

# Review of a determination by IPSA to refuse an expense claim

Mr Eric Joyce Former Member of Parliament for Falkirk

12 May 2015

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### Introduction

- On 26 January 2015, the Chief Executive of the Independent Parliamentary Standards Authority (IPSA) wrote to Eric Joyce MP to inform him of outstanding debts which then totalled £12,919.61<sup>1</sup>. The debts comprised £5,850.68 of staff travel and accommodation claims and £6,204.34 of ineligible claims made by the MP using his payment card, as well as other items which fall outside the scope of this review.
- 2. On 20 February 2015, Mr Joyce e-mailed the Compliance Officer disputing the decision by IPSA to disallow a proportion of his claims which he contends are reasonable and within the "letter and spirit" of the MPs' Scheme of Business Costs and Expenses ('the Scheme'). In consequence, he wished to make a 'complaint' against IPSA. On 3 March 2015, Mr Joyce again e-mailed the Compliance Officer laying out in more detail the disallowed claims he wished to dispute.

### Decision to Conduct the Review

- 3. The Compliance Officer has adjudged that the complaint made by Mr Joyce constitutes a request for a Review of IPSA's determinations in accordance with Section 6A of the Parliamentary Standards Act 2009 (as amended) ('the Act').
- 4. Section 6A of the Act stipulates that if:

(a) the IPSA determines under section  $6(3)^2$  that a claim is to be refused or that only part of the amount claimed is to be allowed, and

(b) the member (after asking the IPSA to reconsider the determination and giving it a reasonable opportunity to do so) asks the Compliance Officer to review the determination (or any altered determination resulting from the IPSA's reconsideration)

The Compliance Officer must -

(a) consider whether the determination (or the altered determination) is the determination that should have been made, and

(b) in light of the consideration, decide whether or not to confirm or alter it.

5. In the case of the disputed claims relating to staff travel and accommodation, these claims were initially paid by IPSA. They have since determined them to be outside the Scheme and therefore not allowable. With regard to the use of the payment card, IPSA is not

<sup>&</sup>lt;sup>1</sup> This is subject to continual reduction as the outstanding debt is offset against subsequent claims.

<sup>&</sup>lt;sup>2</sup> Section 6(3) states that when IPSA receives a claim they must decide whether to allow it or refuse it and if allowed, how much of the amount claimed should be paid.

afforded the opportunity to adjudicate on expenditure by an MP until after the payment has been made.

- 6. The Act specifically refers to refused claims, implying that the MP has not received the amounts claimed, which is not the case here. However, the Compliance Officer holds the view that the review process is still valid for the following reasons:
  - a. Had the claims for staff travel and accommodation been refused at the time they were claimed, Mr Joyce would have been able to avail himself of a review. He should not therefore be penalised if IPSA initially pay the claims and thereafter alter their determination; and
  - b. Payment methods other than reimbursement were not envisaged at the time the Act was drafted.
- 7. Paragraph 2.9 of the Fourth Edition of the Scheme reflects the Act and provides that an MP may request a review by the Compliance Officer of a determination by IPSA, providing the MP has allowed IPSA reasonable time to review their determination. The Compliance Officer is satisfied this requirement has been met.
- 8. Due to the distinct differences between the two categories of disputed claims this review is divided into two sections. The review conclusions are similarly subdivided.

### Staff Travel and Accommodation Claims

- 9. The Review will firstly address claims submitted by Mr Joyce for the period 12 April 2012 to 22 July 2013 for travel and accommodation by a member of his staff.
- 10. On 25 April 2012, in accordance with paragraph 6.9 and 6.10<sup>3</sup> of the Scheme, Mr Joyce registered a 'home office' for his Senior Parliamentary Assistant.
- 11. Mr Joyce states that the employee concerned moved home at his instigation from an address close to his constituency to one accessible from Westminster. Prior to him doing so, the MP spoke with IPSA to ensure that the employee would be eligible for travel expenditure from a 'home office' to Westminster.
- 12. Neither IPSA nor Mr Joyce are able to produce a record of this conversation.

<sup>&</sup>lt;sup>3</sup> Paragraph 6.9 states that if a staff member is to work from home routinely and the MP wishes to claim costs associated with that office, it must be registered with IPSA. Paragraph 6.10 states that the 'home office' registered does not need to be within the constituency or fewer than 20 miles outside.

- 13. Within the period under review, Mr Joyce submitted 22 staff accommodation claims for London hotels totalling £4,408.08 and 47 staff rail and underground claims for travel between the home of his Senior Parliamentary Assistant and London, totalling £1,442.60 (see Annex A).
- 14. In April 2013, IPSA published a document titled *Guidance for MPs' Business Costs and Expenses* described as *"a day-to-day guide for MPs and their staff on managing budgets and employing staff, what to claim and how to claim"*. On the subject of staff travel, the document states:

2.1.2 What you can claim – MPs' staff and family

MPs' Staff

- Up to 96 single journeys each year (to be shared among all staff members), between (1) the constituency office and/or a home office (registered under 6.10 of the Scheme) and Westminster; and (2), for staff members who routinely work from a home office (registered under 6.10 of the Scheme), the home office and the constituency office.
- 15. Mr Joyce contends that in (1) above, the guidance permits claims by a member of staff for travel between his/her home office and Westminster. He states that he contacted IPSA to ensure that his understanding was correct and received an affirmative response.
- 16. Once again, neither party can produce evidence of this conversation.
- 17. The Fourth Edition of the Scheme covers the period when the majority of claims were made and states the following:

Travel by members of MPs' staff

9.17 Each MP may claim for Travel and Subsistence Expenditure for his or her staff to make up to 96 single journeys each year between the MP's constituency office and Westminster. This limit is the total for all staff employed by the MP, not per staff member.

