provided by IPSA themselves, and they find themselves hit with costs they are forced to repay and the resultant negative publicity.

MP6

- The tone of the consultation document is accusatory. It appears to be a concerted effort to punish MPs.
- IPSA's role is to help not hinder the work of MPs. This should not be about 'catching us out' but offering assistance for us to do our jobs well for our constituents.

- The proposals relating to the accommodation allowance do not reflect the increase in property prices between 2010 and 2015.
- Options in the consultation do not reflect the reality of the job. We are being asked to select our least worst option.
- Boundary changes will increase the size of many constituencies and therefore the distances MPs have to travel to conduct work in their patch. There will be a greater need for MPs to have more than one constituency office
- We must revisit the rules relating to connected people to ensure families are kept together. To get this right requires us to revisit and improve the existing legislation (2009). It would be helpful if IPSA put forward possible changes that they feel are required

MP7

- We must compare this regime with how Parliamentarians are resourced in other countries.
- Insisting that MPs must use public transport following late votes will discourage women from standing as MPs.
- MPs who are members of London clubs save the taxpayer money and this should be facilitated.
- We must address the impact on families – this job takes an enormous toll on family life and IPSA are making this worse rather than better.

MP8

- You cannot find accommodation near enough to Parliament or in some constituencies at the existing level of allowances.
- 24 single tickets for family members is insufficient.
- We should compare the regime for MPs with that for representatives of devolved legislatures.
- 99% of claims are legitimate. The remaining 1% of rejected claims are usually the result of administrative error (often IPSA's) not malicious fraud and this should be emphasised.
- Need to be cognisant of the impact on women in the workplace – should invite input from 3rd parties such as Sky, who run a useful childcare service for staff when children are sick
- Being an MP is a 365 days-a-year job including Saturdays and Sundays – it is not just about days when the House sits.
- IPSA talk of comparisons with ordinary people – MPs are ordinary people but with an extra-ordinary job. MPs are the equivalent of reasonably senior executives in private sector companies but are not treated by IPSA as such.
- Do IPSA have a duty of care towards MPs as public servants? The existing regime and consultation demonstrates that they do not believe they do.
- Tone of the consultation document is pejorative.
- There has been an erosion of trust between MPs and IPSA due to the continued leaking of information by IPSA.
- Earlier proposals to link MPs pay to general wage inflation appears to have been abandoned.

MP 9

- IPSA appears to have learned little about the life of an MP since its inception six years ago.
- The expenses scheme is driving a change in how MPs work – rather than facilitating the job they do. It is limiting MPs ability to do their job and they are being forced to adapt. IPSA are not facilitating MPs to do their job.

- Many colleagues opt to drive in order to bring families members with them due to the low number of tickets available for relatives. This is more expensive and leads to added pressure and increased risk of accident given the hours MPs work.
- MPs who employ family members often do so on temporary basis as it gives them maximum flexibility.
- Accommodation allowances need to increase.
- The publication of MP's expenses has had a beneficial impact, but the scheme remains problematic.

MP 10

- The current scheme is not transparent as it does not show how much MPs are topping up the allowance scheme.
- There is no publication of the expenditure that MPs incur through their Parliamentary duties but do not claim. MPs frequently don't make claims due to concern about adverse publicity especially when inevitably the press compare MPs against each other.
- There is a race to the bottom of the expenditure leagues

MP 11

- Continued concerns about claiming for additional security measures.
- Concerns that IPSA publish the names of landlords and the first 3 characters of the addresses from which it is possible to deduce where MPs live
- FOI requests should be refused if that information compromises MPs security. The default position of IPSA should always be not to publish this type of information

MP 12

- There should be a scheme to provide full cover for legal expenses associated with their duties as an MP. There are schemes available but there is confusion about them and what they cover.

MP 13

- The impact of living away from family is significant and the support networks are extremely important
- There should be London housing allowances that enable MPs to rent near Westminster close to colleagues
- IPSA should look at the figures on marital breakdown and assess the impact on MPs mental health. Much of this impact is due to living away from family and friends but the impact of social media and the raised levels of abuse that MPs receive is also taking its toll.

MP 14

- IPSA should pay suppliers direct. There is no need for IPSA to pass payment for items from external suppliers through MPs bank accounts.

MP 15

- IPSA give inconsistent advice

MP 16

- Tone of consultation is that MPs are criminals seeking to outwit the taxpayer which isn't the case. The tone and language IPSA use needs to change

- IPSA should have consulted more with MPs prior to the publication of the consultation document so that the proposals could more accurately reflect some of the issues.
- MPs who choose to employ spouses should be supported in this as it is good value for the taxpayer.
- Some proposals put us in conflict with employment law – e.g. redundancy arrangements for staff following the retirement of an MP (Staff are directly employed by an individual MP and so when staff are subsequently re-employed by their successor they have changed employer).
- Older MPs have seen a significant erosion of conditions relating to retirement - their terms and conditions have changed in a way that would not be allowed in any other employment.
- If the resettlement allowance were improved it would encourage people to become MPs as 'a career break' and improve the diversity of Parliament.

MP17

- The consultation document has already ruled out numerous options which has limited the options for the expenses regime.
- Impact on family life is ignored.
- There is no recognition of regional variations in accommodation costs.
- MPs are working constantly, including during the recesses.
- We risk creating two classes of MP - the rich MPs who can supplement the expenses of doing the job and the ones who have to reclaim their expenses because they cannot afford to do otherwise.

MP18

- IPSA are unrealistic about the costs of constituency offices located on the high street, yet this is often the best way of engaging with your constituents.

MP19

- Consultation document reads as though it's been written by a hostile activist

MP 20

- The prohibition on carrying over allowances from one budget to another is not sensible.
- IPSA need to carry out more shadowing of MPs.
- MPs who chose to rent (rather than stay in hotels) to reduce costs are effectively penalised as they are responsible for the day to day running costs of the property. There is an incentive therefore to stay in hotels

MP 21

- The scheme is not equitable with regard to office accommodation. For MPs who can and do base their staff in Westminster there is no associated office cost (rent, telephone, photocopier etc) and no expenses to reclaim. An MP who bases all their staff in their constituency will need to claim all the office costs and often have to subsidise this themselves.
- A notional cost should be applied to MPs office costs if they base their staff in Westminster.

MP 22

- Our staff's salaries are not compatible with staff in other Parliaments.
- IPSA templates are too inflexible – we can't amend job descriptions.
- The job descriptions do not allow proper ongoing professional development of staff or allow for adequate appraisal of staff

MP23

- Why not provide MPs with a single allowance and let them determine how it's spent? The use of the allowance could be fully accounted for, available for both IPSA and the public to scrutinise but allow the flexibility needed for MPs to work in their often very differing circumstances
- MPs play a unique role in legislating, the importance of which should trump 'value for money' considerations where necessary.

MP 24

- Spouses can represent good value for money and shouldn't be vilified. They often work well beyond the hours that other staff would be prepared to work and are maybe better prepared to take some of the abuse that office staff have to deal with.
- A commute to Zone 3 does not reflect the travel requirements of the vast majority of MPs.
- The personal safety of MPs is jeopardised by being forced to use public transport when the House sits late.
- Resettlement allowances must be clarified in light of boundary changes.

MP 25

- Pleased with security package but the delay has been unacceptable.
- Every MP subsidises the job from their own pocket because they fear making claims.
- Technological advances mean we are more accessible to our constituents than ever before. The scheme therefore needs annual review as the workload has increased substantially.
- The new scheme needs to be future-proofed.
- MPs have no job description/contracts – resettlement allowance should provide reassurance/certainty.

MP 26

- Some constituencies will increase in size post-boundary review. This could present problems for MPs' travel allowances.
- Accommodation allowance is poorly conceived. It needs to keep pace with regional variations.
- Where is the review of staff salaries we were promised?

MP 26

- Heading to home in Zone 6 late at night is not an option.
- Leasing printers is a pointless hassle. MPs should be able to repay IPSA direct for such expenses.

MP27 (commutes from zone 9)

- Travelling to and from Zone 3 does not reflect a typical journey for most MPs.
- Many MPs don't claim second home allowance to preserve their reputation.
- Late votes on Monday and a lengthy commute take their toll on the rest of the week.
- IPSA has a role to play in elevating the status of MPs in the minds of the public. The language used in the consultation document is appalling and suggests MPs are guilty until proven innocent.
- Pooled resources like PRU are invaluable.
- MPs' workload is massive with constituents rightly expecting a prompt responses to all the campaign emails we receive.

MP28

- Salaries for staff are poor compared to other London Borough salaries including City Hall
- Staff pay bands are too rigid – why not allow MPs to set salaries within an overall cap?
- MPs are significant figures in public life – ambassadors as well as legislators. Yet are treated contemptuously by IPSA.

MP 29

- Is currently looking for a flat but feels no point starting a new tenancy before summer recess as this will cost taxpayer however the MP may still need to be in London.
- Accommodation allowance has not kept pace with London rental market.
- Language of consultation document is appalling.
- Being an MP can be an isolating experience – need more support from IPSA. Current regime will result in many MPs experiencing mental health problems.

MP 30

- Guidance received from IPSA is poor. You are encouraged to spend first and claim second, and only then do you know if IPSA will reimburse you.

MP 31

- Tries to avoid negative publicity and therefore subsidises many costs.
- In some constituencies the accommodation is as expensive as some London areas and the bandings for properties outside of London are inappropriate and must reflect such regional variations.
- IPSA has leaked sensitive information in the past.
- Commuting places a huge strain on family life – particularly marriages and this will deter people from becoming MPs.
- A big local issue like HS2 presents significant local difficulties which consume resources. IPSA should consider additional supplementary resources for single issues like this.

MP32

- Avoids renting a flat as it's considerably more expensive than arranging rooms on ad hoc basis. But a flat affords MPs greater flexibility.
- However the time business concludes is unpredictable and rooms at short notice are difficult to book. The unusual requirement is to give 48 hours' notice to cancel a pre-booked room – this isn't practical as diary frequently changes at short notice and the MP often picks up the bill themselves
- Is subsidising his role to approximately 50% of his salary which he is able to do because he has a family business.

MP 33

- Mortgage costs can represent good value for money. Many MPs now either pay for their mortgage on their 2nd homes themselves and rent the property out, or pay the mortgage and claim some of the costs of the 2nd home, or claim another rental property from IPSA. It is a nonsense.

MP 34

- MPs travel and accommodation is not treated equitably. For those who live on the outer edges of London the commute is significant and late at night can be impossible and yet IPSA continue to ignore this.
- I therefore have to miss votes, put my at career and risk my Party losing a vote because of it. IPSA are having a significant impact on Parliament and legislation as a result. Was this what they intended to do?

MP 35

- Cost of establishing a second home is massive. Allowances leave you few options even having bought furniture second hand.
- Staff frequently need to travel to the constituency – the limit on travel for staff is a hindrance to getting the job done.

Other submissions:

Submission 1

Chapter 7. Working from Two fixed locations –MPs' accommodation costs.

Alternatives to the current provision of accommodation.

Point 86. Page 29 "an MP is a unique job with unique demands".

Point 87 page 30 Bullet point 3, "IPSA could reduce MPs accommodation budget in line with a typical London Zone 3 rental cost".

"This would align them more to the experience of most London commuters".

" The cost of properties within zone 3 would save around £0.9 million a year"

I would like to make the following points:-

1. Why do IPSA feel the need to increase the working day by at least 1 hour by forcing MPs to live in zone 3.
2. Why do IPSA feel the need to "align" non London MPs with the experience of London commuters? We are aligned to our constituents commuting experience.
3. Some of us have to commute several hundred miles, leaving our families behind us, why would IPSA then insist we then have to commute into London.
4. The saving of £.9 million is relatively small compared to the inconvenience that this would cause to the working lives of MPs, late votes etc.
5. The consultation makes no reference to the governments policy of reducing the number of MPs by 50, which would save several million.



HOUSE OF COMMONS

Consultative Panel on
Parliamentary Security
Public Body
Email
Received 18/10/2016

Marcial Boo
Chief Executive
IPSA
4th Floor, 30 Millbank
London
SW1P 4DU

19 October 2016

I am writing to you in my capacity as Chair of the Consultative Panel on Parliamentary Security. You and I recently discussed the publication by IPSA of the names of Members of Parliament's landlords and you asked me to put my views in writing.

I accept that, as your consultation states, transparency is at the heart of what IPSA does and I fully support this. Transparency must, as you also acknowledge, be balanced with other considerations. One of these considerations is the safety of Members and of their families and staff members. It has been put to me that publishing the names of Members' landlords represents a potential security risk in that it makes it easier for people to find out where a Member lives. I agree that this is a legitimate concern. Whilst it will not always be possible to find out a Member's address from the name of their landlord, there are occasions—particularly if the name is unusual—when it might be. In the current climate, when Members are subject to threats and, in some cases, attacks, this risk must be taken seriously. I would further argue that the public benefit in knowing the name of a Member's landlord is small. Members are already not permitted to rent property from a “connected party” such as a family member or business associate, so publishing the name of the landlord is likely to tell people little that could be of public interest.

IPSA's current publications policy with regards to landlords' names leads to minimal benefit, but does create a possible—and potentially very serious—risk. For this reason, I would ask you to stop publishing this information. I am sure that you will appreciate that my biggest concern is for the security of Members and their families and staff. We all have a responsibility to minimize any risks.

Signature Redacted

Rt Hon. Lindsay Hoyle
Chairman of Ways and Means and Deputy Speaker

David Davies

MP

Email

Received 27/05/2016

FAO Mr Marcial Boo

Dear Mr Boo

RE Cycle to Work Scheme

As you will be aware MPs staff and other Parliamentary employees are able to access the Cycle to Work Scheme, however MPs themselves are not. I recently discussed this at an IPSA surgery and wondered if IPSA might consider extending this to MPs.

I think it would be uncontroversial and could even be welcomed by some environmental and cycling groups as a way of getting more MPs to be aware of the benefits of cycling. I also think there might be a business case - although I accept it would be marginal.

In my own case you will see that I often use "Boris Bikes" to travel to and fro from Paddington to Westminster. This is cheaper for the taxpayer than a tube and for me I appreciate the health benefits and I can do it almost as quickly. I also have an old folding bike in the office which I use for travel

If there were a cycle to work scheme for MPs I would probably consider using it and investing in a high quality folding bike and barring very inclement weather would aim to use it for all claimable journeys in London.

This would be at least 2 per week and sometimes more. On a rough estimate I think it could amount to between £100-300 saved for the taxpayer if I used a bike instead of the tube on all occasions.

On that basis it might even be possible to persuade the press that it is a good idea!

I would be grateful if IPSA could give it some consideration.

Regards

David Davies MP

Member of Parliament for Monmouth

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Ed Maxfield
MP Staff
Email
Received 13/05/2016

Thank you for the opportunity to contribute to the consultation on the expenses scheme.

In terms of the scope of allowable expenses, I have only one gripe (which is shared by all my colleagues here): that it seems very unfair that tea, coffee and milk etc for constituency offices is now classified as hospitality and not an allowable expenditure when food and drink provided in the Palace of Westminster is subsidised by the taxpayer.

In terms of the practical operation of the system, I would ask that you look at modernising the software that is used to submit expense claim forms. For example, is it really necessary to have numerous different forms for different types of expense? It would simplify things and reduce the resource costs of submitting returns if the software allowed all claims to be made from a single online entry point with 'type of expense' being the first of a hierarchy of options and the boxes to complete being determined by the choice made. The print function is also very clunky.

Additionally, the naming convention of expense types really needs looking at thoroughly. The options that are there seem to have been thrown on to a table in a very random way. Why, for example, have 'constituency office gas' and 'constituency office electricity'? Why not, "Energy costs – constituency office" or, if the most important thing is to distinguish between constituency office costs and other costs, should this not be consistent with all such costs beginning "constituency office...".

With best wishes.

Ed Maxfield | Office Manager

Office of Norman Lamb MP

Member of Parliament for North Norfolk

01692 403752 | Unit 4, The Garden Centre, Nursery Drive, North Walsham NR28 0DR

Electoral Commission
Organisations and Academics
Email
Received 24/10/2016

Review of the Scheme and Publication Policy
- Responses to consultation
Independent Parliamentary Standards Authority
4th Floor
30 Millbank
London
SW1P 4DU

24 October 2016

Dear Sir

Review of MPs' Scheme of Business Costs and Expenses and IPSA's publication policy

The Electoral Commission is an independent body set up by the UK Parliament. Our aim is integrity and public confidence in the UK's democratic process. We regulate party and election finance and set standards for well-run elections and referendums.

Our particular area of interest in IPSA's review is the overlap between the support provided by IPSA to enable MPs to carry out their parliamentary duties and the statutory regulation of political party members and elected officials and election finance, including the rules on donations to MPs as prospective election candidates. It is important that IPSA does not alter its Scheme in ways which would inadvertently make compliance with, and regulation of, the political finance controls more difficult. We would be pleased to work with IPSA on any changes to its Scheme to minimise that risk.

This letter provides our comments on the relevant sections of the consultation document.

The boundary between parliamentary and party political activity (Consultation chapter 6: Questions 12 and 13)

The Political Parties, Elections and Referendums Act 2000 (PPERA) excludes MPs' pay and allowances from being regulated by the controls on donations received for political purposes. It is, however, important that such allowances are not made available to MPs for political campaigning purposes. We are pleased the Scheme currently makes clear

that IPSA allowances cannot be used for activities that are treated as spending on political activities under PPERA. This distinction should continue to be made clear. It is also important to note that under the Representation of the People Act 1983 (RPA), candidates can only accept donations over £50 towards campaign spending during regulated periods from permissible sources. In the case of UK parliamentary general elections, the pre-candidacy regulated period for candidates known as the 'long period' starts when a Parliament has sat for more than 55 months and continues until dissolution of Parliament. The regulated period for candidates, known as the 'short period' begins when someone officially becomes a candidate (after dissolution of Parliament) and is in place until the election. The PPERA exemption from the donation rules for MPs' remuneration and allowances does not apply to the candidate rules and IPSA is not a permissible donor in respect of candidate donations.

The consultation document highlights common questions which arise about whether a claim is party political or parliamentary. It asks whether the scheme has the right balance in its approach to these matters, or whether the scheme should change – by either tightening the rules through setting more exclusions, or by giving MPs more discretion.

We note that an allowance scheme which provides for increased MP discretion over whether a claim is for parliamentary or political purposes could increase the risk of inadvertent breaches of election law and the controls on sources of donations to candidates. Should an MP claim and be paid expenses which are subsequently deemed to be covered by the candidate spending rules, then that payment from IPSA will be an impermissible donation. Under the candidate rules, accepting an impermissible donation is a criminal offence and the money is liable to be forfeited by a court order. There would also be reputational considerations for IPSA should this happen. More generally, should claims be paid for items considered to be for political activities, this would likely call into question the current PPERA exemption for MPs' allowances.

To avoid the potential for unintentional breaches of the candidate donation controls and to minimise the risk of claims under the Scheme in respect of activities that are regulated under PPERA, **we suggest that the Scheme should continue to provide tight rules on what is and is not claimable under the Scheme. Activities which could be construed as either election expenses or campaign expenditure should not be regarded as part of MPs' parliamentary functions or be claimable under the Scheme.**

Other issues relating to the Scheme (Consultation chapter 8: Questions 17 and 20)

Travel by MPs and their dependents

As set out above, there is a risk that MPs could unintentionally breach the candidate donation controls by accepting payments from IPSA for expenses covered by the candidate spending rules. The consultation document asks if there is a need for travel rules for MPs and their dependants which are specific to the “Dissolution period”. Whatever approach IPSA conclude should be used to address travel expenses in the Dissolution period, it is important that the Scheme continues to make clear that activities which could be construed as election expenses are not regarded as part of MPs’ parliamentary functions and claimable under the Scheme.

Expenditure on election campaigns

The consultation document asks if IPSA should alter the scheme’s rules on campaigning in elections so that they capture the *purpose* of the activities which cannot be claimed for. This is being considered as an alternative to the current approach of referring to the relevant legislation and preventing MPs from claiming costs for any activities which could be construed as “campaign expenditure”, as defined by the Political Parties, Referendums and Elections Act 2000, or “election expenses”, as defined by the Representation of the People Act 1983. It is suggested that changing the definition used in the IPSA scheme may restrict a wider range of activities that are intended to give MPs a campaigning advantage and provide more assurance.

The scope of the activities covered by the Scheme, including the extent to which it covers activities outside the RPA and PPERA controls which could give MPs a ‘campaigning advantage’, is a matter for IPSA. However, to avoid the potential for unintentional breaches of the relevant legislation, it will be important to ensure that any general ‘campaigning purpose’ restriction continues to make clear that the Scheme specifically prevents claims for activities which could be construed as either election expenses or campaign expenditure as defined by the RPA and PPERA.

If IPSA conclude that the Scheme should be amended to provide for a general ‘campaigning purpose’ restriction, the Commission would welcome the opportunity to work with IPSA to ensure that the requirements of both regimes continue to be covered.

Yours faithfully

Signature Redacted

Bob Posner
Director of Party and Election Finance & Legal Counsel

The IPSA

Re: Formal Consultation Response from Members' Staff

We, the undersigned, are writing in relation to your consultation on the MPs' scheme of business costs and expenses in relation to Question 8.

You propose a system whereby MPs' staff are unable to accept employment with another MP after being made redundant within 10 weeks without being required to return any redundancy payment made.

We believe this is unacceptable for the following reasons:

- Each office in Parliament is different and there is enormous disparity in working practices and job roles. It is simply not comparable to moving between departments of an organisation with an overarching hierarchy.
- In public sector organisations where people cannot receive redundancy payments on losing a job if they are re-employed in the same sector, there are also usually preferential policies in place to ensure those already working in the sector are first in line for other roles. This would be difficult and potentially controversial to implement in this instance.
- Staff who find themselves searching for work due to redundancy, and who find employment within Parliament, are often forced to take jobs for lower pay than in their previous office. There is no set correlation of pay grades, even between job roles with the same title.
- Redundancy provides for someone to cover their costs when searching for work. If someone were to be employed by another MP nine weeks after redundancy, it is simply wrong to demand a return payment of what might be a considerable amount, which has likely already been spent to cover housing and living costs. To do so constitutes a deep misunderstanding as to the purpose of a redundancy payment.
- If redundancy pay is on an accrued basis, then all terms and conditions relating to staff must also be accrued. This proposed change must require that redundancy and all other terms of employment, maternity/paternity rights for example, be carried over across offices, which also means that MPs hiring staff who have worked in other offices cannot impose probationary periods in 'new' contracts. This is likely to prove an unpopular arrangement with MPs.
- If accrued benefits are transferred over to a new MP, this provides a potential disincentive for MPs to employ people who have worked in Parliament previously before being made redundant through no fault of their own. This is manifestly unfair to people who may have spent many years gaining experience and training in the Parliamentary profession, which is a unique skill set in and of itself.

IPSA

14 JUL 2016

There is a case to be made regards staff being re-employed after redundancy by the same MP and IPSA is correct to look into that particular aspect. However, if this option on redundancy pay is to be taken across the board, then IPSA simply cannot treat each MP as a small business employer.

At present MPs' staff exist without any departmental structural support, have no pastoral care, an imposed pay increase limit of 1% and an effective ban on staff bonuses. We are classified merely as 'an expense' and generally treated by IPSA as such. IPSA has until now abdicated any function as an arbiter of working practices, but if legally necessary terms and conditions like redundancy pay are to be accrued as if all staff belong to a single departmental unit, or payment for unpaid leave subject to additional scrutiny, then it behoves IPSA simply to accept a role as the overall employer of Members' staff, thus also providing the Human Resources, pastoral care and pay structures due, rather than remotely administering the payroll.

Without this step being taken, the proposals specifically related to redundancy are unworkable and will be seen as IPSA once again imposing negative terms and conditions on an easy target.

We thank you for your time and your consideration.

Yours faithfully,

Group of MP Staff Names Redacted

Group of MP Staff Names Redacted

Group of MP Staff Names Redacted

Group of MP Staff Names Redacted

Group of MP Staff Names Redacted

Group of MP Staff Names Redacted

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

Yes; however, there needs to be more recognition of how difficult the current system can make it for Members (and their staff) to claim back certain costs they incur in carrying out their work for fear of being criticised, which can result in them being significantly out of pocket, much more so than would be expected or indeed acceptable in another occupation.

Cognisance also needs to be taken of the fact that the system, in practice, can make it harder for Members to exercise their responsibilities, e.g. when IPSA, either through error or through the way information is published, have incorrectly given the impression of financial error or even wrong-doing by a Member.

Although transparency is required in the system, consideration should be given to certain costs, e.g. £2.50 for parking (which mounts up if you do several surgeries / meetings across towns per month) being published differently or under a collective banner.

Independence is obviously a key principle; however, a means has to be found through which concrete guidance / answers can be given so that Members, and more often Proxys, are not left guessing, which can result in claims not being made for fear of making a mistake and ending up in the press. This would also help IPSA staff as the amount of inconsistent and contradictory information received from the helpline causes much confusion and many additional hours work. Examples of previously accepted claims should be made available to help staff in this regard, even if accompanied by a caveat that this doesn't guarantee acceptance.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes, as for many Members having permanent staff based in Westminster is not feasible but they nonetheless often need support in the House on a regular basis. The option to have staff accompany Members on extended travel would also prove useful so the Member can focus on the purpose of the trip rather than the peripherals than often go along with such travel.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

Restricting the travel to Europe is impractical depending on the portfolio of the Member and / or the purpose of the visit. In the light of Brexit, it is also likely that more travel beyond Europe will be required. Members should be able to easily assess the circumstances under which foreign travel is permissible.

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

In principle, if a Member can justify a diversion for convenience at no extra cost to the public purse then it should be allowed. Simpler guidance can be given as to how Members should assess this. For Members who have lengthy journeys to and from Westminster, being able to divert can be extremely helpful in terms of time efficiency.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which overdefine concepts, such as commuting, which are commonly understood?

Simplification of the rules is always welcome as long as the potential for misinterpretation is minimised.

In general, more flexibility is required in the current system. For example, Members who are driven to and from the airport for travel to and from Westminster should be able to claim mileage for both the outward and return journey, even though they are only in the car one way. The unclaimable journey would not be undertaken if it wasn't for the Member. In addition, they are saving large costs by not parking at an airport for several days.

Transparency doesn't require inflexibility and members who live further away should not have to continually incur greater costs to get to their place of work than those who live in and around London.

Question 6. Do you agree that we should simplify the rules on home offices?

Agree that if Members and / or staff routinely work from home then they should be able to claim costs that are additional to the normal cost of living in the home.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

Having to use the IPSA contracts, job descriptions, and salary scales is helpful at first (although they are too rigid in terms of the individuals Members actually need to employ) until you realise that after they are registered with IPSA there is no further information – no welcome pack; no HR advice for Members, employee, office managers; no direction whatsoever where you should go for advice whether employee or employer; no knowledge is given on what employees should expect in terms of contact from the pension provider, death in service, etc. There are huge gaps in what employees receive when they first start in comparison to other organisations, but because the individuals are generally believe in what their Member stands for, they just get on with the job.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

HR and IPSA should produce guidelines within which Members can provide a fair package to each member of staff, operating within a specific budget allocated for such eventualities. Although public money is being used, Members should nonetheless be able to provide staff with a redundancy based on their length and level of employment, regardless of future employment prospects. In many sectors, it is often the case that an individual has found employment before or just after their redundancy takes affect; this should not prejudice against others who may not be so fortunate. The same applies whether a Member knows they are standing down or unexpectedly loses their seat; with regards the former, staff can be prepared in advance but should not be penalised for their employer's decision to stand down.

If IPSA can provide templates for contracts then they can also provide templates where training, holidays, disciplinary matters, appraisal information is recorded which will then allow a more transparent assessment of what an employee is entitled to.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

Bonuses are an unfair from the perspective that a Member with a portfolio or busy office utilises all their budget and therefore, cannot award any financial reward to their staff above their salary whereas as others who don't use their entire budget, who can already afford to pay more generous wages, can.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

It is right for a connected party to be declared but it not should not be highlighted in a way that suggests a Members is somehow trying to milk the system by employing a connected party. Four days away from home every week; lengthy, unsociable hours; loyalty and discretion are all reasons as why employing a connected party is an important option for Members and not one they should be publically penalised for taking up. Perhaps IPSA should consider asking Members to advise as to the suitability of the connected party to the role in which they are employed, e.g. their qualifications and previous experience, in order to counteract potential criticism. This information can be published along with the other information IPSA published in relation to connected parties.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

I do not have direct experience of this but believe that Members who cannot commute to and from their constituency on a daily basis should not feel they are in any way restricted financially or in terms of public perception in relation to having their family reside with them / visit, particularly where children are concerned.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

All Members / Office Managers should be given specific advice upon election / employment with regards Parliamentary and political functions. Most staff I have spoken to were given no advice in this regard at all nor pointed in the right direction when first employed by their Members but, having previously worked at Holyrood, many were aware of the distinction. However, it was only as time went on and staff had the chance to attend meetings held by IPSA and other HoC departments that the rules became clear. This lack of knowledge could easily have resulted in mistakes being made especially as the first employed need to then assist with those who are employed at a later date.

Examples of activities which are and are not considered political should be readily available, as should clear advice from the IPSA helpline. Not only should this apply to financial claims but to the conduct of Members' offices in terms of enquiries and activities as the public are often unaware of the distinction and can find it difficult to understand when advised.

Members should be able to send an annual newsletter to constituents under the allowances. This works well at Holyrood.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

From a Scottish perspective, although there are some excellent resources available to Members and staff, it can be the case that the Scottish dimension is not provided or cannot be provided readily due to differences in the way things are measured / published between the devolved administrations. As the main

requirement for Members in terms of staff is Caseworkers, it is not possible financially for each Member to have a dedicated Researcher to provide such support, particular at Westminster due to London weighted salaries. This is also the case with regards employing Press / Social Media staff and, as such, being able to pool resources and have group staff can be extremely valuable and cost-efficient

In addition, in terms of organising business, a Group approach is essential to ensure Members can react appropriately to urgent and changes to business, ensuring Parliament holds Government to account.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

Although not ideal, the current arrangements are far better than any of the proposals provided. The option to stay in rented accommodation allow Members to make a home for when they are in London, which when Parliament sits is their home for more than half the week. This is especially important for those who have dependants that accompany them or visit on a regular basis. Hotels suit some individuals but if they were the only option, Members would need to be able to make long-term arrangements, which for several hundred individuals may prove difficult, as would finding rental properties with short-term leases which would only cover 'sitting' days.

The idea that Members who already commute hundreds of miles should stay in zone 3 and commute further is discriminatory and would reduce the time available to them to carry out their work and put further pressure on their health and their life-work balance.

Greater information should be given to the public in terms of why Members are given the allowances they are to reduce the misconceptions that arise from how expenses are often portrayed in the press.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

Members who own the properties that they stay in when in London on parliamentary business should not be able to claim for anything which Members who are renting cannot.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

IPSA should only fund property for those who need to commute from a distance not considered commutable on a daily basis. IPSA should provide the same budget to all such individuals for their accommodation; it is for them to apply the rules to their individual situation and to justify their expenditure.

Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

The more general exclusion should suffice.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

Yes, as they are unable to carry out their work at Westminster they, therefore, need to relocate for that period.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

Members and their offices are obliged to take cost effectiveness into consideration at all times and this should be no different in the run up to an election. If there is a genuine need for expenditure it should not be restricted due to the timing of it. Also, it is difficult for offices to know what they 'may' need in advance of any purchase deadline and having such a deadline may result in purchases which subsequently prove not to be required after all.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

Yes, that would be helpful.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

Continuing with the office costs would make sense and should suffice for any outstanding payments, therefore negating the need for a separate budget. It may be, of course, that a contingency budget would be required for costs that may go over what would normally be expected if, for example, a lease requires more than two months' notice to cancel. However, it is unlikely that the normal two months staffing budget would be sufficient to cover the redundancy costs of long-term staff and, therefore, the separate redundancy budget would need to remain.

If a member is expected to continue to operate effectively until after the election, then winding down their constituency office should not begin until they are no longer a Member.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

Members should be entitled to their resettlement fee as would anyone who had been made redundant, not dependant on conditions of expenses claims outstanding, etc.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

The start-up budget is extremely useful and I cannot foresee any practical implications in continuing to have it as a separate budget or as part of the office costs. The main problem was the advice given I relation to it and the things we were advised it could and couldn't be used for, which were contradictory and resulted in us not being able to provide a new member of staff with the necessary equipment for several months.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

Overpayments resulting in automatic cancellation of payment cards or a decline of new claims / salary changes, etc is an extreme way of dealing with what are often administrative oversights, missed deadlines, or, indeed sometimes, mistakes by IPSA. All this achieves is an ability of the Member's office to function as required and problems then accrue through being unable to pay bills on time, etc. The reason for the overpayments should be identified and discussed directly, and the most efficient way to repay what is

owed agreed. IPSA could consider options of deducting overpayments from a subsequent claim, or through a salary deduction.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

The funding appears to be fair as is. However, IPSA should consider how such information is published in order to reduce the scope for it to be portrayed as an 'overspend'. Instead of an accompanying explanatory note, which can be easily ignored by the media, IPSA could specify in the main body of the publication of accounts that this spending is of a particular category of staff spending, e.g. maternity, paternity, sick leave etc.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

This would be prudent; however, it should be noted that in some areas suitable office accommodation is not easy to find and, therefore, it may not be possible to negotiate such a clause. In terms of living accommodation in London, this should be a given for the landlords who offer Members accommodation.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

It should be adjusted in line with the cost of living.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

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Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

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Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

All images are available for publication but I do not believe there is a need to publish it all routinely, just that which is requested.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

Frequency is not an issue in itself other than publication will inevitably result in journalists contacting Members and their offices. More of an issue is what and how expenses are published.

