

## Review of IPSA's Publication Scheme Consultation

July 2014

## **IPSA's Publication Scheme**

### **Report on consultation**

#### **Executive Summary**

1. In March and April 2014 we consulted on our Publication Scheme. We received six responses. Having considered these, we have revised our proposals and will place on our website our policies, where we have them, on recruitment, health and safety, equality and diversity and customer service, and we will not publish the addresses of MPs' landlords. We will not change our Publication Scheme in response to six other suggestions.

#### **Introduction**

2. This is the report on the review of IPSA's Publication Scheme, following the public consultation which ran from 18 March to 25 April. The review was an opportunity to consider what information IPSA publishes about itself and about MPs and to consider how our approach might evolve.
3. The consultation asked just two questions: do you have any comments about the proposed Publication Scheme (covering information about IPSA)? And, do you have any comments about the proposed Publication Policy (regarding claims made by MPs)?
4. We received six responses to the consultation: from the Information Commissioner's Office, the Senior Salaries Review Body, the Speaker, an MP and two people who work for MPs.
5. We are grateful to those who responded.

#### **Responses**

##### **Question 1 - do you have any comments about the proposed Publication Scheme?**

6. There were four comments on our proposals for the Publication Scheme.
7. First, we were asked to publish individual reward and recognition payments made to IPSA staff, on the basis that we publish MPs' payments to their staff.
8. We already do so. We publish reward and recognition payments to IPSA staff in £50 bands and such payments are audited by the National Audit Office.

9. Second, we were asked to publish details of the expenses incurred by all IPSA staff, in addition to publishing expenses incurred by Board members and senior staff.
10. We propose to retain our current approach. We already publish costs incurred by senior members of IPSA staff. More junior members of staff in other public sector organisations do not have their expenses published. We do not consider that junior staff at IPSA should be treated any differently. Of course, we apply the same rules and evidence requirements for expenses claims to our own staff as we do to MPs.
11. Third, we were asked to publish our policies and procedures, where we have them, covering recruitment, health and safety, equality and diversity and customer service.
12. We are happy to do so.
13. Fourth, we were asked to publish the precise remuneration received by IPSA's Board.
14. We already publish details of the remuneration received by the IPSA Board in bands of £5,000 in line with the practice across the rest of the public sector. We do not think that we should treat IPSA Board members any differently to other Board members in the public sector.

**Question 2 - do you have any comments about the proposed Publication Policy?**

15. We received four comments on our proposals for the Publication Policy.
16. First, we were asked not to publish MPs' landlords' names and addresses as this is personal information about a private individual.
17. We have previously released the names of MPs' landlords in response to freedom of information requests. We therefore cannot withhold this information and plan to publish it routinely in future. But we agree that to publish landlords' full addresses would be to release personal information about private individuals which is not relevant to an understanding of the use of public funds.
18. Second, we were asked to state how long staff had worked for an MP so that it might help to explain instances where a member of staff is at the top of their salary band.

19. We propose to retain our current approach. We do not publish details of the individual remuneration of MPs' staff except when they are 'connected parties'<sup>1</sup> or earn over £60,600 (when we publish details of remuneration in bands of £5,000, not the exact figure). So we do not see a need to publish details of the length of tenure of MPs' staff.
20. Third, we were asked not to publish details of MPs' reward and recognition payments to staff as the individual's colleagues might be able to identify who had received what payment.
21. We do not agree that this is a reason not to publish these details. The reward and recognition payments that MPs make to their staff should be transparent.
22. Finally, we were asked not to publish unsuccessful applications for contingency funding on the basis that no public money is being spent, so it is unnecessary to publish details of the contingency application.
23. We do not intend to amend our approach. We publish details of all transactions and requests for funding, including unsuccessful claims for reimbursement. We think it is appropriate to maintain the same principle with contingency applications.

#### **Our position and next steps**

24. As a result of this consultation, we have now amended our Publication Scheme:
- A. to publish IPSA's policies, where we have them, on recruitment, health and safety, equality and diversity and customer service; and
  - B. not to publish the address of MPs' landlords.
25. We will now introduce our revised Publication Scheme.

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<sup>1</sup> A connected party is defined as a spouse, civil partner or cohabiting partner of the MP; a parent, child, grandparent, sibling, uncle, aunt, nephew or niece of the MP or of a spouse, civil partner or cohabiting partner of the MP; or a body corporate, a firm or a trust with which the MP is connected as defined in section 252 of the Companies Act 2006.