- 9.18 MPs may also claim for Travel and Subsistence Expenditure in respect of the following journeys made by members of their staff:
  - a. Travel within the constituency or within 20 miles of the constituency boundary; and
  - b. Travel elsewhere within the UK for the purposes of relevant training.
- 18. The Fifth Edition of the Scheme, which came into effect in April 2013 was amended to read as follows:

Travel by members of MPs' Staff

9.19 Each MP may claim for Travel and Subsistence Expenditure for his or her staff to make up to 96 single journeys each year between (1) the MP's constituency office and/or home office registered under 6.10, and Westminster; and (2) for staff members who routinely work from a home office registered under 6.10, the home office and the MP's constituency office. This limit is the total for all staff employed by the MP, not per staff member.

19. The Fifth Edition of the Scheme and the guidance published by IPSA at the same time differ slightly, as follows:

...between (1) the constituency office and/or a home office (guidance)<sup>4</sup>; and ...between (1) the **MP's** constituency office and/or home office (the Scheme).

- 20. In an e-mail to Mr Joyce of 12 December 2013, IPSA's Audit and Assurance Team wrote: *"I appreciate that the wording of the guidance on our website differs slightly from the rule printed in the Scheme and renders the meaning unclear".*
- 21. On 19 November 2013, IPSA wrote to Mr Joyce questioning the validity of both the hotel and travel claims. They expressed the view that the Scheme did not permit *"travel between a staff member's home or home office and Westminster"* or *"a daily commute"*. Also, that paragraph 9.36 of the Scheme permitted claims for hotel accommodation only *"where the staff member has necessarily travelled in assisting the MP in his or her Parliamentary functions"* and that *"such claims may be made only when it would be unreasonable to return to any residence"*.
- 22. On 12 December 2013, Mr Joyce was informed definitively that the claims for staff travel and staff hotels were outside the Scheme and he submitted no further claims.
- 23. In relation to staff hotel accommodation claims, the Fourth and Fifth Editions of the Scheme state:

Subsistence expenditure for staff

9.34 Members may claim for the cost of an overnight hotel for a member of their staff, where the staff member has necessarily travelled in assisting the MP in his or her parliamentary functions, or is undertaking relevant training. Such claims may be made only when it would be unreasonable to return to any residence.

<sup>&</sup>lt;sup>4</sup> Mr Joyce believes this version of the guidance was published in October 2012, it was not. The guidance document published in October 2012 reflects the content of the Fourth Edition of the Scheme.

- 24. During a meeting between Mr Joyce and the Compliance Officer on 24 March 2015, Mr Joyce allowed that his Senior Parliamentary Assistant was a Westminster employee and not a constituency employee. The member of staff concerned has been paid a salary within the London area pay range throughout the period covered by this review.
- 25. During the same meeting the MP candidly admitted that his Senior Parliamentary Assistant had been required to work late on some of the dates where a hotel claim was submitted to attend events in Westminster where alcohol was available, as the MP was not permitted to attend such events.

### The Role of IPSA

- 26. When conducting a review of a determination made by IPSA, Section 6A(3) of the Parliamentary Standards Act 2009 permits the inclusion of "a statement of the Compliance Officer's findings about the way in which the IPSA has dealt with the claim".
- 27. Staff travel and hotel claims were submitted by Mr Joyce on behalf of his Senior Parliamentary Assistant over a period of 16 months between April 2012 and July 2013. The Compliance Officer has seen evidence supplied by IPSA of claim validators periodically requesting further evidence and/or clarification regarding individual claims. However at no point over a period of 16 months was the overall eligibility of the claims questioned. It was not until December 2013 that, following an exchange of correspondence with the MP, IPSA's Assurance Team informed Mr Joyce that the claims were not allowable.
- 28. Had the claims been correctly validated in line with the Scheme at the time of submission, the MP would not have been paid £5,850.60 worth of claims that subsequently required repayment.
- 29. When IPSA's Assurance Team wrote to Mr Joyce on 12 December 2013 to inform him that claims for staff travel and hotels were not allowable, they failed to inform him that the £5,850.60 claimed would need to be repaid. In alluding to the subject, Mr Joyce was informed that *"in line with our normal procedures we have passed the information concerning previous ineligible claims to our Credit Management Team"*. Mr Joyce was not told of the requirement to repay until he received correspondence from IPSA on 16 October 2014.
- 30. The discrepancy between the guidance on staff travel published by IPSA in April 2013 and the Fifth Edition of the Scheme has led to confusion and has contributed to the continued submission of claims subsequently declared to be outside the Scheme.

