

# Guidance on pooled research, briefing and drafting services

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IPSA

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## Introduction

1. IPSA's Scheme provides that MPs may claim payments for pooled services. A 'pooled service' provides research, briefing and drafting services to a group of MPs.
2. Unlike other bought-in services, IPSA allows for direct payments to be made to pooled services where an agreement is in place. This means that pooled services can be paid by IPSA either through claims made by MPs for the reimbursement of services or directly as part of a subscription arrangement with IPSA.
3. This guidance provides advice on how to ensure that research, briefing and drafting services meet the Scheme's requirements for funding and avoid content which is party political in nature or otherwise contrary to the Scheme rules. It also sets out the requirements on pooled services relating to administration and reporting to IPSA, and the process for setting up new pooled services.
4. A written agreement between IPSA and pooled services is provided in **Annex 1**. It is expected that every pooled service with a direct funding arrangement with IPSA should have signed this agreement. Research, briefing and drafting services paid for via reimbursement claims should also comply with this guidance. If pooled services do not adhere to the Scheme or fail to comply with this guidance IPSA can determine to discontinue funding.

## IPSA rules relating to pooled services

5. The activities of pooled services funded by IPSA must comply with the Scheme including the Fundamental Principles (Part A) and General Conditions (Part B, Chapter 3). The Scheme sets out that IPSA funded activities must be:
  - Parliamentary in nature
  - Not party-political
  - Not aimed at gaining a campaigning advantage.
  
6. The Scheme gives several instructive examples of activities that are not permitted, which include:
  - Work which is conducted for or at the behest of a political party.
  - Activities which could be construed as campaign expenditure within the scope of the Political Parties, Elections and Referendums Act 2000 / Representation of the People Act 1983.
  - Any other activities whose purpose is to give MPs a campaigning advantage in general elections and referendums.
  
7. The Scheme is also clear that MPs must have regard to value for money when making claims, and that IPSA will not fund claims for costs that can be funded from other sources. These conditions also apply to pooled services.
  
8. In line with the General Conditions of the Scheme, pooled services funded by IPSA should not be formally connected to any All Party Parliamentary Group (APPG) and should not conduct work at the behest of an APPG.

## Guidance on materials produced by pooled services

9. This section provides further detail on when the research, briefing and drafting services provided by pooled services will be compliant with the Scheme. What will constitute party-political or campaigning activity will be context and purpose dependant, and therefore it is not possible to say with certainty what kinds of materials will fall inside and outside of the Scheme. Instead the below sections set out things pooled services should take account of in making efforts to comply with the Scheme.

### *Purpose*

10. Materials should be for parliamentary purposes. This means that, as set out in the Scheme, materials produced for or at the behest of a political party or those whose purpose is primarily to gain a campaigning advantage would not be compliant with the Scheme. As such, supporting MPs in taking part in parliamentary debates, or in responding to constituents will usually fall within the rules of the Scheme. However, supporting MPs in campaigning activities, such as in preparation for hustings, would fall outside of the rules of the Scheme. As would work produced to support party political events, including at party conferences.

### *Bias*

11. To support parliamentary functions materials should not be biased in an overtly party-political way. For example, materials that focus on criticising or praising one party or other, without reference to facts or concise arguments, are likely to be seen by IPSA as party political. The Scheme does not preclude pooled services from producing materials that build an argument representing the broad views of their subscribing MPs. As such briefings do not need to be objectively neutral for IPSA to view them as compliant with the Scheme. They do however need to have a clear parliamentary purpose, and not purely a party political one. Equally, pooled services should not conduct activities purely for the purposes of lobbying government on any particular issue/ set of issues or take direction from any external interest groups.

12. As well as the purpose of documents, IPSA will also consider aspects of their style and content when determining if they are compliant with the Scheme. The below sections set out features IPSA will take account of during assurance processes. We consider these to be markers that

suggest materials may be party political and/or campaigning in nature and therefore be at risk of falling outside the rules of the Scheme.

### ***Language***

13. IPSA will consider the language used in documents in determining whether they are party political in nature.
  
14. **Sweeping statements:** The use of broad sweeping statements without a clear basis in fact can move the tone of documents towards that of campaigning materials. This is true of statements that are related to the party affiliated with a pooled service, and to those about other political parties.
  
15. **Disparaging comments:** Comments that explicitly attack other parties could be considered ‘work which is conducted for or at the behest of a political party’ and to be of a campaigning nature. While scrutiny of the policies of other political parties is part of parliamentary debate, materials that do so in a derogatory way risk falling outside of the rules of the Scheme.
  
16. **Emotive language:** Overly emotive language can make materials read as if they are campaigning documents and could be taken to suggest they are written for political purposes. This is not to say that pooled service materials cannot engage with or acknowledge the emotional significance of topics that occur in parliamentary discourse.

### ***Referencing***

17. Where documents report factual information in a precise way and back up claims with reference to independent sources, they are more likely to be seen as compliant by IPSA. As such referencing is seen as good practice for pooled services. There will be a degree of judgement required in determining which statements of fact benefit from referencing. In general matters of fact that are unlikely to be known by MPs or factual claims that are highly contentious should be considered for referencing.