IPSA needs to ensure that what it publishes is accurate. A previously discussed example and on which is continually misinterpreted is that of flexible air fares from Edinburgh and Glasgow to London. The ability to change a flight time at short notice is a frequent necessity given the changing nature of parliamentary business and flexible tickets allow for this; indeed they are recommended for this purpose by parliamentary travel office. Yet, these tickets are recorded and published by IPSA as 'business class fares'. This is not accurate and IPSA's error in classifying the fares in this way could and has resulted in untrue and unfair media coverage of Members' expenses. Having previously been advised that this matter would be reviewed, it is disappointing to see that no changes have been made as to how this is reported.

IPSA should also ensure that the information it publishes is accompanied, in the main body of text, by adequate contextual information to ensure that the reason for an expense cannot be misinterpreted and that any mistakes, whether by IPSA or the Member, are explained.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

IPSA should not publish claims that have been repaid by MPs as there is no impact on the public purse. In addition, if something is published which needs to be repaid but has not been repaid at that time, notification should be published when it has been repaid.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

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Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

Such information should not be published until the reason for it being overdue has been discussed and, subsequently, an agreed deadline has been missed, as it is easy to make genuine mistakes with such a convoluted system. Furthermore, IPSA should not publish details of suspended cards or financial difficulty unless these details are essential to provide context to other IPSA decisions about published expense claims.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

The security of Members' staff and families should be considered at all times when publishing such information. Personal details should always be redacted of individuals who are not commercial entities.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

If there is a particular issue with regards an expense that is due to be published, the Member should be given the opportunity to provide the context in which it occurred.

Question 37. Is there any further information that we should be publishing about IPSA?

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Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

IPSA should be aware that certain changes they make to the Scheme may have a detrimental impact in terms of those who will seek election in the future. For example, changes to the rules for accommodation could discourage family men and women from standing if they cannot having a permanent residence in which their family can stay / visit.

All changes to the scheme should be considered in terms of the impact they could have in how feasible it would be for individuals with disabilities, caring responsibilities, etc. to carry out the role of an MP.

Hilary Benn
MP
Email
Received 20/10/2016

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

I wish to support the points made by Kevan Jones MP in his response of 19th October on behalf of the Parliamentary Research Service.

This is an invaluable service that helps us to respond to our constituents who contact us about a wide range of matters that are before Parliament. It is much the most efficient and cost-effective way of doing so.

Hilary Benn MP

Information Commissioner's Office

Organisations and Academics

Email

Received 28/10/2016

Information Commissioner's Office response

'Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy - a Consultation'

The Information Commissioner has responsibility in the UK for promoting and enforcing the Data Protection Act 1998 (DPA) and the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR) and the Privacy and Electronic Communications Regulations 2003, as amended (PECR). She also deals with complaints under the Re-use of Public Sector Information Regulations 2015 (RPSI) and the INSPIRE Regulations 2009 as well as having a regulatory role in respect of Trust Service Providers under the Electronic Identification and Trust Services for Electronic Transactions Regulations 2016 (eIDAS).

The Information Commissioner's Office (ICO) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. The Commissioner does this by providing guidance to individuals and organisations, solving problems where she can, and taking appropriate action where the law is broken.

We welcome the opportunity to comment on the current consultation by the Independent Parliamentary Standards Authority (IPSA). The Information Commissioner provided initial advice to the organisation at the time of its establishment in relation to the requirements of both the DPA and FOIA and has also responded to previous consultations on matters falling within the ICO's remit.

We note the organisation is undertaking its first comprehensive review of the MPs' Scheme of Business Costs and Expenses and has also taken the opportunity to consult on possible changes to the Publication Policy. These changes reflect the opportunities to improve publication processes that new technology brings to the organisation and also take account of the change in practice relating to publication of redacted images of receipts, following the Court of Appeal's judgment in 2015.

The Information Commissioner's response relates solely to the Publication Policy as set out in Chapter 9 of the consultation document. As a starting point we are pleased to note the organisation's stated commitment to the principles of transparency and accountability that sit behind this consultation exercise.

We have a number of comments to make that we hope the organisation will find helpful; firstly in relation to the publication of receipts (Question 30).

The Information Commissioner is aware of the change made to the Publication Policy following the Court of Appeal's judgment in April 2015. The judgment upheld an earlier decision by the Information Commissioner which found that images of receipts and other supporting documents presented by Members of Parliament should have

been released in response to a request. We are also aware that previously IPSA was concerned about the additional cost of routinely publishing redacted images of receipts. It is therefore welcome that the organisation is now in a position to consider routinely publishing redacted images of receipts. We note that in the period April – December 2015 the organisation received 950 freedom of information requests for images of redacted receipts and so routine publication will remove such requests from the organisation's request case load. The organisation rightly acknowledges the need to ensure that in moving to routine publication the current redaction requirements and arrangements for sensitive personal data are maintained.

Other publication issues

It is pleasing to note that, as a result of the introduction of new technology and redesigned processes, the organisation is in a position to reconsider a number of the arrangements within its Publication Policy. We welcome the organisation's approach to delivering greater transparency and availability of information to the general public.

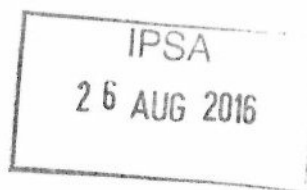
The consultation document identifies a number of issues relating to the frequency and content for future publication of MPs' business costs and expenses.

Whilst the ICO expects that organisations will wish to determine for themselves how frequently they publish information identified for proactive disclosure, based on organisational needs and arrangements, we expect that such arrangements should be periodically reviewed as a matter of good practice. We are pleased to note therefore that the introduction of new technology has enabled IPSA to do so at this point. We agree with IPSA's own comments regarding the time necessary to check the content of receipts and advise that whatever frequency of publication the organisation moves to, the necessary checking and redaction of personal data must continue to be undertaken in an effective manner.

Questions 32 and 34 of the consultation relate to consistency of approach and transparency with regard to publication of certain details of individual claims. We note that information relating to overdue money owed to IPSA has previously been provided in response to freedom of information requests. The existing 'arbitrary' publication of this information has led to the current proposal to put proactive dissemination of this information on a more regular footing, as is the case for other information already made available routinely. The ICO welcomes the proposal to now include this detail as part of regular publication activities. This approach is very much in line with the ICO's best practice recommendations which say that where there is a clear public interest in specific information that is only available in response to an FOI request the information should be reviewed and considered for routine publication by the organisation.

We welcome that IPSA's Publication Policy continues to develop and evolve taking account of legislative requirements and other developments. We acknowledge the organisation's commitment to transparency and fairness, which rightly takes account of their obligations both under the DPA – in respect of MPs' personal data and also the FOIA in relation to an individual's right to information.

October 2016



Graham Jones MP
Constituency Office
50 Abbey Street
ACCRINGTON
BB5 1EE

25 August 2016

Review of the Scheme and Publication Policy – responses to consultation
Independent Parliamentary Standards Authority
4th Floor
30 Millbank
London
SW1P 4DU 151

Dear Sir or Madam

**Re: Review of the MPs' Scheme of Business Costs and Expenses and IPSA's
publication policy A Consultation – May 2016**

I, the undersigned, am writing in relation to your consultation on the MPs' scheme of business costs and expenses to lodge an objection in relation to **Question 8**.

You propose a system whereby MPs' staff are unable to accept employment with another MP after being made redundant within 10 weeks without being required to return any redundancy payment made.

I believe this is unacceptable for the following reasons:

- Each office in Parliament is different and there is enormous disparity in working practices and job roles. It is simply not comparable to moving between departments of an organisation with an overarching hierarchy.
- In public sector organisations where people cannot receive redundancy payments on losing a job if they are re-employed in the same sector, there are also usually preferential policies in place to ensure those already working in the sector are first in line for other roles. This would be difficult and potentially controversial to implement in this instance.
- Staff who find themselves searching for work due to redundancy, and who find employment within Parliament, are often forced to take jobs for lower pay than in their previous office. There is no set correlation of pay grades, even between job roles with the same title.
- Redundancy provides for someone to cover their costs when searching for work. If someone were to be employed by another MP nine weeks after redundancy, it is simply wrong to demand a return payment of what might be a considerable amount, which has likely already been spent to cover housing and living costs. To do so constitutes a deep misunderstanding as to the purpose of a redundancy payment.

- If redundancy pay is on an accrued basis, then all terms and conditions relating to staff must also be accrued. This proposed change must require that redundancy and all other terms of employment, maternity/paternity rights for example, be carried over across offices, which also means that MPs hiring staff who have worked in other offices cannot impose probationary periods in 'new' contracts. This is likely to prove an unpopular arrangement with MPs.
- This proposed change also provides a potential disincentive for MPs to employ people who have worked in Parliament previously before being made redundant through no fault of their own. This is manifestly unfair to people who may have spent many years gaining experience and training in the Parliamentary profession, which is a unique skill set in and of itself. There is a case to be made regards staff being re-employed after redundancy by the same MP and IPSA is correct to look into that particular aspect. However, if this option on redundancy pay is to be taken across the board, then IPSA simply cannot treat each MP as a small business employer. At present MPs' staff exist without any departmental structural support, have no pastoral care, and an effective ban on staff bonuses. We are classified merely as 'an expense' and generally treated by IPSA as such. IPSA has until now abdicated any function as an arbiter of working practices, but if legally necessary terms and conditions like redundancy pay are to be accrued as if all staff belong to a single departmental unit, or payment for unpaid leave subject to additional scrutiny, then it behoves IPSA simply to accept a role as the overall employer of Members' staff, thus also providing the Human Resources, pastoral care and pay structures due, rather than remotely administering the payroll. Without this step being taken, the proposals specifically related to redundancy are unworkable and will be seen as IPSA once again imposing negative terms and conditions on an easy target.

I thank you for your time and your consideration.

Yours faithfully

Signature Redacted

Julie Milligan
Office Manager to Graham Jones MP

Liberal Democrats
MP
Email
Received 24/10/2016

Consultation

Document: <http://parliamentarystandards.org.uk/transparency/Current%20Consultations/Review%20of%20the%20MPs'%20Scheme%20of%20Business%20Costs%20and%20Expenses%20and%20IPSA's%20publication%20policy.pdf>

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

These fundamental principles seem in keeping with the role of IPSA. We especially welcome IPSA's reference to the need to not deter people from becoming MPs and the commitment that MPs should not be financially disadvantaged by carrying out their roles. Evidence currently indicates that the vast majority all MPs find it necessary to financially subsidise the running of their respective offices. Addressing the expenses process to ensure that this is not a trend that continues is important.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

We agree that this makes a sensible change to the rules and is a logical extension to the current scheme.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

We have no objections in principle but think that greater thought should be given to the meaning of the phrase 'as long as the journey cannot be funded from other sources'. One such potential source, Short Travel Money is allocated by the House and is eligible to each party based on the overall short money formula. In terms of the Liberal Democrats, claims are agreed and signed-off by the Chief Whip. This is a separate fund with very separate remit. We would not wish to see it drained by an IPSA system that requires claims to be made against that source before claims were eligible to be met by IPSA.

Question 4. Do you agree that we should remove the rule allowing claims for "diverted" journeys, along with the cost restriction on claims for journeys back to either the MP's constituency or Westminster?

We agree with this change and welcome the clarity it provides.

Question 5. Do you agree that we should carry out some "housekeeping" of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

We have no objections.

Question 6. Do you agree that we should simplify the rules on home offices?

We have no objections.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

IPSA is correct to leave all recruitment to individual Members of Parliament. IPSA rightly have a role in ensuring that the public gets value for money and the IPSA pay bands and job descriptions fulfil this role well. IPSA is correct to recognise that some members require administrative support in human resources issues. Advice is available from multiple sources – including from the House and the Parties – but IPSA is correct to make itself available to Members in this way.

We would like to recognise the improvement in IPSA's handling of enquiries which are outside of its responsibilities and ability to act as a one stop shop on enquiries.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

We strongly believe that the contractual employment rights of all MPs' staff should be maintained and that their employers, the MPs, are best placed to make judgments on what is needed during this period. It is important that IPSA recognise that MPs serve their constituents for years, even decades, and require a considerable amount of time to conduct an orderly shutdown of their offices – especially in cases of an unexpected defeat. By the nature of their work, MPs often deal with complex and sensitive casework from potentially vulnerable constituents, who can be difficult to contact. Forcing an MP leaving office to prioritise value for money over all else can be counterproductive and risks encouraging speedy conclusions rather than ideal ones.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

We are content with the current arrangements in this area.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

There is understandable public concern over the employment of connected parties. It is important, that it is clear to the public that there is no financial advantage derived from the employment of connected parties. We are supportive of the measures introduced, which include the publication of employed connected parties names and salaries in £5,000 bands. We are also supportive of the limit of one connected party employee per MP.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

Whilst we appreciate that it is not within IPSAs statutory remit to promote diversity (nor to make matters worse) we believe that this review offers a valuable opportunity to reassess whether any groups are adversely affected by the current rules. Whilst, as pointed out, there are some factual inaccuracies in the report compiled by the All Party Parliamentary Group on Women in Parliament, there are clear issues, some of which do exist and some of which are a matter of perception. It is clear from the report that many of these issues relate to family support so whether these can be solved by better communication of available assistance or by alterations to the rules, some changes would be constructive. The anecdotal evidence that eligible MPs don't claim for dependants due to negative media attention on their families and private arrangements is concerning. It may mean that this particular element needs to be looked at once again, and whether greater anonymity (similar to certain claims such as for security arrangements) would be a more desirable outcome.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

It is very important that IPSA ensure that it funds activities that are solely Parliamentary in their nature. We believe that discretion should be given to MPs when a matter is in doubt however, with the knowledge that MPs will continue to be held to account via the publication of their claims. This should work alongside the current IPSA helpline so that members can seek regular advice on claims as well as a clearly structured appeals process for refused claims.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

We believe that the pooled staffing services are an invaluable additional resource, which compliments, rather than duplicates the services made available by the House (e.g. the House of Commons Library). Given the large workload MPs and their offices face, having an additional resource provided through pooled staffing services provides greater economies of scale. This in turn means that they are able to better serve their constituents, perform their Parliamentary duties and secure value for money through pooled staffing. We believe that the current safeguards which are in place are well balanced and adequate.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

Whilst accommodation for MPs does constitute a large proportion of expenses claims, we believe the current rules are adequate and proportionate to the requirements of MPs. IPSA is correct to assess the accommodation costs of MPs but has a duty to ensure that the scheme does not have a negative effect on the ability of MPs to carry out their duties. It is important to recognise that being an MP is unlike any other profession and it is important that IPSA recognises that in the provisions of the scheme. There are many aspects of the job that can only be done at the Palace of Westminster – mostly importantly, voting. IPSA must recognise this in the provisions it allows for MPs and their dependants in terms of accommodation.

Option 1: IPSA is right to recognise that forcing MPs to move out of their London accommodation during the summer recess would decrease the level of value for money on this issue. MPs remain MPs during the summer recess and conduct their work across both their Westminster offices and constituency offices. Were IPSA to follow this course of action then it will lead to a number of knock-on effects:

- An increase in the number of hotel claims it receives;
- A premium on the cost of MPs rental accommodation as landlords find ways of recouping money lost over the summer months;
- MPs spending a considerable amount of time re-securing rental accommodation in London at the end of every summer. This would be especially difficult for those with dependents.

Option 2: IPSA is correct to recognise that reducing the accommodation budget in this way would lead to an increase in hotel use and lead to an increase in the cost to the taxpayer.

Option 3: It is important that IPSA provides an expenses system that allows MPs to carry out their duties without having to subsidise the cost of their work or accommodation. It is not correct to view the workload of an MP as simply reflecting the working hours of the House of Commons. Most work a minimum of six days per week, with early starts and late finishes. The vast majority of MPs represent constituencies outside of the London area and face a substantial commute to attend Business in Westminster at the start and end of every

week. Adding additional travel times to their weeks decreases the amount of time they have to serve their constituents. Were the expenses system to be reduced in this way – with an implicit expectation that MPs secure accommodation further away from Westminster – many MPs would feel it necessary to subsidise their accommodation costs in order to carry out their work in Westminster. MPs with dependants already face difficulties in balancing the needs of their families with the role of an MP and decreasing the number of options available to them in terms of accommodation would not be helpful in attracting a wider range of people into Parliament.

Option 4: IPSA is right to point out that this option would not save money and would have a severe impact upon MPs with dependants.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

IPSA is correct to follow a value for money principle in looking at reforms in this area and agree that the current limits achieve this in practicality.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

We agree that there seems little reason for policy change in this area.

Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice? 5

Quite rightly, MPs should not be able to claim any money for travel which provides them an electoral advantage. However, the general rules and exclusions on campaign expenditure and funding of party political activity should suffice in mitigating this. This should also help to avoid the clear confusion which existed during the dissolution period.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

We believe that the working principles applied to this element of the scheme during the 2015 general election were sensible however we would welcome further clarification on this topic.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

It should be noted that if possible most MPs choose to refresh their office equipment at the start of each parliament – indeed this is the first opportunity for new Members have to secure such equipment in the first instance. It is therefore not unusual that this might need to be replaced towards the end of the parliament as equipment reaches the end of its lifetime and becomes faulty. IPSA is correct to keep value for money at the forefront of its analysis but applying arbitrary restrictions on capital purchases during certain parts of the parliamentary cycle is not in keeping with the principles of the scheme more widely.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign

expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

We have no objections to this suggestion but would urge caution and for extensive engagement with the Electoral Commission on this topic.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

We would like to recognise the good job done by IPSA in helping MPs wind down their office following the 2015 general election results. As acknowledged in the consultation document, MPs only used 58.7% of their available budget however we do not feel that any reduction in the budget would incentivise any greater speed in carrying out this work.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

We completely support the need for IPSA to prioritise value for money by ensuring that MPs wind up their offices as quickly as possible. An election is an expensive process for all candidates and whilst IPSA is not engaged in the electoral process, structuring provisions in such a way so that the IPSA scheme recognises that it is interacting with former Members at a difficult and uncertain time would improve the smooth running of the winding down period. We would like to see greater flexibility available from the scheme so that the loss-of-office payment can reflect the specific individual needs of that former Member as they go about winding down their office. This may take the form of a percentage advance or allowing debts to be off-set against the final payment amount.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

We agree that simplifying the start-up budget by merging it with the office costs budget would be a sensible move. We believe that the any confusion based on operating this budget over two financial years can be easily mitigated and that all eligible MPs should receive the increased budget for 12 months regardless of whether they were elected at a general election or in a by-election.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

We believe that early and direct engagement with an MP who IPSA suspects is in danger of overspending on their budget is the best way to ensure that issues are resolved as soon as possible. MPs are ultimately responsible for managing their own budgets and are also perceived as such by the general public. However IPSA must ensure that it engages pro-actively with MPs and their staff to ensure that adequate support is provided to help MPs manage their budgets.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

We support the current provisions offered by IPSA but agree that the communication of this provision can cause unnecessary confusion.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

We agree that MPs should seek to ensure value for money for the taxpayer in carrying out their activities. We don't believe that introducing a rule along these lines is strictly necessary and should instead be reinforced through best practice guidance provided to Members at the start of every Parliament. Whilst the introduction of a two month break clause in accommodation and office rental equipment could save money in the event of loss of office, it has the potential to raise the costs of these contracts over the lifetime of the contract.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

We have no objection to this adjustment.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

We are content with the current operation of contingency funding

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

We would welcome the introduction of a specific access travel fund for constituents to visit Parliament and attend meetings with their respective MPs. All MPs take up issues with the Government on behalf of their constituents. On occasion, these are in part best pursued through meetings with Ministers and officials where the constituent is able to attend and give personal testimony of the issue at hand. Travelling to and from London from many parts of the UK is an expensive and time consuming activity, which can mean that some constituents are not able to attend such meetings and make their case. An introduction of such a fund – whether as a fund directly allocated to each Member each year or as part of a communal allocation – would greatly improve access to Parliament for some of the most disadvantaged and vulnerable people within our society and improve the understanding of democracy amongst the population as a whole.

Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

We believe that the current system, with redacted receipts available upon request is the best way to proceed. The current system fulfils the needs of most members of the public, whilst there is also the provision for those who wish to see the redacted receipts to do so. To publish redacted receipts for all claims would add an unnecessary burden, and whilst forecasted costs are less than previously thought, it is still an unnecessary cost to tax payers. It is also highly likely that if this were to be expanded, there would be errors in redactions which would risk the publication of sensitive information. In light of increased threats to the safety of MPs, it is important that sensitive information like this is not published, whether by accident or otherwise.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

We are content with the current publication cycle of MPs' claims.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

IPSA has a responsibility to protect public funds and take a decision on what information is in the public interest. It is our view that transactions that are made on payments cards but which are not ultimately met by public funds have no need to be disclosed. There is also a concern that disclosing this information could lead to confusion as to whether the public has met this cost.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

It is important that no changes are made to the Northern Irish MPs travel scheme which endanger the lives or increase the opportunity for harm of MPs or their staff.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

It is right that IPSA protects public funds at all times and publication of this information is correct, perhaps on an annual basis. IPSA however must take effective steps in the presentation of this data to ensure that it clearly outlines where money is genuinely owed by a Member and over a sensible reporting period. As always, IPSA must ensure that it proactively engages with all MPs and their staff over such instances where money is owed.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

We agree that IPSA must continue to apply the laws and principles of the Data Protection Act when deciding what should be redacted from receipts and invoices.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

We have no comment on this question.

Question 37. Is there any further information that we should be publishing about IPSA?

We have no comment on this question.

Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

We welcome IPSA's commitment to carry out a review into the impact of the Scheme on the Equality Act's "protected characteristics" criteria and will happily work closely with IPSA to advance progress on this issue. As mentioned in our previous responses, we are concerned that some of the suggested measures within this consultation could have the unintended consequence of making life more difficult for MPs with dependants, especially those with young children.

Accommodation costs in London are considerably higher than the UK average with the balance of the rental market primarily benefiting landlords. It is standard for most rental agreements to include up front rental fees and a large deposit. This often means that those starting work in Westminster must have access to considerable cash funds in order to move into the city in which they work. The effect of this can be seen in the geographical location of applications which tilt heavily in favour of those already in London and the South East, which is not healthy in a Parliament that represents the whole of the UK. IPSA should look to introduce as much flexibility within its scheme to allow MPs to offer the possibility of advance payments to new staff members to help them secure accommodation in London.

Lorraine Glass
MP Staff
Email
Received 19/07/2016

Dear Sir/Madam

On advice from your Policy Officer **[REDACTED]**, I would like to submit a formal response to your consultation to review the 'MP's Scheme of Business Costs and Expenses'.

The subject is the London weighted staff budget given to those MP's who represent London constituencies and employ people from London. I hope you can consider the point I make which is that there are MPs with constituencies outside of London who employ some of their staff from London and pay them the extra weighted salary, yet this is not compensated for in their staff budget. This leaves either a reduced amount in the yearly staffing budget which can lead to staff not being able to get a yearly pay rise, or an employee from London not getting a weighted salary.

The alternative is for the MP to employ from outside London, but this would mean high travel and accommodation costs, exceeding the amount of the extra weighted salary.

Yours sincerely.

Lorraine Glass
Constituency Support Manager to George Kerevan MP
Unit 1, 6 Mitchell's Close, Haddington, East Lothian EH41 3NB



HOUSE OF COMMONS
LONDON SW1A 0AA

Review of the Scheme and Publication Policy –
Responses to Consultation
Independent Parliamentary Standards Authority
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London
SW1P 4DU

Office of Roger Mullin MP
East Shop
Law's Close
343 High Street
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KY1 1JN

13th September 2016

Dear IPSA,

Consultation Response

Please see below my responses to the questions in your ongoing consultation on a review of the MPs' Scheme of Business Costs and Expenses and IPSA's Publication Policy:

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

- The meaning of the latter part of Principle 2 "*should not unduly deter people from any part of society from seeking to become an MP*" is slightly unclear to me. I think this should be explained better.
- I agree with all other principles, particularly with principle 4 which refers to MPs' expense claims having regard to 'value for money'.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

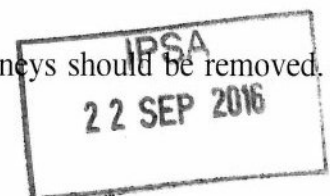
- Yes, I agree.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

- I believe that the current restrictions on foreign travel are adequate as they are.

Question 4. Do you agree that we should remove the rule allowing claims for "diverted" journeys, along with the cost restriction on claims for journeys back to either the MP's constituency or Westminster?

- No, I do not agree that the rule for allowing claims for diverted journeys should be removed. I believe that the rules on this should be kept as they are.





Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

- No, I do not agree. I think it is sensible to fully explain these terms as not everyone is familiar with them.

Question 6. Do you agree that we should simplify the rules on home offices?

- I do not have a view on this as I have not had to deal with this personally.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

- The role of IPSA in relation to the provision of HR advice should be clarified. I have personally found it confusing that both IPSA and the House of Commons provide HR policies for Members' staff. I found it particularly frustrating that I was misled by the IPSA maternity policy in relation to the entitlement of a member of Roger's staff to maternity pay and leave, as it transpired that the policy available by IPSA online was outdated and was not in line with the House of Commons policy made available by the Members' HR Advice service. This resulted in me misleading a member of staff regarding their entitlement. I therefore believe that HR policies should either be provided by the House of Commons or IPSA, not both.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

- I have already made my views regarding redundancy payments clear via a joint letter from MPs' staff to which I added my support in June 2016. In short, I believe that redundancy payments should be issued to staff regardless of whether or not they subsequently become re-employed by the same or another MP. Due to the unique employment situation of MPs' staff, they are likely to be unable to predict when they will be re-employed and by whom, and their ability to plan ahead financially should not be restricted; therefore, the redundancy payment is essential and should not be rescinded if they become re-employed in the same or a similar role.
- With regard to payment for untaken leave, IPSA could provide a template for recording staff annual leave and ask to see these records before issuing payment for untaken leave in order to ensure accuracy.



Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

- The ban on bonuses should be lifted, in my view. Reward & Recognition payments are only available with regard to particular pieces of work, not for consistently outstanding performance. Therefore, there is no monetary incentive available for MPs' staff to perform exceptionally well on an ongoing basis. If a member of staff's role is not project-based, the opportunity to work towards achieving a Reward & Recognition payment is restricted.
- MPs' staff work in small teams and their workload is often heavy and variable throughout the year. As MPs do not have the ability to reward their staff for hard work through means which may be commonplace in other organisations (e.g. paying for a staff night out or teambuilding day through expenses), it would be helpful for them to have the option of paying bonuses where they feel it is merited.
- Bonuses should be allowable, but should come from an MP's core staffing budget; therefore, it would be up to the MP to decide whether to utilise their full budget for staff salaries, or to employ fewer staff (or award lower salaries) and provide regular bonuses. Any bonuses awarded should be modest, and a maximum upper limit could be set e.g. £1,000 per employee per financial year.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

- The only way to clarify whether there is any cause for concern with regard to the employment of connected parties would be to investigate individual complaints. If no concerns arise, then I see no need to make any changes to existing arrangements.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

- IPSA should be mindful of the fact that, unlike most other jobs, MPs are required to stay away from home, family and friends (often a long distance away) for most of every working week. It should therefore be acceptable for some expenditure to be claimed for spouses/family members to visit MPs in London, even if it is not to accompany them to parliamentary events; it should not be deemed unreasonable for an MP's spouse to visit them in London once in a while, to install some sense of normality into their working week. Thought should be given to the fact that most MPs do a very demanding job with a high degree of stress and long working hours, and being able to spend time with their loved ones is likely to improve their mental health and wellbeing, enabling them to perform better as MPs.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?



- The boundary between parliamentary and party political activity can be very much a 'grey area'. I have often struggled to identify where that boundary lies e.g. entering party-related events into my MP's diary – to leave them out would risk the MP being unaware that they are on his schedule, but if I enter such events into the diary and RSVP to them on his behalf, is that classed as a party political activity? IPSA and the House of Commons are reluctant to provide specific answers on questions like this and therefore often I find myself personally inconvenienced to 'err on the side of caution' and ensure things like this are only done outside of working hours and not using parliamentary resources.
- In my view, IPSA should be able to give MPs and their staff a definitive answer when asked if something is deemed 'parliamentary' or 'party political', to enable MPs to remain within the rules.
- The rules should also be clearer on what constitutes a newsletter.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

- It is inevitable that party political goals are going to be considered by MPs as part of their role and therefore this function is vital. MPs need to employ staff to give them a party political slant on briefings, so the most cost effective way to do so is to employ pooled services in order to benefit from economies of scale.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

- Requiring MPs to live in hotels permanently would be untenable as it would mean having to live out of a suitcase and eat out every day. MPs already live an unenviable lifestyle and deserve the small comfort of being able to return to the same place every night, surrounded by their own belongings. In my view, there is no viable alternative to the current arrangements.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

- Yes – keep budget as it is.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

- Yes, I agree with this; however, I think that MPs should be required to declare any ownership of a private property in London and explain why they are unable to use it if claiming for a rental property from IPSA.



Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

- Yes, the existing rules should suffice.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?

- Yes, I agree.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

- I believe that IPSA should work with individual MPs to ensure that each claim is essential and reasonable, and the current restrictions should be scrapped.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

- Yes, the rules should be altered as the definitions are unclear.

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

- A contingency fund could be made available for things like redecorating offices, furniture removal, etc.

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

- Perhaps half of the loss-of-office payment could be provided immediately upon losing the seat, and the other half paid once all financial affairs have been concluded with IPSA.



Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?

- Yes, the suggestions are helpful.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

- I have no particular view on this.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

- Any uplift in funding to cover these types of leave should be reflected separately to the staffing budget (e.g. via a contingency budget) in order to avoid MPs being mistakenly reported as overspending.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

- IPSA should have to approve all rental agreements first to ensure they include the required clauses.
- Yes, the rule should be reworded to clarify.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

- No view.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

- The process should be expedited, for example by providing a standardised online application form or online application facility.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

- As mentioned in my response to Question 7, the HR documentation available on the IPSA website should agree entirely with that provided by the House of Commons/Members' HR Advice service. If it is not possible to ensure that this documentation is updated in line with the current policies, it should not be available online.



Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

- Images should continue to be made available on request, whereby a secondary check that all personal information has been redacted can be performed. This would both save money and safeguard data.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

- The current arrangements are fine.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

- No – it is easy to make a mistake and use the wrong card in error. Also, there can be issues with fraud and trouble obtaining refunds, as I have experienced with my own MP who experienced fraud on his payment card and subsequently encountered considerable difficulty obtaining a refund from Barclaycard.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

- No view.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

- This information should not be published as there may be many underlying/personal reasons why money is overdue. Overdue money should be deducted from the MP's salary unless a repayment agreement can be reached.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

- No.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

- No.



Question 37. Is there any further information that we should be publishing about IPSA?

- No.

Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

- No view.

I trust that this submission is helpful to your consultation. Please do not hesitate to contact me should you require clarification of any of my responses.

Yours sincerely,
Signature Redacted

Lynda Holton
Office Manager to Roger Mullin MP
Kirkcaldy & Cowdenbeath Constituency

MAPSA

MP Staff Representative

Email

Received 24/10/2016

Written evidence submitted by the Members' and Peers' Staff Association (MAPSA) to the IPSA consultation 'Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy – May 2016'

INTRODUCTION

The Members' and Peers' Staff Association (MAPSA) is a cross-party organisation run by and for Members' staff whether they work full time, part time, as an intern, in the constituency or in Westminster.

We represent all staff of any political party and work with the House departments, IPSA and other groups to ensure that all staff working for Members have access to the best possible working environment, facilities and support.

We appreciate the opportunity to respond to IPSA's 2016 consultation 'Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy'.

In order to facilitate the best possible response MAPSA sent an online survey to every member of staff across the country, totalling over 3000. This survey contained 38 questions, not all of which are relevant to this consultation so a full copy is not attached to this document. We have also not responded to all the questions set out in the consultation document as some of them are not relevant to staff or are not our position to comment on.

Over 1000 individual responses were received, making this, we believe, the largest survey conducted of staff members. It clearly demonstrates the strength of feeling on these issues, both positive and negative, and we would strongly encourage IPSA to take notice of this on the issues we have outlined below. We would be happy to discuss any of these or additional staff related matters at any point in the future.

MAPSA

October 2016

Question 1:

We welcome IPSA's proposals to clarify its fundamental principles and believe they are clearer and easier to understand. We particularly support point 6: *'MPs are responsible for their own financial and staff management – and IPSA should support them in exercising their responsibilities'*.

We would add that the term 'support' should not be interpreted as IPSA being responsible for the actual employment and management of staff over and above the issuing of contracts etc.

While value for money is obviously important, it should not compromise MPs offices being resourced appropriately and fully to allow them to do their job to the best of their ability, even if this may come at an increased cost.

Question 2:

When staff of MPs were asked the question 'do you agree that the same rules for travel costs should apply to MPs and their staff', 91% answered yes. 72% also felt that this would improve their ability to do their job. This finding supports IPSA's proposal to implement this and we believe it should be done with immediate effect.

"Staff should be able to move freely between the constituency and Westminster without having to worry about budget constraints. We sometimes need to travel between the constituency and Westminster to help the MP and also to do training. There needs to be much more integration between the world of Westminster and constituencies. This would benefit both parties."

"MPs staff should be free to travel in support of their MPs duties as much as possible, at the request of their employer."