31. The online expense system used by MPs to submit expense claims requires the MP to specify a category into which their claim falls. The system provides the option to choose 'staff home office to London' which, in the circumstances, is misleading.

#### Conclusions

32. The Fourth Edition of the Scheme covers the period from April 2012 (when the claims for staff travel began) to March 2013 and it is silent on the subject of staff travel from the home or home office of a member of staff to Westminster. It is however explicit on other types of staff travel that are allowable.

## 33. The Compliance Officer must therefore infer that staff travel between their home or home office and Westminster was not allowable between April 2012 and March 2013.

34. The Fifth Edition of the Scheme which covers the period from April 2013 to March 2014 is more descriptive and more specific regarding staff travel (see 18 above). It allows them to travel between (1) an MP's home office and Westminster; and (2) the home office of a member of staff and the constituency office.

## 35. It is clear therefore that from April 2013 onwards, staff travel between a home office and Westminster is not allowable.

- 36. It is regrettable that IPSA saw fit to publish guidance to MPs that did not accord fully with the Fifth Edition of the Scheme and which, on their own admission was, as a result, *unclear*. However, when conducting the Review I am bound to rely on the Scheme, as opposed to guidance, when making my decision.
- 37. The MP has acknowledged that his Senior Parliamentary Assistant was a Westminster employee as opposed to a constituency employee. This is supported by his remuneration which was consistently within the scale for parliamentary staff.
- 38. Mr Joyce has also acknowledged that, on occasions, his Senior Parliamentary Assistant attended evening functions instead of the MP due to restrictions placed upon his attendance.
- 39. When, at the request of Mr Joyce, his Senior Parliamentary Assistant relocated from the constituency to Westminster he was at liberty to choose the location he would domicile himself and his family.

- 40. The location chosen is popular with commuters to London who make the trip daily, at their expense, and without the opportunity to claim for a hotel from the public purse when work becomes demanding.
- 41. The Compliance Officer accepts fully that on each occasion that a hotel claim was made, the Senior Parliamentary Assistant was working late and was *assisting the MP in his parliamentary function*; nevertheless, he has seen nothing that would suggest it *would be unreasonable to return* to his residence.

## 42. The Compliance Officer therefore concludes that the hotel claims subject of this review, totalling £4,408.08, are not allowable under the Fourth and Fifth Editions of the Scheme.

- 43. While the stance now being taken by IPSA on the staff travel and accommodation claims submitted by Mr Joyce is correct, their previous actions render them complicit for the following reasons:
  - a. Despite questioning individual claims, the underlying validity of the claims was not challenged over a period of 16 months;
  - b. In December 2013, when the MP was finally told by IPSA that the claims were not allowable, he was not informed that repayment would be required;
  - c. IPSA did not inform the MP that repayment would be required until October 2014, almost a year after he was first informed that the claims were not allowable; and
  - d. IPSA published guidance on staff travel which was *unclear* and open to misinterpretation.
- 44. In light of these factors, and particularly the resultant delay caused in pursuing the debt, the Compliance Officer would invite IPSA to consider the proportionality and appropriateness of their current actions. In particular, he would ask IPSA to consider whether they should continue in their attempt to recover the £1,442.60 paid for staff travel.

### **Payment Card Claims**

45. The Scheme states that *"IPSA will on request provide MPs with a payment card"*. Following such a request, Mr Joyce was first issued with an IPSA payment card in 2010. The first payment made with the card by the MP during the period covered by this review, and which IPSA rejected as being outside the Scheme, occurred on 14 June 2012. At the time of drafting this review Mr Joyce has subsequently used the card on a total of 60 occasions to make payments which IPSA regard as outside the Scheme (see Annex B). The last payment made on the card, and refused by IPSA, was made on 19 September 2014.

- 46. Payment cards are covered by Annex C of the Scheme and the Fourth, Fifth and Sixth Editions are relevant for the purposes of this review. The Scheme provides a list of expense categories the card can be used for; this includes travel, hotels and constituency office telephone bills<sup>5</sup>. The disputed types of expenditure made by Mr Joyce using the card are travel, hotels and mobile telephone bills.
- 47. In the majority of cases where IPSA has requested repayment following use of the payment card outside the Scheme, Mr Joyce does not contest the decision. The primary reasons given by IPSA for seeking repayment are:
  - a. the cost of a hotel claim was above the limit allowed by the Scheme (£150 per night in London and £120 per night elsewhere);
  - b. the inclusion of ineligible items on a hotel bill;
  - c. insufficient evidence provided in support of a payment;
  - d. where information has been redacted from a receipt submitted in support of a payment; and
  - e. charges levied by hotels when the MP has failed to keep the booking.
- 48. Prior to receiving the payment card, Mr Joyce signed a declaration which included the following paragraph:

"I further undertake to complete the on-line monthly form listing the journeys charged, within 14 days of receipt of the email advising of its availability and send the corresponding receipts to IPSA within 21 days of receiving the email thereby confirming proper use of the Travel Card. I understand that if I do not comply with these requirements IPSA may at its discretion cancel my card."

