

Review of IPSA's Publication Scheme Consultation

March 2014



REVIEW OF IPSA'S PUBLICATION SCHEME

18 March 2014

Contents

Foreword by the board of IPSA.....	3
Chapter One: Background and History	5
Legislative underpinnings	5
Publication over time.....	5
Other publications	5
Publication in the future	6
Chapter Two: The State of Play.....	7
What IPSA has already published	7
What we publish now	7
What change is needed?.....	8
Chapter Three: IPSA’s Publication Scheme.....	10
What a Scheme covers.....	10
What changes does the current Scheme need?	10
Proposed IPSA Publication Scheme	11
Chapter Four: IPSA’s Publication Policy for MPs’ Business Costs and Expenses	14
What the Publication Policy covers	14
What changes does the policy need?	14
Chapter Five: Implementation	17
Costs.....	17
Chapter Six: How to respond to this consultation.....	18
Annex A: Publication Policy for MPs’ Business Costs and Expenses.....	19

Foreword by the Board of IPSA

Publication of information has been at the heart of our activities since we began. We processed our first claim from an MP in June 2010, and published the first details of all claims made by MPs in December 2010.

IPSA was created after the expenses scandal of 2009 to introduce a new set of rules relating to business costs and expenses and to restore public confidence. As a public body, we have a legal obligation to publish a range of information under the Freedom of Information Act. We also have a legal duty under the Parliamentary Standards Act to have regard to the principle that we should act in a way that is transparent. Since the beginning, however, we have seen publication of information as involving more than legal obligation. We believe that transparency, achieved through a robust programme of publishing the details of the use of public money, is a fundamentally important tool in ensuring the proper use of taxpayers' money and in contributing to the restoration of the public's trust in Parliament and Parliamentarians.

Rigorous and regular publication is not a discipline we apply only to MPs; we apply it to ourselves as well. We know that, as for MPs, the regular publication of our activities is one of the safeguards which make sure that we keep to the high standards we set ourselves and demand of others.

This consultation paper essentially addresses two things. First, it sets out for consideration a new *Publication Scheme*, covering the entirety of what IPSA will publish regularly, including information about our use of the public's money and MPs' business costs and expense claims. Having such a scheme is an obligation for every public body under the Freedom of Information Act. Second, the paper sets out a new *Publication Policy* relating to the details we publish on a regular basis about the claims made by MPs. Where our Publication Scheme only states that we will publish these details, but does not set out the details of which information we will publish and how often, the proposed Publication Policy does so.





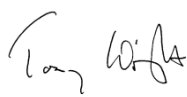
We do not put these proposals forward for public consultation because we are obliged to¹. We do so because we believe it right that the public should have a say about what information they need so as to feel confident that they know how public money is being spent.

We put our first Publication Scheme out for public consultation in 2010 as one of the first tasks we undertook as a new organisation. Since that time our approach to publication has

¹ IPSA's statutory consultees in relation to the publication of information are: the Speaker of the House of Commons, the Leader of the House of Commons, the House of Commons Committee on Standards and Privileges, the Compliance Officer and any other person IPSA considers appropriate.

evolved, and the public appetite for the information that IPSA holds has grown. We offer these amendments to our existing Scheme and Policy for public consultation today to make sure that our approach remains up-to-date and continues to meet its goals.

We welcome your views with interest.

				
Sir Neil Butterfield	Sir Ian Kennedy (Chair)	Elizabeth Padmore	Anne Whitaker	Professor Tony Wright

