



HOUSE OF COMMONS  
LONDON SW1A 0AA

**Strictly Private & Confidential**

Peter Davis,  
Compliance Officer for IPSA,  
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30, Millbank,  
London  
SW1P 4DU

Your ref: C1415-011  
Our Ref.: BB/NB/3604  
22<sup>nd</sup> January, 2015

*Dear Mr. Davis,*

**Re: Mileage Claims**

Further to your letter of 16<sup>th</sup> December 2014, I have the following comments:-

1. I note the various comments on the chronology of events.
  - a) Following our meeting in January 2013, I took the following actions as agreed:
    - Checked regular routes to ensure the accuracy of claims of mileage. These were all captured and used to claim for regular routes travelled. No requirement was stated by you either at our meeting or in writing to capture the mileage on every journey from the car's trip computer. Given that the journeys that I make are, in general, regular or slight variants of a common route, this appeared to be a reasonable way of capturing the journeys.
    - Ensured that I have captured every journey in my diary on basis of venue, ward or appropriate diary entry.
    - Captured the distance and destination visited in monthly spreadsheets which I ensured were updated at least every week on my office computer in Westminster. Given that most travel claims incurred mileage on a Friday to Sunday & would typically cover 6 journeys, this means that the mileage is accurately captured. You have suggested that I claimed that I began the spreadsheets after our meeting. I made no such claim. I did point out that I had captured the details on the spreadsheets and supplied them to you covering the period of your investigation at our meeting in October 2014. Initially you claimed that I had not given them to you. This clearly caused you consternation and led to your requesting to view the electronic copies. I provided the necessary access which demonstrates that I have maintained these spreadsheets on a regular monthly basis as I have stated.
    - Used the weekly updated spreadsheets to inform the monthly claim submitted to IPSA.
  - b) As part of my response to your requests for information, I supplied:
    - Copy of my monthly spreadsheets recording the journeys, dates & mileage claimed on Parliamentary business. These monthly spreadsheets are updated on at least a weekly basis. This is normally undertaken on a Monday, when I have access to my Westminster computer, after the weekend's activities. Most of the mileage that I incur happens on a Friday to Sunday so this is the most opportune time to update these records.
    - Copy of my Outlook diary which records my Westminster activity and some constituency events as booked by my Westminster PA. I stress that this only captures events that are booked via my Westminster PA and I routinely have last minute requests to attend community events or other such activities which go unrecorded on my Outlook diary. I reiterate that my Outlook diary is a tool for planning my activity and for the use of my



office. It is not intended to be a complete record of my activities and my office has never claimed it as such.

- Copy of my paper diaries which has a record of all events and activities in my constituency. This has planned events and the all the events that I participate in. There is a record of every journey that I undertake on Parliamentary business. You have asserted that that there a journeys that I have claimed where there are no records of activities. This is not correct. There is a record of every journey although, I accept that in many cases, the exact address is not shown. However, the ward that I have visited is quite clearly shown.
- Copy of my constituency surgery book. I note that you chose not to look at this even though it was offered. This has a record of every constituency surgery and the names and addresses of all those people I have seen at a constituency surgery session.
- Copy of my street surgery book. This details the dates & addresses of places visited. It also has detailed notes of complaints raised by constituents for following up via casework. I note that you took a cursory look at the book but did not use it for your investigation.
- Access to my staff both in my constituency office & in Westminster. It is clear from the feedback from my staff that this was a steep learning curve for you on how an MP's office works.
- Detailed maps showing the journeys that I undertake on Parliamentary business. You have repeatedly asked how I can be sure that the mileage claims are consistently at particular levels. This is because I travel similar journeys on a regular basis so, naturally, the distances involved are very similar.

I trust that you will confirm that I have fully cooperated with your investigation, supplied all requested documents and access to staff.