- 49. When claims have been made by an MP on a payment card, IPSA will send the MP a *reconciliation form* at the end of the month which contains details of all the transactions made using the payment card during the period. The MP is required to return the form within 30 days with an explanation for each transaction and supporting evidence. If the payments are not reconciled with supporting documentation within this timeframe, they become a debt.
- 50. Mr Joyce has had the use of his card restricted on a number of occasions for not meeting the deadline.
- 51. On 10 February 2014, IPSA's Credit Management Team wrote to Mr Joyce and informed him that he had £3,862.98 of outstanding debt on his payment card and sought to discuss

<sup>&</sup>lt;sup>5</sup> In September 2014 the use of the payment card was extended to include all expense types.

a method of repayment. A meeting subsequently took place with the MP during which he contested a proportion of the debt.

- 52. On 29 April 2014, Mr Joyce e-mailed IPSA disputing the size of the debt and laying out his arguments. The total figure for his outstanding debt he believed was £1,949.72.
- 53. On 28 May 2014, IPSA's Credit Management Team again wrote to Mr Joyce informing him that he had £2,008.96 of outstanding debt on his payment card and requested repayment.
- 54. On 4 June 2014 they e-mailed the MP to say that they had *"reviewed the outstanding claims and found an error in the system which incorrectly reported some 2011/12 claims as outstanding when they have been paid or resolved"*. Mr Joyce was advised that his outstanding debt was £367.95, an amount he subsequently paid.
- 55. On 16 October 2014, IPSA's Head of Operations wrote to Mr Joyce to inform him that he had £4,410.35 of outstanding debt on his payment card.
- 56. Mr Joyce has disputed a number of mobile telephone bills which IPSA has rejected as they were not accompanied by supporting evidence. Annex C of both the Fourth and Fifth Editions of the Scheme provides guidance to MPs as to what the payment card can be utilised for. Mobile telephone bills are not included.
- 57. The case put forward by Mr Joyce for there being insufficient evidence provided in support of two of his mobile telephone claims is that the company with whom he had his contract was taken over; the new contract provider being unable to facilitate his request. The MP's proxy believes that an opportunity existed to print the relevant information but was missed. The decision by IPSA to reject the claims was correct.
- 58. During the course of the review Mr Joyce's proxy provided additional evidence in support of two further telephone bills. As a result and despite the evidence having been submitted outside of the timeframe stipulated by the Scheme, IPSA has agreed to allow the claims for £722.36.
- 59. Mr Joyce does not claim for rented accommodation in either his constituency or in London and instead uses hotels. He contends that, as a result, his accommodation claims are substantially less than most MPs. By booking early the MP obtains a preferential rate but can incur a fee if unexpected circumstances mean that he does not use the room. IPSA will not pay these fees.

- 60. Mr Joyce contends that he makes every effort to cancel hotels where possible and that the rate he obtains by booking early more than offsets the costs of the occasional 'no show' fee. He believes that IPSA should honour these claims.
- 61. Mr Joyce refers to a claim for hotel accommodation that exceeded the maximum nightly rate prescribed by the Scheme (£150 per night in London and £120 per night elsewhere) but states that it was booked through the House of Commons Travel Office and was at the best rate they could achieve<sup>6</sup>. The Scheme is clear and unequivocal on the nightly limit and provides no caveats. If the MP wished to recover the excess cost, the only route would have been via an application for contingency funding under Chapter Ten, Section D of the Scheme.
- 62. The Compliance Officer can find no evidence that such an application was made and therefore payment of the additional cost was rightly rejected.
- 63. Mr Joyce disputed a claim of £896.92 for hotel accommodation in December 2012 which IPSA rejected as it contained ineligible items and was partially redacted. Paragraph 1.4 of the Scheme states that "a claim will not be paid if any part of the claim or the evidence supporting the claim is redacted prior to its submission to IPSA". The MP argued that while a proportion of the claim was correctly rejected, £450, representing three nights' accommodation should have been allowed. IPSA has since allowed the disputed part of the claim.

### The Role of IPSA

- 64. During 2014, IPSA contacted Mr Joyce on a number of occasions to inform him of outstanding debt on his payment card. Following the email of 4 June 2014, in which Mr Joyce was informed his debts totalled just £367.95, he repaid this amount in full. At this stage he could have presumed nothing further was outstanding. In October 2014, he was contacted again to inform him that debts of £4,410.35 were still outstanding.
- 65. Annex C of the Fourth Edition of the Scheme states that an MP's payment card may be *"suspended if it is persistently or seriously used outside the Scheme".*
- 66. IPSA has provided Mr Joyce with payment cards since 2010 and his misuse of the cards has been fairly consistent throughout the time he has held them. IPSA has briefly suspended his card on several occasions when the MP has failed to provide information and supporting receipts at the end of a payment period.

<sup>&</sup>lt;sup>6</sup> Claim number 303099.