"Our Member has staff only based in the constituency, so we need to travel frequently. A lift on claims from constituency to London would be useful."

"Yes, there are things taking place in Westminster that it would be useful to go to. We could also be on hand to help out when needed. It would be so much more helpful to visit Westminster more regularly and feel involved. We can feel quite isolated away in the constituency office."

"Personally, I think there should be some allowance for those members of staff who work for MPs from a devolved country to travel to and from the devolved parliaments."

"The job of parliamentary staff is to support MPs and Parliament in its business. Barriers to doing so should be minimal. The ever changing nature of parliamentary business and means that changes in travel are often required and the policy should recognise this. Very often this is a personal inconvenience to staff and we should not have to worry about costs."

Question 6:

The issue of home working is one that increasingly applies to MPs staff, particularly with the improved IT facilities provided by Parliamentary Digital Services, in the form of Office 365, Sharepoint, Onedrive etc.

However it is an area that is clearly not fully understood even by those who do work from home on a regular basis. 19% of staff responded saying that they routinely work at home for 1 or more days a week, however 86% of all respondents said they were not aware that any percentage of their home working costs could be claimed and only 2% actually did put in any claims.

It is obviously necessary to simplify the rules on home offices for staff and provide comprehensive advice on how the appropriate costs can be claimed. Staff should not be financially compromised if the MP has agreed that they can work from home for a proportion of their working week.

Question 7:

MAPSA does not agree with IPSA's comment that staffing is 'the least regulated area of spending'. IPSA sets the contracts, pay scales, budget and terms of employment for staff with banding for salaries, terms of employment etc. in fact making it one of the most regulated areas. The process of recruitment does and should remain the responsibility of the MP, but with support from IPSA and/or the House where appropriate.

When surveyed, staff overwhelmingly agreed that there should be more HR provision for staff (88%) and also that MPs should remain as staff employers, but were almost equally divided as to whether IPSA or the House should provide the additional provision, although they were not asked in detail which areas they felt should lie with each organisation. MAPSA has welcomed the opportunity to work with IPSA on the working group into this issue and will be interested to see the findings of the report in due course and possible solutions to this issue.

"I think at the moment there is a serious lack of support for MP's staff with job contracts and pay salaries. If I have an issue with pay, working hours or a grievance, my HR rep is also my boss who is also the MP. It means it's really difficult to negotiate fairly and free from fear of being discriminated against on future occasions for being a 'trouble-maker' or difficult."

"There should be more communication between IPSA and present HR."

"Anybody providing proper HR support for staff would be a major improvement."

"MPs and MPs' staff should have a separate HR. IPSA should be responsible for that of MPs and the House should be responsible for that of staff."

"I think that there is a complete lack of any sort of HR in Parliament, and so it would not really matter to me which one takes this responsibility, just that it happens."

"The support for staff, other than through the limited resources of MAPSA, is essentially non-existent. Likewise, there is very little guidance on offer for MPs who have disputes with staff. Far greater oversight and support is needed all round."

Additionally, staff did not feel (96%) that their salaries should be classified as an 'expense' when published and that there should be a clearer separation of what are 'expenses' to the MP and what can be technically classified as 'essential office costs'.

MAPSA believes this would lead to a reduction in negative press if IPSA made this differentiation very clear when publishing costs. MPs are often vilified for claiming large sums of money as 'expenses' but when the figures are broken down and the press/constituents have it explained to them that the bulk of that is office rent, staff salaries, stationery etc. the negative impression is greatly reduced.

In the original foreword to the 'MPs Scheme of Business Costs and Expenses First Edition' it states: *"Transparency is critical if public confidence in Parliament is to be restored...The power of transparency is that it allows people to find out for themselves what is being done in their name and with their money."*

We feel that ensuring the public and press understand that staff salaries and associated costs are not ‘expenses’ that the MP incurs, would be a key element in ensuring that transparency and also to restoring public confidence in MPs as a whole, as well as providing some comfort for staff who also have to deal with accusations about their employer’s costs.

“Staffing costs should be separate from office expenses. MPs can feel under pressure to keep costs down by not utilising the whole staffing budget by employing enough people and this can have a detrimental effect on the health and wellbeing of the existing staff who struggle to keep up with the work.”

“IPSA should be pro-active in stopping journalists presenting staff costs as expenses. It is unfair on MPs, misleading to the public and it makes it very difficult to imagine wages recovering from their recent decline in value.”

“The media tend to distort reporting of expenses, lumping together staff with other aspects.”

“Staff costs which should be included on the IPSA's own accounts and not the MPs' expenses.”

“Constituents frequently criticise MPs' "incredibly generous expenses", despite the changes since 2010. There is still a lack of public understanding. I believe that it is impossible to over-emphasise that the vast majority of MPs' so-called "expense claims" relate to staff costs. I would like to see staff costs reported completely separately from all other claims.”

“It's so unfair at the moment - when people claim "XXXX" was claimed by the MP on expenses, it makes the public think they've spent it all on hotels and food.”

“I believe some MPs try to keep their staffing costs low as they don't want to appear high up the 'list' to the public on staff spending. This means staff have extra work to do, even if there is money in the budget to employ another pair of hands.”

“Yes, there are a number of MPs who actively underpay their staff in order to maintain low expenses. Some also stop staff from claiming travel expenses for travel for work for the same reason.”

Although not a specific question in the IPSA consultation, 97% of those surveyed felt that a staff salary review should be conducted as soon as possible and salary brackets increased alongside an increase in the overall staffing budget. A review has not been carried out since 2010 and salaries have not kept pace with comparable roles elsewhere. There is a fast turnover of staff in Parliament and the majority of people who leave do so in order to earn a greater salary. There is no career progression and limited incentive to stay.

While a regular churn does ensure fresh ideas and vigour, it is also vital that those with extensive experience are given a reason and incentive to stay to provide stability and continuity for new and existing MPs offices.

“The House does not benefit from the best talent available in the market since it does not offer comparable market rates. If the salary scale was wider, the best talent would stick around rather than being forced to leave after a year or two to work in the private sector. Better staff would mean better politics.”

“Salaries have been static and salary bands are significantly below other comparable roles outside Parliament. The Salary budget is very squeezed as NI and pensions now have to be included which never used to be the case.”

“Staff often work long hours, including antisocial hours at evenings or weekends, that is not really reflected in the salaries specified by IPSA. The maximum staff budget prevents overtime being paid, as there simply isn't enough money in the pot, despite staff regularly working in excess of 50 plus hours

a week. Constituency staff are also disadvantaged in the upper salary limits, when they also play an important part in the MP's office."

"It is simply outrageous MP pay has been revised and increased while researcher and staff pay has been restricted at 1.3%. Parliament should be a leading example of good pay and conditions, currently it's not."

"Living costs, especially in London, have risen significantly."

"They have not been reviewed in 6 years, while other public sector workers have had at least a 1% increase in pay. We should be getting at least the same as other public sector workers. I also feel that pay should rise in line with inflation as otherwise we are effectively losing money. Good staff are constantly leaving for the private sector where they can be paid much more. To provide a good service to constituents we need higher wages."

"They are capped too low, meaning good able and talented staff (who would be capable of earning many times more outside Parliament) are forced to leave or earn below their potential."

"Increases (including recent 1%) should automatically be added to staff salaries and not just added to the staffing budget."

"Staff salaries have been static since 2010 and with the removal of bonuses meant that the actual highest level of remuneration was reduced by 15%. The salaries and benefits do not reflect the level of responsibility, skill and scrutiny of Members' staff."

"The annual 1% pay rise is also at the discretion of the MP, and my office did not receive this as it was only a recommendation."

Question 8:

Of those surveyed who were involved in redundancy process over the 2015 Election period, the majority felt that IPSA handled the redundancy process adequately, although there were also a large number of negative comments:

"It was often difficult to get responses from IPSA. The former MP had to make representations on our behalf. We were not given clear notices from IPSA and had to wait for the outcome of the former MP's meetings."

"It could have been better but staff were generally very nice and tried to be helpful - perhaps a designated helpline in the future would help."

"IPSA only handled the calculations - there was no 'HR function'. Support for the redundant staff came from the MP and Office Manager, themselves also redundant."

"I had worked for one MP for a significant period of time and was unsure how long it would take to wind-up the office. IPSA tried to second guess both the member and me and insisted on reasons as to why PILON should be paid. The member was the employer not IPSA."

While we appreciate the acknowledgement that IPSA is not implying any wrongdoing by MPs or staff over the issues of redundancy or PILON and that all expenditure was compliant with the rules, we do not agree with the comment that there were 'three significant concerns' that emerged.

This was IPSA's first General Election so processes and figures cannot be compared against any other on a like for like basis. Staff and MPs worked with IPSA and the House over redundancy, PILON and re-employment and while figures and costs may have been higher than IPSA predicted this can in many instances be put down to the change in political landscape. However, this may occur at future elections and in different ways and IPSA should be prepared to be flexible with differing amounts of notice periods, particularly where the seat has changed parties.

On the issue of staff leaving the employment of one MP and immediately starting with another but receiving redundancy, we do not believe this should be amended unless continuous service is offered. Even if it is offered it should be considered that the terms, conditions, hours and pay may all vary so that the new job may not be comparable with the old. While we recognise that redundancy was a large sum paid out it was done so legally, correctly and appropriately and we would need to be reassured by strong legal advice if any alteration is proposed in the future.

We would agree with IPSA that MPs who have given a lengthy notice of their intention to stand down should be able to wind up their offices in a timely fashion and that this should include giving correct notice to staff being made redundant. We received some mixed comments on this point, however those who disagreed made the point that the end of the redundancy process should not be before the Election as work continues right up to the point of a new MP being elected. It may therefore be an option to end it a week after an Election to allow for some short handover/wind up.

The other point that is raised is that of holiday pay. It should be stressed that there are very large numbers of staff who may not take full holiday allowances, particularly over busy periods such as an Election, so it is not surprising that holiday pay claims were high for that year. Additionally, an extremely high proportion of staff work regular overtime hours without claiming, often due to there being no capacity in the staffing budget, so may use TOIL instead of holiday. These are matters and decisions that remain the responsibility of the MP as the employer and we do not believe this should be amended.

Question 9:

The issue of staff bonuses is an area that will obviously generate a lot of comment. However, the vast majority of people commented that better salary rates with a regular review of pay would be preferable to bonuses or incentives.

Question 10:

We are interested that despite the 2015 assurance review of connected parties IPSA feels that it is necessary to include it again in this consultation. As stated in the consultation document IPSA 'found no grounds for concerns for the majority of connected parties'. We would also be interested to learn what form 'public concern' takes and in what volume.

The majority of staff respondents did not agree that it is an issue that should be looked into further.

Question 12:

When asked whether they found the information helpful that was put out by IPSA on the issue of what constitutes party political matters and how it affects staff work during Dissolution, 50% were positive in their response, however a concerning high figure of 40% were not aware of the information at all.

MAPSA worked with IPSA and the House to run training events for staff to ensure that as many as possible were briefed on this and other issues. Over 900 people attended, however it remains difficult to ensure

information reaches all constituency staff. We believe this is an area where a specifically targeted approach for staff could be improved for the next Election and would be happy to work with IPSA on how best to achieve this. Additionally, 77% think that similar advice should be provided for the day to day work of MPs' staff.

"Some of the issues were woolly and it was difficult to get clear guidance. The lines should be clear as to what staff can and cannot do."

"I was aware of the information issued. We have an office manager who told us what we could and could not do. I am not aware of what part of that was IPSA lead information or just what our MP wishes."

"This information was useful however this was made available too late for offices to make timely arrangements. Also, all the information was not available immediately and required a lot of chasing up - this was a similar view to other local constituencies."

"This is a problem that still hasn't been solved. We were told we couldn't do party political work - so only really provide constituency casework help, as anything else can be construed as party political. But access to computers and caseworker software was curbed, making casework nearly impossible. Additionally, most Westminster staff aren't caseworkers. When at advice sessions, people asked IPSA what they could do, they were simply told it was up to MPs to decide what was party political or what was not."

"The information changed on a daily basis - there was no consistency of approach."

"Only if they do it properly. The guidance given at election time was very poor. It was equivocal - like much of the HR advice. If you are going to give advice, it should be clear and easy to understand - not open to differing interpretations."

"Some guidance would be helpful. This would be particularly useful for new members of staff."

"MP's should be better briefed on what their IPSA staff can and cannot do."

Question 13:

As with the issue of connected parties, we are surprised that IPSA has chosen to include the issue of pooled staffing services again.

However, it is a facility that is greatly used and valued by Members and staff alike and over 70% of respondents agree that having it allows them to spend more time on constituency matters and/or on matters of particular interest to the Member.

With the quantity of electronically generated standard emails that are now being received by MPs; the volume of which has increased dramatically since the 2010 Election, these services have become even more appreciated and valued. A majority of staff believe that if they were not available it would have an impact on staffing requirements/budget as the workload would be unsustainable on current staff resources.

"With the increase in online companies such as change.org and 38 degrees we receive far more policy based enquiries than ever before and it would be impossible to draft responses to each issue in a timely manner."

"The growth in standard emails makes the PRU invaluable to us."

"Last year this constituency received over 15,000 petition emails alone - for hundreds of different

petitions from 38 Degrees, Change.org and others. I'd go further and say we'd not be able to function without these pooled resources'."

"Strongly agree because there are aggressive campaign groups which flood offices with identical lobbying emails from constituents, all of which need to be answered but without the level of effort required for individual housing, benefits, tax credits. Pooled resources means everyone gets an answer without government departments being flooded by individual campaign inquiries from MPs and their staff."

"If we didn't have such a pooled service we would need the staffing budget increased and another member of staff just for research and written composition."

"I would be absolutely unable to do my job without the PRU and I can't imagine sufficient replacement - even if we could hire an extra staff member or two, we would not be able to have the specialist knowledge necessary on each different department, and it would be completely unworkable getting approvals for so many separate letters, EDMs, etc, or confirmation of a mutual position."

"We would probably need 2 additional members of staff to cope, which would cost more than £50,000 against pooled costs of around £3,000."

"The office would need at least 2 additional FT members of staff to deal with campaign emails and the like. The pooled resources we have access to are vital to managing this workflow, as well as general enquiries from constituents."

Question 18:

92% of staff believe that MPs' staff who normally work in Westminster should be allowed to claim for travel and subsistence while travelling to and working in constituency offices on parliamentary business during dissolution. We do not believe that staff should be financially compromised or inconvenienced while carrying out their jobs during this period.

We also believe that greater information should be made available about this. There was some confusion about the location staff could claim mileage from, whether this was Westminster (closed) or their home where the majority were working from. This was eventually clarified as being from home, but information was not put out until too late for many to be made aware of it.

"Staff that normally work in Westminster, normally live in London, therefore if they are required to work in the constituency office, normal rules should apply."

"When working from an office that is not your normal place of work it is completely fair and transparent to expect your employer to pay for your travel expenses. This does happen in the private sector."

"It seems entirely unreasonable to expect staff to relocate from Westminster to a constituency office which may potentially be hundreds of miles away. In this day and age it seems much more sensible to issue guidance over what duties those staff may and may not perform, and leave it to individual members and offices to determine working practices."

"It is of course necessary to continue to provide a service to constituents, even during the election period. It is therefore outrageous that staff are not able to claim for travel and subsistence while travelling to and working in constituency offices on parliamentary business during this period."

“If my employer tells me that I must work from another location, if this is not my home, then the employer should cover this.”

“Absolutely - casework does not stop during dissolution. Actually, such staff should either be paid to travel to the constituency - or they should be allowed to continue working in parliament - if they are not allowed to travel to the constituency.”

“Just let them stay working in their Westminster offices!”

Question 23:

For the majority of staff this question was not relevant, however of those who were involved in start-up budgets and responded, 92% said they found the budgets helpful

It was also pointed out by staff that the cross over in financial years did make the budget confusing, so an increased amount into the office costs budget for the first financial year may help simplify this.

Additionally, several staff members commented that an increased limit on the IPSA Visa card would have been extremely useful as part of the start-up process, rather than having to contact IPSA every time the limit needed raising.

Question 25:

It is unacceptable for any MP to be reported as overspending while paying for maternity, paternity, adoption and long term sick leave. This is an area where it is vital that IPSA makes it extremely clear when publishing costs that these are supporting the MPs work and be proactive with the press, particularly regionally.

Staff should not be made to feel that their personal circumstances are in anyway likely to compromise the public image of their MP. Staff take huge pride in their work and jobs and find negative comments for their employer upsetting. If this is coupled with long term sick leave or other personal situations, this could become a very difficult and emotional circumstance.

A lot of staff have suggested that this is treated the same way as the new security package costs and put into one total figure for all MPs. This would seem to have a lot of merit and would alleviate other concerns that publishing spending will act as a disincentive for MPs to hire people who may find themselves requiring time off in the future.

“Really unhappy about how this is managed - our local paper published the cover as a 'shocking' expense in an article on the local MPs expenses. I appreciate this is the media doing that but the MP shouldn't be made to feel that cover is in any way wrong and the information when released by IPSA must be dealt with sensitively.”

“It should be paid from a central contingency fund and not counted as additional expense for the MP. Inevitably MPs are directly compared with each other when it comes to expenses and that public comparison takes little or no account of circumstances such as long-term sick pay, maternity or suchlike and the necessary additional staff cover for those circumstances.”

“Surely this could be treated the same way as the security budget and remain unpublished. Why should an elected member come under scrutiny for covering basic employment rights for their staff.”

Question 29:

There were a number of other issues raised, which we have outlined below:

Boundary changes:

We hope that IPSA will be considering the possibility of boundary changes in due course and the increase in staffing resources, office costs and overheads that this will result in. Where rural seats expand further it will become increasingly common to require two offices with the associated costs and likewise more staff to administer the increase in communications and work.

Security:

In recent months security of MPs and staff has been of concern to everyone. Staff were asked whether they were aware of additional security measures and whether it goes far enough to assist staff, particularly those who work in constituency offices. While 84% were aware of it, only 62% felt it was sufficient for staff and that more could be done.

Additionally a large amount of people suggested some form of personal safety training and first aid training should be made available to staff, particularly those in the constituency.

“It does since the engagement of Chubb to carry out assessments. This should have been standard practice - all new MPs should have an assessment when they are elected and establish a permanent office, and a standard package installed for all members.”

“It’s MP based. Takes no account of personal security of staff members who for example are often at surgeries / meetings alone before their member arrives. Staff members can also be followed home etc. - not just MPs.”

“It would help if personal alarms were just issued rather than having to trawl through lots of brochures. I know they are available at Westminster to have a look at but out in the Constituency we just have the brochures and there are so many it's difficult to make the choice.”

“The nature of the job is that you will always be at some risk in the constituency but the recent communications from IPSA on what is available is helpful to know.”

“All the security is mainly focussed on MPs and not sufficiently on staff. The security and staff MUST be given more of a priority.”

“The IPSA security review almost exclusively dealt with the MP but very little assurance was provided to members of staff who, in the constituency, deal with members of the public (who are often distressed or angry) alone by themselves. The only security advice staff received was from the local police following the incident.”

“The fact that IPSA publishes receipts of travel and hotels is a huge security risk. MPs and staff tend to take the same flights [and trains] and stay at the same hotels week-to-week, yet IPSA publishes these receipts. Someone could easily go online and look at the travel patterns of MPs or staff and be able to target them. This information should be excluded from the public domain.”

“Training was only done at Westminster with 72 hour notice. Promise of training in constituency never happened.”

“A straightforward how to/escalation policy of where to go and what to do with regards to dangerous constituents/threats generally/self-defence training.”

A selection of additional comments received but not pertaining to any specific consultation question:

“I am not convinced that IPSA understands the relationship between an MP and their staff and the work that the staff do. I would like IPSA to include visits to MPs constituency offices in their consultation.”

“Payment of expenses incurred by staff should be repaid directly to the staff concerned rather than to the MP as it is difficult for staff to then obtain the money back from the MP.”

“Support for MPs proxy is too remote to begin with, they need face to face training in the first few weeks to make the transition much smoother.”

“If an MP seeks a yes/no to whether something is permissible to be claimed it would be really helpful to get a yes/no reply from IPSA in writing. The no reply is not an issue it is the "yes, provided you think it is permissible under the scheme" which is not very helpful as that is why you have contacted them in the first place. When you get a verbal "yes" and put in a claim, months later it can be subject to lengthy queries.”

“The fact that we cannot set up direct debits for paying services (electricity, phone) means we pay over the top. Surely this is an unnecessary expense when you consider the amount of offices that are in the same position.”

“It seems wrong that MPs cannot claim for light refreshments in the constituency office where they receive a great number of visitors / constituents. This means that if a representative of an organisation or business visits the office the expense of something as simple as offering a cup of tea or coffee falls on staff members. This is especially important when dealing with sometimes distressed members of the public who have an appointment relating to a difficult life event. Most reasonable employers provide light refreshments to staff and visitors.”

“When you ask for advice it would be helpful to receive a written confirmation one way or the other not the usual "if you or the Member thinks it comes under the scheme ...”

“It has been very helpful to be able to respond to the consultation anonymously, knowing that my responses will not be held against the MP in a public way.”

“The online expenses claim system is far too complex and difficult to use. The categories and menu drop-downs are confusing and inadequate. The whole interface is extremely user unfriendly and time-consuming to use. On a technical level, it is not compatible with certain browsers i.e. Chrome, which is incredibly annoying. It frequently crashes. The system of running "reports" from it is very complicated and unclear. The entire system needs redesigning.”

“I would like to request that staff can reimbursed direct for office expenses. Every time staff buy papers etc. from their own pocket I have to get the MP to reimburse them and then claim it back. It would be really helpful if it could be paid direct in the same way as mileage and parking etc.”

Martin Williams
Member of Public
Email
Received 12/10/2016

Hi,

I have attached below responses to selected questions from the consultation on the MPs' Scheme of Business Costs and Expenses, and IPSA's publication policy.

As a journalist, I recently investigated and wrote about the expenses scheme in my book, 'Parliament Ltd', which was praised by IPSA. I therefore hope the following responses will be of use and interest.

All the best,

Martin

--

Martin Williams
Freelance journalist

Signature Redacted

Question 2.

Do you agree that the same rules for travel costs should apply to MPs and their staff?

In general, this appears to be fair and reasonable. However, Paragraph 27 proposes to end the rule that staff can only make up to 96 single journeys between the constituency and London a year. I would suggest this rule provides a good purpose and scrapping it only serves to enable MPs to exploit their staff. As your consultation notes, the rule works well in almost all cases. Without it, it would be easier for MPs to move their staff an excessive amount between constituency and Parliament, rather than simply hiring two separate sets of staff (part-time if necessary), like most MPs do. While researching for my book on MPs' financial affairs, Parliament Ltd, I interviewed one MP who did this. He said he made his staff travel down two days a week and stay in London at their own expense. He explained that one member of staff stayed with a relative, while the other "stops in one of these Easy hotels which... it's like being in a morgue apparently, they just sort of slide him in." To many, this would appear a shoddy state of affairs for MPs' staff to have to put up with. Although the rule on 96 journeys does not prevent this outright, it certainly restricts excessive moving of staff in a way some may regard as exploitative. MPs should be expected to manage their staff appropriately so that staff are not forced to travel so excessively where it is quite clearly avoidable (given that most MPs do not do this).

Question 3.

Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

These restrictions seem completely arbitrary and counter-productive. Clearly, this is not ideal. The restriction to Europe is especially arbitrary. There should be more flexibility for MPs to travel abroad. I say this as someone who has called for tighter restrictions on expenses. However, there are cases where MPs have been unable to claim trips using expenses and so they turn to lobbyists and PR firms to fund their trips for them. I believe the key to this is: (a) to place strict limits on the amount it is possible to claim on travel,

including a ban on business-class travel and expensive hotels; (b) firm proof that not only the trip is for parliamentary business, but also that each day of the trip has been used for parliamentary business.

Question 5.

Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which over-define concepts, such as commuting, which are commonly understood?

No. The idea that rules can be relaxed simply because time has passed since the Expenses Scandal is a very dangerous one. These rules pose no harm, so they should be kept. The principles of these rules and definitions remain (as far as I am aware). Just because they have not been needed so far, does not mean they may not be needed in the future. Having the rules in place allows a frame of reference that MPs, journalists and the public can draw on if and when any discrepancies arise.

Question 14.

Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

I am disappointed that IPSA appears to have ruled out the option of locating blocks of property, as universities do for their students, and requiring large numbers of MPs to stay in them. This would be the single most effective way to restore public trust in politicians' spending on accommodation. Regardless of cost, that alone would be a great achievement. And financially, it would almost certainly prove very cost-effective in the long-term. This method has already been tried and tested in other countries, and has worked well. For instance, politicians in Norway who live more than 40km from Parliament are entitled to furnished apartment in a block of 147.

In the suggestions made in IPSA's consultation, the worst one by far is the idea that IPSA could only provide funding for hotel accommodation. This would not only be highly costly, it would also be likely to damage public trust in the expenses system even more. During the course of researching my book on MPs' financial affairs, Parliament Ltd, I uncovered countless MPs who had claimed for luxury hotels within the £150-a-night limit. One MP had claimed nearly £25,000 on hotel stays in one year. If anything, it is hotel spending rather than rent claims that need to be curbed.

Even if there is no major change to accommodation claims, there should be tighter rules around what MPs can claim. For instance, a number of MPs have claimed for houses owned via tax havens, meaning that taxpayer's money is being handed straight to landlords who are potentially avoiding huge tax bills.

Question 16.

What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

No. The purpose of the expenses system is to ensure that anyone can afford to be an MP - not to just subsidise individuals' living situations for the sake of it. True, MPs should not have to lose out substantially in order to maintain a home in London, but changing this rule would not do that. Banning MPs who own property in London from claiming for a second home would not force them to sell up. The worst scenario is that they will not be able to make additional money by renting it out. In other words, changing this rule would not put anyone out of pocket, eating into their parliamentary salary. It would merely prevent some MPs from moonlighting as landlords. With the additional factor of public opinion, which is strongly against the current rules on this, there is no justification for allowing this to continue.

Question 30.

What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

This is absolutely essential for transparency. As a journalist who has spent ages investigating MPs' expenses, I cannot emphasise strongly what a vast improvement it would be to publish images of all receipts.

In the 2009 Expenses Scandal, much of the controversy was only exposed because the Telegraph was leaked the full, un-redacted receipts. This enabled journalists to identify the precise details of expenses claims which was essential - for instance - for discovering when MPs had employed their families' company for services and claimed the bill on expenses.

Examples that I uncovered in my recent book (by sending dozens of time-consuming FOI requests to IPSA) include revealing MPs who stayed in luxury hotels. The same issue can be seen in the Lords' Expenses System: only after many FOIs did I discover that one Peer had claimed £9,000 to travel business class on a BA flight from New York, just to make a four minute speech in Parliament. Without accessing receipts, a good proportion of the relevant information is missing. True, it is - in theory - obtainable under FOI, but this makes it incredibly hard to identify the receipts of interests and it is not at all practical for members of the public who simply want to find out about their MPs' expenses. I also doubt it is cost effective for IPSA to have to so many FOI requests.

I should add that there also needs to be consideration for what is redacted on receipts, and would argue that IPSA needs to be extremely careful only to redact what is really necessary to redact. Again, it is worth remembering that many of the Telegraph's revelations were only possible because they had un-redacted receipts. My experience of IPSA's redactions has been largely positive, but there may be room to extend transparency further in this regard.

Question 31.

How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

As frequently as possible.

Question 32.

Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

Yes, for the reasons stated in the consultation review document. This is still taxpayers money being lent to MPs. There is an administrative cost, including potentially for efforts to receive repayment. However, it would make sense (and be fairer to MPs) if this information was published in a separate dataset from regular expenses. The expenses database is already complicated and any efforts to avoid confusion for casual browsers would be welcome for all concerned. But publication and transparency is the most important thing.

Question 34.

What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

As frequently as possible.

Question 35.

Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

As I have said in previous answers, in the 2009 scandal, many the Telegraph's revelations were only possible because they had un-redacted receipts. My experience of IPSA's redactions has been largely positive, but there may be room to extend transparency further. Certainly, there should be no effort to limit what is published even further.

I do not really see that the Data Protection Act would apply particularly to this, since we are mainly talking about (a) businesses and (b) MPs' use of public money. I am not sure there would be much justification for withholding the names and addresses of any businesses, hotels, sole traders etc whose services have been used by MPs, since these are commercial entities rather than private individuals.

Question 36.

Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

- Publication of receipts should be a top priority. If it is possible to link these with the online database, it would be a great asset for transparency and accountability.
- It would be good if more could be done to emphasise the distinction in the data between (a) MPs' own expenses; (b) their office expenses; (c) their staff's expenses. I am not suggesting any change in how this is reported, but merely in how it is published. At the moment the dataset is so big and cumbersome that scrutinising it properly would be a challenging task the casual browser who wants to find more information about their MP. So perhaps splitting the data into separate (but collatable) spreadsheets.
- The search function on IPSA's website is shoddy, slow and impractical. There is no good excuse for this.
- Have you considered just publishing the data online in a Google Sheet document, once a month? This would be simple, cheap and easy for people to read.

Medwyn Griffiths
Member of Public
Email
Received 11/05/2016

Dear Sir/Madam,

I have worked for my local authority for over 20 years and have always been conscious of others who have been made redundant and had to wait over the 10 weeks to find employment. I am shocked (but not surprised these days) that the rules by which we have to abide is so different in the ivory tower. Also, I have always said that employing family members using public money is wrong and as we are the ones who provide the means, we should be able to investigate in more details who is being paid what and what for. This should look at the last 10 years and have every penny ill-gotten repaid to the coffers in these times of austerity (for the rest of us of course).

How would I go about starting a petition to get these matters investigated?

Diolch/ Thank you.

Medwyn Griffiths

Meg Hillier

MP

Email

Received 24/10/2016

IPSA Consultation – Response from Meg Hillier MP

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

This function needs to be returned to the House of Commons which currently provides HR advice. MPs pay individually for insurance policies funded by the taxpayer. The total cost of these policies is probably higher than the cost of any dispute settlements under the old self insurance regime where the House of Commons picked up the cost of HR resolution.

The insurance only kicks in in case of an employment dispute. This means that well managed offices receive no legal advice or support until or unless an employment claim is made against the MP as employer - which good employers would seek to avoid at all costs. Even then there is a £2000 excess charged. The Insurance will only pay out if the MP has sought and followed to the letter the advice provides by the House of Commons HR advisors. This means that these professionals are aware that their advice is closely scrutinised and this can lead them to be overly cautious.

So MPs are caught between HR advisors employed by the House of Commons, a private insurer funded by IPSA which provides not advice or support unless there is a dispute, and IPSA payroll (which has given conflicting advice in the past). It would make sense if these functions were combined. As pay roll is a simple function it could easily be outsourced (most logically to the House of Commons so that the two main staff functions were aligned) with an audit arrangement or service level agreement as necessary so IPSA could be satisfied that salary levels etc were being adhered too. This should be cheaper as there is a large staff complement in the House of Commons already serviced by their payroll department, whereas IPSA has a small staff team on payroll. This would both save taxpayer's money and provide a more streamlined services to MPs and their staff.

Similarly the House of Commons could be funded by MPs who currently purchase insurance to self insure MPs involve in staff disputes.

An alternative could be private HR advice commissioned by individual MPs. But this would be expensive and because of the time taken to understand the nature of the work and working environment in Parliament is unlikely to be effective.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

I wish to comment on staffing support for Chairs of Select Committees.

I was elected Chair of the Public Accounts Committee in June 2015.

In this role I work with and liaise with a number of teams and individuals. I am at the centre of a web of organisations and teams, including the National Audit Office, the clerks to the committee, MPs of all parties, committee members, whistleblowers and members of the public.

The Public Accounts Committee was established to examine the economy, efficiency and effectiveness of Government spending. This is mainly focused on the civil services officials who are accounting officers or heads of service. With the growth of outsourcing we follow the taxpayers' pound wherever it is spent which increasingly includes the private sector, so widening our scope. The PAC meets twice a week when Parliament is sitting.

We mostly conduct single hearings on a topic, usually using a report or investigation by the NAO as our starting point. We also request investigations (often because whistleblowers or MPs raise issues with me). For a minimum preparation it is preparing thoroughly with a single NAO report, but often it is more than one as well as reading other evidence and doing my own work around the subject.

My work requires pre hearing preparation, including close liaison with the committee members who have a particular interest, liaison with MPs in general including meeting MPs with a particular constituency interest, meetings with whistleblowers and experts to help shape the committee's work, liaison with officials from the NAO, the clerks team and planning the future agenda. After a hearing I work closely with the NAO to shape the heads of the report and the final draft report for circulation to members. Once a report is published there is a raft of media work around it.

In terms of resources the committee clerks service the committee, the NAO similarly serve the committee and any Member of Parliament (Lords and Commons) can ask for advice and briefings from them. The personal support to me in managing this workload is from my existing staff complement. My office is supporting the caseload of a busy inner London constituency and was already stretched to meet the published deadlines for casework and other correspondence.

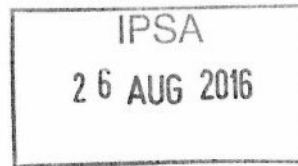
In order for me to liaise effectively with colleagues across the House, brief them, gather evidence from them and feedback I have created a part-time role. The nature, pace and complexity of the work of the PAC requires this to be a senior role. I am not able to pay for a full-time member of staff as this would mean reducing my office staff beyond what is manageable. As it is my office staff are fielding more contacts (even if they field them to other teams to ultimately action). They also have to support me in writing keynote speeches – which requires a whole different skill level compared with short public comments at local events.