Chapter One: Background and History

Legislative underpinnings

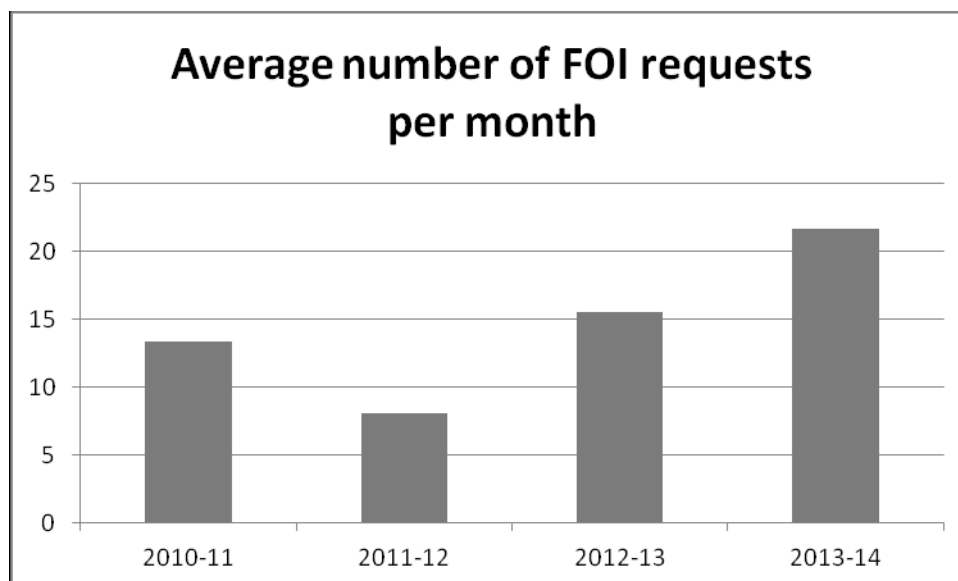
1. As a public body, our approach to publishing information is grounded in the Freedom of Information Act 2009 (FOI Act). As with every public body, the FOI Act gives us many duties, including: to adopt and maintain a Publication Scheme, approved by the Information Commissioner; to publish information in accordance with this Scheme; and to review the Scheme from time to time.
2. The FOI Act also lays out what a Publication Scheme must include, the importance of public interest in the creation and review of a Publication Scheme, and that public authorities can publish information under their scheme in the manner they think fit.

Publication over time

3. We established our first Publication Scheme within this framework in July 2010, following a public consultation. This Scheme covered the full range of information we planned to publish, both about ourselves and about MPs. We also released our Policy on the publication of details about MPs' claims at this time.
4. We amended this Policy in November 2010 in the lead-up to the first round of claim publication in December 2010, and refreshed this Policy again in February 2012.

Other publications

5. In addition to the information proactively covered in our Publication Scheme and Policy, we publish information in response to parliamentary questions and requests made under the Freedom of Information Act.
6. Since 2011-12, the number and complexity of FOI requests that IPSA has received (and responded to) have increased sharply.



Publication in the future

7. What we publish, both proactively and reactively, has changed over time and will change in the future. In some cases, we may be driving changes ourselves: we may decide that transparency can best be delivered by changing the way in which we publish information, or a change in our processes may change the information that we hold. In other cases, change may be driven from outside IPSA: technological developments may allow us to change the way in which we publish, or legal requirements relating to personal data and freedom of information may change.
8. The new Publication Scheme and Policy put forward in this paper represent what we believe to be the most appropriate for today's world. We have no doubt that they will require change over time, and we will consult on further changes when they are required.

Chapter Two: The State of Play

What IPSA has already published

9. Since our first publication cycle in December 2010, IPSA has published details of all claims by all MPs – around 650,000 claims in total, covering claims and payroll costs worth around £270m. For each of these claims, the public can see how much was spent, when, and on what. IPSA also publishes annual total spending for each MP, and a breakdown of that spending by category.
10. We have also published further details on:
 - repayments of capital gains made under our interim mortgage interest subsidy arrangements;
 - lease agreements for MPs who rent offices in their constituencies;
 - MPs who rent accommodation from other MPs;
 - reward and recognition payments to MPs' staff; and
 - the name, job title and salary range of connected parties employed by MPs.
11. In addition, we have published a range of information on our own policies and activities. Some of this information is designed to explain IPSA's processes to MPs, their staff, and the public, such as our guidance on how to make claims. IPSA also publishes information on who we are and what we do, such as our governing legislation, Board members' biographies, and our corporate plan. Finally, we publish a great deal of information about what we have done, such as the details of all of our major contracts, how we have performed against our key performance indicators, and our accounts.
12. In addition to the information we publish on a regular basis, we have published a range of information in response to FOI requests and parliamentary questions. We began receiving FOI requests even before we took over responsibility for MPs' business costs and expenses, and have received 690 in total. These requests have covered a wide range of information, from further details about individual claims by an MP to details of our own operations. We have also made public the responses to 280 parliamentary questions.