- 67. When validating each claim, IPSA applies a number of criteria (see paragraph 47) in making a judgement about the eligibility of the claim. They do not however have a written policy to provide guidance to their validators and to ensure consistency in claims handling.
- 68. When Mr Joyce was supplied with a payment card he signed a declaration acknowledging IPSA's authority to suspend the card at their discretion.
- 69. IPSA has no clear policy on whether claims made by MPs who fail to keep a booking with a hotel and are subsequently charged a fee by the hotel should be paid or rejected. Each case is dealt with on its merits. This allows scope for subjective decision making.
- 70. The information provided to Mr Joyce regarding the size of his payment card debt has been contradictory and misleading. There has been no continuity in how his case was handled and no consistency of approach. The time taken to arrive at a definitive figure for his payment card debt is unsatisfactory.
- 71. IPSA first provided Mr Joyce with a payment card in 2010. Had they taken decisive action when it became apparent that there was persistent misuse of the payment card the acrued debt would have been a fraction of the figure it has become.

#### Conclusions

- 72. Due to Mr Joyce's unique knowledge of his payment card use combined with previous dialogue with IPSA, the Compliance Officer strongly suspects that Mr Joyce did not believe that his payment of £367.95 was sufficient to reconcile his total payment card debt<sup>7</sup>. Nevertheless, during 2014, the MP could be forgiven for losing faith in the ability of IPSA to provide him with an accurate and definitive figure for his outstanding debt.
- 73. Enquiries with IPSA reveal that they do not have either a written policy or written guidance for staff on the subject of hotel 'no shows'. In dialogue with a member of IPSA management, the Compliance Officer was informed that they were normally allowed if they appeared "genuine and unavoidable".
- 74. Mr Joyce is correct that his accommodation expenditure is considerably lower than most MPs. In addition, in the period of approximately two and a half years covered by the review I have found only four claims made by Mr Joyce in this category.

<sup>&</sup>lt;sup>7</sup> Mr Joyce contends that he believed the debt he had accrued in previous years had been 'written-off' by IPSA and that £367.95 was the figure that remained.

- 75. The Compliance Officer believes Mr Joyce has established that the fees acrued for hotel 'no shows' are *genuine and unavoidable*. Therefore, without a written policy to guide them and in light of the representations made by the MP, he concludes that the claims which total £575 should be allowed <sup>8</sup>.
- 76. The Compliance Officer has seen no further evidence from any source to contradict the decisions made by IPSA regarding payment card claims. He has given Mr Joyce ample opportunity to provide evidence that would assist in a review of a larger number of claims; this has not been forthcoming.
- 77. Other than those claims referred to at paragraphs 58, 63 and 75 above<sup>9</sup>, and without further supporting evidence from Mr Joyce, the Compliance Officer concludes that the remainder of the existing payment card debt, totalling £4,606.98, is correct.

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<sup>&</sup>lt;sup>8</sup> The claims referred to are 196486, 209751, 280929 and 274678. Claim 280929 is for £179 and therefore £29 is not allowable.

<sup>&</sup>lt;sup>9</sup> The claims referred to are for £722.36, £450 and £425 respectively.

### Annex A: Staff hotel and travel claims

| Form   | Date       | Expense Type                         | Amount   | Summary reason                    |
|--------|------------|--------------------------------------|----------|-----------------------------------|
| 174557 | 02/05/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 174557 | 10/05/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 174557 | 27/04/2012 | Public Train underground<br>MP Staff | £ 24.20  | Not an allowable staff<br>journey |
| 174557 | 12/04/2012 | Public RAIL MP Staff - RTN           | £ 40.80  | Not an allowable staff<br>journey |
| 176543 | 15/05/2012 | Public RAIL MP Staff - SGL           | £ 11.40  | Not an allowable staff<br>journey |
| 180222 | 23/05/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 180222 | 22/05/2012 | Public RAIL MP Staff - RTN           | £ 30.90  | Not an allowable staff journey    |
| 180222 | 24/05/2012 | Public RAIL MP Staff - RTN           | £ 21.70  | Not an allowable staff<br>journey |
| 193374 | 17/07/2012 | Public RAIL MP Staff - RTN           | £ 30.90  | Not an allowable staff journey    |
| 211020 | 30/07/2012 | Public RAIL MP Staff - RTN           | £ 46.70  | Not an allowable staff journey    |
| 211601 | 25/09/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 219865 | 24/10/2012 | Hotel London Area MP Staff           | £ 300.00 | Not an allowable staff hotel      |
| 219865 | 09/10/2012 | Public RAIL MP Staff - RTN           | £ 30.90  | Not an allowable staff journey    |
| 219865 | 07/09/2012 | Public RAIL MP Staff - SGL           | £ 24.20  | Not an allowable staff<br>journey |
| 219865 | 03/08/2012 | Public RAIL MP Staff - SGL           | £ 25.10  | Not an allowable staff journey    |
| 219865 | 17/10/2012 | Public RAIL MP Staff - SGL           | £ 15.40  | Not an allowable staff<br>journey |
| 219865 | 20/07/2012 | Public RAIL MP Staff - RTN           | £ 31.00  | Not an allowable staff journey    |
| 219865 | 20/07/2012 | Public RAIL MP Staff - RTN           | £ 30.00  | Not an allowable staff<br>journey |
| 221330 | 06/11/2012 | Hotel London Area MP Staff           | £ 300.00 | Not an allowable staff hotel      |
| 221330 | 06/11/2012 | Hotel London Area MP Staff           | £ 20.00  | Not an allowable staff meal       |
| 223517 | 20/11/2012 | Hotel London Area MP Staff           | £ 300.00 | Not an allowable staff hotel      |
| 223517 | 20/11/2012 | Hotel London Area MP Staff           | £ 16.08  | Not an allowable staff meal       |
| 230865 | 01/12/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 230865 | 04/12/2012 | Hotel London Area MP Staff           | £ 150.00 | Not an allowable staff hotel      |
| 230865 | 12/12/2012 | Hotel London Area MP Staff           | £ 450.00 | Not an allowable staff hotel      |
| 236953 | 18/01/2013 | Hotel London Area MP Staff           | £ 300.00 | Not an allowable staff hotel      |
| 243400 | 06/02/2013 | Hotel London Area MP Staff           | £ 147.00 | Not an allowable staff hotel      |
| 243400 | 06/02/2013 | Public RAIL MP Staff - RTN           | £ 31.10  | Not an allowable staff<br>journey |