The PAC looks across every department. Often in a typical month I will have read, prepared, questioned and chaired sessions on eight completely subject areas and covered many more with MPs and media. Whilst also releasing on average 2 committee reports a week.

Doing all of this with only my Parliamentary office as support is short changing my constituents. My committee is the busiest select committee. I work long hours, to which I have no objection, but this means that my own time is even more stretched. I would welcome some staffing support as the chair of the most productive committee.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

In the past MPs were able to vire a percentage of their budget between their office costs and staffing budgets to help support whichever budget was the most pressured. This was an important way for MPs to manage their budgets and would welcome a return to this.



Graham Jones MP
Constituency Office
50 Abbey Street
ACCRINGTON
BB5 1EE

25 August 2016

Review of the Scheme and Publication Policy – responses to consultation
Independent Parliamentary Standards Authority
4th Floor
30 Millbank
London
SW1P 4DU 151

Dear Sir or Madam

Re: Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy A Consultation – May 2016

I, the undersigned, am writing in relation to your consultation on the MPs' scheme of business costs and expenses to lodge an objection in relation to **Question 8**.

You propose a system whereby MPs' staff are unable to accept employment with another MP after being made redundant within 10 weeks without being required to return any redundancy payment made.

I believe this is unacceptable for the following reasons:

- Each office in Parliament is different and there is enormous disparity in working practices and job roles. It is simply not comparable to moving between departments of an organisation with an overarching hierarchy.
- In public sector organisations where people cannot receive redundancy payments on losing a job if they are re-employed in the same sector, there are also usually preferential policies in place to ensure those already working in the sector are first in line for other roles. This would be difficult and potentially controversial to implement in this instance.
- Staff who find themselves searching for work due to redundancy, and who find employment within Parliament, are often forced to take jobs for lower pay than in their previous office. There is no set correlation of pay grades, even between job roles with the same title.
- Redundancy provides for someone to cover their costs when searching for work. If someone were to be employed by another MP nine weeks after redundancy, it is simply wrong to demand a return payment of what might be a considerable amount, which has likely already been spent to cover housing and living costs. To do so constitutes a deep misunderstanding as to the purpose of a redundancy payment.

- If redundancy pay is on an accrued basis, then all terms and conditions relating to staff must also be accrued. This proposed change must require that redundancy and all other terms of employment, maternity/paternity rights for example, be carried over across offices, which also means that MPs hiring staff who have worked in other offices cannot impose probationary periods in 'new' contracts. This is likely to prove an unpopular arrangement with MPs.
- This proposed change also provides a potential disincentive for MPs to employ people who have worked in Parliament previously before being made redundant through no fault of their own. This is manifestly unfair to people who may have spent many years gaining experience and training in the Parliamentary profession, which is a unique skill set in and of itself. There is a case to be made regards staff being re-employed after redundancy by the same MP and IPSA is correct to look into that particular aspect. However, if this option on redundancy pay is to be taken across the board, then IPSA simply cannot treat each MP as a small business employer. At present MPs' staff exist without any departmental structural support, have no pastoral care, and an effective ban on staff bonuses. We are classified merely as 'an expense' and generally treated by IPSA as such. IPSA has until now abdicated any function as an arbiter of working practices, but if legally necessary terms and conditions like redundancy pay are to be accrued as if all staff belong to a single departmental unit, or payment for unpaid leave subject to additional scrutiny, then it behoves IPSA simply to accept a role as the overall employer of Members' staff, thus also providing the Human Resources, pastoral care and pay structures due, rather than remotely administering the payroll. Without this step being taken, the proposals specifically related to redundancy are unworkable and will be seen as IPSA once again imposing negative terms and conditions on an easy target.

I thank you for your time and your consideration.

Yours faithfully

Signature Redacted

Megan McCann
Secretary to Graham Jones MP

Nigel Double

MP Staff

Email

Received 11/05/2016

At the outset I never thought I would ever be writing in support of the scheme that came into being in 2010. I have managed claims for Gary Streeter throughout the time since the introduction in 2010 and having proved experienced in handling claims and keeping abreast of the scheme have been able to offer additional support to three other MPs who use me in a variety of ways. Management of staff budgets for others working in the same office is a particular issue for confidentiality reasons.

The scheme has developed well through the last parliament and adapted in making changes to become flexible and more user friendly, and not much needs to change in my view. Allowing members to use the payment card for all purchases has been a very positive addition.

One area that still seems a nonsense is that of accommodation and not allowing members to use their own mortgaged property. It is almost impossible to have mortgaged accommodation and use the property because of rules. This forces either the sale of the property or the need to sublet and rent an alternative. It therefore doesn't save the scheme money and opens the member to intrusive investigation about letting a mortgaged property and renting another. Surely simple rules could be adopted to ensure the scheme is not abused and allow the scheme to cover the equivalent of up to the maximum rent allowed paid towards an interest only mortgage. This also necessitated in some cases the subletting by a member to another member that caused further media intrusion and criticism.

The scheme is lagging behind on the rise of rental accommodation costs in the near vicinity of Westminster. I understand that the policy is that members must be prepared to travel further in search of rental accommodation within the allowance and cover the costs of their travel to and from Parliament themselves. Negotiation of leases is more difficult year on year and I believe this should be looked at further in attempt to keep the allowance in line with average rents for. 1 bed apartment within walking vicinity of parliament.

I also read thoughts on providing accommodation in central based dormitory block being touted. Firstly to make any such arrangement prior to the extensive repair programme of the buildings which may require a substantial upheaval to the location of offices and facilities would be unwise, and thus it is unlikely to be resettled until at least 2025. Secondly, housing all MPs together is in my view an unwelcome suggestion. Already the relational strains placed on family life cause to many family break downs among members as well as not being able to get out into a normal social setting would have further consequences and add yet further costs to the tax payer at a time of of an ongoing austerity.

The staffing budget has much improved throughout the last parliament and I feel this is set about right for the needs of the MP office in Westminster and the constituency. Having managed a Westminster office for near on 15 years, currently the staffing allowed is the most satisfactory throughout that period and allows for hard working staff to work sensible hours and maintain efficiently both offices.

Making changes to the employment of staff who are associated parties of the member I believe to also be an unnecessary amendment to the scheme. Members need to have trustworthy staff who are able to be flexible and often work unsociable hours in line with the members requirements, and a family member is often the best placed and most economical way of providing for this, limited to single employee is the right balance.

Those are the main points I choose to make to the consultation.

Nigel Double



IPSA Consultation – Parliamentary Labour Party (PLP) Joint Response

The work MPs do in their constituencies, in Westminster and in the country is immensely varied. No two constituencies are identical. Even neighbouring seats often present a completely different set of local concerns and problems – and a different pattern of casework. Some seats present particular challenges because they cover large geographical areas. Others have a far more concentrated population but have high levels of deprivation where the MP may be the only advocate constituents can rely on. To state the obvious, some seats lie a long way from Westminster and entail a regular commute of more than 10 hours; others lie within a common daily commuting distance. Many MPs have additional responsibilities as frontbench spokespeople or as members or chairs of Commons Select Committees.

For parliament to be a properly functioning modern democracy the expenses system needs to be

- a) as open and transparent as possible so that the public can have confidence in it and those who put themselves up for election are not put at an unfair disadvantage ;
- b) simple and straightforward so that taxpayers' money and users' time are not wasted on completely unnecessary bureaucracy;
- c) coherent, so that the rules don't change every year and advice is given impartially and consistently;
- d) flexible enough to meet the variety of work patterns that are intrinsic to the work of Parliament; and
- e) properly resourced so that constituents can, for instance, get timely replies to enquiries and MPs are backed up with high quality research and information.

Many aspects of the present system fail to meet these tests. The IT system is laborious and inefficient (it takes six clicks, for instance, to print a form). Some of the rules are too complex and have led to IPSA giving different advice to different members. Other rules are simply illogical. Emails and correspondence have been lost and often IPSA's inefficiency has left people out of pocket for thousands of pounds for months. Excessive bureaucracy has meant that security concerns could not be addressed in a timely fashion. Many MPs report that they choose not to claim for entirely legitimate expenditure because they find the system too complex. One MP reports that the main reason she has decided not to stand at the next election is that she is "sick of being treated like a crook by IPSA".

We believe that this consultation is a chance – perhaps the last chance – for IPSA to put in place a system that better meets the needs of a modern democracy.

We have given responses to the consultation's questions below.



Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

We think the new principles are an improvement on the old ones. They are straightforward and we agree with the emphasis on value for money. However we have a few concerns.

We believe the first, second and seventh Principles should be rewritten as follows:

1. The Scheme's purpose is to enable anyone to be an MP and to ensure that MPs are able to carry out their duties. The Scheme should take account of MPs' diverse working arrangements and should not deter people from any part of society or any particular background from seeking to become an MP. MPs should be resourced appropriately to carry out their parliamentary functions. The Scheme should help MPs do their jobs and recognise the diversity of that work.
2. The public should be assured that as public servants, MPs' use of tax-payers' money is effective, cost-efficient and transparent.
 - The Scheme will not put the security, privacy, or family life of MPs and their staff at risk.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Yes. Staff are employed to support MPs and should not be financially disadvantaged in doing so.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

We support the restriction on the number foreign visits but as we leave the EU it will make better sense for the determining factor to be the nature of the visit rather than the institution visited. It makes little sense, for instance, for MPs to be prevented from travelling to NATO to discuss the ongoing crisis in Ukraine just because NATO is not an institution covered by the Scheme.

Question 4. Do you agree that we should remove the rule allowing claims for "diverted" journeys, along with the cost restriction on claims for journeys back to either the MP's constituency or Westminster?

IPSA advice on eligible journeys has been very confusing. In one case IPSA advised that an MP who travelled from a school assembly in her constituency to a vote in the Commons would not be able to claim for the trainfare because she had not gone directly from her constituency office to Parliament. This proposed new rule will add to that confusion as it is drafted so clumsily. Diverted journeys are not claimed in significant numbers, and the system seems to be working well. So we see no need to change.

Question 5. Do you agree that we should carry out some "housekeeping" of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which overdefine concepts, such as commuting, which are commonly understood?



Yes, but would like to be informed of the specifics of any proposed changes.

Question 6. Do you agree that we should simplify the rules on home offices?

Yes.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

IPSA has abdicated any function as an arbiter of working practices. However, if legally necessary terms and conditions (such as redundancy pay) are to be determined by IPSA, it should also accept the role as the overall employer of MPs' staff and, to that end, provide a full HR function including pastoral care, pay structures and HR advice, rather than simply administering a payroll service.

If, however, IPSA is simply an 'agent' dealing with financial probity issues and administering a payroll service and a basic employment framework, it should distance itself from matters relating to employment practices. This ambiguity needs to be resolved.

There are a number of issues which concern staff, these largely concern grievance management and industrial relations issues.

Staff should be able, through their trade union, to be in a position to bargain for their terms and conditions of employment. Improving the standards of terms and conditions of staff has a positive impact on the functioning of Parliament and therefore it is right that staff should be represented on bodies that determine their overall package of terms and conditions, and have leverage in this (i.e. that they are not merely there for the exchange of information).

Staff should be able to take grievance management processes to an independent form of conciliation/arbitration. There needs to be an independent place of restitution for industrial disputes.

We note that IPSA is engaged in a separate consultation on this and we look forward to having an opportunity for a fuller discussion of precise proposals.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

We note that IPSA states that it does not imply 'any wrongdoing by individual MPs or their staff' by raising this issue and that each MP is an individual employer.

The relationship between an MP and his or her staff is exceptional. It requires a very significant degree of mutual trust, discretion and sensitivity. In many cases personal loyalty is what keeps the staff member in post even though they could command a much more significant salary elsewhere. There is a high level of insecurity attached to working for an MP, too. An individual MP may be unexpectedly deselected by his or her party or lose the election. Even under the Fixed Term Parliaments Act an election may be called earlier than expected (or later, as in 2001). Any



significant change in the Scheme would mean that staff would be demotivated in the run-up to an election or might leave them early.

Moreover, the whole point of redundancy payments is that they provide for an employee to cover their costs of living when searching for work. If someone were to be employed by another MP nine weeks after redundancy, it would be entirely wrong to demand a payment be returned, which would, most likely, already been spent to cover housing and living costs.

On the issue of redundancy notice, the key issue here is about continuity of employment. Should staff continue to be employed by a successor MP, then they should be able to have continuity of employment. This would significantly restrict a new MP's ability to manage an employee and could add to costs of redundancy at a future date. Additionally, if redundancy pay is on an accrued basis, then all other terms and conditions relating to affected staff must also be accrued. This proposed change, therefore, would have an impact on probationary periods in 'new' contract periods. It would disincentivise new MPs from employing staff who have previously worked in Parliament, which would be unfair for employees.

For these reasons it would be inappropriate to change the rules on redundancy and pay in lieu of notice.

Question 9. Are there any other changes that you think we should make to the existing rules governing MPs' staffing expenditure?

We believe the staffing budget and pay grades should be increased. MPs' workload has increased, as has the cost-of-living, especially in London. MPs need to be appropriately staffed and it is increasingly clear that pay scales are forcing staff to move on to better paid positions elsewhere.

Additionally, IPSA imposes a strict rule of a 1% annual pay-rise for staff. This should be a matter of discretion for the MP, as long as the staffing budget is not exceeded.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 10. Should we make any changes to the practice of employment by MPs of connected parties? If so, when should we introduce any new arrangements?

IPSA provides no evidence of abuse that would justify changing the rule and specifically says that "there were no significant grounds for concern that public funds were being misused".

We do not believe the rule needs changing. We believe it would be illegal summarily to suspend the employment rights of existing connected parties and it would be a mistake to prevent MPs from employing a connected party who may deliver the best value for money for the taxpayer.

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

It is a fact of parliamentary life that most MPs have to live in two places. Many MPs have young children and other dependants, and all MPs have a right to a family life. Good employers in other fields try to ensure their employees have a sensible balance between life and work. We believe that within reason this should apply to parliament as well and we note that IPSA states that some



MPs do not claim for their dependants, even though they are eligible, because they do not want to attract adverse media attention to their families and their private arrangements.

We urge IPSA to look at a simpler and less intrusive way of making allowance for the family needs of MPs. It is already a sad fact that very few mothers stand for parliament.

One area where IPSA could make a helpful change is in relation to spousal travel, possibly allowing for a fixed number of trips per annum between the constituency and Westminster. At the moment this is only allowed if accompanying dependents.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

Because of the diversity of constituencies, of constituents' concerns and of MPs' experiences and personal situations, it would be impossible to draw up a single definition of 'parliamentary business'. For that reason it is right that the present rules allow a degree of discretion, whilst making clear that any activity that is overtly party political should not be funded by IPSA and the taxpayer.

We believe our constituents expect us to be able to

- garner the views of our constituents via surveys
- advertise our surgeries and our contact details in whatever means they deem best including sporting and arts programmes and social media (and not just via local newspapers) and
- update constituents on our parliamentary and constituency activity.

Any further attempt to limit funding for this would render MPs less visible and accessible and undermine the very nature of the constituency link. This will be even more important if and when new boundaries reducing the number of MPs come into force.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

We believe that IPSA should continue to fund pooled staffing services – organisations that provide a range of briefing, research and letter-writing services. These organisations are efficient and cost-effective.

In recent years there has been an increase in the number of constituents contacting MPs with policy requests, often organised by campaign groups. The pooled staffing services are important as a trusted source in providing an outline response which staff can then adapt for local use.



If this support was removed, then MPs would either be unable to respond to many of their constituents, or would have to employ a new staff member. It would remove an efficient and cost-effective set of services. It would either make it harder for MPs to do their jobs, or cost more.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

The nature of MPs' work inevitably means that MPs for seats outside London have to work and live in two places. Different MPs have different family arrangements and often parliamentary recesses do not coincide with school holidays, so the Scheme needs to retain a substantial degree of flexibility, allowing for instance for renting a property, staying in a hotel or meeting associated costs. We believe that IPSA should look again at whether it would not save substantial amounts for the taxpayer if a similar system were introduced to that available to members of the House of Lords.

We would make several points:

- IPSA acknowledges that 'there has been no significant increase in the accommodation budget since 2010'. Inflation in the meantime has eaten away at the budget in real terms, especially as many rental leases specify an annual increase in rent of 3% or inflation, whichever is the higher. Many MPs have reported that the figure no longer covers their rent and they have had to absorb the cost themselves or else move every year at further substantial cost.
- IPSA suggests MPs should move out of any London properties during the long summer recess. This ignores the fact that MPs are often required to be in London on Parliamentary business during the summer recess. Parliament may be recalled, MPs may be required to manage London-based staff, they may have to perform Shadow Ministerial, Committee or Backbench business by meeting stakeholders or they may be required for media appearances. IPSA's proposal is unrealistic and impracticable.
- IPSA suggests that the accommodation budget should be reduced to reflect only the days when parliament sits. This totally misunderstands the nature of MPs' work, which does not only occur when parliament is sitting. It would effectively mean that either MPs were being asked to subsidise the rent when parliament is not sitting or else effectively closing the rental option entirely and forcing MPs to stay in hotels at greater cost to the taxpayer.
- IPSA suggests reducing the budget in line with a typical London Zone 3 rental cost on the grounds that this would align MPs with 'the experience of most London commuters'. But MPs who claim under the accommodation budget are by definition already commuters from outside London. Some colleagues have a return journey to Westminster that takes upwards of twelve hours door to door. In the normal course of things they might do this once a week, but often twice or more if there are specific constituency concerns. Several MPs pointed out that in light of death threats that some MPs have received, it is important to recognise that decisions about accommodation have to factor in security concerns



rather than just geography or cost. Parliament can end late at night so consideration needs to be given to those travelling back to accommodation that is not within close proximity to parliament and it is worth bearing in mind that many parliamentary meetings and engagements on a Tuesday and Wednesday evening occur after the House has finished sitting. We therefore think that IPSA's proposal is unrealistic.

- Forcing MPs to stay in hotels would almost certainly cost more. This is especially true because the demands on MPs' time are unpredictable, but booking hotels at short-notice is costly. This would require MPs carrying around many of their possessions. It would create far more administrative demands relating to booking rooms. It would damage MPs' family life. And it could put their security at risk, as several MPs have special security measures installed in their houses – measures that would be unavailable at a hotel.
- These alternatives would also disproportionately affect women, people from less advantaged backgrounds, and people with reduced mobility. Not only is that unfair, these are precisely the people we should be trying to incentivise to become an MP, not discourage.

In short, the four alternatives suggested in the consultation show a complete lack of understanding of how MPs do their jobs, they would almost certainly cost more than the existing system and they would damage MPs security, privacy and family life.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

We believe the associated costs budget should use the same budget limit as for overall accommodation. Ending the associated costs provision would force MPs to rent accommodation or stay in hotels at a significant extra cost to the taxpayer.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

We agree with IPSA's current position.

Chapter 8. Other issues relating to the Scheme

Question 17. Do you think there is any need for travel rules for MPs and their dependants which are specific to the Dissolution period? Should the more general exclusions on campaign expenditure and funding of party political activity suffice?

We do not believe there needs to be specific Dissolution travel rules.

Question 18. Do you agree that we should allow MPs' staff who normally work at Westminster to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period?



We agree that staff should be allowed to claim for travel and subsistence while travelling to and working in MPs' constituency offices on parliamentary business during the Dissolution period.

Question 19. What is the most effective way of ensuring that MPs' spending on capital equipment is kept to essential purchases in the months preceding a general election?

We believe that IPSA should work with MPs to ensure that spending is limited to essential items in the months preceding a general election.

Question 20. Should we alter the rules on campaigning in elections so that they capture the purpose of the activities which cannot be claimed for, rather than relying on those activities being construed as campaign expenditure as defined by the Political Parties, Referendums and Elections Act and election expenses as defined by the Representation of the Peoples Act?

We believe the current system is working well so do not see the need for a change. As the consultation says:

"The Election Assurance review found no significant evidence of misuse of business costs and expenses for the purposes of campaigning in the General Election. For more than 95% of MPs there was no indication that they had claimed for campaign-related expenditure. Ineligible claims were not systemic and related to only a small minority of MPs."

Question 21. Should we make the winding up process simpler by continuing with office cost and staffing budgets for another two months? Do you have any other suggestions about how to make the process simpler?

We believe the current system worked well so do not see the need for a change. As the consultation says, "departing MPs for the most part conducted their affairs efficiently and quickly".

Question 22. Should we make any changes to the timing of the loss-of-office payments made to MPs (and which replace the current resettlement payments) in future general elections?

MPs who lose their seats no longer receive a salary. Their loss-of-office payment helps them keep a roof over their head, and pays for them to conclude their parliamentary affairs. It should not be conditional on concluding their financial affairs with IPSA, as it is required in order for those financial affairs to be concluded.

A change needs to be made to the Scheme in the context of the Boundary Review and the reduction of seats from 650 to 600. The current wording of the scheme specifies that:

"To qualify for the Resettlement Payment or Loss of Office Payment, the individual must have been an MP on the day before the dissolution of Parliament and a candidate for re-election for the same seat, but not re-elected."

There is a concern that the Boundary Review will lead to MPs not technically being a candidate for the "same seat", and therefore not qualifying if they were not re-elected.

Question 23. Do you agree that we should try to simplify the operation of the start-up budget? Do you think our suggestions would help?



We agree that the office costs and start-up budgets should be merged.

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

MPs have a responsibility for managing their personal and office budgets. We would advocate more training and communication with MPs to prevent budget overspends and recover overpayments.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

Cover for staff maternity, paternity, adoption, long term sick leave and care leave should be funded and reported centrally. It should not be listed or reported as part of a MPs' staffing budget. IPSA should simply report centrally how much covering leave has cost in total.

This is because it is incorrect to report it as an MP 'overspending', and it risks divulging sensitive information about MPs' staff. The Scheme should seek to allow and encourage people from all backgrounds to stand for and work in Parliament, not actively discourage them by suggesting that maternity or paternity cover is somehow illegitimate.

Question 26. Do you agree that we should introduce a rule to make clear to MPs that they need to negotiate two-month break clauses in accommodation and office rental agreements, and clarify the rule allowing MPs to claim for accommodation in the constituency and London in exceptional circumstances?

We are concerned that introducing a "two-month break" rule would apply retroactively and hit MPs that have already agreed their contracts. We would welcome evidence on how much the absence of this rule has cost.

We agree that the second rule should be clarified and would like to be informed of the specifics of any proposed changes.

Question 27. Do you think any adjustment should be made to the London Area Living Payment?

We believe an adjustment should be made. Since the LALP has not changed since 2010, but the cost of living in London has increased, this has meant a real-terms cut and led to MPs being disadvantaged financially. The rule regarding travel between an out-of-London constituency and Westminster on parliamentary business for those who claim LALP rather than any accommodation costs needs to change.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

Contingency funding is not working for many MPs – we would suggest an increase in the office rents budget. Some London MPs have been forced to move staff into Parliament, which increases



crowding, removes them from the constituency, and is not an option for non-London MPs. MPs from other constituencies have been unable to base their offices close to their constituents.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

- We believe IPSA should agree to service level agreements and Key Performance Indicators (KPIs) so that IPSA's support for MPs can be properly monitored.
- We are concerned that IPSA is not prepared for a potential early General Election.
- If an MP dies in office, there is very little support for their staff and family. We believe IPSA should buy 'death in service' insurance to extend the provision for a lump sum payment from two times salary to four times. This will not cost a great deal, but will be of great help if another tragedy occurs.

Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

We believe that images of receipts should only be published on request. It is evident from the number of requests made that this is of relatively minimal interest.

We are concerned about publishing sensitive data. We are especially concerned about such data affecting the security of MPs, their families, or their staff. Mass publishing carries with it more risk than publishing in response to requests.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

We believe that data should be published annually. This would enable the public to have a full overall view of IPSA spending. Partial data can be misleading and lead to inaccurate portrayals.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

Repaid transactions by definition involve no cost to the taxpayer, so we believe they should not be published.

Question 33. Are there any changes you think we should make to the publication of information about Northern Ireland MPs' travel claims?

We do not have a view on this.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?



We believe the current system is working well, as the consultation says: “the sums involved are small in relation to overall expenditure”.

Were a system of publication be introduced, we believe it should be annual (in line with all publication). We also believe there should be a clear procedure of formal notices, time to repay, and notification that the information will be published. It should also clearly note which claims are disputed.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

We are particularly concerned with the security of MPs, their families, and their staff. In particular, concerns have been raised about data being too detailed. For example, detailed information about mileage claims or the location of accommodation could threaten security.

Question 36. Are there any other issues relating to the publication of MPs’ business costs and expenses which you wish to raise?

No.

Question 37. Is there any further information that we should be publishing about IPSA?

IPSA should publish a detailed breakdown of its office and staffing costs.

Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

We have raised these concerns above. We believe in particular the proposals on MPs accommodation, and the proposals on data publication, are likely to have a negative impact on equality and diversity.

Ruth Evans
Chair of the Board
IPSA
4th Floor
30 Millbank
London, SW1P 4DU

19 October 2016

Dear Ruth,

Review of the Scheme and IPSA's publication policy – a consultation. Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

As the Executive Committee of the Parliamentary Research Service, we write to provide the answer to the question above.

- a) We welcome that IPSA's in-depth internal assurance review of 2014 gave PRS clearance. Nothing has changed in the constitution or operation of the PRS since that review took place.
- b) By pooling staff, and providing its work to all its members, the PRS brings great efficiency to the support it delivers to Members in their Parliamentary duties.
- c) The PRS offers great value for money. Any changes brought in by IPSA which would impede the ability of the PRS to carry out its function would result in a fall in the overall efficiency of the MPs' Scheme of Business Costs and Expenses and load substantial extra pressure on non-pooled staff of MPs.

Specifically, in response to the issues raised in paragraphs 73, 75 and 76 of the consultation:

- a) The services the PRS provides are to support its members exclusively in their Parliamentary duties, as detailed in the PRS's constitution; annual contract with its members; the job description of the PRS Director; and as overseen by the Executive Committee and all member Annual General Meeting. The PRS does not work outside of Parliament and Members are responsible for ensuring that the PRS's output is only used in support of their own Parliamentary duties.
- b) The service the PRS provides is "different and separate" from the House of Commons Library, as explicitly detailed in the PRS's constitution.

- c) The PRS's model, as a not-for-profit pooled research facility open only to Labour Members of Parliament to join, has the confidence and support of its members and is tailored to the needs of HM Opposition MPs – whose role in Parliament is different to that of MPs who are members of the Party of Government. Organising pooled staffing services by political party is in our view the only viable model.

This letter, including the detailed response below constitute our submission to the consultation. We would very much welcome an ongoing dialogue with you and the IPSA board on these matters. We also invite board members to visit the PRS.

Yours sincerely,

Kevan Jones MP

(Chair)

On behalf of the Executive Committee: Rt Hon John Healey MP, Emma Reynolds MP, Wayne David MP, Sharon Hodgson MP, Diana Johnson MP

About PRS

1. The Parliamentary Research Service is a pooled research facility open to Labour Members of Parliament to join. The PRS was established in January 2011 and provides research materials and support for our members in their Parliamentary duties.
2. The PRS was formed in response to the substantial and growing workload on MPs and their staff from organised email campaigns and petitions and the changing expectation in the response time expected to email correspondence compared with postal mail.
3. PRS helps Members to better respond to issues of public concern and public policy matters that are being considered by Parliament. Feedback from Members has been consistently very positive. Indeed, in response to the 2015 members annual survey 99 per cent (86 respondents) said they were either satisfied or very satisfied with the PRS; 100 per cent (87 respondents) said the PRS helped them to do their job and 99 per cent (86 respondents) said they would recommend the PRS to other MPs/MPs' offices. The service provided by the PRS also enables its members to use more of their resources for staffing in other areas of work and therefore provide value for the taxpayer.
4. PRS services are valued by its members because they are distinct from the other services provided by the PLP (which is party political and not funded by IPSA) and House of Commons Library.
5. The PRS is one of the most open and transparent uses of allowances and has a structure which allows it to ensure staff are aware of, and comply with, House of Commons and IPSA rules and that materials are provided to support Parliamentary duties only.

Efficiency

6. The PRS is a not-for-profit, membership organisation with membership fees used to build a team of researchers.
7. The Terms of Service in the PRS contract state that "Work done for or on behalf of subscribing Member is akin to as if the work was carried out directly by a subscribing Members' personal staff."
8. The PRS was founded in 2011 in response a huge growth in email campaigns. Petitions websites which trigger emails and the UK Government and Parliament Petitions website are contributing to the continuing increase.

9. There is a great deal of duplication of research undertaken by MP's offices, particularly regarding these campaigns and petitions. The PRS undertakes initial research and provides briefings to MPs in order to minimise this duplication, freeing-up staff in MPs' offices to work on more complex or constituency focused casework and correspondence. The PRS agrees with the IPSA consultation's statement that "The services are valued by MPs and mean that MPs can deploy more of their resources for staffing in other areas of work".
10. The PRS agrees with the IPSA consultation statement that pooled services: "are able to provide tailored briefing to a significant number of MPs simultaneously, which brings economies of scale". The PRS believes that it is one of the most efficient uses of allowances and therefore provides value for the taxpayer.
11. Without the PRS, there would be an inevitable pressure on IPSA to provide additional resources for MPs to staff their individual offices to research the growing number of email campaigns and petitions.
12. The PRS maintains a database of over 1750 documents, listed by issue. It would be impossible for each individual MP's office to maintain this number of research documents.

Openness and transparency

13. As well as being one of the most efficient uses of allowances, the PRS is one of the most open and transparent uses of allowances.
14. The PRS welcomes that IPSA has had access to the materials it produces via the PRS website, has had dialogue with IPSA on the materials, successfully completed an in-depth assurance review into all aspects of its work and welcomes further opportunities for engagement with IPSA.
15. PRS welcomes future reviews from IPSA whenever requested. PRS welcomes further guidance from IPSA on all aspects of its operation.
16. IPSA's payments to pooled staffing resources and membership fees are transparently claimed from IPSA by Members. Membership is entirely voluntary.

Compliance

17. The PRS is independent of any political party and supports its members exclusively in their Parliamentary duties.
18. PRS has a structure which allows it to put into place monitoring processes to ensure compliance with House of Commons and IPSA rules and that materials are provided to support Parliamentary duties only.
19. The PRS contract states:
 - 4.4. *All work is independently reviewed by the director or their nominee to ensure quality.*
20. Part of the PRS Director's job description is: "ensuring PRS materials and finances adhere to IPSA guidance."
21. The PRS executive believes any decline in pooled staffing resource membership could result in an increase in the number of 'Bought-in services' - staffing services provided by companies, self-employed individuals or others not on the payroll.

Political vs Parliamentary

22. The PRS website states: "The Parliamentary Research Service works exclusively for its members. The PRS does not work outside of Parliament or have any other funding than members' subscription fees. The PRS is independent of the Labour Party and supports its members exclusively in their Parliamentary duties and not in party political activities."
23. IPSA access to the PRS website was provided in 2014. Following the IPSA assurance review of pooled services, the PRS were pleased to receive notification from IPSA that "the nature of the services provided is eligible under the Scheme and that there is evidence of sufficient oversight and governance to ensure that the materials you provide meet your service standards".
24. IPSA also found that the materials reviewed from the PRS were "sufficiently objective in tone and language so as to be satisfied that the materials were eligible under the Scheme."
25. The PRS contract with its members states:
 - 4.3. *All services must be provided wholly, exclusively and necessarily in support of Parliamentary duties, and the PRS Director shall determine whether work requested falls within this requirement. Members are responsible for ensuring that the PRS's output is only used in support of their own Parliamentary duties.*

26 A regular email is sent to members to update them on the latest PRS materials, this includes the text: “Please note that PRS materials are intended for use solely by PRS Members. As the PRS contract states, Members are responsible for ensuring that the PRS’s output is only used in support of their own Parliamentary duties.”

27 The PRS contract states:

6. When a general election is called, the PRS will not produce new materials or updates during the dissolution period and the PRS website will be frozen. However, as discussed with the House Authorities and IPSA, access to the archive of PRS materials via the PRS website will continue for members.

28 The PRS is overseen by an elected executive board of MP members who meet with the Director. There is accountability through its annual survey and Annual General Meeting which all members are invited to.

29 The content of PRS materials is drawn from sources such as statements, debates and briefings.

The difference in service provided by PRS to the PLP

30 The PRS and PLP are separately constituted, staffed, and located. HM Opposition MPs have access to services through the PLP and can join the PRS should they wish. The PLP is not funded through IPSA. The PRS provides a pooled Parliamentary staff service and is funded through IPSA. This is a clear distinction which Opposition MPs are aware of.

31 When the PRS was being set up, in 2010, the founding MPs wrote: “The unit would offer a Parliamentary resource, its staff would be MPs’ staff, but on a pooled basis. This would not be a party political, election-based resource. Political briefings for parliamentarians, campaign support and other key political and campaign functions would continue to be delivered by the PLP Office. The PLP Office must retain its role as a political resource for Labour MPs, as well as fulfilling its historic role in the administration of the PLP and the Parliamentary Committee.”

The difference in service provided by PRS to the House of Commons Library

32 The House of Commons library publishes generalised and comprehensive briefings. PRS produces specific and summarised briefings which include the Opposition’s policy position.

As stated in the PRS’s constitution:

1.2.1 It will provide a research and information service different and separate from any political Party's Research Department or the House of Commons Library, thereby enhancing MPs' effectiveness in performing their Parliamentary and constituency duties.

1.2.2 It will interface with the resource available to the HoC Library so that Members can get best use of the Library's database and also access materials on the Internet.