### ***Suggested points***

18. It is common for materials that aid MPs in speaking in parliamentary debates to include suggested points or 'lines to take'. While in many circumstances their use in materials produced by pooled services will be parliamentary in nature, they have the potential to be problematic if they are seen as co-ordinating interventions made in the House by members of a specific party. In this context, they can be considered 'work which is conducted for or at the behest of a political party'. In general materials produced by pooled services should ensure that suggested points contribute substantially to debates and that they do not solely promote messages linked with any political party.

### **Inspection of materials**

19. As part of IPSA's role in assuring that public money is spent in accordance with the Scheme, it is necessary for IPSA to periodically inspect the materials pooled services produce.

20. IPSA will typically review materials from pooled services that are registered for direct payments once each parliamentary term, for which they are required to make materials available to IPSA. Reviews may be conducted more than once a parliament if IPSA determines that is necessary.

21. To the extent possible, IPSA will seek to conduct reviews in a collaborative manner, that helps pooled services to comply with the Scheme. This is in recognition that some judgments about which materials fall outside of the Scheme will be difficult.

22. Pooled services should share materials with IPSA for inspection in a timely manner when they are requested.

23. IPSA, as a public body, is subject to the Freedom of Information Act 2000. Therefore, information held by IPSA is subject to Freedom of Information requests and IPSA may be required to release information pertaining to pooled services when requested. IPSA will hold information provided by pooled services for no longer than needed to carry out a review or perform its wider regulatory functions.

## Financial reporting and claims

24. MPs can pay for pooled staffing services out of either their staffing cost budget or their office cost budget. They can claim for pooled services in one of two ways:
1. IPSA can pay subscription fees directly to the service provider; or
  2. a reimbursement claim can be submitted to the online expenses system.
25. A reimbursement claim must be accompanied by documentary evidence in the form of an invoice signed by the subscribing MP.
26. Agreement from IPSA is needed for a direct subscription fee to be set up. To set up a direct payment, an MP must sign an IPSA-created direct payments form and return it to the service provider. The form asks the subscriber to confirm the amount for which they are claiming. It also asks the MP to affirm that they will not submit a reimbursement (or duplicate) claim and will only use the services provided in the performance of their parliamentary duties. The form should be provided to IPSA each financial year.
27. Once a direct subscription arrangement is set up, the pooled service will receive payments from IPSA as a lump sum encompassing all subscribed MPs' fees for the period claimed for. IPSA will also deduct the subscription fee from each subscribing MP's budget on IPSA Online.
28. Pooled services with direct payment arrangements are required to provide regular up to date information to IPSA. This information should include:
- The list of subscribing MPs
  - The total amount claimed for
  - Start month (of subscription) and number of months
  - Which budget each subscribed MP is paying from (office or staffing)
  - An invoice
29. A template spreadsheet to record this information is available.
30. This information can be provided to IPSA Finance Team by email ([financeteam@theipsa.org.uk](mailto:financeteam@theipsa.org.uk)).

31. Pooled services with direct payment arrangements are required to provide updated information and invoices to IPSA in a timely manner. It is at the discretion of pooled services to decide at what interval, for example annually or bi-annually, to report to IPSA. Billing cannot be carried out on a monthly basis.
32. Pooled services with direct payment arrangements should inform IPSA when an MP subscribes or unsubscribes from their service as soon as possible.

### Setting up a new pooled service

33. Any group of MPs can set up a new pooled staffing service. Pooled services may be affiliated to a political party, but this is not a requirement. Pooled services should not be associated with APPGs or aligned with any set of interests outside of Parliament. They should focus on providing research, briefing and drafting services to groups of MPs in support of their parliamentary functions. Lobbying activities must not form part of their work.
34. As set out in the above section, MPs can register research, briefing and drafting services to be paid for via a subscription fee paid directly to the service provider. They can also claim for these services by reimbursement. Those looking to establish a pooled service registered for direct payments should consider whether a sufficient number of MPs will subscribe to make the process worthwhile. IPSA reserves the discretion to decide whether a pooled service should be registered for direct payment or not.
35. IPSA does not specify what organisational form pooled services should take. Pooled services do not need to be legal entities and can, for example, take the form of an unincorporated association. It is equally possible for pooled services to have their own legal identity, for example as a limited company. A sole trader could also register as a pooled service provider.
36. MPs interested in establishing a new pooled service for direct payments should speak to IPSA before doing so and should contact [info@theipsa.org.uk](mailto:info@theipsa.org.uk) in the first instance.



37. The director or most senior staff member(s) of a pooled staffing service must sign the written agreement set out in **Annex 1** if the pooled service has a direct funding arrangement with IPSA.

# Annex 1: Written agreement between IPSA and pooled staffing services

The conditions set out in this agreement and in the related guidance must be followed by all IPSA funded pooled staffing services, which provide research, briefing and drafting services to MPs. All pooled services registered with IPSA on a direct payment basis must sign this agreement as a condition of funding. Failure to meet these conditions could lead to IPSA no longer being able to fund a service.

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Organisation: \_\_\_\_\_

Hereby agrees:

- To comply with IPSA's Guidance on Pooled Staffing Services.
- To comply with the Scheme in particular the Fundamental Principles (Part A) and General Conditions (Part B, Chapter 3) set out in IPSA's Scheme and in doing so to ensure that the written materials produced are parliamentary in nature, not party-political, not aimed at gaining a campaigning advantage and not for lobbying purposes.
- To make materials available for inspection by IPSA when requested, and at least once every parliament.
- To provide the necessary financial details and information about subscribers to IPSA's Finance Team in a timely manner.