What we publish now

13. The bulk of the information that we regularly publish, and the effort we put into publication, relates to claims by MPs for business costs and expenses. The details of claims are published every two months, three months in arrears (i.e. claims processed in June and July are published in November).
14. For each claim made by each MP, we publish the following information (where relevant to the type of claim):
 - a. MP's Name
 - b. MP's Constituency

- c. Expense type
- d. Transaction date (year, month, date)
- e. Claim reference number
- f. Budget type
- g. Short description
- h. Details
- i. Amount claimed
- j. Amount reimbursed
- k. Amount not reimbursed
- l. Reason why not reimbursed
- m. Amount repaid
- n. To [journey destination]
- o. From [journey departure]
- p. Journey type
- q. Class of travel
- r. Mileage
- s. Nights (length of hotel stay)
- t. Category of hotel stay (London/Non-London/international)

15. These details are available on our publication website: www.parliamentary-standards.org.uk. The information is searchable, and can be exported to an Excel spreadsheet. Users can search to the level of individual claims or for all expenditure.

16. In September, we publish aggregate data on claims for the previous financial year. This information is sorted by MP and available on the publication website. We also publish annually the information listed at paragraph 10.

What change is needed?

17. As noted in Chapter One, what we publish as part of our planned, regular activity has evolved over time. After nearly four years of operation, it is timely to take a step back and consider what we can improve, both in terms of content and process, and what the future may call for.

18. As a rule, publication of information on a planned, regular schedule is a better use of resources than publication which is ad-hoc and reactive. FOI requests can identify information which we should consider for regular publication on the grounds of public interest. Where the public has shown continued interest in information that we hold, and which is proper to release, we want to make sure that we deliver it regularly, in context, and in a consistent form.

19. We also want to make sure that our principles of transparency and accountability are delivered in practice. Our approach to publication means that we demand more of ourselves than simply meeting our responsibilities under the FOI Act.

20. The next two chapters propose new versions of our Publication Scheme (covering all the information we publish) and our Publication Policy for details about MPs' business costs and expense claims.

Chapter Three: IPSA's Publication Scheme

What a Scheme covers

21. As a public body we are required to adopt and maintain a Publication Scheme, approved by the Information Commissioner.
22. The Information Commissioner's Office (ICO) has published a model Publication Scheme, which covers seven classes of information for publication. These classes are:
 - **Who we are and what we do:** Organisational information, locations and contacts, constitutional and legal governance.
 - **What we spend and how we spend it:** Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
 - **What our priorities are and how we are doing:** Strategy and performance information, plans, assessments, inspections and reviews.
 - **How we make decisions:** Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.
 - **Our policies and procedures:** Current written protocols for delivering our functions and responsibilities.
 - **Lists and registers:** Information held in registers required by law and other lists and registers relating to the functions of the authority.
 - **The services we offer:** Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

What changes does the current Scheme need?

23. Many of the changes in the Publication Scheme below reflect changes in best practice, such as publishing the names, titles and pay ranges of senior staff, and where our annual spend with a supplier exceeds £25,000.
24. Other changes make items more specific, or remove items which have become redundant. For instance, our current scheme says that we will publish our performance against any service level agreements, even though we are not the provider of services under any service level agreements.
25. The Publication Scheme, which is mapped out below, sets out all the information we will publish including information about IPSA as well as MPs' business costs and expense claims.

Proposed IPSA Publication Scheme

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

<u>Class of Information</u>	<u>Information to be published</u>
Who we are and what we do Organisational information, structures, locations and contacts.	<ul style="list-style-type: none"> • Short biographies of Board Members and Chief Executive
	<ul style="list-style-type: none"> • <i>Roles and responsibilities of Board (including any statutory role they fill)</i>
	<ul style="list-style-type: none"> • <i>How senior appointments are made</i>
	<ul style="list-style-type: none"> • Link to relevant acts (Parliamentary Standards Act etc)
	<ul style="list-style-type: none"> • Brief history of IPSA; where it came from etc, what it does
	<ul style="list-style-type: none"> • Contact details for general enquiries (telephone, email, written)
	<ul style="list-style-type: none"> • <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>
What we spend and how we spend it 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.	<ul style="list-style-type: none"> • Publication of MPs' business costs and expenses
	<ul style="list-style-type: none"> • The day rates and total remuneration received by Board members, in £5,000 bands
	<ul style="list-style-type: none"> • Resource accounts for each year
	<ul style="list-style-type: none"> • <i>Pay ranges for all employees earning a salary equivalent to the Senior Civil Service minimum pay band, in £5,000 bands</i>
	<ul style="list-style-type: none"> • <i>Pay ranges for each of the IPSA employee grades (A-E) and number of employees in each grade</i>
	<ul style="list-style-type: none"> • <i>Procurement policy</i>
	<ul style="list-style-type: none"> • <i>Details of all contracts worth £25,000 or above, and any supplier with whom our total annual spend exceeds £25,000</i>
	<ul style="list-style-type: none"> • Statistics on FOI and other correspondence
	<ul style="list-style-type: none"> • Information on how to make an FOI request or other general correspondence, include timescales
	<ul style="list-style-type: none"> • FOI requests responses, including a log of responses
	<ul style="list-style-type: none"> • Estimates as approved by Parliament
	<ul style="list-style-type: none"> • Responses to parliamentary questions
What are our priorities and how are we doing Strategies and plans, performance	<ul style="list-style-type: none"> • IPSA annual report and corporate plan

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

CONSULTATION QUESTION 1: Do you have any comments about the proposed Publication Scheme?