## Annex A: Summary of changes

### IPSA's Publication Scheme

(Items in italics are additions or material changes to what we currently publish).

<b><u>Class of Information</u></b>	<b><u>Information to be published</u></b>
<b>Who we are and what we do</b> Organisational information, structures, locations and contacts.	• Short biographies of Board Members and Chief Executive
	• <i>Roles and responsibilities of Board (including any statutory role they fill)</i>
	• <i>How senior appointments are made</i>
	• Link to relevant acts (Parliamentary Standards Act etc)
	• Brief history of IPSA; where it came from etc, what it does
	• Contact details for general enquiries (telephone, email, written)
	• <i>Name and title of each staff member reporting directly to the Chief Executive, accompanied by a description of his or her team's function and size</i>
<b>What we spend and how we spend it</b> Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit.  Financial information for the current and previous two financial years should be available.	• Publication of MPs' business costs and expenses
	• The day rates and total remuneration received by Board members, in £5,000 bands
	• Resource accounts for each year
	• <i>Pay ranges for all employees earning a salary equivalent to the Senior Civil Service minimum pay band, in £5,000 bands</i>
	• <i>Pay ranges for each of the IPSA employee grades (A-E) and number of employees in each grade</i>
	• <i>Procurement policy</i>
	• <i>Details of all contracts worth £25,000 or above, and any supplier with whom our total annual spend exceeds £25,000</i>
	• Statistics on FOI and other correspondence
	• Information on how to make an FOI request or other general correspondence, include timescales
	• FOI requests responses, including a log of responses
	• Estimates as approved by Parliament
	• Responses to parliamentary questions
<b>What are our priorities and how are we doing</b> Strategies and plans, performance indicators, audits, inspections and	• IPSA annual report and corporate plan

reviews.  Available at least for the current and previous three years.	
<b>How we make decisions</b> Decision making processes and records of decisions.	<ul style="list-style-type: none"> <li>• Board minutes</li> </ul>
	<ul style="list-style-type: none"> <li>• Public consultations, including responses, summarised as appropriate excluding where respondents have requested they not be published</li> </ul> <p>We will redact as appropriate to remove personal or potentially defamatory content</p>
<b>Policies and procedures</b> Current written protocols, policies and procedures for delivering services and responsibilities.	<ul style="list-style-type: none"> <li>• The Scheme of MPs' Business Costs and Expenses</li> </ul>
	<ul style="list-style-type: none"> <li>• All IPSA policies and guidance on claiming under the MPs' Scheme of Business Costs and Expenses</li> </ul>
	<ul style="list-style-type: none"> <li>• Information on our complaints procedures, covering requests for information as well as the operation of our Scheme, and other operational complaints</li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Records management policy</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Information assurance policy</i></li> </ul>
	<ul style="list-style-type: none"> <li>• Research or opinion polls carried out</li> </ul>
	<ul style="list-style-type: none"> <li>• Gifts and hospitality code</li> </ul>
	<ul style="list-style-type: none"> <li>• IPSA staff expenses policy</li> </ul>
	<ul style="list-style-type: none"> <li>• IPSA's policy on the publication of MPs' business costs and expenses</li> </ul> <p>• Where we hold them, we will publish policies and procedures covering recruitment, health and safety, equality and diversity and customer service.</p>
<b>Lists and registers</b> Information contained in currently maintained lists and registers only.	<ul style="list-style-type: none"> <li>• Registers of interest, political activity monitoring form, conflict of potential interests for Board Members, Chief Executive, Directors, and Compliance Officer</li> </ul>
	<ul style="list-style-type: none"> <li>• Hospitality and gifts record for Board Members, Chief Executive, Directors, and Compliance Officer</li> </ul>
	<ul style="list-style-type: none"> <li>• Expenses for Board Members, Chief Executive, Directors, and Compliance Officer</li> </ul>
<b>The services we offer</b> Information about the services we currently provide including leaflets, guidance and newsletters produced.	<ul style="list-style-type: none"> <li>• IPSA responsibilities in statute</li> </ul>
	<ul style="list-style-type: none"> <li>• Letters sent to all MPs collectively, including any bulletins sent to MPs</li> </ul>