| 245182 | 22/02/2013   | Hotel London Area MP Staff   | £ 300.00 | Not an allowable staff hotel      |
|--------|--------------|------------------------------|----------|-----------------------------------|
| 245182 | 13/02/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
| LADIOL | 13/02/2013   |                              | 1 32.00  | journey                           |
| 251113 | 27/02/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        | _,, _, _, _, |                              | _ 000    | journey                           |
| 251113 | 05/03/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 264234 | 26/04/2013   | Hotel London Area MP Staff   | £ 150.00 | Not an allowable staff hotel      |
| 264234 | 12/03/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 264234 | 20/03/2013   | Public RAIL MP Staff - RTN   | £ 27.90  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 264234 | 21/03/2013   | Public RAIL MP Staff - RTN   | £ 33.40  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 264234 | 01/04/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 275278 | 15/05/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 275278 | 07/05/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 275278 | 14/05/2013   | Public RAIL MP Staff - SGL   | £ 25.20  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 275278 | 24/04/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        | 22/05/2012   |                              |          | journey                           |
| 275278 | 23/05/2013   | Public RAIL MP Staff - RTN   | £ 56.50  | Not an allowable staff<br>journey |
| 282177 | 05/06/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
| 2021// | 05/00/2015   | PUBLIC RAIL IVIP Stall - KIN | L 52.00  | journey                           |
| 282177 | 12/06/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
| 2021// | 12/00/2013   |                              | L 52.00  | journey                           |
| 282177 | 19/06/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        | ,,           |                              |          | journey                           |
| 282177 | 24/06/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 282177 | 26/06/2012   | Public RAIL MP Staff - SGL   | £ 24.10  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 282177 | 24/06/2013   | Hotel London Area MP Staff   | £ 150.00 | Not an allowable staff hotel      |
| 285236 | 10/07/2013   | Public RAIL MP Staff - RTN   | £ 27.90  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 285236 | 11/07/2013   | Public RAIL MP Staff - RTN   | £ 32.80  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 285236 | 17/07/2013   | Public RAIL MP Staff - RTN   | £ 27.90  | Not an allowable staff            |
|        |              |                              |          | journey                           |
| 285925 | 16/07/2013   | Public RAIL MP Staff - RTN   | £ 27.90  | Not an allowable staff            |
|        |              |                              |          | journey                           |
|        |              |                              |          |                                   |

| 285925 | 23/07/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
|--------|------------|----------------------------|----------|-----------------------------------|
| 298044 | 16/07/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
| 298044 | 06/08/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff<br>journey |
| 298044 | 09/09/2013 | Public RAIL MP Staff - RTN | £ 32.80  | Not an allowable staff journey    |
| 298044 | 09/09/2013 | Hotel London Area MP Staff | £ 150.00 | Not an allowable staff hotel      |
| 298050 | 12/09/2013 | Hotel London Area MP Staff | £ 300.00 | Not an allowable staff hotel      |
| 300798 | 13/09/2013 | Public RAIL MP Staff - RTN | £ 49.50  | Not an allowable staff journey    |
| 300798 | 19/09/2013 | Public RAIL MP Staff - RTN | £ 32.80  | Not an allowable staff<br>journey |
| 300798 | 19/09/2013 | Hotel London Area MP Staff | £ 150.00 | Not an allowable staff hotel      |
| 305131 | 25/09/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
| 305131 | 02/10/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
| 305131 | 09/10/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
| 311603 | 14/10/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff journey    |
| 311603 | 23/10/2013 | Public RAIL MP Staff - RTN | £ 32.80  | Not an allowable staff<br>journey |
| 311603 | 29/10/2013 | Public RAIL MP Staff - RTN | £ 27.90  | Not an allowable staff<br>journey |
| 280929 | 30/05/2013 | Hotel London Area MP Staff | £ 350.00 | Not an allowable staff hotel      |
| 288761 | 22/07/2013 | Hotel London Area MP Staff | £ 125.00 | Not an allowable staff hotel      |