33 All HM Opposition MPs have access to the House of Commons library but many have chosen to become members of the PRS because these are distinctly different services.

34 The House of Commons Library has many more staff than PRS, which has 11 staff. The PRS is a lean organisation - it has a basic website through which members access documents, no reference books to manage, no social media presence, and focuses on constantly updating briefings on the issues that are of current relevance to its members.

35 The House of Commons Library and all of the House services do a fantastic job of supporting staff of MPs, including pooled staff. The House of Commons library in particular, publishes detailed Research Papers and Standard Notes on its website which are often useful as a research resource for pooled staff, as they are for staff of MPs.

36 Library briefings are highly detailed, and part of the work of MP's staff is to read these and summarise them, according to the needs of their MP. As part of its work, PRS does this centrally for large numbers of MPs, providing an economy of scale. The PRS produces short, highly summarised briefings, with detail focused on the aspects of an issue PRS members are interested in, rather than the longer highly detailed briefings the library produces. PRS staff analyse materials including library briefings in order to extract the most relevant information for PRS members.

37 It is not unusual to find that a small section, perhaps one paragraph, of a particular library briefing may be relevant to the PRS briefing. For example background information on a particular clause of a Bill. As a pooled staffing resource, it is part of the role of PRS researchers to read library briefings and obtain this relevant information, in the same way staff based in MPs' offices do.

38 The PRS prioritises materials on issues which are relevant to large numbers of its members, which provides the economy of scale.

39 The PRS contract states:

9. *The PRS provides its services upon the request, direction and control of the subscribing Member for the sole purpose of assisting that Member in the direct execution of his Parliamentary duties.*

40 This requires a great breadth of short, regularly updated briefings on issues. The issues are frequently important to a specific group of people across multiple constituencies (such as a rare health condition).

41 PRS materials are updated as requested by our members, and to keep them valid in accordance with events in Parliament and updates to HM Opposition and Government positions. For example a briefing document may be updated before and after a vote on a specific amendment to a Bill.

The need for pooled staffing resources to be organised by party

42 No pooled staffing resource has been formed on a cross-party model to date. The PRS model commands the confidence and support of its members which is essential to the ongoing dialogue between the staff of PRS and its members about the materials it provides. PRS staff develop expertise on the policy positions of the Opposition.

43 HM Opposition MPs frequently receive correspondence on different issues to MPs from the Party of Government, and so require different briefings. This reflects the different constitutional role of Opposition MPs but also the geography and demographics of constituencies of MPs from a particular political party. It is essential to the utility of the materials and the economy of scale that PRS is able to provide that its materials reflect the requirements of its membership.

Recommendations

44 The PRS would welcome from IPSA any updates in the criteria that make it eligible under the scheme. PRS welcomes future reviews from IPSA whenever requested. PRS welcomes further guidance from IPSA on all aspects of its work.

45 In 2011, as part of service improvements, IPSA announced it would be able to pay annual subscriptions for pooled staffing services directly to the PRS. To promote greater efficiency, the PRS would recommend the process for the membership renewal be conducted via an online form rather than a paper form.

Paul Harvey

MP staff

Email

Received 21/10/2016

Dear Sir/Madam,

Please find attached below comments in relation to your consultation. I am member of staff for an MP.

Question Six – The rules in relation to home offices need to be tightened up. No MP should be able to have their office based out of a private home. For an MP to be an effective representative and carry out their duties fully, they would require an independent office. It is important that IPSA takes a much stronger line in relation to office expenditure in general. A large number of MPs currently share offices with their local political party. This means that political parties are often being subsidised as they would not otherwise be able to afford an office. The taxpayer/IPSA should not be funding political parties in this way. IPSA would need to provide MPs with a larger office budget in order to ensure that they can afford to rent an office solely for the MP but it would be preferable to funding the offices for political parties.

Question Seven to Nine – Staffing needs to be reformed. This is one area that experiences too much abuse from MPs who choose to blur the lines between Parliamentary and Party political. A large number of MPs have Parliamentary staff who carry out party political work at the tax payer's expense. This is something that should be stopped. My preferred option would be to provide MPs with staff who are employed by the state rather than making the MP the employer. This would provide greater security for staff and continuity for local residents. Given that civil servants in Westminster are able to manage changes in Government, I am sure that they would manage it in local constituencies also. Some staff would complain as they would not want to work for an MP of another political party. They would then have the option to leave the position and work for that particular political party should they wish to do so. This would also bring an end to the problems encountered by MPs staff being stuck in between the public and private sector. For some purposes MPs staff are public sector and other they are not. This is unnecessary and confusing.

Question Eight – I am aware that some staff are trying to put together a joint letter in relation to this. It is wrong that MPs staff are able to receive redundancy money when their MP stands down, only to be re-employed by his replacement. If redundancy payments are to be stopped under these circumstance however, the staff members should not lose their years of service and their contracts should be considered as continuous.

Question Ten – MPs should be banned from employing family members, and loopholes should also be closed in relation to this. MPs should also be very tightly controlled on how they employ people connected to their own political party. As mentioned previously, the solution to this would be to make staff civil servants and employed by the state rather than the MP. Failure to introduce this will allow the system to continue to be abused for party political ends.

Question Thirteen – MPs should not be able to use Parliamentary funds to employ party political people via pooled funds. This is diverting public money away from its intended purpose. Parties have created these position from pooled funds in order to provide party political research and advice. This is not Parliamentary but party political. This is something that IPSA should stop immediately. If the political parties wish to employ people to provide party political advice, the party should fund these positions. This again ties into the point previously made about making staff civil servants rather than employees of the MP.

Question Fifteen – MPs should be allowed to claim for basic costs in their second home, which should be in London. MPs should not be able to switch the designation of their second home.

Question Sixteen – The position taken by IPSA is totally wrong. MPs who own property in London should not be allowed to claim for a separate rented property whilst making a considerable personal profit. This is wrong and IPSA should alter this policy as soon as possible.

Question Seventeen – MPs should not be able to make any claims for any costs relating to dependents. MPs should not be able to make any claims relating to any party political activity.

Questions Eighteen – Expenses should not be paid to staff under these circumstances. Primarily because no researcher does Parliamentary work when they visit the constituency, it is always party political. If staff are made civil servants this would resolve this matter.

Questions Nineteen – Stop MPs making claims three months prior to a general election and make public any claims in that final period before the election.

Question Twenty One to Twenty Three – Winding up a Parliamentary office is a simple process that takes no more than four weeks. IPSA should cover the costs up to this point and no longer. If you make staff civil servants, the offices used could also be publicly owned buildings which would reduce winding down and set up costs. There is no reason why an MP needs a different office when they win a seat for the first time.

Question Twenty Four – If you make staff civil servants and provide office space, you would have no problems with overspending and no need to claim money back. If you do need to claim money back for overspending, it should be deducted from the MPs salary. In order to assist with becoming an MP, all new MPs should be forced to undertake training within two months of being elected. This should cover how to manage staff and budgets. It is clear than many MPs do not have the ability to do either of these things.

Question Thirty – All claimed for receipts should be published, whether they are requested by the public or not.

Question Thirty One – Claims should be made public as soon as possible.

Question Thirty Two – No those payments should not be made public as they are not being paid by the taxpayer and that information would be abused by the media and political parties.

Question Thirty Four – This information should be made public as often as possible.

Yours sincerely

Paul Tant
Member of the public
Email
Received 20/10/2016

We need people who want to make the country great to become politicians and don't care about large wage packets and fiddling expenses! Let's keep it simple. They don't need expenses at all, they can pay fuel and rent out of their already large pay packets like the rest of us do. If this is a problem they can jump off the gravy train and find a better job! Please do the right thing by the people who are paying through the nose for all of this, and cancel expenses altogether!

**Review of the MPs' Scheme of Business Costs and
Expenses and IPSA's Publication Policy –
A Submission from the Policy Research Unit
October 2016**

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1. Introduction

- 1.1 Scope. This submission to IPSA's review of the Scheme is concerned primarily with Chapter 6 of the consultation document¹ and, in particular, with Paragraphs 73-77 and Question 13, namely:

What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

- 1.2 The PRU's pooled staffing model is in line with IPSA's existing Fundamental Principles, as contained in the MPs' Scheme of Business Costs and Expenses 2016-2017, as well as IPSA's draft Fundamental Principles proposed in this consultation, in particular draft Fundamental Principle 4, namely:

All money claimed from IPSA by MPs should be exclusively for parliamentary purposes and have regard to value for money.

- 1.3 Value for money of shared staff model. The PRU's researchers carry out a role very similar in nature to that of an individual MP's staff, the key difference being that PRU researchers are *shared* between nearly 300 MPs. This model is efficient², as it greatly reduces duplication of effort across MPs' offices, which results in considerable value for money for the taxpayer.

- 1.4 Single party model. The PRU is not aware of any shared research staff employed directly by two or more MPs who assist MPs belonging to different political parties. Certainly it seems unlikely that significant numbers of MPs would be comfortable with such an arrangement. There are good reasons for this (outlined below), which are entirely in line with the Scheme and Fundamental Principles.

- 1.5 Parliamentary duties only. This submission also touches on the issues raised in Paragraphs 64-72 of the consultation and by Question 12, around what can be considered 'Parliamentary'. The PRU makes clear that it can assist MPs with their Parliamentary duties *only* and that the PRU alone is responsible for its output. The PRU requires MPs upon paying for our services to agree to the following: "*You may only use PRU research services in support of your Parliamentary duties...*"³ (see Annex) and the PRU Staff Handbook (the relevant section of which IPSA has a copy of) states: "*...the PRU and the PRU alone signs off on PRU material*"⁴.

- 1.6 In this submission, the PRU is able to draw on detailed usage statistics as well as the views of MPs and their staff given anonymously to us with this consultation in mind.

¹ IPSA, Review of the MPs' Scheme of Business Costs and Expenses..., May 2016.

² IPSA, Annual Review of the MPs' Expenses Scheme Consultation, January 2011, p40.

³ Policy Research Unit, PRU Service Agreement.

⁴ Policy Research Unit, Staff Handbook.

2. Background to the PRU

2.1 The Policy Research Unit is a non-profit-making, pooled research facility based in the Houses of Parliament and open to Conservative MPs to join. It was established in 1998⁵ and, as outlined in its Articles of Association, provides briefing, research, correspondence and related support for MPs exclusively in support of their Parliamentary duties⁶. A notice on all pages of the PRU website states:

“Material provided on this website is for the sole use of subscribers to the Policy Research Unit Ltd. It is provided to assist Members with their Parliamentary duties only.”

2.2 The PRU is independent of any political party and does not engage in, or assist with, party political activities.

2.3 Research staff of the PRU specialise in specific policy areas and develop professional relationships with our subscriber base, so as to better understand their needs.

2.4 Our written research material is distributed via a website. The majority (99.25%⁷) of this is shared with all MPs subscribing, however, we also draw on our policy knowledge to provide tailored work for individual MPs.

2.5 The PRU has made its research material available to IPSA since the Authority's inception and to other authorities which preceded it. Since 2014 all research material distributed via our website has been available to IPSA at all times.

2.6 While IPSA has made clear that *“the PRU is not bound by the Scheme in the same way that MPs need to comply”*⁸, the PRU seeks to comply wherever reasonable.

2.7 The PRU has long been recognised as being able to provide good value for public funds. The Review Body of Senior Salaries in 2007 said: *“In principle we welcome pooled research and support facilities for MPs since these have the potential to provide better value for money.”*⁹ Drawing on this report, two years later, and explicitly referring to

⁵ The Policy Research Unit Ltd was incorporated on 22 February 2012, and had superseded the Parliamentary Resources Unit, founded in 1998. PRU 2012 is limited by guarantee.

⁶ See, PRU Articles of Association, Part 3 – The Company's Objects and Powers, as filed at Companies House on 14 September 2012.

⁷ Based on 2015-16 figures when 464,563 documents were downloaded, 3,577 of which were tailored for individual Members. Note that with prorogation falling during this period, overall download figures were lower than might otherwise have been expected.

⁸ See for example, email from IPSA to PRU, 15 July 2014.

⁹ Review Body on Senior Salaries, Report No. 64, *Review of parliamentary pay, pensions and allowances 2007*, Cm 7270-I, para 5.22.

the PRU, the House of Commons Commission said: *"We consider it important that innovative arrangements such as collective employment should be able to continue."*¹⁰

2.8 In IPSA's Annual Review of the MPs' Expenses Scheme Consultation – January 2011 it was noted by IPSA that *"'Pooled resources' are typically research and briefing services, where MPs can receive the service from a separate organisation without having to employ a researcher directly. This can be an efficient way of providing the service to MPs, both in terms of cost and expertise."*¹¹

2.9 With almost 300 MPs subscribing to the Unit, considerable duplication of effort across MPs' offices is saved.

2.10 MPs and their staff have asked us to pass on their views to IPSA as part of this consultation. In total, 109 MPs contacted us as did 63 of their staff. The following statements are from an MP subscribing to the PRU and a member of staff in the office of an MP subscribing to the PRU¹²:

"I underspend my staffing budget by £60,000 per annum. [Were the PRU to be replaced...] I would have to use that to take on extra staff at a higher cost."

- **Member of Parliament subscribing to the PRU.**

"The PRU are an essential resource for our office and saves us hours upon hours of work which would have to be duplicated in countless offices. I feel they are invaluable in a professional environment with an emphasis on timely and thorough responses which often sees staff already working over our contracted hours."

- **Staff member in the office of an MP subscribing to the PRU.**

2.11 In our most recent annual survey, carried out in March 2016, 99.6% of respondents (225 individuals) said they would recommend the PRU to another MP's office¹³.

¹⁰ House of Commons Commission, Employment of Members' Staff by the House, 26 October 2009, Paragraphs 81-82.

¹¹ IPSA Annual Review of the MPs' Expenses Scheme Consultation, January 2011, paragraph 158 & FN 19

¹² The PRU asked in October 2016 all MPs subscribing to our services to give their views on Question 13 of the Consultation and the wider benefits of pooled research services. These are included anonymously throughout this submission. MPs' staff were also invited to give their views on a similar basis.

¹³ PRU Annual Survey, March 2016. Responses were received from 226 staff in offices subscribing to the PRU.

3. Exclusively Parliamentary Purposes

3.1 The PRU agrees with IPSA that it is not always easy to define 'Parliamentary activity', something the Scheme, in its present form, does not seek to do (see Paragraph 66 of the consultation). That said, the PRU does go further than IPSA and issues guidance to PRU staff on what does (in addition to what does not) constitute Parliamentary activity (see below).

3.2 The consultation further notes (Paragraph 65) that following IPSA's 2011-12 review of the scheme that *"MPs need to make a judgement about what they are asking the taxpayer to fund"*.

3.3 However, while IPSA is silent on what does constitute Parliamentary activity, it has issued guidance on non-Parliamentary activity for MPs (and their staff in supporting their MP) which has included the following:

- Work which is conducted for or at the behest of a political party
- Work relating to delegations to an international assembly
- Work relating to the performance of ministerial functions
- Attendance at party conferences or meetings
- Work that could be construed as campaign expenditure

3.4 As noted in Paragraph 2.6 above, the PRU is not bound by IPSA regulations in the same way as MPs. However, as it happens, the PRU does not currently undertake any of the 'non-Parliamentary activity' listed above. This is despite specific guidance from IPSA to the PRU stating that IPSA does not object to the PRU carrying out one of the above activities, namely attendance at party conferences.

3.5 Party political work. The PRU takes a number of steps to make clear that our service is provided to assist MPs with their Parliamentary duties only (see, for example, Paragraphs 3.25 to 3.27). It does not carry out party political work.

3.6 International delegations. The PRU does not conduct any work relating to delegations to an international assembly, and we are not aware that we have ever been asked to do so.

3.7 Ministerial functions. The PRU does not conduct any work relating to the performance of ministerial functions. As outlined in Paragraph 3.8 below, IPSA supports PRU staff attending the Conservative Party Conference (though the PRU does not currently send staff), where the view is that they ought not to assist MPs, but the PRU's research knowledge would be enhanced through attendance. Similarly, PRU staff interact with ministers to enhance the PRU's research knowledge, but do not support the work of ministers.

3.8 Party conferences. The PRU explicitly prohibits its staff from assisting MPs with party conferences (just as MPs' own staff are prohibited from so doing). This position is clearly and routinely communicated to PRU staff and subscribers.

3.9 Campaign expenditure. This is defined in the Political Parties, Elections and Referendums Act 2000 and the PRU does not conduct any work that falls within Part 1 of Schedule 8 of the Act for election purposes.

3.10 The PRU Staff Handbook (the relevant section of which IPSA has a copy of) requires staff to turn down requests to help with party conferences, stating:

"We should...reject request that relate to the Conservative Party Conference."

3.11 Messages are sent to subscribers in the run-up to the party conference season to underline this point and at a recent CPD session for MPs and their staff (see Annex) one section stated:

"We CANNOT undertake party political work eg for conference or the leadership campaign."

3.12 The PRU does not currently send staff to any annual party conferences. However, in 2014, as part of an assurance review, IPSA said: *"Having considered the issues, we have understand that it is a legitimate activity for you to undertake relevant research and business at conference as well as it being an opportunity for you to promote your service and for this to be part of the PRU's ordinary running costs. The PRU is not bound by the Scheme in the same way that MPs need to comply and therefore reasonable costs for attending party conference are acceptable. You should however ensure that when attending conference none of your staff are doing so to support an MP or group of MPs and that they do not, say, draft materials for use at conference or fringe events where the costs of attendance are funded from MPs' subscriptions paid by IPSA."*¹⁴ The PRU will bear this statement in mind.

Parliamentary or party political

3.13 The PRU does not do work for or at the behest of a political party. As IPSA noted in its 2014 assurance review: *"The Unit is not part of the [Conservative] party structure."* Our staff have a job description which is based closely on IPSA's model job description for MPs' Senior Researchers. Our standard material is drafted to reflect the views that a Conservative MP would likely hold. This mirrors the position of a Parliamentary assistant who would draft a letter on the basis of the views that they know or think

¹⁴ Email from IPSA to PRU, 15 July 2014

their MP would be likely to hold. In doing so, the work of a Parliamentary assistant would not be construed as non-Parliamentary. The PRU believes that the same principle should apply to pooled staffing facilities.

3.14 In basing material on the views the PRU knows or thinks it likely an MP holds, the PRU draws on interactions with individual MPs. Just like an MP's own staff, where necessary, we take direction from individual MPs on their views.

3.15 The PRU notes the existence of the Conservative Research Department which provides political briefings for MPs at the behest of the Conservative Party.

3.16 On many matters, our website contains letters supporting two opposing positions (for and against – e.g. remaining in the European Union) allowing MPs to choose which material they would like to use.

3.17 Some of the standard material that we draft will be in direct opposition to the Conservative Party position. In addition to the “off the shelf” material on our website, we regularly provide bespoke briefings and letters where our staff draft material in direct opposition to the Conservative Party position or provide a critique of the Conservative Party position.

3.18 Often constituents write to MPs based on the manifesto they stood on at a General Election or based on whether the party they belong to is in government or opposition. While we prohibit our staff from producing material which is campaigning in nature or solicits votes, it is natural for an MP in pursuit of his or her Parliamentary duties to explain why they do or do not support a given party position, why they do or do not support a change in a given party's position, etc. To restrict this activity would be difficult in the extreme, both because context matters and as *“The system of political parties, which has existed in one form or another since at least the 18th century, is an essential element in the working of the constitution.”*¹⁵ It could also be argued that such a restriction would not benefit constituents.

3.19 The PRU's Articles of Association state that the first objective of the PRU is: *“to provide research and information to Members of the House of Commons of the Parliament of the United Kingdom in order to enhance their effectiveness in performing their Parliamentary and constituency duties.”*¹⁶ In addition to taking account of what IPSA has identified as ‘non-Parliamentary activity’ (Paragraphs 3.3 – 3.12), the PRU offers guidance to PRU staff, and MPs and their staff, about what might be considered Parliamentary. In addition:

- further examples of non-Parliamentary activity are suggested; and

¹⁵ <http://www.parliament.uk/about/mps-and-lords/members/partysystem/>

¹⁶ PRU Articles of Association, Part 3 – The Company's Objects and Powers, 5.1.1, as filed at Companies House on 14 September 2012.

- PRU staff, and MPs and their staff are routinely reminded that the PRU can assist with Parliamentary duties only.

3.20 Obligations of PRU staff. The PRU Staff Handbook (the relevant section of which IPSA has a copy of) states: *“As employees whose salaries are derived in large part from MPs’ allowances, we must ensure that our work supports our subscribers wholly, exclusively and necessarily with their Parliamentary duties. This means we need to take care to avoid work of a party political nature.”*

3.21 Staff delivering training to new starters draw on the following headings, taking from a ‘Day Zero’ training manual:

- Compliance
- Not party political
- Help Members wholly exclusively and necessarily in their Parliamentary duties
- Factual briefing not propaganda
- Separate third party views and party line from facts
- Party lines clearly sourced outside the Unit

3.22 Specific guidance about the type of language and activity which could be considered Parliamentary is provided on an ongoing basis (for example around the election time and the recent EU referendum).

3.23 PRU staff are made aware that we serve MPs subscribing to the Unit as individual MPs, not delegates of a particular party. During the EU referendum, for example, PRU staff were required to draft material for MPs from any perspective. A party-run organisation may not have offered the same latitude, let alone required staff to act in this way.

3.24 PRU staff are reminded that in determining the political nature of some activities context is important. As our Staff Handbook states: *“A constituent may mention the positions of political parties and this may require explicit reference to parties in the reply. On the other hand, however, it may not be appropriate – or indeed desirable -- to make party political points in response to a query about, for example, combatting a particular disease.”* In any case, it is our experience that MPs rarely see value in making nakedly party political points when corresponding with constituents.

3.25 An extract from the PRU Staff Handbook covering ‘What we should avoid’ and ‘Work we should reject’ is included in the Annex.

3.26 Members and their staff. The PRU requires MPs upon paying for our services to agree to the following: “You may only use PRU research services in support of your Parliamentary duties...”¹⁷ (see Annex)

3.27 The following guidance and notices are provided to MPs and their staff:

All PRU briefs include the following notice on their cover page -

This brief has been produced by the Policy Research Unit Ltd, a research facility available by contract to Members of Parliament. This material is intended for use by Members, wholly, exclusively and necessarily in support of their Parliamentary duties. The brief does not constitute an official publication of the House. Should you require additional briefing on this topic supporting specific positions please contact the author.

Guidance included on template correspondence, where relevant -

Members may, of course, wish to edit this letter to reflect a preferred tone or include details about their constituency or personal record.

Important notes for Members’ Staff:

- Optional paragraphs are included in this letter
- This letter is in line with Government policy. As ever, should your Member wish to support a different perspective, please contact the author who can assist with an alternative.

Standard notice on all pages of the PRU website -

“Material provided on this website is for the sole use of subscribers to the Policy Research Unit Ltd. It is provided to assist Members with their Parliamentary duties only.”

3.28 We engage face-to-face with Members and their staff on a regular basis (eg at staff association meetings, PRU open days) and on these occasions stress the limitations on our work. A recent CPD presentation open to Conservative Members, for example, included a section which stated: “We **cannot** undertake party political work eg for conference or the leadership campaign.”

3.29 The 2015 General Election. The following advice was given to subscribers in the run-up to the 2015 General Election in the form of a handout for the staff association, MAPSA (February 2015) and as an FAQ on the PRU website (March 2015):

¹⁷ Policy Research Unit, PRU Service Agreement.

Can I use PRU material for campaign purposes?

No. The PRU is only able to assist Members and former Members in their Parliamentary duties. IPSA is happy for our material to remain available during dissolution. However, it is up to individual offices to decide how they use the material.

PRU materials, whether downloaded prior to dissolution or during dissolution, can never be used for campaigning purposes and this remains the case during dissolution. Individual subscribers are responsible for how they use PRU materials and if in any doubt should seek advice from the relevant authorities.

3.30 The sole recommendation for the PRU of IPSA's 2014 assurance review was that, while material at the time was considered *"sufficiently objective...As we approach the General Election however, extra care should be taken that the materials do not begin to promote manifesto commitments or policy as this could be construed as campaigning."* In October 2014, the PRU met with IPSA and it was agreed that the PRU would produce and share with IPSA examples of language which might be used for various scenarios in the run-up to the 2015 General Election. Example language, much of which merely recorded facts as they would be reported on the BBC (eg *"David Cameron has made clear that a future Conservative Government would support this change."*) was shared with IPSA and IPSA did not raise an objection. This example language was shared with some subscribers and all PRU staff.

3.31 Members' staff understand that the PRU can assist with Members' Parliamentary duties only and not with campaigning. In our recent call for evidence to assist with this submission, 100% of Members' staff said they understood this position.

3.32 While a Members' office may not have the need or resources to produce the guidelines above or similar, we believe the PRU has a strong track record of working with PRU staff, subscribers and IPSA to ensure there is a clear understanding that we assist Members with their Parliamentary duties only. In some cases, as demonstrated above, we have imposed restrictions upon ourselves which go beyond the Scheme and which go further than IPSA requires. We believe the Unit already operates well with the first part of draft Fundamental Principle 4.

4. Value for Money

4.1 The PRU has long been recognised as being able to provide good value for public funds. The Review Body of Senior Salaries said in 2007: *"In principle we welcome pooled research and support facilities for MPs since these have the potential to provide better value for money."*¹⁸ Drawing on this report, two years later, and explicitly referring to the PRU, the House of Commons Commission said: *"We consider it important that innovative arrangements such as collective employment should be able to continue."*¹⁹

4.2 In IPSA's Annual Review of the MPs' Expenses Scheme Consultation – January 2011 it was noted that *"'Pooled resources' are typically research and briefing services, where MPs can receive the service from a separate organisation without having to employ a researcher directly [emphasis added]. This can be an efficient way of providing the service to MPs, both in terms of cost and expertise."*

4.3 With almost 300 MPs subscribing to the Unit, considerable duplication of effort across MPs' offices is saved. Some 108 MPs in told us in our recent call for evidence that if the PRU ceased to exist the result would be "needless duplication" of work across MPs' offices. No MP took the opposing view.

4.4 MPs' offices can deal with 500-1000 calls or emails a week.²⁰ Our download statistics back up this Parliamentary analysis and suggest the trend is upwards.

4.5 In our annual customer survey, carried out in March 2016, 99.6% of staff of MPs who subscribe to the PRU said they would recommend us to a Conservative MP who does not already subscribe.

4.6 Comments from respondents to the survey include:

"If we could not use PRU, we would likely need to take on additional staff. This would likely cost our office at least £25,000 annually, as opposed to around £3,000 in pooled staffing costs."

- **Staff member in the office of an MP subscribing to the PRU**

¹⁸ Review Body on Senior Salaries, Report No. 64, *Review of parliamentary pay, pensions and allowances 2007*, Cm 7270-I, para 5.22.

¹⁹ House of Commons Commission, *Employment of Members' Staff by the House*, 26 October 2009, Paragraphs 81-82.

²⁰ "For MPs with larger or urban constituencies, correspondence could be between 500-1,000 calls/emails a week which needs a larger staff resource to manage." Report to the House of Commons Administration Committee on the findings of the interview study with Members on leaving Parliament April 2016 <https://intranet.parliament.uk/Documents/intranet/Interview-study-Members-leaving-Parliament-report.pdf>

"In my office there is one member of staff dealing with constituency issues. Without the PRU providing briefing letters, I would be doing double hours with the number of campaign letters we receive."

- Staff member in the office of an MP subscribing to the PRU

4.7 There can be little doubt that the Unit provides value for money as described in the second part of draft Fundamental Principle 4. We can also say something about the magnitude of the benefits of the PRU's economy of scale model.

4.8 In 2015-16, 464,563 documents were downloaded from our website. It should be noted that this included a period of prorogation when downloads were greatly reduced. With usage per office increasing, the likelihood is that in 2016-17 in excess of 500,000 documents will be downloaded. However, sticking with last year's known figures, this means that every MP subscribing to the PRU used an average of 1,600 documents, or about 6 per working day. As a result 290 researchers in 290 offices are not researching the same national policy background for the same debate as in 289 other offices. Instead, they can focus on matters of particular concern to their MP and their MP's constituents.

4.9 Of these 464,563 downloads, some 3,577 were documents tailored to an individual MP. In addition, at any one time there are 1,500 documents on our website available to all subscribing MPs, often on quite specialist subjects. In total, in 2015-16 some 2,355 documents were made available to all MPs. However, it should be noted that many of these will have been updated multiple times to reflect changing events.

4.10 There are several ways to arrive at an estimate at the saving this model provides for taxpayers. None can be definitive, but all suggest savings to the taxpayer extending across a Parliament to millions of pounds.

4.11 One way is to estimate the time an MP's researcher might take to write the equivalent volume of documents. We could say with some confidence that it would take an MP's researcher *at least* 30 minutes to write each of the 1,600 documents the average office downloads. We know this is a conservative estimate as some briefs take our own specialist researchers over a day to write. However, on the basis of 30 minutes each, it would take 21 weeks per office to replicate the work of the PRU. Factoring in annual leave, if the PRU ceased to exist, this suggests Conservative MPs alone would need 145 extra staff. This calculation does not account for daily updates made by PRU staff to our material.

4.12 Another way to estimate the benefit of the PRU is to ask MPs' staff how much time the PRU saves them. Our recent call for evidence suggest a figure of 14+ hours per week.

4.13 This picture is backed up by MPs questioned. We asked: *“Do you agree that if the PRU ceased to exist, IPSA may have to consider increasing the staffing allowance by significantly more than the annual PRU subscription?”* 103 MPs said “Yes”, while 4 said “No”.

4.14 The value offered by pooled research should, however, not simply be quantified in time or money saved, but also in the quality of output. Few directly employed MPs’ researchers could expect to develop the specialist skills and knowledge of the PRU’s team of researchers. While Members’ staff develop and possess noteworthy skills, it can still be said that the PRU helps ensure constituents get a level of service from MPs which is of a higher quality than it would be in the absence of pooled research.

5 Single-Party Model

- 5.1 Although some MPs do share members of staff, insofar as we are aware to date this has only been within a political party not across political parties. The same is true with pooled resources in that to date a cross-party model has not been established.
- 5.2 Where there are opportunities to work with other pooled service providers, the PRU has a track record of attempting this. For example, upon the closure of the Portcullis Pension scheme, and with the assistance of IPSA, the PRU explored opportunities for a new staff pension scheme with the PRS. The PRU is open to other such opportunities at an administrative level.
- 5.3 However, just as a DUP MP and a Sinn Fein MP or a Labour MP and a UKIP MP could not under normal circumstances reasonably be expected to share a member of staff, so too there are insurmountable obstacles to the pooled staff of MPs of a particular party also serving MPs of another party.
- 5.4 Enjoying the trust of MPs is essential to the viability of the PRU. We are only able to reflect the views of backbenchers and frontbenchers by having regular contact with them and this regular contact would not be possible as a political reality or from a practical point of view if we were also seeking to understand the concerns of the MPs of 10 other parties. The sheer numbers of meetings required would alone make the job an impossible one.
- 5.5 Of 109 MPs expressing an opinion in our recent call for evidence, 108 said that if the PRU ceased to exist, a significant volume of constituency correspondence would still require a close understanding of the very latest Conservative Party position. None said no understanding of the Party's policies would be required.
- 5.6 The correspondence that MPs receive when they are members of HM Opposition are often very different than those received by MPs in the party of HM Government. It would be different again for MPs of other parties of opposition, not least for those representing constituencies in Northern Ireland, Scotland and Wales. This is reflected in the campaigns that MPs receive and also the action that MPs are asked to take. The breadth of the work a pooled research facility serving MPs from all parties would have to undertake would be significantly higher than for those serving single parties.
- 5.7 In practical terms, we foresee difficulties and inefficiencies in trying to draft a letter on behalf of MPs from 11 different parties. Whereas now we rarely produce by default more than 2 or 3 versions of a letter on a given topic, this could increase to 20 or 30. The economy of scale principle which underpins our model would collapse. In response to our call for evidence, one MP said:

"The idea of 'pooling' such resources across parties shows how little IPSA understands about the day-to-day office & casework management of MPs. How, for example, would a pooled resource accommodate the Conservative Party's view and the SNP's view on Trident?"

- **Member of Parliament subscribing to the PRU.**

5.8 In our recent call for evidence from Members' staff, 96.6% said it was both possible and desirable for pooled research services to serve a single party. We cannot say whether anyone thought it was not possible, although this would seem unlikely given that all respondents use our services. MPs expressed fundamental reservations in response to our call for evidence about pooled research services ceasing to serve MPs of a single party. As one MP put it:

"I would not use a cross-party body."

- **Member of Parliament subscribing to the PRU.**

5.9 The consultation observes that some of the services provided by pooled research organisations are similar to the services available to MPs from the House of Commons Library. The PRU disagrees with this interpretation. It is our view that the parallel lies between the material that the PRU produces and the material that an MP's Parliamentary assistant produces. IPSA has noted previously this comparison with MPs' researchers, saying: *"Pooled resources' are typically research and briefing services, where MPs can receive the service from a separate organisation without having to employ a researcher directly. This can be an efficient way of providing the service to MPs, both in terms of cost and expertise."*²¹ The complementary relationship between pooled research services and the Library were described in response to our call for evidence by one MP thus:

"The PRU is able to provide a more focused and bespoke research service than the Library. Library info is useful but not always tailored as I wish."