## IPSA's Publication Policy

CATEGORY	PREVIOUS POSITION	NEW POSITION	WHEN INTRODUCED
Residential accommodation: landlords' names	One-off publication on 19 November 2012	Annual publication of landlords' names and first part of MPs' postcodes	2015
Office accommodation: landlords' names	One-off publication on 14 November 2013	Annual publication of landlords' names and first part of MPs' postcodes	2015
Budget uplifts and reductions	MPs' annual expenditure published in September of following financial year  Annual budget limits published in MPs' Scheme of Business Costs and Expenses	MPs' budget for the financial year, with explanation for any uplift or reduction from general limit  MPs' annual expenditure against each budget  Any contributions to the cost of apprenticeships	September 2014
Sums written off	Published as aggregate figure in annual accounts	Annual figures broken down by MP	2015
Contingency applications	Publication in response to FOI requests	Annual publication of all contingency applications, the amount applied for and amount, if any, agreed	September 2014
MPs' staffing information	Total staffing expenditure and salaries (in £5k bands) for connected parties	Total staffing expenditure, job titles of staff, full time or part time, whether employed for whole year. Salary in £5k bands for connected parties and any staff earning £60,600 or more	2015
MPs' staff reward and recognition	Number of awards and total value of awards	Value of all individual awards listed, along with total amount	September 2014
Mortgage interest subsidy and capital gains repayments	Total mortgage interest subsidy claimed and any capital gain repaid (first published March 2013, updated September 2013)	As now, with updates each September where MP has a repayment schedule	September 2014

## **Annex B: Publication Policy for MPs' Business Costs and Expenses**

### IPSA's Publication Policy

#### Introduction

1. This document sets out IPSA's policy on the regular and proactive publication of information about the expenditure of public funds by MPs in accordance with the MPs' Scheme of Business Costs and Expenses ('the Scheme'). Our approach to requests under the Freedom of Information Act is discussed in paragraph 18 below.

2. This document provides details of the part of IPSA's Publication Scheme relating to the publication of MPs' expenses. It supersedes all previous policy statements on the publication of MPs' expenses.

3. We will publish information about claims made by MPs under the Scheme in regular cycles, as set out below:

- Every two months, we will publish details of MPs' business costs and expense claims. These will be for the two months which are three and four months in arrears of the month of publication. (For example, claims processed in June and July will be published in November.)

- We will publish annually additional information about MPs' use of public funds. This will include information on residential accommodation, constituency offices, staffing, budget uplifts, and the employment of connected parties<sup>2</sup>.

- We will publish annually the total sums paid for additional security measures and disability assistance. These sums are the aggregations of all claims made by all MPs for these categories of expenditure in a single financial year.

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<sup>2</sup> A connected party is defined as a spouse, civil partner or cohabiting partner of the MP; a parent, child, grandparent, sibling, uncle, aunt, nephew or niece of the MP or of a spouse, civil partner or cohabiting partner of the MP; or a body corporate, a firm or a trust with which the MP is connected as defined in section 252 of the Companies Act 2006.



4. Neither the two-monthly nor annual cycles of publication will take place when the UK Parliament is dissolved or on a day where there are substantial local or devolved assembly or parliamentary elections.

5. In order to protect personal information and ensure that IPSA takes due account of the personal security of MPs and their staff, we will redact information in line with our responsibilities under the Data Protection Act (1998) ('the DPA').

#### Regular publication of details of claims for business costs and expenses

6. We will publish claims only after a final determination has been made – i.e. when the claims have been approved for reimbursement, when they have not been approved for reimbursement, and when they have been approved for reimbursement in part. Details of claims that are subject to review will only be published once the review has been completed.

7. Each publication cycle is likely to include a number of older claims where, for example, reviews or late submission of evidence may have affected the timeliness of the reimbursement or otherwise of a claim.

8. For each type of claim we will publish the information set out below:

- **For all claims:** MP's name, constituency, financial year, date, claim reference numbers, budget (e.g. Travel, Accommodation, Office Costs), type of expenditure (e.g. public transport – rail, council tax, photocopier hire), short description, details, amount claimed, amount reimbursed, amount not reimbursed, the reason why a claim was not reimbursed and amount repaid to IPSA.

- **Travel and subsistence claims:** place of origin, place of destination, category of journey, class of travel, mileage, length of hotel stay, category of hotel stay.

9. Most information is submitted by MPs through the online claims system. The only addition by IPSA is the automatically generated claim reference, the amount reimbursed or not reimbursed and, when appropriate, the reason a claim was not reimbursed.

10. We will publish details of instances when MPs have made a claim and received reimbursement, but have subsequently repaid monies to IPSA.