Total: £5,850.68

### Annex B: Ineligible use of payment card by MP

| Form   | Date       | Expense Type                                | Amount   | Reason for Debt   |
|--------|------------|---|----------|---|
| 188911 | 14/06/2012 | Hotel London Area                           | £ 17.80  | Hotel exceeded nightly limit and  |
|        |            |   |          | invoice includes ineligible items.  |
| 188911 | 20/06/2012 | Hotel London Area                           | £ 18.70  | Hotel exceeded nightly limit and  |
|        |            |   |          | invoice includes ineligible items.  |
| 196486 | 25/06/2012 | Parking                                     | £ 3.00   | MP unable to provide evidence.  |
| 196486 | 28/06/2012 | Hotel London Area                           | £ 150.00 | Hotel 'no show'.  |
| 196486 | 13/07/2012 | Hotel London Area                           | £ 60.76  | Hotel exceeded nightly limit and<br>invoice includes ineligible items.<br>Amount deducted is incorrect and<br>should be £60.76  |
| 196486 | 20/07/2012 | Hotel London Area                           | £ 180.21 | Hotel exceeded nightly limit and<br>invoice includes ineligible items.<br>Amount deducted is incorrect and<br>should be £180.21 |
| 209751 | 30/08/2012 | Hotel London Area                           | £ 24.42  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 209751 | 06/09/2012 | Hotel London Area                           | £ 43.84  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 209751 | 10/09/2012 | Constituency<br>Office Tel.<br>Usage/Rental | £ 265.48 | Insufficient evidence provided. Mobile phone bills are not permitted on payment card.   |
| 209751 | 12/09/2012 | Hotel London Area                           | £ 150.00 | Hotel 'no show'.  |
| 209751 | 19/09/2012 | Constituency<br>Office Tel.<br>Usage/Rental | £ 456.68 | Insufficient evidence provided. Mobile phone bills are not permitted on payment card.   |
| 219577 | 18/10/2012 | Hotel London Area                           | £ 46.72  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 235499 | 13/12/2012 | Hotel London Area                           | £ 446.92 | Invoice has been redacted and invoice includes ineligible items. £450 would otherwise be payable.                               |
| 240595 | 10/01/2013 | Hotel London Area                           | £ 97.91  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 248317 | 31/01/2013 | Hotel London Area                           | £ 133.75 | Hotel exceeded nightly limit and invoice includes ineligible items and hotel 'no show'.   |
| 248317 | 14/02/2013 | Hotel London Area                           | £ 28.65  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 248317 | 15/02/2013 | Hotel London Area                           | £ 84.75  | Hotel exceeded nightly limit and<br>invoice includes ineligible items.<br>Amount deducted is incorrect and<br>should be £84.75  |
| 255704 | 28/02/2013 | Hotel London Area                           | £ 70.75  | Hotel exceeded nightly limit and invoice includes ineligible items.   |
| 255704 | 07/03/2013 | Hotel London Area                           | £ 7.15   | Hotel exceeded nightly limit and invoice includes ineligible items.   |