- **Member of Parliament subscribing to the PRU.**

5.10 However, even if an attempt were made to transfer the workload of the PRU to the Library, it should be noted that in addition to the thousands of correspondence items we produce, much of the briefing material we produce is on topics not covered by default by the Library. Our analysis suggests that last year we produced 250 briefs on topics which the Library did not. Of the other briefs we produced, several will have focused on areas of particular interest to our subscribers (eg particular clauses of a Bill) not covered in the same depth by the Library.

²¹ IPSA Annual Review of the MPs' Expenses Scheme Consultation, January 2011, paragraph 158 & FN 19

- 5.11 In our recent call for evidence from staff of MPs who subscribe to the PRU, 98.4% said the PRU assists MPs with their Parliamentary duties in ways which the Library does not. The one respondent who disagreed did not suggest this was grounds for the PRU ceasing to exist.
- 5.12 Via the economy of scale model, the PRU provides some of the functions of a Parliamentary assistant, albeit with deeper specialism deriving from a focus on one or two policy areas rather than a generalist focus on all policy areas. Like an MP's Parliamentary assistant, the PRU may use material from the Library to inform its work but does not seek to duplicate or provide a similar service to the Library.
- 5.13 Some 89% of MPs (82 in number) told us in our call for evidence that if the PRU ceased to exist they would be likely to spend more of their Allowances on bought-in services. That indicated that there is a strong demand for work which does not overlap with the work of the Library.
- 5.14 It is important to bear in mind that while we understand some surveys around this consultation have demonstrated that pooled research is valued above other resources in assisting Members' staff reply to campaign correspondence, those surveys are likely to have included respondents with no experience of using, or no access to, pooled research services.

6 **Recommendations**

6.1 Overall, the PRU believes the Scheme operates effectively in the interests of the public and MPs with regard to pooled research services operating a model like the PRU's. We would also note that IPSA's 2014 assurance review found *"the nature of the services provided is eligible under the Scheme and that there is evidence of sufficient oversight and governance to ensure that the materials you provide meet your service standards."*²²

6.2 The PRU asks IPSA's Board to note that the PRU's pooled staffing model is in line with IPSA's existing Fundamental Principles, as contained in the MPs' Scheme of Business Costs and Expenses 2016-2017, as well as IPSA's draft Fundamental Principles proposed in this consultation, in particular draft Fundamental Principle 4.

6.3 On Question 13, we know that IPSA appreciates that the staff of pooled research services are comparable to MPs' directly employed staff.²³ The difference is that staff of pooled research services are shared between several MPs. Just as a DUP MP and a Sinn Féin MP or a Labour MP and a UKIP MP could not under normal circumstances reasonably be expected to share a member of staff, so too there are insurmountable obstacles to the pooled staff of MPs of a particular party also serving MPs of another party. For this, and other reasons outlined in this submission, we believe that the funding via IPSA of pooled staffing services such as the PRU which are exclusively subscribed to by MPs of a single political party offer a highly regarded,²⁴ compliant²⁵ and good value²⁶ way of assisting MPs with their Parliamentary duties which could not be replaced by existing services²⁷; and our strong recommendation is that removing the single-party element would be entirely unworkable, thereby increasing pressure on the public purse and reducing the ability of MPs efficiently and effectively to serve constituents.

6.4 More broadly, we have a number of other recommendations to further improve the working relationship between IPSA and providers of pooled research services, namely:

1. The PRU would welcome having a nominated IPSA member of staff as a liaison point, much as MPs have.

²² Email from IPSA to PRU, 15 July 2014

²³ See, for example, IPSA Annual Review of the MPs' Expenses Scheme Consultation, January 2011, paragraph 158 & FN 19

²⁴ See, for example, PRU Annual Survey, March 2016. Responses were received from 226 staff in offices subscribing to the PRU.

²⁵ See, for example, Email from IPSA to PRU, 15 July 2014

²⁶ See, for example, IPSA, Annual Review of the MPs' Expenses Scheme Consultation, January 2011, p40.

²⁷ See, for example, Paragraphs 5.10, 5.11 & 5.13.

2. PRU would welcome ways to make the payments for pooled services more efficient.
3. PRU would welcome the publication by IPSA of assurance review reports. Indeed, we have already indicated to IPSA that we would welcome the publication of the 2014 review. As this review contains minor factual errors, we would welcome the opportunity to see draft copies of all assurance reviews before publication to help IPSA eliminate factual errors.

Annex

PRU Service Agreement



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PRU Service Agreement

Subscribers to the Policy Research Unit (PRU), on payment of the PRU fee, accept the following terms:

- The PRU is a not-for-profit company limited by guarantee, in which its subscribers are its members.
- You are happy to become a member and in the event that the company is wound up, the maximum amount payable by each member is £1.
- Your PRU subscription is for 12 months (unless disrupted by the dissolution of Parliament).
- Your subscription will provide you with access to standard letters and briefs on all major business on the floor of the House.
- The PRU will aim to provide new standard letters within 5 working days of accepting a request.
- You continue to hold liability for constituents' data, and any other data, forwarded to the PRU. The PRU strongly recommends that data which identifies a particular constituent is not sent to the PRU.
- You may only use PRU research services in support of your Parliamentary duties and must ensure that your staff and volunteers comply with this.
- You must not allow non-subscribers to the PRU to use PRU materials.
- If you unsubscribe from PRU services, or cease to be an MP, you may still be billed the following year for the bespoke element of a past PRU subscription or receive a small refund if you have not commissioned bespoke work.

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Extract from PRU Staff Handbook on the Parliamentary vs party political

What we should avoid

Our job is to support our subscribers in their capacity as Members of Parliament. MPs are, however, frequently also candidates, or potential candidates, for political office. We should avoid assisting MPs with activities they carry out in that capacity.

This means we should avoid:

- Soliciting votes for a Member, candidate or political party, by which we mean advocating that a constituent vote for them in any election.
- Advocating that a constituent vote against a Member, candidate or political party.
- Supporting a Member's efforts to achieve the above.
- Using PRU facilities for non-PRU work including party political work, paid or otherwise.

Requests we should reject

Occasionally Members' staff ask us to take on requests that there is no valid way we could fulfil without breaching these guidelines. In these rare cases, we should reject the request. We should also explain to staff why we are rejecting it, because it is likely that if we cannot deal with it, they, as Members' staff bound by the same rules, should not either. Using taxpayer-funded staff time, stationery, franking services, etc. for party political purposes presents an ethical and political risk to Members too.

We should therefore reject requests that:

- Relate to the Conservative Party Conference
- Are made for the purpose of advancing a campaign for election.
- Are to be used in campaigning activity, e.g. a briefing for use in connection with an election hustings.
- Ask why a constituent, or people in general, should vote for a given Member, candidate or political party.
- Solicit advice as to whom, or which political party, a constituent should vote for.

Responses from MPs to PRU's call for evidence to submit to this consultation

"Just as Members' views may differ on major issues in the Chamber by political party, so too do they obviously differ in correspondence with their constituents. So it is vital that Members are able to trust a service that supports this."

"IPSA seem to be trying to create non-political politicians. They ignore that MPs were elected on a party manifesto to follow the aims of that party. It is therefore perfectly legitimate for them to use the resources paid for by their constituents to pursue the agenda their constituents elected them to follow."

"The big policy issues, one could research themselves via parlisearch, for the less popular PRU is vital."

"PRU allows staff to access info quickly allowing constituents to obtain quick responses. PRU servicing just the Conservative Party gives us confidence of position and trusted services."

"Removal of PRU would absolutely mean a reduction in the quality of service to constituents as most MPs' offices would not have the capacity or expertise to research such a wide variety of topics and policies."

"This consultation question is a waste of time. If pooled resources cease to exist this will increase the cost to Members and IPSA."

"PRU is an invaluable tool to my work, and the work of my staff. If the PRU ceased to exist, the workload of my staff would increase dramatically and IPSA staff allowances would not cover the extra staff I would require."

"My greatest concern is that if the PRU ceased to exist, I would need to employ another member of staff. So IPSA would have to increase each Member's allowance massively. That would be a dreadful result for the taxpayer. The PRU is efficient and offers great taxpayer value."

"It would be unutterably ridiculous for a PRU unit or similar to serve MPs from other parties as well."

"I have found the PRU invaluable + I greatly value having them there."

"The PRU saves as much money as employing a full member of staff in our office – for considerably less money. The high quality output from PRU is greater than the amount we pay for it. Please don't go!"

"I underspend my staffing budget by £60,000 per annum. I would have to use that to take on extra staff at a higher cost."

"I think the PRU means taxpayers get a better deal from the essential research work every MP needs to deal with constituents."

"The assistance provided by the PRU to me and my staff both in Parliament & the constituency is indispensable. Constituents would undoubtedly suffer considerably if the PRU's assistance were to end."

"It is not unreasonable for MPs to have access to research staff who have an understanding both of individual policy areas and their party's positions and thinking."

"IPSA needs to get real and understand we are elected on a party ticket; overwhelmingly people vote for the party first and the individual second. Therefore it is axiomatic that we recruit staff who understand and support our policies who can be trusted to be discreet. The PRU falls into the same category."

"I would not use a cross-party body."

"The PRU provide an invaluable service to me and my staff. Without their assistance, the quality of help we are able to offer constituents would be severely affected as resources would have to be reapportioned to fill the gap created."

"The PRU represents good value for money and provides a timely service on business of the House as well as helpful template letters in line with party policy."

"The PRU saves time. The answers are as I would write myself. The PRU represents good value for the taxpayer – who receive a timely response."

"This is a tried and tested system. It should be left alone. IPSA should focus on making what it currently does more effective & efficient."

"Trust + confidence."

"IPSA's proposal has not been properly thought through."

"This resource is invaluable and saves the tax-payer a fortune. Stop trying to find problems where they do not exist!"

"The idea of 'pooling' such resources across parties shows how little IPSA understands about the day-to-day office & casework management of MPs. How, for example, would a pooled resource accommodate the Conservative Party's view and the SNP's view on Trident?"

"The PRU saves a significant amount of time which my staff can then spend helping constituents!!"

"Vitaly important it continues as it is."

"PRU are cost effective way of providing us with non party political information."

"If the PRU became cross-party we would need the budget from IPSA for another researcher."

"A researcher can help two or more MPs. I regard the PRU as a sensible acceptable extension of that."

"The PRU works extremely well in its current form. It is notable that letters include optional paragraphs to capture a range of positions – including those which may disagree with govt. policy."

"I heavily rely on my subscription to the PRU to undertake my parliamentary duties as an MP. Without the PRU + given the very large amount of policy emails, letters, etc. it would be virtually impossible to do my job effectively."

"I believe this suggestion is not only wrong BUT yet again makes IPSA look like they have little or no idea how our business works – ridiculous."

"The PRU system is not broken + therefore does not require to be fixed."

"The PRU saves me a fortune in staff costs and time. I would have to take on many more staff to provide the service the PRU provides. It is important to me that staff have the time to support my constituency and parliamentary work and the PRU allows them the time to do this. The only alternative to PRU type organisations would be to not respond to constituent enquiries. This would not be good for engaging the public with politics."

"The PRU is able to provide a more focused and bespoke research service than the Library. Library info is useful but not always tailored as I wish."

"The work of the PRU saves time and enables the delivery of effective factual responses to constituents' enquiries on policy related issues."

"PRU is indispensable to me. I would need to employ at least one additional member of staff at a cost of 10 times the PRU subscription. That is not a good use of public money."

"PRU provides responses to standard letters + campaigns which relate to Government policy. It is simply not possible for members of staff to put in the amount of time + effort PRU do, to construct responses which are detailed. With more e-campaigns the workload of an MP's office is going up and not down. In the past MPs used to get 12 letters a week, we can now get that in 1 minute."

Prof Rosie Campbell

Academic

Email

Received 19/10/2016

**REVIEW OF THE MPs' SCHEME OF BUSINESS COSTS AND EXPENSES AND IPSA'S PUBLICATION POLICY – A
CONSULTATION, OCTOBER 2016**

**A response from Prof. Rosie Campbell (Birkbeck, University of London),
Prof. Sarah Childs (University of Bristol), Prof. Emma Crewe (SOAS), and
Prof. Georgina Waylen (University of Manchester)
October 2016**

This collective consultation response draws on the following research:

(i) Rosie Campbell

The ESRC funded *Representative Audit of Britain* (grant number ES/L016508/1) - a survey of all candidates who stood in the 2015 British general election. Full details available here

<http://parliamentarycandidates.org/project/representative-audit-of-britain/>. And the Leverhulme Trust funded Britain's New Political Class (grant number RPG-2013-175) - the project collates information about parliamentary candidates' backgrounds between 1945 and 2015. Principal investigator Jennifer Hudson (UCL) full details available here <http://parliamentarycandidates.org/project/britains-new-political-class/>

(ii) Sarah Childs

The ESRC and the University of Bristol funded a secondment to the House of Commons, autumn 2015-July 2016.¹ In January 2016, as part of this project, all MPs received an email circulated by the House of Commons inviting Members, on a confidential basis to discuss their experiences of working in the House, and the challenges posed in respect of maintaining family and social life, and managing more than one household. The email resulted in 16 meetings, phone calls and emails with MPs currently in the House, male and female, new and more longstanding, and from across the House. This constitutes a very small percentage of the total population overall, and coupled with MPs self-selection cannot claim to constitute a representative sample. The data was however augmented by additional discussions with individual MPs collected as part of the wider project, and which also included collective discussions with women MPs from both main parties. It also drew upon amongst other publications, the 2010 Speaker's Conference report,² the 2014 Women in Parliament APPG Report,³ and the 2015 Report for the House of Commons Administration Committee on the findings of an interview study with Members on women's experience in Parliament.⁴ Importantly the new interviews were disproportionately with male MPs, and so complemented the women-centred inquiry of the Admin Committee's Report.⁵

In analysing MPs' views and the extant literature, a critical reading of IPSA rules and IPSA publications was undertaken, informed by the Inter Parliamentary Union's 'Gender Sensitive Parliaments' Framework. This approach identifies infrastructure as one of the key dimensions for securing a representative legislature. It examines the ways in which the work of Members is facilitated and whether this privileges a particular type of MP - explicitly or implicitly, consciously or unconsciously. Findings operated at two levels. The first addresses MPs' experiences of, and interactions with IPSA under the current rules and practices. Attention was drawn to MPs perceptions and experiences of (a) inadequate systems and insufficient knowledge of IPSA staff; (b) poor relations with IPSA staff; and (c) the extensive time it takes MPs to complete the 'paperwork. Significant room for improvement on the 'day to day' practical arrangements for MPs and, pointedly, a desire for more effective working relationships between MPs, MPs' staff, and IPSA staff was noted. The second level findings point to a more fundamental questioning regarding the assumptions which underpin the current system of pay and expenses.

(iii) Georgina Waylen

As part of a larger European Research Council Advanced Grant on Understanding Institutional Change: A gender perspective, Georgina Waylen has examined the pre 2009 expenses regime, the expenses scandal, and the post 2010 expenses regime, asking amongst other things, whether male and female MPs have behaved differently or been treated

differently either before the 2009 scandal, during it, or under the new IPSA governed regime. She has also examined from a gender perspective the process in which IPSA was designed, analysing how far IPSA's rules and norms have a differential impact on different groups of MPs (Waylen and Southern 2015, 2016).

(iv) Emma Crewe

An ethnographic study of the work of MPs, funded by the Leverhulme Trust, entailed observation of MPs in Parliament and constituencies (44 MPs formally, many others informally), as well as MPs' staff, parliamentary candidates and others working with MPs between 2011-2013. Although expenses were not a particular focus on the research, in the unstructured interviews about MPs' work, male and female MPs in all parties brought up the subject, usually as one of the challenges facing them. These included, concerns that (a) the new expenses regime obstructs fulfilling obligations to family and dependents, and (b) that security is given insufficient importance. Both of these observations are clearly gendered.

... ..

CHAPTER 2. THE FUNDAMENTAL PRINCIPLES OF THE SCHEME

QUESTION 1. DO YOU AGREE WITH OUR NEW FUNDAMENTAL PRINCIPLES? DO YOU FIND THEM EASY TO UNDERSTAND? AND DO YOU AGREE WITH OUR EMPHASIS ON VALUE FOR MONEY?

Fundamental Principle 2: 'should not unduly deter'. This principle requires IPSA to be able to confirm that 'people from any part of society' are not deterred from being an MP.

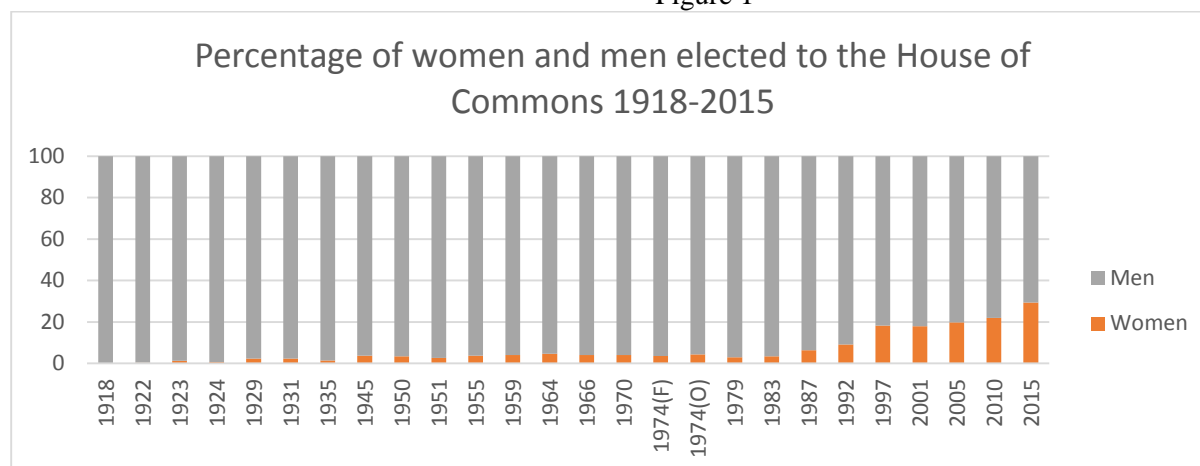
We ask:

- What efforts and/or research did IPSA undertake to assess this? And what processes are in place to confirm this statement, given the clear over-representation of certain groups within the UK Parliament?

We draw attention here to the continuing under-representation of women - and within that group of mothers - in the UK House of Commons. Figure 1 documents the over-representation of men and the under-representation of women, 1918-2015. Significant progress has been achieved in the last 20 years, although the upward trajectory is not always linear, with some elections seeing fewer women MPs returned than previously (e.g. 2001). The step change was 1997 – where the number of women MPs doubled - which resulted in large part from the Labour party's use of a party quota – All Women Shortlists (AWS). 101 women of the 120 MPs were Labour, 35 of these from AWS seats.

The 'motherhood gap' in Parliament points to fewer women MPs having children relative both to male MPs, to women in comparable professions, and to women more widely in society. Some 45 percent of women MPs do not have children compared to only 28 percent of male Members.⁶

Figure 1



Source: Rallings and Thrasher, British Electoral Facts 1832-2006; House of Commons Library Research Papers 10/36 General Election 2010 and CBP-7186 General Election 2016.

Principle 3: 'be treated in the same manner as other citizens. They should neither gain, nor be disadvantaged, financially.

In 2015-16 the MPs' Scheme stated: The presumption should be that in matters relating to expenses MPs should be treated in the same manner as other citizens. If the arrangements depart from those which would normally be expected elsewhere, those departures need to be explicitly justified.

We would support the re-insertion of the qualification. To put this more baldly and illustratively: MPs are doing a different kind of job to other citizens: MPs are not the same as other commuters working in London (as implied on p.30).

In sum, we contend that the concept of neutrality advanced by IPSA (p.22) is not neutral; does not result in fairness; nor ensures that everyone has the same opportunities. The current rules presume sameness, and accordingly privileges some, and disadvantages, others. Differential outcomes are gendered, classed and raced. The way that IPSA currently interprets their fundamental principles 2 and 3, results then, in a profound contradiction, with differential outcomes for Members. These effects go against IPSA's commitment not to have a deleterious impact on the diversity of the House of Commons.

CHAPTER 5. EMPLOYMENT OF CONNECTED PARTIES AND FINANCIAL SUPPORT TO MPs' FAMILIES

QUESTION 10. SHOULD WE MAKE ANY CHANGES TO THE PRACTICE OF EMPLOYMENT BY MPs OF CONNECTED PARTIES? IF SO, WHEN SHOULD WE INTRODUCE ANY NEW ARRANGEMENTS?

Waylen and Southern's research has shown a big gender gap in who employs a 'connected party'. In 2012/13 23.6% of MPs employed a 'connected party'.⁷ This overall figure conceals big sex differences. For example, 26.6% of male MPs employ a connected party (down from 32.8% in 2009), whereas only 12.9% of female MPs do so (down from 23.1% in 2009). There are also differences in whom male and female MPs employ: male MPs are more likely to employ their spouses. These differentials likely reflect historic assumptions and patterns of married men's and women's paid employment. The practice of employing connected parties is evidently not a gender neutral practice. IPSA's own analysis however (p69) makes no mention of these differences.

THE GOOD PARLIAMENT REPORT:

- *Defend the principle that 'connected parties' can be legitimately employed by MPs as part of a wider commitment to the principle of family* It

It is clear from qualitative evidence that the right to employ a connected party is valued by many MPs and by the connected party.⁸ This right should be maintained as it is one way in which some MPs – like other small family businesses – manage their work/life balance and family commitments. It should be noted that IPSA find that 'there is no 'substantive evidence of misconduct in the employment of connected parties'.⁹

QUESTION 11. DO YOU HAVE ANY SUGGESTIONS ABOUT HOW WE SHOULD PROVIDE FINANCIAL SUPPORT TO MPs IN RESPECT OF THEIR FAMILIES?

We note from the consultation document:

- 'The financial risk to the taxpayer in this area is low'
- There is anecdotal evidence that some MPs do not claim for their dependents, even though they are eligible, because they do not want to attract adverse media attention to their families and their private arrangements.
- Some MPs have argued that it is unfair that we do not fund spouses' or partner travel when they are travelling on their own to accompany the MP at an event that they are attending in their capacity as an MP

We ask:

- Why is it that the number of trips for children between the constituency home and Westminster limited? What principle or rule determined this number?
- What analysis has been undertaken by IPSA to determine housing and other costs associated with living in London?
- An MP undertaking a journey by private transport as the driver will be reimbursed...what if your partner drives?

- Taxi use: clarify that having a child or children with you is sufficient to claim for a taxi as ‘alternative methods are impractical’ e.g. child/children and luggage, and the MP.
- Why must the MP be ‘sole’ carer for a child between 18 and 21?

CHAPTER 7. WORKING FROM TWO FIXED LOCATIONS – MPs’ ACCOMMODATION COSTS

QUESTION 14. DO YOU THINK THAT THERE IS A VIABLE ALTERNATIVE TO THE CURRENT ARRANGEMENTS FOR FUNDING MPs’ ACCOMMODATION? IT WOULD NEED TO PROVIDE VALUE FOR MONEY, SECURITY, TRANSPARENCY AND SUPPORT MPs IN CARRYING OUT THEIR PARLIAMENTARY FUNCTIONS IN TWO LOCATIONS.

Notwithstanding the tabloid tendency to construct the MP as a self-interested, self-aggrandizing, and pocket-lining scoundrel, there is plenty of evidence that today’s MPs are busier than ever: MPs’ appointments diaries will have few if any blank spaces. When at Westminster their days could be filled many times over – with chamber business, legislative and select committee scrutiny, and civil society lobbying and public engagement. Constituency representation has grown exponentially in the last few decades, in part facilitated by the internet, and a perception that the MP is more than the ‘port of last resort’.

The working life of an MP is, then, not some discrete Mon-Friday 9-5pm job but rather a 24/7 vocation. Nor is it an ‘easy way of life’ – subject as it will be to the vagaries of electoral success and the unpredictability of political events that re-shape parliamentary and constituency business. Despite the tendency for the media and public to perceive MPs to be on holiday whenever the House is not sitting, MPs are rarely ‘off work’. Shopping at the supermarket is frequently an opportunity for constituents to grab hold of their MP; ditto dropping off the kids at the School gate or attending their Sports day or Christmas play; even when at the local hospital MPs are not immune from their constituents’ demands.

Of course, much of this is not so very different to many occupations which do not have clearly demarcated or finite hours. Work/life imbalance is hardly unique to MPs. Yet, there are some exceptional features of the MPs work that should be explicitly acknowledged in any pay and expenses regime. To do otherwise is likely to render existing MPs less effective than might otherwise be the case, may feed into retention issues, and are likely to reduce the diversity of the supply pool for future MPs (APPG 2014). One MP claimed that ‘very few sensible people would run for Parliament if they knew the life of an MP’. Two others talk of political friends and colleagues saying they would not do the job (for one MP these were friends who were elected representatives at other levels).

In absolute terms sufficient people are currently seeking selection by political parties and standing for election. But the question for this Report is *how MPs’ pay and expenses regime might mediate who these people are; whether they favour implicitly or explicitly a particular type of candidate*. Amongst MPs there is concern that some of the younger MPs elected in 2015, especially those with young families might not last the 5 year term. The percentage of broken marriages or ‘lost relationships’ at Westminster is unknown (and therefore cannot then be compared with the national average or with comparable occupations), but MPs talk of ‘many of their friends’ losing their relationships, and one suggested that 1 in 5 marriages broke down within a five year parliament.

The likely effect of inadequate support for MPs families: a skewing of the supply pool.¹⁰ One MP noted how of the new intake of women MPs, those with younger children were more likely to live in the constituency. One MP recounted how her young children resided in the constituency with her partner. She had had to ‘re-shape family’ with her husband going part-time and relying on her parents; the bonds between her and her family had been disrupted as a consequence. In her view Parliament was ‘not family friendly, as you’ve been away [in Westminster] then you have to work in the constituency’.

The question of living in only one location with one’s family might be answered differently – on average – by women and men.¹¹ Given existing gender relations the woman MP is less likely to have a partner willing to act as the constituency ‘wife’ while she is busy down in Westminster.¹² If an MP chose to live in London with their family, they are likely to lose any extended family and other support networks in the constituency.¹³ There may also be the possibility of an MP effectively constituting a single parent whilst in London, if the partner remains in the constituency with other children.¹⁴

The job that MPs do is not, in our view, the same as other jobs – a point we will continue to make. Members should not simply be seen as travelling for business like any other worker. Rather they *work* in two locations. Hence, MPs should be treated differently: they need two bases that are family friendly - a *residence suitable for a family in both locations*. Without acceptance of the principle of supporting two residences for a family in both work locations,

IPSA's apparently neutral rules will penalize those with caring responsibilities. There is considerable concern amongst MPs that the existing arrangements for MPs housing simply do not provide sufficient funds to 'keep the family together' by covering the cost of a family home in both places. 'Although portrayed as a luxury, managing more than one household on the funding available is a struggle financially'. Allowances have also not increased since 2010; that '2.4k' for each child does not buy an extra room for a child. As a consequence, MPs are having to 'top up' from their own income or as one admitted, having no choice but to leave the children in the constituency - they lacked family money to cover the additional costs.

IPSA's 'appropriate support to an MP's family' (p.11) should therefore be *family-friendly accommodation in two places all year round*, and reasonably permanent. There is also something of a contradiction between IPSA's guidelines which say that MPs can claim rent in either the constituency or Westminster, and all of the associated discussion which is seemingly premised on the rent being for Westminster. Promoting support for MPs living and working in two locations might entail making it easier for MPs to choose where they pay rent.

Sufficient travel funds between the constituency and Westminster for MPs and their families. If you are in a partnership or are married and without children, or with grown up children there is no support for your partner to come to Westminster. This is of course in line with practices for many other employees. But once again, the 24/7 nature of the MPs work and most importantly, the MPs reality of *working in two locations* should bear some force here. The MP is not returning to the constituency for 'the weekend' but will spend much of this working on constituency representation and party activity.¹⁵ The more affluent MP will - and is paying - for this.

THE GOOD PARLIAMENT REPORT:

- *Defend the principle of the family and support sufficient funds for family accommodation in the constituency **and** Westminster, and for familial travel between Westminster and the constituency*

The traditional image of an MP residing in a London *pied-à-terre* when the House of Commons is sitting, and returning to his wife, children and Labrador on the weekends is an old-fashioned and masculinised model of an MP.¹⁶ Given the current parliamentary calendar and sitting hours of the House of Commons, the single-parent MP, the MP who wants to reside with their family as much as possible, and the MP with a partner working in London, may very well want to have their children with them in London when the House is sitting, and in the constituency at the weekends, and during recess. A regime of business costs and expenses that does not support such arrangements will likely skew the supply pool of candidates to those who follow a more traditional family model or those who have independent means.¹⁷ IPSA should in its 2016 review reflect on the adequacy of the accommodation 'uplift' for children, and the rules regarding partner and child travel between the constituency and Westminster. There is qualitative evidence to suggest that some MPs are supplementing these allowances with their own funds.¹⁸

- Why is it that there is no provision for spouse/partner travel for those MPs who do not have children, given the fact that MPs work and live in two places unlike other workers who work in one and live in another?
- Can you book a 'family' room in a hotel – are additional funds available above the current limit?
- IPSA currently funds 'clubs' for overnight accommodation but these do not routinely accept children.
- The 2K 'uplift': is this sufficient to 'buy' an extra room for a child? What analysis has been undertaken to determine the housing and other costs associated with living in London? On what basis are these reviewed? 2015-6 : no change to accommodation Expenditure Budget.
- Tendency of IPSA to suggest 'workarounds' to address issues to do with caring, for example use of contingency funds (this is felt to be laborious, inconsistent, creating more work, lack of awareness amongst MPs and a sense that this is special pleading rather than a normal expectation).¹⁹
- Any reduction in MPs accommodation budget to reflect the number of days that MPs sit would disadvantage families with working partners or children who live in London Monday-Friday and return to the constituency at the weekends.
- Given the hours the House sits any reduction that would extend the travelling/commuting time would be disadvantageous to MPs with families and those with additional security concerns (likely women, BME, disabled, and gay MPs).
- The rejection of University style accommodation is regrettable; this would be able to offer diverse housing options – e.g. single person; family; disability friendly. Have the security costs of this been seriously considered? What evidence has been taken from other Parliaments on this accommodation possibility?

QUESTION 15. DO YOU THINK THAT WE SHOULD CONTINUE TO ALLOW MPs TO CLAIM FOR ASSOCIATED COSTS, SUCH AS UTILITIES AND COUNCIL TAX, ON PROPERTIES THAT THEY OWN? IF SO, WHAT SHOULD THE BUDGET BE?

Yes - To do otherwise would be to disadvantage less wealthy MPs

MPs claim to be routinely ‘out of pocket’, a state of affairs one MP claimed would not happen with any other job. Additional housing costs that are topped up: 4K per year said one MP. There is also the problem of finding London hotels at the permissible price of 120 pounds per night.²⁰ The need to top up travel costs to and from Westminster, and within the constituency; ditto MPs’ spousal/partner and children travel costs to and from Westminster, not least when children are over 16. Taxis will likely either not be covered by the rules or not claimed for even when permitted, under a regime that presumes public transport is available in the constituency and in a media environment when even legitimate taxi costs will likely incur public opprobrium. Then there were the everyday costs that MPs felt should be covered but were not: not being able to claim hospitality: tea, coffee or orange juice for guests in the constituency or school children at Westminster. One MP calculated that this cost over 7k per year. Coupled with these were the office costs that need to be paid for ‘up front’ from ‘petty cash’ or a ‘slush fund’ – one MP stated that they provided a 5K kitty. Sure, there is the IPSA loan, but as one MP stated they did not want to take out the loan because their monthly outgoings would subsequently be increased.

On the basis of MP interviews, it is clear that MPs are not only putting their hands in their pockets for expenditure that lie outside the rules, but also are not claiming for legitimate costs that are legitimately expensible. They do this for two main reasons: first, because of the complexity and perceived unpleasantness of interacting with IPSA (the ‘hassle’; not wanting to face IPSA) and secondly, because of the fear of media scrutiny of MPs’ expenses. No one wants to be the ‘most expensive MP’. And so MPs talk about not claiming for short mileage or for when their spouse picks them up at the station, or to and from some events when critics might perceive the event as party political and not sufficiently parliamentary. Of course, all of this assumes that MPs have sufficient funds to be ‘out of pocket’. *A commitment to a diverse House should not presume that MPs are willing or able to draw on family money in this way.* As the view of an older male MP in a privileged position put it: if MPs are not in receipt of accurate and clear guidance on whether a particular expense is legitimate, then the tendency not to claim is increased. It is perceived as too risky and that matters for all MPs, but it likely matters most for MPs who lack private resources and or have additional costs, such as children of school/college age.

CHAPTER 8. OTHER ISSUES RELATING TO THE SCHEME

QUESTION 25. WHAT ARE YOUR VIEWS ON HOW FUNDING FOR THE COVER OF MATERNITY, PATERNITY, ADOPTION AND LONG-TERM SICK LEAVE SHOULD BE PROVIDED? WHAT IS THE FAIREST WAY OF PUBLISHING THE RESULTING SPENDING?

FOR STAFF: for reasons of transparency this should come from a designated ‘maternity/paternity/adoption’ budget and not hidden in the central contingency fund. This makes parental leave and other caring or sick leave hidden from the public’s views – when these are legitimate, lawful, normal and natural part of the workplace. As the consultation notes, masking such leave/payments leaves risks claiming MPs being perceived to be ‘overspending’ when they are not.