2. You supplied the details of your role and procedures I note your procedures as supplied. I note that you are effectively the investigator, prosecuting counsel, judge, jury, executioner & enforcement officer. This places you in a highly privileged position with a clear requirement to carefully consider all evidence presented. In particular, your procedures require you to ensure that claims have been made in accordance with the IPSA Expenses Scheme. It is incumbent on you to ensure that claims are in accordance with the scheme and not with what you believe that the scheme *should* require or what you would *like* the scheme to require.
3. You have made detailed observations on the level of my mileage claims compared to other MPs. I make no comment on any other colleagues, their claims or amount of work undertaken. I would, however, point out that I am a full-time constituency MP with no Ministerial or shadow responsibilities and all of my activities are heavily dedicated to my constituency. A high proportion of local travel, potentially by comparison to some colleagues, is simply unavoidable given my position and the nature of my work.
4. I refer to the IPSA publication "The MPs' Expenses Scheme". Page 30 makes clear that travel expenses can be claimed for "travel within the constituency or within 20 miles of the constituency boundary". Please can you therefore specify where in the Scheme there is a requirement to capture the exact mileage at the time of undertaking the journey? Given that I can find no such requirement laid out in the scheme, this is not actually a requirement. Yet you have suggested to me that this should be a requirement. I presume that you will then be requiring IPSA to make such a direction so that all MPs have to undertake the same measures. If you have plans to add a requirement that is not currently specified in the scheme or in any guidance issued by IPSA, this cannot be applied retrospectively for me





alone as this would mean treating me differently to all other MPs and therefore as direct discrimination.

5. The scheme is silent on how such journeys are recorded and does not specify which routes are to be undertaken. There is a requirement to make the journeys as cost effective as possible and that is why I have provided detailed maps of the routine journeys that I undertake. My journeys to the constituency are to attend events or activities at a wide variety of different times of day and against a wide variety of traffic conditions, and based on my 56 years of living in this area, I naturally construct the journeys which use the optimal route in terms of the time taken for the journey with a predictable journey time. I deliberately avoid areas of high congestion, known traffic black spots or where I expect to encounter severe delays, prevailing local conditions will slow the journey or where there are likely to be road closures. This may mean that there may appear from a remote location a more direct route but that such routes would not be chosen by a rational human being with a working knowledge of the traffic conditions which prevail in this part of North-West London. I have previously offered to conduct a discussion with you on the reasons why such roads or routes are either impractical, will require an unacceptable delay or potentially take me through an area of high traffic, and remain more than happy to do so now.
6. You make a comment on my claims being from home. I make the following comments:
  - a) I work 7 days a week as a constituency MP. When Parliament is in session, I spend Monday afternoon to Thursday evening in Westminster on Parliamentary business. I attend Westminster on very occasional Friday sessions when there are Private Member's Bills being considered that I support. I spend Friday to Monday lunchtime on constituency business. I visit employers, schools, colleges, voluntary organisations, charities, local public bodies, residents at home and other parliamentary duties such as street surgeries. When Parliament is not sitting, I spend 7 days a week undertaking such activities. The only exceptions being when I am away on Parliamentary business, my annual holiday or where illness has intervened.
  - b) Home to office mileage. I have worked from home since 1998, well before I was elected to Parliament. I have dedicated office facilities for both myself and for my wife in self-contained premises in my home. When I was elected in May 2010, I did not have an office in Westminster until July 2010 and I did not have a constituency office until July 2010 either. I therefore set up my home office to allow me to undertake my role as a constituency MP. I have continued this to the present day. Even when I had a constituency office in July 2010 to July 2011, this was a temporary one with a desk for each member of staff but not one for me. As such, I continued to work from my home office and visited the constituency office on a regular basis. On transfer to my current constituency office, I maintained my home office to provide facilities for me to work on constituency business outside of the 9am-5pm office hours. I visit my constituency office to hold constituency surgeries, to hold meetings on constituency business and to see staff when required. I do not claim for the journey between my home and the constituency office.
  - c) From May 2010 to May 2013, I conducted weekly constituency surgeries to see constituents by appointment. These surgeries were held either in the constituency office, Wealdstone Library or the Edgware Scout Centre, the aim being to provide a range of venues to reduce the inconvenience of constituents to travel. Following my ill health in 2013, it became necessary to hold surgery sessions in my constituency office only. As my staff are considerably more experienced, they now attempt to deal with as much casework as possible without constituents being required to see me first, allowing me to deal with the more complex cases which take an extended interview. Surgeries