Chapter Four: IPSA's Publication Policy for MPs' business costs and expenses

What the Publication Policy covers

26. In this chapter we use 'Publication Policy' as shorthand for our policy on publication of the details of MPs' business cost and expense claims. This is an integral part of our overall Publication Scheme, as laid out in the previous chapter.
27. Our Publication Policy covers information published at the level of individual claims, as well as aggregate data and supporting information which provides greater clarity about the use of public funds.

What changes does the policy need?

28. The public have shown an interest in seeing more of the supporting information provided by MPs with their claims, and for more explanation about the information that we already publish.
29. As noted in Chapter One, we have seen a sharp increase in the number and complexity of FOI requests for further detail on the evidence provided in support of claims.
30. Answering these requests has helped to provide transparency and explain information that we regularly publish about the use of public funds that might otherwise have been confusing or misleading.
31. At the same time, answering these requests on an ad-hoc basis has been a drain on our resources, and means that, if not published promptly, information at this level of detail can easily fall out-of-date.
32. The proposed Publication Policy at Annex A incorporates a range of new details which we have previously published in response to FOI requests. Including them as part of our regular publication activities will provide greater transparency and make sure that information in the public domain is up-to-date.
33. A summary of the proposed changes are set out below:

CATEGORY	CURRENT POSITION	PROPOSAL	WHEN INTRODUCED
Residential accommodation: landlords' names and addresses	One-off publication on 19 November 2012 [unless MP's address revealed by publication]	Annual publication of landlords' names and addresses and first part of MPs' postcodes	After 2015 general election
Office accommodation: landlords' names and addresses	One-off publication on 14 November 2013	Annual publication of landlords' names and addresses and first part of MPs' postcodes	After 2015 general election
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	After 2015 general election
Contingency payment applications	Publication in response to FOI requests	Annual publication of all contingency claims, 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 £58,200 or more	After 2015 general election
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

CONSULTATION QUESTION 2: Do you have any comments about the proposed Publication Policy?

Chapter Five: Implementation

Costs

34. In general, the changes recommended in this paper will involve a one-off cost, but lower the cost of publication over time.
35. Where the changes can be made without significant cost, IPSA will implement them at the conclusion of this consultation. In general, these will be changes which involve small changes to our website, or do not require frequent updates.
36. Where there are more significant implementation issues, we will work towards introducing the changes following the general election due in 2015.
37. The main costs involved in the recommended changes fall into two categories:
 - one-off costs for IT changes to publish new information, and to capture it in a way which makes regular publication more efficient; and
 - an increased cost to redact information of a personal nature prior to publication.

Chapter Six: How to respond to this consultation

38. IPSA has set out its approach towards publication to allow those with an interest to consider our proposals and to put forward their views. The consultation runs from 18 March to 25 April 2014. Please submit your response before the closing date as responses received after 25 April may not be considered.
39. Once the consultation period has closed, IPSA will move quickly to analyse the responses before publishing the final Publication Scheme and Policy.
40. Responses to the consultation will be published in full, including the identity of the respondent, unless the respondent requests otherwise.
41. IPSA asks for responses by email to publicationconsultation@parliamentarystandards.org.uk – please title the email with the subject ‘consultation response’. If you don’t have access to email, you may send a paper copy of your response to:

IPSA

Portland House

Bressenden Place

London, SW1E 5BH.

Annex A: Publication Policy for MPs' Business Costs and Expenses

IPSA's proposed 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 parties².

² A "connected party" is defined as: a spouse, civil partner or cohabiting partner of the MP; a parent, child, grandparent, grandchild, 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 trust with which the MP is connected, as defined in section 252 of the Companies Act 2006.

- 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.
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.
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 £58,200 or more. Further, we will publish the names 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 uplifts that have 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 postcode, for rental accommodation;
- the landlord's name, and first part of the 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.