FOR MPs: *The Good Parliament* Report makes the following recommendation to the new Commons Reference Group on Representation and Inclusion:

COMMONS REFERENCE GROUP ON REPRESENTATION AND INCLUSION RECOMMENDATION 12 (SHORT TERM)

Produce a House Statement on maternity, paternity, parental, adoption and caring leave. All parties represented in the Commons would be expected to sign up to this

An MP asked, could I please put on a lunchtime seminar with MPs who had had babies whilst elected to the House so that new MPs could find out about how to time and manage their pregnancies, and how best to address the care of young babies with parliamentary work and the parliamentary week (Report author, citing a 2015 intake MP).

My partner and I have already decided that we can’t have a family if I am an MP. They don’t want to be a single parent and they would be, back in the constituency with the child (2015 intake MP).

There is, as previously noted, a sizeable ‘motherhood gap’ in Parliament, with fewer women MPs having children relative both to male MPs, to women in comparable professions, and to women more widely in society. Some 45 percent of women MPs do not have children compared to only 28 percent of male Members.²¹ Arrangements

regarding maternity, paternity, parental, adoption, and caring leave for Members are informal and operate at the party level. This no doubt results from the historic maleness of the House. Yet, to become a truly inclusive institution the House of Commons must accommodate and facilitate both the pregnant woman Member and co-parenting and caring MP. Table 3 below shows how Parliaments commonly respond to maternity, paternity, and parental leave.²² It reveals that provision for maternity leave is, in the majority of parliaments, the same as the national law, although more than one quarter makes no provision. Paternity and Parental leave fare less well, suggesting that the father MP is rarely recognised.

Table 3
Parliamentary Provision of Maternity, Paternity and Parental Leave

	No provisions	Same as National Law	Own Provisions
Maternity	26%	62%	12%
Paternity	49%	45%	6%
Parental	60%	39%	1%

Source: IPU²³

In directly addressing the question of MPs with parenting and caring responsibilities, the Reference Group would importantly be responding to contemporary concerns amongst women MPs from across the floor of the House, notably identified in the 2014 Women in Parliament APPG Report.²⁴ Following a consultation period,²⁵ clear recommendations should be made by the Reference Group to the Administration Committee.²⁶ For the period of leave, the MP might choose to:

- (i) Vote remotely (i.e. off the Parliamentary Estate);²⁷
- (ii) Appoint a proxy from amongst fellow party MPs to vote and otherwise act for them in respect of tabling questions, amendments, etc. in Parliament;²⁸
- (iii) Be formally and transparently ‘paired’ so that their absence from Parliament does not affect the balance of party representation in divisions.²⁹

In considering these options the Reference Group should look to the, albeit limited, best practice in other parliaments,³⁰ as well as external institutions, and work with IPSA to deliver an appropriate scheme. A working principle is that MPs should have flexibility in how they balance their caring,³¹ legislative, and constituency duties.

QUESTION 28. DO YOU HAVE ANY SUGGESTIONS ABOUT HOW TO IMPROVE THE PROCESS FOR CONTINGENCY FUNDING?

See above re: maternity and caring, and sick leave

QUESTION 36. ARE THERE ANY OTHER ISSUES RELATING TO THE PUBLICATION OF MPs’ BUSINESS COSTS AND EXPENSES WHICH YOU WISH TO RAISE?

Publication of information emphasises that the system is transparent but it is unhelpful to publish receipts. They can too easily be taken out of context. More explanation needs to be given by IPSA to explain why MPs incur very different levels of cost (e.g., distance of constituency from Westminster, number of dependents) so that comparison between MPs is fairer.

THE GOOD PARLIAMENT REPORT:

- *Seek the equitable publication of costs incurred by MPs in respect of their children. That is, like the additional costs incurred for reasons of disability or additional security, these should be published at the aggregate and not individual level*

The additional costs incurred by MPs with children are currently treated inequitably relative to the additional costs incurred by MPs with disabilities, and in relation to additional security costs.³² This leaves MPs who make claims for legitimate children related costs being perceived as ‘expensive’ in the media, by political opponents, and amongst the public. This is one reason why some MPs do not claim their legitimate expenses; and it is why the least expensive MPs – often valorised by the press – are frequently older men either without children, or with grown up children. Whilst IPSA should of course confirm the legitimacy of all costs associated with MPs’ children, there is no public interest in this information being linked to individual Members. All the latter does is feed critical comment of the parent MP.

CHAPTER 10. EQUALITY AND DIVERSITY

QUESTION 38. WHAT LIKELY OR ACTUAL IMPACT DO YOU BELIEVE THE SCHEME AND MATTERS RAISED IN THIS CONSULTATION MAY HAVE ON EQUALITY AND DIVERSITY IN RELATION TO MPS AND THEIR STAFF?

A Representative and Inclusive House of Commons

Whilst more representative than previously the 2015 House of Commons is still more than two-thirds male and has fewer MPs from the UK's BME and disabled populations relative to their percentage in the population (Childs 2016). Parliament's declining working class composition is also increasingly negatively remarked upon. There are many reasons for the skewed composition of a parliament (Campbell and Childs 2015 Norris and Lovenduski 1995): across the globe socio-economic, cultural, and political factors combine in different configurations to produce legislatures in which ethnic majority men are over represented (Hughes forthcoming).

Jess Phillips MP, in a Westminster Hall debate in 2015, epitomized the case for a representative and inclusive Parliament (10 Nov 2015, 34WH): 'It is not the job of oil rigs to reflect society; it is not the job of oil rigs to push for laws and regulations to improve families' lives; and the world does not look at the people who work on oil rigs for an example of what our culture should be. But it is the job of Parliament to do those things'. Our consultation response takes it as axiomatic that a representative and inclusive Parliament is a democratic good (Childs 2016). It seeks this first, for reasons of justice, but also because it finds persuasive, arguments that link who is present in our political institutions with the quality and legitimacy of our democratic processes and outcomes (Phillips 1995).

A gendered critique of the pay and expenses regime introduced in the wake of the 2006-8 UK Parliamentary 'expenses scandal' dates from prior to the establishment of IPSA. Women MPs made individual and collective contemporaneous submissions, and have continued to do so thereafter (private information). Feminist academics also participated in expert IPSA consultation and reviews, most notably in 2012. Their interventions at this point directly challenged IPSA's claim that MPs' pay and conditions do not affect the diversity of the supply pool of parliamentary candidates. Subsequent research demonstrated, notably for the first time, the significant 'motherhood gap' in Parliament (Campbell and Childs 2014). As previously stated the 2012 survey of MPs found that 45% of women MPs compared to 28% of men MPs had no children. Furthermore, men MPs who had children had on average 1.9 and women MPs with children 1.2 children and the average age of women MPs' eldest child when they first entered Parliament was 16 years old whilst the equivalent figure was 12 years old for men MPs. Thus women MPs are less likely to have children than men MPs, when MPs do have children women MPs have fewer of them and enter Parliament when their children are older than men do.

THE GOOD PARLIAMENT REPORT: Any pay and expenses regime must work for all MPs; pay and expenses must not constitute a barrier to a more diverse group of individuals seeking selection by parties and election to the House of Commons. IPSA make commitments to support 'MPs working from two fixed locations' and to provide 'appropriate support for MPs' families'.³³ IPSA are currently consulting on the MPs' Scheme of Business Costs and Expenses.³⁴ Their Equality Impact Assessment is to be 'developed during the consultation period'. IPSA add: 'there will be a full assessment of any changes that we make to the rules following consultation'.³⁵

Box 1

Diversity Sensitive Principles and MPs' Business Costs and Expenses

- The expenses and pay regime for MPs should neither explicitly nor implicitly discriminate against certain groups of people. This is for reasons of equality and fairness, but also because to do so would likely negatively impact the supply pool of candidates seeking election. Given the difficulty of determining this relationship, the precautionary principle should come into play
- Any expenses and pay regime for MPs should be explicitly designed to facilitate the effective work of an MP at both Westminster and in the constituency
- Within this overarching commitment to the 'effective' MP, MPs' resilience, and that of their family, should be central
- IPSA should always act to ensure the retention of a diversity of MPs; where issues of retention are identified, measures should be implemented to directly address these
- MPs' experiences of housing, travel and security are likely mediated by their gender and other identities, not least ethnicity, disability and sexuality, as well as their family situations

- MPs should not feel obliged to supplement their pay and expenses costs with their own private income; being an MP should be affordable by people from across socio-economic backgrounds
- IPSA should be cognisant of the media context within MPs live and work; and recognise that some groups of MPs, such as women, LGBTQ or BME MPs, might receive more hostile coverage; and that some groups of MPs may be more concerned about the possible impact of the media on their families

In previous reviews of IPSA's provision for MPs the claim that MPs' pay and conditions do not affect the diversity of the supply pool of parliamentary candidates was challenged by gender equality experts and some women MPs.³⁶ Subsequent academic research established for the first time that there was a significant 'motherhood gap' in Parliament.³⁷ Problematic gendered assumptions continue to underpin the system of MPs costs and expenses, working to the detriment of the parent MP – male and female; and there are unintended consequences of existing rules and practices that particularly affect working class MPs, and MPs without additional private wealth.

- *Ensure that IPSA acknowledges that MPs' experiences of security are likely affected by their identities*

The issue of security is keenly felt by women MPs at Westminster,³⁸ and felt to be afforded insufficient recognition by IPSA. This might well be true of other Members as well. The address of the family home in the constituency is often widely known, and some MPs are concerned that they are frequently alone in their constituency home with their children, and without sufficient protection. The rules permitting taxi use in the evenings are also felt to be overly restrictive, relative to public and private sector provision. The legitimate use of taxis is further limited by the perception that the media will be highly critical of MPs even when they are correctly claimed for.

- Why were the rules on taxis tightened? How comparable is this rule with other large employers? Was an equality and diversity assessment made for this decision?

In the 2015 MPs scheme publication IPSA stated, '29. No respondent provide specific evidence to us either that our existing rules were having an impact on the equality and diversity of the House of Commons, or that the changes we proposed would do so. Given the meetings held between Sarah Childs and MPs during 2015/16 we feel that this reflects more a reluctance on behalf of MPs to speak out rather than a fair account of some MPs views regarding IPSA and equality and diversity. As one of Childs' interviewees stated: 'MPs are not prepared to put their criticisms in writing as every email/letter would or could be published'. Please see Appendices for MPs views on IPSA.

As stated above, and notwithstanding its intentions, we consider that the current IPSA expenses scheme is not neutral in its operation or in its outcomes, and that the current proposals will not alter this. As a result, any new scheme is likely to have negative impact on equality and diversity, disadvantaging some MPs – particularly those with caring responsibilities and those without additional resources to make up the gap between expenses and actual costs. Thus, while recognizing that it is not IPSA's responsibility to *promote* diversity of MP, its current practices are effectively going against one of its own tenets: not to make diversity worse. IPSA must therefore carry out comprehensive, systematic and regular research directly analyzing the equality impact of its expenses scheme, including the provision of more detailed sex disaggregated data.

Appendix 1

Is anonymous and is contained in a separate file

Appendix 2

Administration Committee 'Report for the House of Commons Administration Committee on the findings of the interview study with Members on women's experiences in parliament, 21 Aug 2015'³⁹

Members would like more guidance from IPSA, such as on which office goods can be requested when Members are caring for a young child. 14

Members wondered whether IPSA had taken sufficient account of the equality issues (through an equality assessment for example) surrounding its rules around travel and taxis, including the implications for those travelling with children. 6

Many participants referred to a lack of flexibility in the rules surrounding expenses for those with caring responsibilities...unaware whether they could request a cot, bathing equipment or a fridge in their office when they were caring for a young child. 13

Many participants highlighted that no formal maternity leave exists for MPs.....funds could have been provided to pay for extra staff to deal with constituency and other matters during a period of maternity leave. This could include money for extra office support to attend meetings on the MP's behalf to at least monitor and keep track of progress on cases and particular issues. 14

...lack of clarity around as to the rules around travel expenses for spouses and children, but most highlighted that the allowance only covered for travel for children if they were under a certain age and did not include travel for spouses/partners... 17

...[taxi] not allowed under IPSA guidance unless it was past a specific hour, and that even then it was subject to disclosure under FOI, which deterred many women from so doing. ...where they were travelling with a young child...lots of luggage as well as the child to carry. Others noted that when they travelled to their constituency there was no public transport, so there was no other option but to take a taxi. Most emphasized that clear and specific guidance from IPSA would benefit all MPs, but especially women and children, who may be unnecessarily worried about claiming additional expenses due to the continued fallout from the expenses scandal [see below Georgina to add]

MPs are now allowed only a one bedroom home in London, which means that MPs with families struggle with children sleeping on sofas, in particular when children visit in school holidays. One highlighted that MPs need to live in two places and that their expenses should reflect this. One male MP stressed the importance of being able to create a good environment for a happy family, and felt that if they had children, IPSA should permit them to have some room for them in their second home.⁴⁰ 17

Appendix 3

Report to the House of Commons Administration Committee on the Findings of the interview study with Members on leaving Parliament, Jane Tinkler and Nitin Mehta, April 2016

Amongst those MPs who gave a reason for stepping down, the most common one was the effect being an MP had on their family life. 4

There was some criticism of the removal of spousal travel allowance, thereby making it more difficult for family members to join MPs in London or to join them on work related trips. 12

Some felt that despite the good reasons behind IPSA's creation, it may even have gone too far: 'we just want sufficient support not special treatment'. 14

The IPSA rules for claiming expenses were seen as not very accessible and more guidance or training for MPs and their staff would be welcomed. Despite being in place for six years, there was still significant uncertainty about what could be claimed and what could not. The rules were experienced as overly bureaucratic and inflexible. There was a concern from interviewees that IPSA did not yet have sufficient understanding of how MPs operated, for example having to split their time – and therefore expenses – between Westminster and their constituency.

This sometimes led to MPs paying for legitimate expenses out of their own funds, placing an additional burden on them. As claims made were public, MPs were conscious that mistakes in their claims would be reported, leading to negative press reports. They noted that appeals, when they found in favour of the MP, were rarely reported. It was also perceived that sometimes IPSA guidance contradicted that provided by other parts of the House, for example on the redundancy preparations for staff in the run up to an election. Note too that there was support for the way IPSA had handled exit services for MPs when standing down from their positions.

On practical issues, it was felt that IPSA's online claiming system had not been designed with the user's needs in mind, although it was seen to be improving. The hours when IPSA could be contacted had been extended which was significantly more convenient. And although individual staff were helpful when speaking to them on the phone, MPs often reached a different member of staff each time and so had to explain their situation frequently. It was thought that the time taken to make a decision could be improved, especially in cases where payment for an MP's staff was involved where delays could lead to financial difficulties. Many MPs said that they had delegated dealing with IPSA to staff. But that it was now taking up a significant amount of staff time each week. This was not good value for money when the staff could be dealing with constituents or other issues.¹⁹

- ¹ ESRC/UoB Impact Acceleration Award 2015-16, ES/M500410/1.
- ² <http://www.publications.parliament.uk/pa/spconf/239/239i.pdf>
- ³ <http://appgimprovingparliamentreport.co.uk/download/APPG-Women-In-Parliament-Report-2014.pdf>
- ⁴ The Administration Committee Report interviewed 23 MPs.
- ⁵ Only three male MPs were interviewed for the Administration Committee Report. This Briefing also drew on more interviews with Conservative men, and disproportionately SNP MPs. As with the 2015 Admin Committee party differences were not discernible, other than in respect of the tendency for Conservative male MPs to prefer longer and fewer days in Parliament.
- ⁶ Campbell and Childs 2014. <http://onlinelibrary.wiley.com/doi/10.1111/1467-923X.12092/abstract>
- ⁷ In 2014-15 IPSA report that there were 171 connected parties employed by MPs and that 25 percent of MPs employed a connected party, IPSA 2016, 70.
- ⁸ Data gathered as part of this project.
- ⁹ IPSA 2016, 23, 72.
- ¹⁰ See Childs 2004 for discussions of women MPs perceptions that they are lucky to have such supportive partners.
- ¹¹ It is well known that women's geographic mobility is lesser than men's; that men on average are more likely to be in receipt of the higher income.
- ¹² For this reason the 'good candidate' cannot be allowed to be defined by someone who will only ever live in the constituency, and has a spouse or grandparents to care for the child'.
- ¹³ See the Administration Committee Report.
- ¹⁴ Admin Committee Report 2015, 12.
- ¹⁵ Some MPs protect some 'family' time each weekend, or at one point over a month, for example. And of course different MPs do more or less constituency and party work, no doubt determined by both their own preferences and the electoral competitiveness of their seat.
- ¹⁶ See also the same point made in the House of Commons Service (2015, 5, 10)
- ¹⁷ IPSA 2016, 24.
- ¹⁸ Interview data gathered as part of this project.
- ¹⁹ As reported in the Administration Committee report 2015, 16).
- ²⁰ One MP noted how their usual hotel's 'summer rates' suddenly left them out of pocket. In November 2015 a Travelodge (The Cut, Waterloo) cost more than 200 pounds, when booked some four days out. Note how the unpredictability of the parliamentary timetable compounds this issue.
- ²¹ Campbell and Childs 2014. <http://onlinelibrary.wiley.com/doi/10.1111/1467-923X.12092/abstract>
- ²² The survey did not specifically ask about caring or adoption leave.
- ²³ IPU 2011, 92-4.
- ²⁴ The Group would also be fulfilling Recommendation 49 of the 2010 Speaker's Conference. The House of Commons Service 2015, includes reference to 'the pressure to come back after having a child was therefore [in absence of proper maternity leave] great (House of Commons Service 2015, 14). See also <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm151110/halltext/151110h0001.htm>
- ²⁵ This consultation could be extended beyond parents to acknowledge the caring needs of others in society, not least elderly people.
- ²⁶ Our current system of election (first past the post, or single member simple plurality) renders it harder- albeit not impossible – to adopt a 'substitute' solution. In party list systems a substitute who acts in the place of the MP is identified from the party list, frequently the next best placed candidate. In the UK such an approach would require the parties to 'find' people, most likely a losing candidate or ex-MP to act in the place of an MP on maternity, paternity or caring leave. However, questions might be asked regarding the legitimacy of this individual who will not have stood for election in the said constituency. Both local parties and the wider electorate might not in such circumstances accept an alternative non-elected party representative acting in the place of their MP. One might also think of the arrangements prior to a by-election, whereby constituency duties are 'normally handled by a neighbouring MP of the same party' as constituting a practice/norm akin to a proxy (see Rogers and Walters 2015, 23).
- ²⁷ The inclusion of remote voting for MPs on maternity/paternity/caring leave need not be read to favour this reform in general. I leave it to those who know about technology to establish a secure system, e.g. biometric validation.
- ²⁸ According to the Speaker's Conference (paragraph 267), 'while there are arrangements for proxy voting in the House these arrangements require the Member to be present in the House of Commons. There is some precedence for proxies in the Lords; and in the Labour party in terms of voting in PLP meetings. In New Zealand there is a procedure for proxy voting – Standing order 154. See Appendix 6.
- ²⁹ Proxy voting is permitted for nursing mothers in the Australian House of Representatives. The Speaker's Conference (Recommendation 53) called for 'greater transparency' regarding the organisation of pairing. Formal pairing might, if it was in place over an extended period, risk rendering the paired MP unduly absent from parliamentary duties. Again, this might raise questions of legitimacy and effectiveness for the individual MP.
- ³⁰ See Appendix 6. Also, IPU 2011, 94. Australia: <http://www.aph.gov.au/~media/02%20Parliamentary%20Business/24%20Committees/243%20Reps%20Committees/Procedures/NursingMothers/FullReport.pdf?la=en>; Canada: <http://www.parl.gc.ca/Committees/en/PROC/StudyActivity?studyActivityId=8775954>
- ³¹ See Barbara Keeley MP, <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm151110/halltext/151110h0001.htm>
- ³² IPSA 2016, 23, 75.
- ³³ IPSA 2016, 11.
- ³⁴ Specific recommendations will be made by the author as part of this consultation which closes in October 2016.

³⁵ IPSA 2016, 11.

³⁶ The Report author along with colleagues, Professor Rosie Campbell and Dr Emma Crewe, made this point on more than one occasion; a number of women MPs individually and collectively contributed to previous reviews. Private information.

³⁷ As discussed under Recommendation 12.

³⁸ This is the case amongst those who participated in Childs' 2016 study, and reported in the House of Commons Service (2015, 6) 'Members wondered whether IPSA had taken sufficient account of the equality issues (through an equality assessment for example) surrounding its rules around travel and taxis, including the implications for those travelling with children.

³⁹ Comments on security not noted as I understand changes have been made in the summer of 2016.

⁴⁰ Nb the 2k up lift.

Response to IPSA Consultation

This document provides responses to questions raised in IPSA's consultation on its *Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy*. The responses are provided on behalf of MPs in the SNP Westminster Group.

Chapter 2. The Fundamental Principles of the Scheme

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

MPs support each of the principles set out in the consultation. The principles should however be extended to recognise the impact IPSA's own activities can have on MPs, their staff and potentially their families.

On many occasions IPSA's actions have – instead of supporting MPs' parliamentary work (an aim reflected in draft fundamental principle one) – in practice made it harder for MPs to exercise their responsibilities. Examples include instances in which IPSA has wrongly administered costs and/or reimbursement which, when published, have incorrectly given the impression of financial error or even wrong-doing by an MP.

Similar issues arise when IPSA publishes expense information which is inaccurate, inadequately redacted, or without any accompanying context.

For these reasons, Members support the inclusion of an additional principle: that IPSA's arrangements, including relating to publication, should strike a reasonable balance between allowing public scrutiny and protecting MPs, their staff and families from unwarranted media intrusion.

Draft principle two underlines that the Scheme should not deter people from seeking to become an MP. A particular concern in this respect is that no-one should be deterred from seeking to become an MP by possible risks to their own safety or security, or those of their family or staff. IPSA should ensure that its support for security arrangements is adequate and is determined by the risks and requirements to which MPs are subject – and not determined by a need to minimize costs.

Draft principle eight confirms that IPSA should administer the Scheme in a transparent and effective way. This should be extended to include the words "clear and consistent". IPSA is at present unwilling to give guidance on whether a proposed expenditure or course of action is acceptable before it is undertaken. It is the experience of Members who seek advice from IPSA that they are told no advice can be given and that they should submit the invoice and it will be considered. This happens even in cases where similar or identical expenditure has previously been allowed. Since it is inevitable that IPSA's consideration of an invoice will on occasion conclude that the expense is not admissible, this refusal to give advice in effect ensures that MPs will sometimes be deemed, through no fault of their own or their staff, to have broken the rules. IPSA's refusal to give advice is neither responsible in terms of ensuring proper use of public money, nor fair to those affected.

Chapter 3. Simplification of the rules – travel and office costs

Question 2. Do you agree that the same rules for travel costs should apply to MPs and their staff?

Members agree that applying the same rule for travel costs to MPs' staff as to MPs would be of benefit to the ability of MPs to exercise their parliamentary functions. This is particularly important for MPs whose constituencies are far from Westminster, whose staff may have to take long and financially burdensome journeys between the constituency and Westminster.

Question 3. Should we remove the current restrictions on foreign travel, while continuing to limit the number of return journeys to three and to Europe?

IPSA may want to re-visit the premise of this question, in the context of the vote to leave the European Union. That aside, Members agree that current restrictions should be relaxed, as they do not allow for other job-related travel outside Europe – for example, by MPs who have foreign affairs spokesperson roles.

Question 4. Do you agree that we should remove the rule allowing claims for “diverted” journeys, along with the cost restriction on claims for journeys back to either the MP’s constituency or Westminster?

No. The removal of this rule would disproportionately affect Members who have longer, and thus more time-consuming and expensive, journeys between their constituencies and Westminster. The present system allows MPs to undertake non-parliamentary duties by the most efficient travel route and without any extra cost to the public purse. To remove the rule would not save public money but would encourage less efficient use of MPs' travel time.

Question 5. Do you agree that we should carry out some “housekeeping” of the rules on travel to eliminate those which are not necessary to mitigate financial risk, or which overdefine concepts, such as commuting, which are commonly understood?

As will be clear from other responses in this document, the issue is not “housekeeping” but consistent and predictable application of definitions and boundaries as well as a willingness by IPSA to provide advice to MPs on proposed expenditure.

The present Scheme allows for expenditure on extended UK travel relating to opposition front bench or shadow ministerial duties. The Group has been advised by IPSA however that such expenditure is only available to Members representing the Official Opposition. This restriction is unwarranted and should be removed.

There should be a specific category of journeys allowing MPs to meet ministers or civil servants in the devolved administrations in relation to constituency work. This would eliminate the anomaly that IPSA will pay for a Scottish MP to travel to London to meet the Department for Health – which has no responsibility for health in their constituency - but not to Edinburgh, to meet the minister there who is responsible.

IPSA should also recognise that for MPs with the longest travel times between London and their constituencies, there can be instances in which travel disruption or security/safety considerations make it impossible or inadvisable to complete the journey as planned. This can mean a Member needs to find overnight accommodation at an intermediate point between London and the constituency. IPSA should be willing to reimburse costs for such accommodation.

Finally, IPSA should ensure that the rules on travel take adequate account of the efforts by the House to ensure better security precautions for Members. IPSA's present restrictions on taxi journeys, for example, give no flexibility to use taxis in circumstances where safety or security concerns would make it sensible to do so.

Chapter 4. Regulating MPs' expenditure on staffing

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

It is vital that expert and consistent advice and support is available on the employment of staff. This should include advice from IPSA and the House of Commons HR services. This is particularly important for new MPs.

Problems with HR support and advice from IPSA have consistently been raised by MPs. The following is one MP's constituency manager's particular experience:

Upon being informed that a member of staff was pregnant, I looked at the IPSA for MPs website and printed out a copy of the maternity policy which was readily accessible on the Staffing page. This policy informed me that MPs' staff would be eligible for full pay for 26 weeks as long as they had worked one year's continuous service for the same Member by the time the baby was due. The member of staff in question met the given criteria, and therefore expected to receive 26 weeks' full pay.

However, the member of staff pointed out that, having read her contract, there appeared to be a further stipulation that, in order to receive 26 weeks' full pay, employees had to have worked a full year by the 15th week before the baby's expected due date. Under these conditions, the member of staff in question would not be eligible.

Not only was this further stipulation not mentioned in the maternity policy on the IPSA website, it was also not mentioned in the House of Commons guidance note issued by the Members' HR Advice Service, which was subsequently provided to me by email. I was therefore unsure how to advise the member of staff which policy applied and whether or not she would be eligible for the full entitlement. This made it confusing for both myself and the employee, and meant that I had effectively misled the employee initially as to her eligibility for maternity pay.

Since raising this discrepancy with the Members' HR Advice Service, the House of Commons guidance note has been updated and the maternity policy has been removed from the IPSA website whilst it is updated accordingly.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

MPs' staff are employed by Members, not by IPSA. There is no continuation of employment for staff if a Member loses their seat or retires. It is up to a new Member as to whom they employ and what positions they fill. On leaving the employment of a departing MP, a member of staff therefore has no guarantee of further employment. Even if the staff member is in due course successful in gaining employment with another MP, this is with a different employer and there is no reason to deny the staff member their right to redundancy payment.

Penalising staff conflicts with draft principle number three of IPSA's proposed 'Fundamental Principles'. To deny payments in the examples given would be to penalise staff who work for MPs, and to disadvantage them financially.

In the example of the staff who were re-employed by an MP within ten weeks, the timeline is arbitrary. A cut-off based on an arbitrary time period would have perverse consequences for the administration of a redundancy-pay exemption. It would also create an incentive for the staff of a retiring MP to give notice well before the end of the parliamentary session, potentially preventing the MP from being able to represent his or her constituents effectively.

The comparison with other public sector arrangements – such as the example given of the NHS – is not helpful: these are widely different sectors with different arrangements and, importantly, pay-scales and salaries.

Chapter 5. Employment of connected parties and financial support to MPs' families

Question 11. Do you have any suggestions about how we should provide financial support to MPs in respect of their families?

MPs have raised a number of concerns about IPSA's approach and advice relating to dependents. For MPs whose constituencies are far from Westminster, travel expenses and arrangements are particularly burdensome, and this is even more so for those with children:

- It should be possible to register another family member or family friend to accompany an MP's children on visits to London, to allow for circumstances in which a spouse's or partner's job makes this difficult.
- IPSA advice on registering of dependents and MP's housing allowance is unclear. At least one MP has been unable to obtain a commitment from IPSA as to what "visiting regularly" constitutes, whether there is a quota to be fulfilled etc. Added to this is the concern that any innocent mistakes could cause reputational damage to an MP if and when claims are published.
- Some Members have expressed disquiet relating to older children who are disabled and who may occasionally travel with Members and spouses to London. Such visits may not be "regular" but can be essential in the family circumstances. One Member sought advice on this from IPSA but was told, in effect, that it was up to the MP to decide what constituted "regular". The MP chose not to seek the uplift due to the uncertainty caused by IPSA's lack of guidance and the consequent danger of reputational damage. This is unacceptable and it should be made clear that should a Member have an older disabled dependent, that should be sufficient to allow the clause to operate, irrespective of whether the visits are regular or occasional.
- Support from IPSA for Members looking for accommodation in London that would be appropriate for small children is lacking, and is needed especially by Members unfamiliar with London.
- Another Member shared the concern mentioned in the consultation paper that IPSA does not fund spouses' or partners' travel when they are travelling on their own to accompany the MP at an event that they are attending in their capacity as an MP. IPSA should also be willing to reimburse costs incurred for certain journeys when a spouse or partner travels to London to accompany the MP even when the reasons are not related to childcare or attendance at events. This might occur for example when the requirements of parliamentary business mean the MP works at Westminster over a weekend or during recess.

Chapter 6. The boundary between parliamentary and party political activity

Question 12. Should we tighten our rules on what we do not consider parliamentary for funding purposes? If so, in which areas? Or should we give MPs more discretion when a matter is in doubt, relying on the fact that the claim will be published and MPs held to account?

IPSA is empowered to regulate MPs' business expenses and to take decisions on the admissibility of expenditure. To decide not to carry out this responsibility on the grounds that it is too difficult, and that MPs will be "held to account" by the media, is an abdication of that responsibility which also, as set out elsewhere in this consultation response, undermines the principle that IPSA's role is to support MPs' parliamentary work. As noted in this document's response to question 1, whether or not rules are

tightened, IPSA must be prepared to offer clear and consistent advice to MPs that makes it simple to understand whether and why an expense will be admitted.

As an example: some MPs have commented that there is a clear need for a budget to allow them to communicate with constituents through annual reports and newsletters. However the guidance on paper communication with constituents at the moment is unclear: although newsletters and annual reports are forbidden, guidance is less clear around the use of surveys or mass letters on particular subjects, or surgery advertising through the post. Indeed, from paragraph 71 of the consultation paper it seems that IPSA itself lacks a firm view on this matter. In paragraph 72 IPSA seems to create a false choice with regards to tackling the problem, saying either it already has the right approach, or that the rules should be tightened through more exclusions, or that MPs should be given discretion over the claims. There is however the alternative, more straightforward and better option of simply clarifying the existing exclusions, and applying them consistently when advising MP and MPs' staff.

Question 13. What views do you have on the funding by IPSA of pooled staffing services which are exclusively subscribed to by MPs of a single political party?

Although the House of Commons Library provides invaluable support to MPs, it does not produce briefing for use in debate. Nor is it directed by Members to commission primary evidence from external experts. In addition, its role means it is limited in the extent to which it can home in on arguments and evidence which particular MPs may wish to deploy. Pooled staffing services help fill these gaps in a cost efficient way, bringing expert support to bear on topics MPs deal with in their parliamentary work. Such services are vital to the work of MPs and their staff and there should be no change to MPs' ability to subscribe to such a service. The SNP Group has cooperated fully with IPSA in establishing a pooled staffing service to support its MPs.

Chapter 7. Working from two fixed locations – MPs' accommodation costs

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

Members do not support the options presented in the consultation document. In particular, they do not support the proposal that MPs' London accommodation costs might be limited to the periods in which Parliament sits. This would:

- make it impossible for MPs to sign leases for any more than a few weeks at time.
- as a consequence, make it impossible to conduct security surveys and install necessary security equipment in living accommodation in London.
- dramatically increase the costs of accommodation when MPs are in London.
- act as a disincentive to travel to Westminster during recess periods, even for meetings or events essential to an MP's parliamentary duties.

In addition, some MPs have been told by property agents that councils including Westminster do not allow lets of less than three months.

These proposals would also disrupt any arrangements made by Members to allow family and/or disabled dependents to travel with them to Westminster. Even under existing arrangements it can be difficult to find suitable accommodation. This would be made worse by putting in place arbitrary rules that would make it impossible to arrange or afford suitable accommodation. Getting a hotel room in London to cover such situations would also be difficult and would in many cases discourage Members from bringing family

members to London. This runs contrary to the avowed aim of making Parliament more family friendly - unless IPSA believes that should only apply to those Members who reside in the London area.

Nor do Members support the proposal to set the accommodation budget in line with rental costs for London Zone 3. There are several reasons:

- to require MPs to find accommodation at a distance from Westminster would run counter to the aim of effective and efficient support for their parliamentary duties.
- the comparison with commuters in London is spurious - many MPs already spend ten to fifteen hours per week commuting, or even more, while most commuters are not subject to short notice changes to their finishing time eg from 10pm to 1 or 2am.
- the effect of the proposal would be that Members would be unable to continue to reside in their present accommodation and would require to seek accommodation further out in Zone 3. That would have an adverse impact upon the family life of Members, in the same manner as indicated above in relation to costs. It could also impact on the security of Members. At present the House is attempting to put in place better security precautions for Members. Concerns raised have related to MPs' accommodation and also to travelling at night. To force MPs to move well away from Westminster would mean they were travelling longer distances, often late at night, and often with luggage, making them more conspicuous and increasing the security risks they face – not to mention that Members may be targeted also because of their gender, race or disability. Such a proposal runs counter to and undermines efforts being made by the House and the police to ensure the security of Members.