are therefore regularly scheduled for my constituency office, to prevent double bookings, and are simply cancelled in the event that there are no scheduled appointments for the time allocated by my diary assistant in Westminster. My Outlook diary therefore records such surgeries as reserved time, *not* as events that occurred. Frequently, surgeries will be cancelled at the last minute but these remain in my Outlook diary. As I have explained, my Westminster PA organises my Outlook diary but the decision on actually holding a constituency surgery is taken in my constituency office, normally on the Friday before planned surgery on a Monday morning. My Westminster PA has no other involvement and therefore has no reason to amend the diary after the fact, given that she generally will not know if a surgery occurred or not. The Outlook diary is therefore not an accurate picture of when surgeries have been held. This has been explained to you on several occasions by myself and my staff. If there are no bookings by the Friday preceding the surgery on the following Monday, the surgery does not happen and I use the opportunity to visit particular parts of the constituency on Parliamentary business instead on my own initiative. Both I and my constituency office retain a record of all surgeries held and also those people who are booked into see me. I therefore have a clear audit trail of when such surgeries actually take place. The surgery book is available for your inspection should you so wish and has been offered to you.

- The result of reviewing the data that you supplied is that no surgeries took place on 15/7/13, 2/9/13, 10/2/14, 31/3/14, 7/4/14, 19/5/14, 16/6/14, 23/6/14, 4/8/14 and 18/8/14. On 11/11/13, there was only one client who was seen at 10am, I then returned home for lunch and then visited Harrow Weald in the afternoon.
- On 20/12/13, the visit at 8.30am to the Post Office finished at 9.30am. I then returned home for lunch before going to 209 for a meeting in the afternoon.
- On 21/7/14 a surgery took place in the morning 10am to midday. I then returned home for the afternoon. The mileage claimed was for a visit in the evening.
- On 27/1/14, 24/2/14, 3/3/14, 30/6/14 & 14/7/14, a surgery took place & visits took place to HW subsequently. Home to office mileage was therefore incorrectly claimed.

I therefore calculate that the repayment should be **£20.25** in this category.

7. I run a very busy office environment with a full-time PA in Westminster, two full-time caseworkers, a part-time secretary, office manager and an intern at my constituency office. Constituents contact me by telephone to either Westminster or Harrow, by letter, by personal visit to my constituency office, by response to surveys or reply paid cards or by email. We respond to a wide variety of different complaints and take up a wide variety of causes on behalf of constituents. I run street surgeries virtually every Saturday & Sunday. I take notes at each of these sessions for the compilation of letters to follow up on behalf of constituents. Until August 2014, I have undertaken the correspondence for these activities from home using my own facilities or the services of my wife. In August 2014, I have started utilising the skills of one of my caseworkers to dictate the details of the correspondence for transcription into letters. This has speeded up my response rate. All email correspondence comes direct to me and I then pass it to one of my caseworkers for appropriate action. Over most weekends, I receive specific complaints which often need me to view the site i.e. they can be seen from the road and help to better inform the action required. I then tend to visit these sites on a Monday morning when I do not have a constituency surgery. Hence why there are claims for certain constituency visits on a Monday morning. I reiterate the point that I made in my major submission that such visits to do not necessitate or include a visit to my constituency office. I return home for lunch from such visits and then visit the constituency office when required in the afternoon.