| 255704 | 14/03/2013 | Hotel London Area | £ 4.20   | Hotel exceeded nightly limit and<br>invoice includes ineligible items. |
|--------|------------|-------------------|----------|--|
| 268660 | 18/04/2013 | Hotel London Area | £ 28.61  | Hotel exceeded nightly limit and                                       |
|        |            |                   |          | invoice includes ineligible items.                                     |
| 274678 | 16/05/2013 | Hotel London Area | £ 125.00 | 'No show' fee  |
| 280929 | 28/05/2013 | Public Train UND  | £ 70.00  | MP unable to provide evidence.   |
|        |            |                   |          | ·  |
| 280929 | 29/05/2013 | Public Train UND  | £ 60.00  | MP unable to provide evidence.   |
| 280929 | 30/05/2013 | Hotel London Area | £ 203.05 | Hotel exceeded nightly limit and                                       |
| 200525 | 30,03,2013 |                   | 1 203.03 | invoice includes ineligible items.                                     |
| 280929 | 06/06/2013 | Hotel London Area | £ 61.45  | Hotel exceeded nightly limit and                                       |
|        | ,,         |                   |          | invoice includes ineligible items.                                     |
| 280929 | 08/06/2013 | Constituency      | £ 200.00 | Insufficient evidence provided. Mobile                                 |
|        |            | Office Tel.       |          | phone bills are not permitted on                                       |
|        |            | Usage/Rental      |          | payment card.  |
| 280929 | 11/06/2013 | Public Train UND  | £ 30.00  | MP unable to provide evidence.   |
| 280929 | 20/06/2013 | Hotel London Area | £ 179.00 | Hotel 'no show'.   |
| 280929 | 20/06/2013 | Hotel London Area | £ 12.00  | Hotel exceeded nightly limit and                                       |
|        | -,,        |                   |          | invoice includes ineligible items.                                     |
| 280929 | 20/06/2013 | Hotel London Area | £ 28.80  | Hotel exceeded nightly limit and                                       |
|        |            |                   |          | invoice includes ineligible items.                                     |
| 293411 | 25/07/2013 | Constituency      | £ 200.00 | Insufficient evidence provided. Mobile                                 |
|        |            | Office Tel.       |          | phone bills are not permitted on                                       |
|        |            | Usage/Rental      |          | payment card.  |
| 293411 | 14/08/2013 | Hotel NOT London  | £ 98.50  | Hotel exceeded nightly limit and                                       |
|        |            | Area              |          | invoice includes ineligible items.                                     |
|        |            |                   |          | Amount deducted is incorrect and                                       |
|        |            |                   |          | should be £98.50   |
| 303099 | 12/09/2013 | Hotel London Area | £ 199.00 | Hotel exceeded nightly limit and                                       |
|        |            |                   |          | invoice includes ineligible items.                                     |
| 303099 | 12/09/2013 | Hotel NOT London  | £ 16.50  | Hotel exceeded nightly limit and                                       |
|        |            | Area              |          | invoice includes ineligible items.                                     |
| 316759 | 02/11/2013 | Hotel NOT London  | £ 65.00  | Hotel exceeded nightly limit.  |
|        |            | Area              |          |  |
| 333640 | 21/01/2014 | Public RAIL – RTN | £ 18.20  | Not Claimed.   |
| 352346 | 27/02/2014 | Hotel London Area | £ 73.07  | Hotel invoice includes ineligible items.                               |
| 352346 | 27/02/2014 | Hotel London Area | £ 3.60   | Hotel exceeded nightly limit and                                       |
|        |            |                   |          | invoice includes ineligible items.                                     |
| 352346 | 05/03/2014 | Hotel NOT London  | £ 20.00  | Hotel exceeded nightly limit and                                       |
| 252246 | 12/02/2014 | Area              | c 72.00  | invoice includes ineligible items.                                     |
| 352346 | 13/03/2014 | Hotel London Area | £ 72.00  | Hotel exceeded nightly limit and                                       |
| 252246 | 12/02/2014 | Hatal Landon Araa | C 80 C0  | invoice includes ineligible items.                                     |
| 352346 | 13/03/2014 | Hotel London Area | £ 89.69  | Hotel exceeded nightly limit and<br>invoice includes ineligible items. |
| 352346 | 19/03/2014 | Hotel NOT London  | £ 19.50  | Hotel exceeded nightly limit and                                       |
| 552540 | 19/03/2014 | Area              | L 19.30  | invoice includes ineligible items.                                     |
| 352346 | 21/03/2014 | Hotel NOT London  | £ 270.00 | Hotel exceeded nightly limit and                                       |
| 332370 | 21,03,2014 | Area              | L 270.00 | invoice includes ineligible items.                                     |
| 362398 | 01/05/2014 | Hotel NOT London  | £ 18.00  | Hotel exceeded nightly limit.  |
| 302350 | 51,05,2014 | Area              | 10.00    | Hoter exceeded fightly liftle.   |
|        |            | 7.1.04            |          |  |

| 362398 | 08/05/2014 | Hotel NOT London<br>Area                    | £ 18.00  | Hotel exceeded nightly limit                                  |
|--------|------------|---|----------|---|
| 362398 | 25/04/2014 | Public Train RAIL -<br>SGL                  | £ 2.20   | Extended travel not permitted by Scheme.                      |
| 362398 | 25/04/2014 | Public RAIL - SGL                           | £ 10.00  | Extended travel not permitted by Scheme.                      |
| 370796 | 23/05/2014 | Hotel NOT London<br>Area                    | £ 169.00 | Hotel exceeded nightly limit.                                 |
| 370796 | 18/06/2014 | Hotel NOT London<br>Area                    | £ 186.00 | Hotel exceeded nightly limit.                                 |
| 370796 | 27/05/2014 | Hotel NOT London<br>Area                    | £ 24.00  | Hotel invoice includes ineligible items.                      |
| 373719 | 25/06/2014 | Constituency<br>Office Tel.<br>Usage/Rental | £ 13.50  | Late-payment fee.   |
| 380646 | 07/08/2014 | Hotel NOT London<br>Area                    | £ 272.33 | Hotel invoice includes ineligible items.                      |
| 384203 | 02/04/2014 | Hotel NOT London<br>Area                    | £ 2.00   | Hotel exceeded nightly limit.                                 |
| 384203 | 04/04/2014 | Hotel NOT London<br>Area (Travel)           | £ 40.15  | Hotel invoice includes ineligible items.                      |
| 385868 | 06/09/2014 | Hotel NOT London<br>Area                    | £ 36.00  | Hotel exceeded nightly limit and included a cancellation fee. |
| 385868 | 11/09/2014 | Hotel NOT London<br>Area                    | £ 208.00 | Hotel exceeded nightly limit.                                 |
| 385868 | 19/09/2014 | Hotel NOT London<br>Area                    | £ 383.00 | Hotel exceeded nightly limit.                                 |
| 392378 | 25/09/2014 | Hotel NOT London<br>Area                    | £ 69.00  | Hotel exceeded nightly limit.                                 |
| 392378 | 02/10/2014 | Hotel NOT London<br>Area                    | £ 102.50 | Hotel exceeded nightly limit.                                 |
| 392378 | 03/10/2014 | Hotel NOT London<br>Area                    | £ 68.00  | Hotel exceeded nightly limit.                                 |
| 392378 | 15/10/2014 | Hotel NOT London<br>Area                    | £ 28.00  | Hotel exceeded nightly limit.                                 |
| 385868 | 06/09/2014 | Hotel NOT London<br>Area                    | £ 120.00 | Cancellation fee  |

Total: £6,204.34