11. Published information is available in a searchable format on our website at [www.parliamentary-standards.org.uk](http://www.parliamentary-standards.org.uk).

12. Payroll costs are separate from claims for business costs and expenses and are not published as part of the regular cycle of publication of claims. We will publish details of MPs' payroll arrangements annually, as set out below.

#### Publication of additional information

13. We will, annually, as soon as practicable after the end of the financial year, publish details relating to the expenditure of public funds for the previous financial year in relation to each MP in the following areas:

- total annual claims against office budgets;
- total annual claims against residential accommodation budgets, including hotel stays;
- total annual claims against travel and subsistence budgets;
- total annual claims against staffing budgets. We will publish the job titles of any staff employed during the financial year, whether the role was part or full time, and whether the staff member was employed for the whole financial year. In line with the Government's approach to the wider public sector we will also publish, in bands of £5,000, the details of the salaries of members of staff earning £60,600 or more. Further, we will publish the names, job titles and salaries (expressed in bands of £5,000) of connected parties employed from public funds. With the exception of these connected parties, staff names will not be published. We will publish details of any contributions the MP receives for the costs of employing an apprentice; and
- total budgets available to the MP for the financial year, including any uplift or reduction that has been applied. IPSA will also publish the value of any uplifts, and show whether they

were applied as the result of a successful application for contingency funding, registration of dependants, or arrangements for staff cover.

14. At the same time, we will publish:

- the aggregate sum of all claims for which MPs received reimbursement under the security assistance budget;
- the aggregate sum of all claims for which MPs received reimbursement under the disability assistance budget;
- details of repayments made by MPs;
- details of all applications for contingency funding received, including MP's name, the amount applied for, and whether the application was approved;
- details of claims and capital gain repayments made under the transitional mortgage interest subsidy arrangements;
- the landlord's name, and first part of the MPs' postcode, for rental accommodation;
- the landlord's name, and first part of the MPs' postcode, for office accommodation;
- the value of each reward and recognition payment made by each MP during the course of the financial year; and
- any unrecovered sums due to IPSA which have been written off and reported in IPSA's annual accounts.

What IPSA will not be publishing proactively

15. We will not, as a matter of course, publish images of receipts or invoices supporting claims.

16. We will not publish the following information:

- details of MPs' home addresses (i.e. those addresses for which they receive no subsidy from IPSA) unless it is entered in support of a claim, in which case we will publish only the town or city and the first alphabetical block and the first numerical block of the postcode, for example:

- SW1 [\*\*\*]
- IP21 [\*\*\*]

Claims where this information may be relevant might, for example, be for mileage or other journeys;

- details of MPs' addresses for which the MP is in receipt of funding from IPSA, other than the town or city and the first alphabetical block and the first numerical block of the postcode, for example:

- SW1 [\*\*\*]
- IP21 [\*\*\*];

- specific journey times;

- any customer, account, invoice or policy numbers, or any other serial numbers that may be traced back to sensitive personal data, such as TV licence numbers or flight numbers;

- email addresses, telephone numbers, fax numbers;

- financial details such as credit card or bank account details;

- car registration numbers; and

- names, addresses or other contact details of small suppliers with regular access to MPs' homes.

17. We will not publish details of individuals' Security Assistance or Disability Assistance claims.

18. We will not publish certain personal data where it would contravene any of the data protection principles in the Data Protection Act. IPSA is also subject to the Freedom of Information Act and handles each request under that Act on a case-by-case basis.

19. We will not publish full names or surnames of staff on the payroll.
20. We will not publish specific details of a disability.
21. We will not publish names of office cleaners or cleaning companies, as they may have keys to the office so there is a potential security risk.
22. We will not publish details of any purchases made on the Payment Card which the MP decides to repay before the expense is presented to IPSA.
23. We will not publish details of claims which have initially not been approved for reimbursement where, on resubmission, they have been approved, provided it is clear that the reason for the initial determination was due to a minor administrative oversight on the part of the MP, such as the incorrect or incomplete submission of evidence, and where the oversight was rectified in the resubmission.
24. The names of specific hotels which the MP stays at in London or their constituency, as the MP may stay there regularly so there is a potential security risk.
25. We will not publish individual travel claims for MPs representing constituencies in Northern Ireland.
26. We will not publish information which we consider may compromise an MP's security.
27. We will not publish internal notes made by IPSA system administrators.