MPs have raised a number of concerns about funding and support for accommodation.

- More than one Member felt they were not adequately advised about council tax and utilities costs. These are burdensome costs, especially for MPs not accustomed to the expense of living in London, and more and better advice is needed for new Members who are not used to London prices or finding accommodation in London.
- Members have queried why some 'associated expenses' are excluded from reimbursement under paragraph 4.11 of the Scheme even though analogous expenses are allowed under paragraph 4.10 and even though the costs are a necessary consequence of working from two fixed locations:
 - tv licences are excluded, even though telephone and internet services are allowed;
 - contents insurance is excluded, even though buildings insurance is allowed.

Question 15. Do you think that we should continue to allow MPs to claim for associated costs, such as utilities and council tax, on properties that they own? If so, what should the budget be?

For similar reasons to those in the response to question 14, IPSA should continue to allow MPs to claim for associated costs.

An issue of primary concern to Members is the fact that on a number of occasions IPSA has failed to pay rent correctly for MPs – both for their accommodation and constituency offices. This is unacceptable and once again raises the problem of potential reputational damage to MPs when they are not at fault.

Some MPs have questioned why IPSA, although it can pay rent to landlords or agents, cannot pay council tax direct.

Question 16. What are your views on MPs, who own property in London, also claiming for rent on a property from IPSA? Do you agree with our current position that ownership of property is a private matter for MPs and that IPSA should treat all MPs' eligibility for funding equally?

One MP has had difficulty with IPSA in this regard, in a situation that the consultation document does not consider in the premise to this question. The Member had owned a property in London for many years

before becoming an MP. Following election, the MP expressed no desire to move out of this property. However, IPSA informed the MP that it would not pay for the MP's mortgage expenses but that it would pay for rental of alternative accommodation even if this was more expensive. Such advice from IPSA is tantamount to encouragement to MPs to let out their own private properties in London and move into rented accommodation so that they can claim this rent on expenses.

Chapter 8. Other issues relating to the Scheme

Question 24. Do you have views on the most effective way of recovering overpayments to MPs and preventing budget overspends, bearing in mind that MPs have responsibility for managing their own budgets?

Overpayments should not be dealt with by an automatic cancelling of payment cards. An example was given by Pete Wishart MP at the Speaker's Committee for the Independent Parliamentary Standards Authority on 2 March 2016. Mr Wishart said:

I want to ask about monthly reconciliation, which can become overly burdensome for Members of Parliament. In one month, a quarter of new Members of Parliament—nearly all from the Scottish National Party—had their credit cards stopped. What is intriguing is that IPSA made a fantastic impression on our group of MPs when they were newly inducted; there was goodwill towards IPSA but it was totally gone after new Members, possibly misunderstanding some of these things, had their credit cards stopped. Reputational issues arise when a credit card is stopped.

Overpayments should instead be dealt with via telephone communication. IPSA could consider and offer options of deducting overpayments from a subsequent claim, or through a salary deduction.

Question 25. What are your views on how funding for the cover of maternity, paternity, adoption and long-term sick leave should be provided? What is the fairest way of publishing the resulting spending?

Members understand that the publishing of an explanatory note to accompany publication of budgets that cover maternity pay etc. is intended to be helpful. Such pay is at present reported as 'overspend', however. IPSA should further consider how such information is designated. Instead of an accompanying explanatory note – which can be easily ignored by the media – IPSA could specify in the main body of the publication of accounts that this spending is of a particular category of staff spending, viz. maternity, paternity, sick leave etc.

Question 28. Do you have any suggestions about how to improve the process for contingency funding?

With regards to publishing data on contingency funding, IPSA must consider the privacy and confidentiality of MPs' staff, who might be easily identifiable by published data, given that most MPs have small teams in their constituency offices.

IPSA should set out clear policies and procedures on maternity leave cover arrangements - dealing with pregnant employees is a normal part of working life, not a 'contingency' or an illness.

Chapter 9. IPSA's publication policy for MPs' business costs and expenses

Question 30. What are your views on whether IPSA should publish the redacted images of all receipts, or just those which are requested by the public?

Publishing of monthly credit card payments is sufficient to provide a transparent picture of Members' use of expenses. It also reduces risks associated with publication of individual receipts. For some categories of expense, including accommodation and travel, there is a risk that publication of individual receipts – which

IPSA does not always redact adequately – can make it easier for someone to discover details relating to an MP which give rise to security problems and run contrary to the efforts to improve security for Members. Examples are of details allowing someone to work out where an MP lives, or that there is a high likelihood that the MP regularly stays in particular accommodation. IPSA should seek advice from the security services as to what to publish.

Question 31. How frequently do you think we should publish information on MPs' claims and other aspects of their spending in future?

IPSA must consider the consequences of its actions for MPs when financial data is published, however frequently.

Firstly, IPSA must ensure that what it publishes is accurate. As an example, flexible air fares from Edinburgh and Glasgow to London – which are frequently necessary given uncertainty about timings of parliamentary business, and furthermore are offered at a special rate by the parliamentary travel office – are recorded and published by IPSA as 'business class fares'. This is not accurate, and IPSA's error in classifying the fares in this way could and has resulted in misleading media coverage of Members' expenses.

Secondly, IPSA must ensure that information it publishes is accompanied, in the main body of the report, by adequate contextual information. For example, the publication of expenses must ensure it is clear when overpayments have been the result of errors by IPSA and not by the MP in question. There have been occasions where IPSA has made a series of errors relating to a payment, each one requiring the MP to spend time in ensuring the error was corrected, and each one subsequently published and requiring the MP to spend time answering media allegations that they were at fault.

Question 32. Should we publish information on transactions on MPs' payment cards which are eventually repaid by MPs?

IPSA should not publish claims that have been repaid by MPs. By definition such claims once repaid have no impact on public budgets and their publication adds nothing to transparency around how public money is used. As set out in the answer to question 1, this is particularly the case in the present circumstances, in which IPSA will not give prior advice as to whether a claim will be eligible.

If claims which have been published are later repaid, IPSA should ensure that the reasons for the repayment are made clear, including in circumstances where the repayment has been necessary following IPSA error.

Question 34. What are your views on the publication of overdue money owed to IPSA by MPs? Should we publish this regularly, and how frequently?

IPSA should not publish details of suspended cards or financial difficulty unless these details are essential to provide context to other IPSA decisions about published expense claims.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Our concerns on this are the same as those given in response to question 30 and relate to the security of Members, their staff, and other individuals. In addition, IPSA should be open to representations from Members where there are other legitimate reasons why a particular individual's details should be redacted from published documentation.

Question 36. Are there any other issues relating to the publication of MPs' business costs and expenses which you wish to raise?

Since information held by IPSA is subject to Freedom of Information, IPSA should give attention to what information it records and how it records it, whether or not the information is intended for publication. Two examples have arisen:

- In one instance, IPSA's online reports to an MP overstate their London accommodation expenditure. This is because IPSA continued to pay rent for a flat after the MP had moved out, and because IPSA has taken several months to credit the MP's account with reimbursement of council tax and water rates. Previous undertakings that the online information would be corrected have not been met.
- Additional security measures provided for an MP's office or living accommodation are being categorised by IPSA as "miscellaneous" spending. Rather than setting the budget as "uncapped", however, IPSA sets it at zero so it shows as an "overspend". Although MPs are assured that this will not be published, it presents a risk to record the information in this way even internally.

Chapter 10. Equality and Diversity

Question 38. What likely or actual impact do you believe the Scheme and matters raised in this consultation may have on equality and diversity in relation to MPs and their staff?

Answers provided to other questions in this consultation indicate a number of instances in which Members have concerns that proposed changes may impact disproportionately on certain categories of Member or might serve to discourage others with valuable skills and experience from standing for election to Parliament, or from accepting employment as staff for an MP. These include women, Members with a disability or who have family members with a disability, and those whose personal financial resources are not adequate to meet gaps in funding created by IPSA's policies or approach to administration.

Response to the IPSA consultation on Business Costs and Expenses and IPSA's publication policy

Question 1:

On the issue of IPSA's fundamental principles I would comment that:

- Principle 1: more emphasis should be placed on the scheme enabling MP's to do their job effectively and efficiently. Doing so cost effectively should be the second, not the main priority.
- Principle 2: The scheme should not deter anyone, unduly or otherwise.
- Principle 3: making a comparison to 'other citizens' is unnecessary, especially given references elsewhere to the unique nature of this role (para 86).
- Principle 7: I would agree with this, providing that when they are published they are in context and make a distinction between 'expenses' and 'costs'.

Question 2:

Staff should be able to accompany their employer to any meeting or event that the MP deems necessary.

Question 3:

The test of this rule should not be the frequency of travel, but relevance of journey. One trip could be a waste, four could be of great value.

Question 9:

It is time for a staff salary review. There are many staff who leave to earn more money in public affairs and similar jobs, but who would rather stay to support the MP. As employers we lose good people because there is no career progression or salary incentive to stay and that does not help MPs.

Question 10:

The consultation document states: 'public concern about the employment of connected parties has remained'. This assertion is in no way qualified and is therefore misleading. What is the concern and how is it assessed and against what criteria?

There should not be any need to make changes to the practice of employment by MPs of connected parties. Any new proposals in relation to connected parties should be based on value and value alone.

Question 13:

Without the PRU I would need to hire at least one extra full time member of staff to cope with the volume of standard emails that we receive from lobby groups. This would have an impact on staffing budgets.

Question 14:

IPSA's position on accommodation costs appears to totally ignore trends in the London property market. The levels set in 2010 and those imposed now cannot both be correct.

All of the bullet points in paragraph 87 give rise to concern that they were ever considered at all. They reveal a total lack of understanding as to the working patterns of MP's. Many members need to be in London during recesses, over weekends and whilst undertaking Ministerial duties. Although dismissed, the existence of these proposals distort what should be a balanced and impartial document.

Accommodation arrangements should only be changed to tie directly into varying trends in the market.

Question 34:

This proposal is fine providing IPSA mistakes and apologies are also published in exactly the same manner.

Question 37:

A full breakdown of the nature and volume of responses to IPSA consultations should be published prominently on the IPSA website. Likewise full publication of IPSA errors and remedial action should similarly feature. All details of dialogue and relationships with the media should also be published as a matter of routine.



HOUSE OF COMMONS
LONDON SW1A 0AA

Marcial Boo
Chief Executive
Independent Parliamentary Standards Authority
30 Millbank
London SW1P 4DU



20 October 2016

I am writing regarding IPSA's consultation and re-iterating a few of the points I made in our recent meeting.

It would be advantageous to give Members of Parliament the option of a low, modest, flat-rate, taxable allowance. This would be a voluntary alternative to the complex and time-consuming system of expenses. Because it would be taxed, MPs could spend it however they preferred, on whatever style and format of housing they deemed most appropriate to their working life, and after paying 40 per cent in tax there would be almost no way to make capital gains on this allowance.

IPSA already give a taxable London allowance of some 3,000 pounds. As the precedent has been set, why not offer a larger but still modest amount which could save tens of thousands of pounds in administration costs per year?

For example, I claim no rent or mortgage, only utilities. This broadly corresponds to a possible allowance of, say, £7,000 minus tax, but as an allowance it would entail no administration costs

I believe scores of MPs would take up this option, which would allow IPSA to make significant savings in their operating costs and decrease the huge amount of waste involved in processing claims. The reduction in cost to the taxpayer would, I think, be substantial.

I do hope IPSA will seriously consider this option and its many benefits.

Signature Redacted

 **EDWARD LEIGH MP**

Stephen Twigg
MP
Email
Received 07/10/2016

Question 1. Do you agree with our new fundamental principles? Do you find them easy to understand? And do you agree with our emphasis on value for money?

Yes. Value for money is essential, alongside ensuring that members are resourced adequately to perform their Parliamentary functions and provide a quality service to constituents.

Question 7. Have you any views on the roles and responsibilities of IPSA in relation to the regulation of MPs' staffing expenditure and the need for any consequential HR advice?

A central HR function to provide advice would be helpful.

Question 8. How do you think we should address concerns about value for money in respect of the redundancy payments, pay in lieu of notice and payment for untaken leave made to the staff of MPs who left office after the May 2015 General Election?

It is right that MPs' staff are entitled to decent redundancy payments and that they receive their payments in lieu of notice and appropriate payments for untaken leave. Whilst it is essential that only appropriate payments are made to MPs staff, I do not feel it necessary to make further adjustments to the scheme.

Question 14. Do you think that there is a viable alternative to the current arrangements for funding MPs' accommodation? It would need to provide value for money, security, transparency and support MPs in carrying out their parliamentary functions in two locations.

I am one of the MPs who claims accommodation expenditure in my constituency rather than in London. The current system enables me to rent a flat in my constituency. I welcome the fact that Ipsa is not proposing any changes to the rules or allowances for MPs who claim accommodation expenditure in our constituencies as I believe the current system delivers value for money whilst enabling MPs to undertake our constituency and parliamentary functions.

Question 29. Are there any other changes to the Scheme which you think we should consider? Are there any aspects of MPs' budgets, which have not been covered elsewhere, to which you would like to draw our attention?

Overspends in the staffing budget incurred in one year should be able to offset against underspends in a following year (providing the budgets balance in a Parliament). This 'smoothing' would provide valuable flexibility to MPs.

Question 35. Do you have any particular concerns about publication or redaction of details of individuals who may be named on receipts, invoices and other documentation?

Yes. Names of individual contractors such as sole traders (with their addresses) should be redacted. There is a risk that such individuals might be targeted.

Unite Parliamentary Staff Branch Response to IPSA consultation 2016

1. We are the Unite Parliamentary Staff Branch, and have represented the staff of MPs and Lords for over 30 years. We are fully cross-party, and have over 500 members, both in Parliament and in the constituencies.
2. As you might expect, we have views about a large number of the areas into which IPSA are consulting, but this submission will restrict its scope to those points that concern staff; individual branch members may of course wish to make representations on other questions that have been raised. To assist this process, we ran a short online survey of all staff, asking some key questions and quote some of the findings below; we attach a summary of the survey findings to assist IPSA's consideration of this submission. We had 462 responses, which is a decent number, though we acknowledge that respondents will have been self-selecting.

Chapter 2 – IPSA's principles

3. We are pleased that IPSA are seeking to update their fundamental principles, and looking to be open about this in **Question 1**, although the draft does raise an important issue. The very first principle states that the Scheme should "assure the public that MPs' use of taxpayers' money is well-regulated and that MPs are resourced appropriately...", but in addition to this public assurance, the branch believes that it is important that the Scheme also *ensures* that these laudable goals are achieved in practice. An additional principle to emphasise this point would be welcome.
4. The branch would also like to see another principle added to the list. Although principle six notes that "MPs are responsible for their own ... staff management", IPSA are aware of our long-held belief that as a Standards Authority IPSA should also seek to promote high employment standards, which are notoriously variable across 650 MPs. Whilst we recognise that this is not currently in IPSA's remit, we believe that IPSA should be pushing for such a role, and are certain that the public would welcome a confirmation that such high standards are maintained at their Parliament.

Chapter 3 – Travel costs

5. We welcome IPSA's reconsideration of the rules covering allowable staff travel, and agree with **Question 2** that it makes sense to match these rules to those covering MPs. In practice few staff will be making so many journeys, but it must be right to focus on their permissible nature rather than an arbitrary limit, and so this seems to us to be a sensible change.

Chapter 4 – Staffing

6. Unsurprisingly, the questions in this chapter have attracted significant interest from staff, and you will already be aware of widespread concern about the suggestions that you make in paragraphs 45-47 about redundancy payments.

7. With regards to **Question 7**, Unite has already been contributing to the working group to consider the scope of IPSA's role and the division of these activities with the House authorities. IPSA will be aware that the branch in general terms is supportive of IPSA taking a more activist role to ensure high standards are maintained, and appreciates IPSA's independence and ability to act as an outside arbitrator. On the question of how such roles are apportioned between IPSA and the House, however, Unite's general attitude is that so long as services and oversight are delivered and there is clarity as to who bears that responsibility, we are less concerned with who that is.
8. We recognise that IPSA are rightly concerned about the value for money that the public receive, and that staffing costs form a significant part of the allowances. This is inevitable and we believe that the public benefits from the services that it receives from dedicated staff as workloads continue to increase, particularly as funding is reduced for CAB and other public advice bodies.
9. **Question 8** has significant implications for our members, and so we are very keen to ensure that the full context of the statistics quoted is made clear. In paragraph 39 IPSA state that "MPs' expenditure on staffing, at around £83 million in 2014-15, accounts for 80% of MPs' spending on their business costs and expenses." We would be interested to know how this percentage compares with other years in the 2010 Parliament, as the final year of a five-year cycle would naturally see the least capital expenditure, and so this proportion may be artificially high. IPSA's general election guidance specifically stated "**Office costs:** You may use your usual Office Costs Expenditure budget for your parliamentary functions until the election. However, the purchase of capital items (IT equipment, desks etc.) will be prohibited from 30 September 2014 (six months before dissolution). If there are exceptional circumstances which mean that you must purchase a capital item after this date, you must seek approval from us first."¹ Clearly this means that the 80% figure will be unrepresentative.
10. We are glad to note in paragraph 46 that IPSA acknowledge that all of the post-election expenditure on redundancy, PILON and for untaken leave was compliant with the rules, but we are worried that the public may not be best informed by being asked to respond to a consultation that only gives the overall costs rather than clarifying the average per employee. As 182 MPs left Parliament, this would suggest that these significant sums were divided between some 800 people, which would give helpful context. A number of staff as well as MPs have further been concerned that despite the confirmation that the expenditure was all within the rules, these figures have been presented as a problem to be addressed, and so their legitimacy has been in some sense brought into question.
11. IPSA raise the issue of **redundancy** payments for staff who manage to subsequently find employment with another MP after the election. It is not surprising that 125 staff managed to do this within ten weeks last year, since they naturally have the appropriate experience and skills that an MP desires, and so are able to do a good job for their constituents without having to learn the ropes. Their statutory and contractual entitlement to an average of £7,800 redundancy is entirely appropriate. IPSA are aware that this is because staff are employed by an individual MP rather than collectively or even by "The MP for xy constituency", and so they suffer from cyclical job insecurity and the reality of broken service if their employer is defeated or stands down. We would be strongly opposed to any policy of redundancy clawback for staff who are fortunate to find work with another MP, who find their redundancy entitlement for the future reduced to zero and begin work again

¹ <http://parliamentarystandards.org.uk/IPSA/MPs/Documents/IPSA%20Electoral%20guidance%20for%20MPs.pdf>

in a probationary period without the protections that come with continuity of service. Such a policy would also have to consider cases where the new work relationship does not succeed and the member of staff leaves their new employer after a matter of months. Would they then be eligible for receiving their full original redundancy package?

12. The redundancy bullet point also makes reference to rules in local government and the NHS that prevent redundancy payments if a member of staff soon gets another job in that sector. We do not believe that this is an appropriate comparison, however, as such rules are explicitly intended to address high paid senior staff rather than frontline workers². As IPSA knows that the bottom end of MPs' staff pay scales is as low as £15,000, we do not think that such a rule would be in the least bit appropriate, and it would not be acceptable.
13. We further feel that introducing such an arbitrary rule would have the undesirable consequence of encouraging experienced staff to seek employment for any other group than MPs, very possibly for political parties, MSPs or MLAs; jobs in the same sector, open to the same arguments as IPSA has raised, but beyond IPSA's control to address. This seems to us to be an inconsistent and undesirable prospect, which would simply lead to MPs being less able to recruit such experienced staff and therefore reduce the quality of service provided to the public. We do not believe that IPSA would wish to disadvantage MPs in this way, which would not really deliver additional value for money.
14. The issue surrounding **PILON** appears to be one of the timing of formal notifications, and this is a matter of the advice that MPs receive. These decisions can cut both ways, and Unite is aware of at least one instance last year where a member of staff on long-term sick leave was left without any clarity of their redundancy details, which were not confirmed until the very last minute, as their retiring employer had disappeared without completing any paperwork and was not contactable.
15. As well as the PILON, IPSA highlight the monies paid for **untaken leave**, which is a familiar aspect of working in Parliament. A large proportion of staff do not take their full holiday entitlement, due to increasing workloads and the realities of sharing such labour in very small offices; in most years this is never paid, and so it is only noticed in a year when a redundancy situation emerges. In many ways this is of a part with the still ongoing culture of unpaid overtime in Parliament, which our survey suggests is routinely undertaken by over 55% of staff, and only rarely performed by about 16% of staff³. Despite this, only a small percentage of MPs pay for overtime, our survey indicating almost 90% of staff never claiming for this⁴. This may be because of MPs' unwillingness to claim or be seen to claim for overtime funds, or because staffing budgets may already be spent (or indeed that there is uncertainty whether there will be any money unspent by the end of the financial year). That staff are dedicated enough to work additional hours in the face of increasing workloads for the benefit of constituents is creditable, and we would like to see MPs be encouraged to reward this appropriately.

² "Higher earners would be defined as any individual earning above £100,000; below this threshold a taper would apply – down to a second earnings threshold (proposed to be in the region of £80,000); for employees earning below this level recovery arrangements would be purely determined by the employer or through national contracts." Policy Proposal, Consultation on Recovery of Public Sector Exit Payments, February 2016, <https://www.gov.uk/government/consultations/recovery-of-public-sector-exit-payments/recovery-of-public-sector-exit-payments>

³ Unite survey, October 2016, Question 3.

⁴ Unite survey, October 2016, Question 4.

16. We are concerned at the wording in paragraph 48 that states “**Interns** who are not volunteers, but instead are treated as employees, must have a contract of employment and be paid at least the national minimum wage.” IPSA will be aware that by definition interns are not volunteers and are entitled to be treated as employees. We hope that the above wording, which suggests that only a subsection of interns fall into this category, is simply an error.
17. IPSA are aware of Unite’s view that **Reward and Recognition** payments have been neither understood nor implemented by most MPs, as reflected by the low level of uptake. Our survey indicates that about 10% of staff had received these, while over a third did not even know that they exist.⁵ We would welcome a return to MPs being able to pay their staff a bonus for outstanding service with the accountability that comes with transparency, but note that this would still be limited by the requirement that such payments would come from the staffing budget that is becoming ever more stretched. We do not foresee that many MPs would have the scope to offer deserved bonuses.
18. In asking for other views about staffing expenditure (**Question 8**), IPSA will not be surprised to hear that Unite believes that the level of the **staffing budget** needs to be reviewed (and in our view increased) once again. IPSA knows that these budgets have not been increased since 2012, whereas the workloads in MPs’ offices have grown steadily worse, exacerbated by governmental cuts to public bodies that offered support and advice⁶. You will know that this is work that the public rightly expects to be done well and promptly, and that we no longer consider the financial provision to be adequate. When IPSA came into being, they based the staffing budget on the 2007 recommendation of the Senior Salaries Review Board (SSRB), which is now almost a decade old and does not reflect the changes to either the nature or the scale of the work in MPs’ offices since then. Unite asks that a new salary review be commissioned to consider these matters.
19. In a related point, Unite has previously raised the issue of resources for MPs in the event of the proposed **reduction in constituencies** from 650 to 600, and has been told that the matter was yet to arise. Since the Boundary Commission have now made initial proposals, and there is a majority government that is supporting this change, we feel it important that IPSA consider this seriously. While it is the case that currently constituencies are of varying sizes, some larger and some smaller, the reduction in seats will mean that the average seat will be 8% larger than now. Obviously there will still be the same amount of work coming from constituents, and so this will further overburden stretched offices unless more resources are made available. Unite would appreciate confirmation that IPSA will be recommending increases in the staffing budget to reflect this.
20. As well as a review of the budget, Unite would like to see **pay grades** reconsidered. This is particularly important at the bottom of the scale, where pay floors have not been raised for many years and are simply inadequate, especially as the cost of living has risen in that time. IPSA rather than Unite will have the data on how many staff are paid at this bottom end of the scale, and we would hope that they would agree that it is now time that this level is raised.

Chapter 5 – Connected parties

⁵ Unite survey, October 2016, Question 5.

⁶ Unite survey, October 2016, Question 7.

21. For the past six years IPSA has restricted the number of **connected parties** who can be employed to one per MP and has increased the transparency of their status. **Question 10** now asks if there should be further policy changes because “a perception of risk to taxpayers’ money” and “public concern about the employment of connected parties has remained.” Unite recognises that this has been an area of particular interest, and one in which IPSA must strive hard to reassure the public. However, IPSA also acknowledges “the valuable role that connected parties play in running MPs’ offices and maintaining contact with the local community”; it is well known that the public receives excellent value for money from many connected parties who work far more than their contracted hours seven days a week. Unite’s guiding principle is that so long as they are doing the job it should not matter if the member of staff is a connected party, and if the job is not being done it should not matter if the member of staff is *not* a connected party. We do not believe that the overall rules need to be changed.

Chapter 6 – Political activity

22. Unite is glad to read that IPSA “found no widespread abuse of the Scheme for the purposes of **campaigning**” in the lead-up to the General Election, which would naturally be the time when pressure to bend the rules would be expected to be greatest. In small offices staff are expected to follow the instructions of the MP, and so appreciate as much clarity as possible over what is and is not permitted. It is not for Unite to stipulate what should and should not be excluded from what is considered appropriate and parliamentary work in **Question 12**, but we do ask that this is made as clear as possible to MPs in order to diminish the prospect of staff being pressured into undertaking inappropriate activities.
23. The Unite branch represents members in the **pooled staffing services**, the PRU, PRS and PRT. We believe that they perform a useful service, and would not want to see them defunded as a response to **Question 13**. Although we can understand IPSA’s querying of this arrangement, we are not aware of any of these groups having produced inappropriate material; if IPSA has any evidence of this, we would be keen to see it. The benefits of pooled services are the efficiencies that they create by eliminating duplication of work, which is a saving both of effort and money. We also want to emphasise that not all expressions of partisanship are inherently wrong: if a member of the public wants a strictly factual answer to a query, there are a number of authoritative sources that they can consult. Often constituents will ask what is the opinion of an MP’s party towards an issue, or for a politician’s perspective and insight, and so it is natural that answers will include some partisan element – this can be not only expected, but demanded! Unite would also like to gently raise a concern at a suggestion in paragraph 76 that pooled services may be an unnecessary duplication of the services offered by the House of Commons Library. While Unite do not represent House staff, we are well aware that the Library employs real experts, who are paid for their expertise. If there were greater demand on them this may produce a slight saving from the IPSA staffing budgets, but at the cost of greater expense to the taxpayer elsewhere.

Chapter 8 – Other issues

24. IPSA raises a valuable point in **Question 18** that demonstrates the appreciation of how the Scheme works in practice following the experience of the 2015 general election. The argument to simplify the rules over travel and subsistence for staff to match those of MPs makes sense as the bottom line is still that their appropriate parliamentary duties are being

fulfilled. Unite appreciates IPSA's common sense approach to this last year even though it was not spelled out in the then scheme, and agree that this is a helpful update.

25. IPSA raises some important points about **winding up costs** following the experience of the general election. If there is confusion as to which budgets should be used for claims, the priority should be for extra clarity of explanation. Allied to this, we agree that the process could begin earlier, which should be simplified by fixed-term Parliaments. We believe that it would be helpful for IPSA to contact all MPs at least 3 months before any expected General Election setting out the budget structures.
26. Although we recognise that MPs have the responsibility for **financial management** in their offices, Unite thinks that IPSA may be able to offer a bit more support in this area. Specifically, when MPs are considering in-year changes to their budgets (including those caused by such matters as maternity), some staff have reported that they have struggled to get from IPSA accurate details of how changes to payroll will impact the budget by the end of the year. As IPSA have all of this information, we would hope that this information would be easily compiled by IPSA on request, and that IPSA can be more proactive in forecasting overspends and alerting MPs to this.
27. Cover for **staff maternity, paternity, adoption, long term sick leave and care leave** should be funded and reported centrally. It should not be listed or reported as part of a MPs' staffing budget. IPSA should simply report centrally how much covering leave has cost in total. This is because it is incorrect to report it as an MP 'overspending', and it risks divulging sensitive information about MPs' staff. The Scheme should seek to allow and encourage people from all backgrounds to stand for and work in Parliament, not actively discourage them by suggesting that maternity or paternity cover is somehow illegitimate. However, should IPSA chose to include this 'cover' in an MPs staffing budget, IPSA should 'explain' that any increase in staffing budget may be because of staff maternity, paternity, adoption, long term sick leave and care leave. This would explain why there is an uprating, but it should not be reported as 'overspending', nor should it be reported as 'exceptional' or indeed contingency. If it is to be included it should be categorized as a temporary uplift.
28. **Contingency funding** has not been available to cover increased casework loads since 2012, but the reality has been more work nonetheless. Unite has argued the case for increasing the staffing budget above, but otherwise this restriction may need to be revisited. Casework levels cannot be planned for strategically and do indeed rise in response to governmental policy that is beyond our control.

Chapter 10 – Equality and Diversity

29. We are slightly concerned that despite the reference in your paragraph 147 to "our responsibilities under the Equality Act 2010", your earlier paragraph 53 had stated that "promoting diversity in Parliament ... is not in our statutory remit". We would have expected that such a duty was required as a public authority under the provisions of Section 149 of the Equality Act, and we would appreciate it if IPSA could clarify this point.
30. Unite remains concerned at the lack of **diversity amongst staff** in Parliament, and recognises that as such work is frequently an initial step towards elected office that such lack of diversity is a genuine issue of public concern. In particular we believe that BME and people with disabilities are underrepresented in the staff of MPs. We believe that IPSA can play a positive role here to address this without unduly interfering with MPs' rights as employers.

Currently many jobs for MPs are awarded to preferred individuals without having been publicly advertised. While MPs should always have the right to choose who they employ, we would be in favour of IPSA insisting that vacancies for new jobs would have to be advertised before IPSA agreed to release payment for them. This would give more opportunities for people to advertise for jobs who do not already know somebody on the inside, and in particular we would hope that many MPs would give people with a disability an automatic right to an interview.

31. The Unite branch appreciates being consulted for this survey, but continues to believe that we should be formally **recognised as a representative union** for negotiating purposes. We also wish to reiterate our longstanding desire for **appropriate HR support** for MPs' staff.

Max Freedman
Chair
Unite 1/427
Representing staff of MPs

20th October 2016

Graham Jones MP
Constituency Office
50 Abbey Street
ACCRINGTON
BB5 1EE



25 August 2016

Review of the Scheme and Publication Policy – responses to consultation
Independent Parliamentary Standards Authority
4th Floor
30 Millbank
London
SW1P 4DU 151

Dear Sir or Madam

Re: Review of the MPs' Scheme of Business Costs and Expenses and IPSA's publication policy A Consultation – May 2016

I, the undersigned, am writing in relation to your consultation on the MPs' scheme of business costs and expenses to lodge an objection in relation to **Question 8**.

You propose a system whereby MPs' staff are unable to accept employment with another MP after being made redundant within 10 weeks without being required to return any redundancy payment made.

I believe this is unacceptable for the following reasons:

- Each office in Parliament is different and there is enormous disparity in working practices and job roles. It is simply not comparable to moving between departments of an organisation with an overarching hierarchy.
- In public sector organisations where people cannot receive redundancy payments on losing a job if they are re-employed in the same sector, there are also usually preferential policies in place to ensure those already working in the sector are first in line for other roles. This would be difficult and potentially controversial to implement in this instance.
- Staff who find themselves searching for work due to redundancy, and who find employment within Parliament, are often forced to take jobs for lower pay than in their previous office. There is no set correlation of pay grades, even between job roles with the same title.
- Redundancy provides for someone to cover their costs when searching for work. If someone were to be employed by another MP nine weeks after redundancy, it is simply wrong to demand a return payment of what might be a considerable amount, which has likely already been spent to cover housing and living costs. To do so constitutes a deep misunderstanding as to the purpose of a redundancy payment.

- If redundancy pay is on an accrued basis, then all terms and conditions relating to staff must also be accrued. This proposed change must require that redundancy and all other terms of employment, maternity/paternity rights for example, be carried over across offices, which also means that MPs hiring staff who have worked in other offices cannot impose probationary periods in 'new' contracts. This is likely to prove an unpopular arrangement with MPs.
- This proposed change also provides a potential disincentive for MPs to employ people who have worked in Parliament previously before being made redundant through no fault of their own. This is manifestly unfair to people who may have spent many years gaining experience and training in the Parliamentary profession, which is a unique skill set in and of itself. There is a case to be made regards staff being re-employed after redundancy by the same MP and IPSA is correct to look into that particular aspect. However, if this option on redundancy pay is to be taken across the board, then IPSA simply cannot treat each MP as a small business employer. At present MPs' staff exist without any departmental structural support, have no pastoral care, and an effective ban on staff bonuses. We are classified merely as 'an expense' and generally treated by IPSA as such. IPSA has until now abdicated any function as an arbiter of working practices, but if legally necessary terms and conditions like redundancy pay are to be accrued as if all staff belong to a single departmental unit, or payment for unpaid leave subject to additional scrutiny, then it behoves IPSA simply to accept a role as the overall employer of Members' staff, thus also providing the Human Resources, pastoral care and pay structures due, rather than remotely administering the payroll. Without this step being taken, the proposals specifically related to redundancy are unworkable and will be seen as IPSA once again imposing negative terms and conditions on an easy target.

I thank you for your time and your consideration.

Yours faithfully

Signature Redacted

Vivienne Preston
Senior Caseworker to Graham Jones MP