8. On canvassing. In terms of claims where you have stated that you believe that my role has a party political nature, I reiterate the comments that I have made. I am happy to provide details to you of my notes of street surgeries carried out on those days with the details of cases that I have taken up. My role at each of these events is to deal with cases raised by constituents. Clearly, under data protection requirements such details need to remain confidential in that they reveal names and addresses of constituents and, equally importantly, matters of personal concern to those individuals
9. On party political events. You have highlighted a claim for a day when there was a fund raising event on the 22nd February and, in my submission on 1st December 2014, I specifically accepted that this claim was submitted in error. In terms of the claims that appear to have been made for events of a party political nature, as I stated in my submission, I accept that, in the absence to the contrary and diary entries, I have accepted that these particular journeys should not have been made, have apologised for the error and agreed to repay the money accordingly. I note that these total **£82.80** on the basis of my submission.
10. On claims using standard mileage, you appear to have completely ignored my detailed submission of journeys that I undertake and the routes chosen. You have confined your assessment of the journeys based on a visit you made to my constituency and using journeys from my home to unspecified locations in my constituency. You have not supplied me with the location visited, the route chosen, the day of the week or the time of day travelled so that I can point out why such routes are not viable. On the basis of this you have then chosen to reduce all of the journeys I have undertaken by an arbitrary percentage over a 20 month period. This is draconian and, more importantly, has no basis in the requirement on you to ensure that claims are in line with the IPSA Scheme.
11. I make clear that I have captured every single journey made in my diary, on spreadsheets which are updated at least every week and at the earliest opportunity and provide maps showing the journeys made. All of these journeys are compliant with the IPSA Scheme as published. All of the claims have been submitted to IPSA, have been paid, and IPSA has not queried a single claim for me since 2011. I maintain that these routes are the most cost effective possible based on local traffic conditions and the need to ensure that journeys are of a predictable duration to arrive at the appointed time. They are optimised to avoid known areas of traffic congestion and other local traffic problems such as road closures. Given that all claims are compliant with the scheme, it is not for the Compliance Officer to make arbitrary adjustments to compliant claims.
12. You have criticised me for travelling from home to venues in my constituency. I have made clear that I began my Parliamentary career without office facilities other than those from my home. I reiterate since my hospitalisation in February 2013 I am required to eat proper meals at breakfast, lunch and dinner, to take prolonged periods of rest where I can lie down and to control the amount of time and effort I utilise. This necessitates journeys direct from home to locations in my constituency, return at appropriate times during the day for rest and food. I would also point out that the investigation has exacerbated stress and had a negative impact on my medical condition.
13. Following your notification of this investigation, I have captured each journey made via the car trip computer, kept a written record and then copied this to the relevant monthly spreadsheet when I have access to a computer in my Westminster office, in an effort to double check and be certain of my claims. I have also added further description of the route

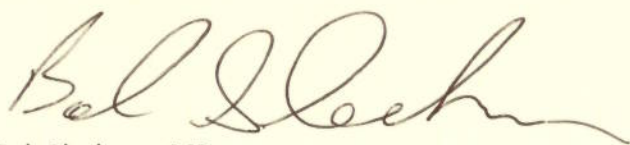


used. The actual mileage recorded has remained either the same or, in some cases, actually increased as a result.

14. I made a detailed submission to you on 1<sup>st</sup> December 2014, providing maps, distances and justification for journeys taken where necessary. I am concerned that you do not appear to have properly considered this evidence as submitted. Almost all of my journeys are of a regular nature, using the same routes and have been developed over a lengthy consideration of the optimum route to be followed based on local knowledge. You appear to dismiss this submission on a basis of remote theoretical knowledge without any consideration of known local traffic hot spots or other local considerations. In regard to this, my claims are provably compliant with the Scheme. Therefore, I suggest that you withdraw your unwarranted allegations at this juncture. I continue to use these routes and claim the mileage for the journeys undertaken in line with the maps provided and would be more than happy to swear under oath that these are the journeys that I have undertaken and claimed, no question.
15. You have highlighted a visit that I made to the Tottenham Hotspur FC training ground. In my submission, I pointed out that I went via the Tottenham Hotspur FC ground at White Hart Lane and provided a map supporting this journey. This journey was unique as I have never previously visited the training ground and have not visited subsequently. The claimed mileage was clearly a mistake and, it is surprising that IPSA did not query this mileage at the time, given that it would exceed that allowed by the Scheme. As I have clearly demonstrated to you, the trip distance should have been 39 miles in line with the route used.
16. It is appropriate to point out, again, that my claims to IPSA are based on the ward that I have visited. They are either to a specific venue, or else to the centre or thereabouts, of the ward in question. You have made a specific reference to claims to Stanmore so, for the avoidance of doubt, these are for venues on or north of Stanmore Broadway.

I am happy to discuss the details of my analysis with you and to agree a final position next week.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Bob Blackman', with a long, sweeping horizontal line extending to the right.

Bob Blackman MP  
Harrow East