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## Summary

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5 The allegation I investigated was that the Member had breached paragraph 16 of the Code of Conduct for Members. Correspondence, sent on House-provided stationery, had invited constituents to volunteer to "stuff" envelopes. The correspondence did not describe the literature which the volunteers might be asked to distribute.

10 The Member told the Commissioner that she was seeking volunteers to assist with her parliamentary work and not to assist with party political work. She said that she had followed the Independent Parliamentary Standards Authority (IPSA) guidelines regarding the recruitment of volunteers. The supporting evidence submitted by the Member demonstrated that the use of volunteers to assist with purely parliamentary activity had been foreseen by the authorities.

I was satisfied by the response I received from the Member, and have seen no evidence to suggest any volunteers would have been asked to assist with work for or at the behest of a political party or otherwise to confer undue advantage.

15 In light of the Member's assurances and the absence of evidence that the volunteers would have been asked to assist with party political, rather than parliamentary activity, the allegation of a breach of the rules and of paragraph 16 of the code of conduct was not substantiated. I do not, therefore, uphold the allegation.

## Ms Anna Turley: Resolution letter

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### Letter from the Commissioner to the complainant, 30 January 2020

5 When I wrote to you on 5 November 2019, I explained I would stop work on my inquiry during the period of dissolution. I have now resumed work on it, and having reviewed again all the information gathered during the course of my inquiry, I have reached a decision.

#### My Decision

I do not uphold the allegation that Ms Turley breached paragraph 16 of the Code of Conduct for Members.

#### 10 My Rationale

15 In my initial letter to you, on 25 July 2019, I said I had written to Ms Anna Turley, inviting her comments on your allegation that she had breached the rules of conduct. My investigation focused specifically on whether she had used House of Commons stationery and pre-paid postage envelopes, in breach of Paragraph 16 of the House of Commons Code of Conduct.

When I opened my inquiry, I sought to clarify the intention behind Ms Turley including the survey question

20 5. *“Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time or stuffing a few envelopes?”*

The question Ms Turley asked did not specify the nature of the content of the letters to be distributed by any volunteers.

25 When I asked the Director of Customer Experience for his view on this matter, he said that, based on the evidence available, the question *“...breaks the initial part of [the] guidance, namely being in connection with work for or at the behest of a political party.”*

30 When I shared the Director’s response with Ms Turley, she responded that, *“There is no data sharing of the information collected on the survey with the Labour Party.”* She also stated that, *“...data from the survey is all stored in a database used only for parliamentary work.”* Ms Turley has provided me with a copy of the Privacy Statement she uses, which sets out how personal data is stored by her office under the General Data Protection Regulations (GDPR). She also told me in her letter of the 2 October 2019 that, *“No political work takes place within my constituency office.”*

Ms Turley further explained that she followed the Independent Parliamentary Standards Authority (IPSA) approved guidelines, regarding the recruitment of volunteers to help her constituency office. She provided copies of the IPSA Model Volunteer Arrangement template, which she required all prospective volunteers to complete. As part of this template agreement, in the section titled *What I expect from you*, the following is explained;

*I will expect you:*

1. *to help me conduct my parliamentary functions by [describe the functions which the volunteer will be helping to conduct]*
- 10 2. ...

Based on her responses, I am satisfied that Ms Turley's parliamentary work and her party-political work are kept separate from each other. The supporting evidence Ms Turley submitted demonstrates that using volunteers to assist with parliamentary activity is a possibility foreseen by the authorities. I have seen no evidence to suggest that the volunteers would have been asked to assist with work for or at the behest of a political party or otherwise to confer undue advantage. I appreciate that this was not clear from the way the request for volunteers was worded, and understand, therefore, the basis on which you submitted your complaint.

I enclose a copy of the evidence I have gathered in the course of my inquiry and which has led me to reach my conclusion. A copy of this letter together with the relevant correspondence will be posted shortly on my webpages. I now consider this matter to be closed.

*30 January 2020*

## Written evidence

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### 1. Letter from the complainant to the Commissioner, 17 July 2019

Thank you for your response dated 16 July 2019<sup>1</sup>.

5 It is apparent that I did not make myself entirely clear. I have no objection to the questionnaire attached to Ms Turley's letter *per se*, but objected strongly to the last two questions which ask if we can help her, by stuffing envelopes or similar. I'm afraid I cannot remember the exact wording.

10 It is the last two questions to which I object, considering she has an excessively high staffing budget for someone whose office is never open to her constituents except by afternoon appointment!

Please reconsider your decision.

17 July 2019

### 2. Letter from the Commissioner to Ms Anna Turley MP, 25 July 2019

15 I would welcome your help with an inquiry into an allegation I have received from [name redacted], about your compliance with paragraph 16 of the House of Commons Code of Conduct for Members. I enclose a copy of [name redacted] letter and the enclosures she has sent as evidence.

My inquiry

20 My inquiry will focus on whether you have acted in breach of paragraph 16 of the House of Commons' Code of Conduct for Members through your use of House provided stationery and postage paid envelopes.

The Code of Conduct

Paragraph 16 of the current Code states:

25 *Members are personally responsible and accountable for ensuring that their use of any expenses, allowances, facilities and services provided from the public purse is in accordance with the rules laid down on these matters. Members shall ensure that their use of public resources is always in support of their parliamentary duties. It should not confer*

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<sup>1</sup> Complainant was invited to elaborate on her original correspondence, which briefly set out the following; "I feel that the enclosed is a gross abuse of public funds. I would appreciate your comments. Using HoC to ask for personal support" received on 11 July 2019

*any undue personal or financial benefit on themselves or anyone else, or confer undue advantage on a political organisation.*

5 Further to this the *Rules on the use of stationery and postage-paid envelopes provided by the House of Commons, and for the use of the crowned portcullis*<sup>2</sup> state the following.

### **“Principles**

10 *2. These rules are not expected to cover every eventuality; Members should therefore always behave with probity and integrity when using House-provided stationery and postage. Members should regard themselves as personally responsible and accountable for the use of House-provided stationery and postage. They must not exploit the system for personal financial advantage, nor (by breaching the rules in paragraph 3 below) to confer an undue advantage on a political organisation.”*

15 Paragraph 3 of the rules lists examples of uses for which House-provided stationery should not be used. Those examples include the use of stationery and pre-paid envelopes, “in connection with work for or at the behest of a political party...”

20 Paragraph 4 of the rules also sets out the following. “Items which may not be sent in pre-paid envelopes on their own...must not be attached to correspondence legitimately sent using pre-paid envelopes.”

As part of my inquiry I will specifically consider whether you acted in breach of the rules by including in a House provided pre-paid envelope a questionnaire in which you asked;

25 *5. Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time or stuffing a few envelopes?*

*Leaflets*    *Yes / No / Maybe*

*Stuffing*    *Yes / No / Maybe*

30

<sup>2</sup> <https://www.parliament.uk/documents/facilities/Accommodation-and-Logistics/Stationery-rules-March-2015.pdf>

## Next steps

I would welcome your comments on the allegation that your letter amounts to a breach of paragraph 16 of the Code of Conduct for Members. In particular I would appreciate your answers on the following questions:

- 5 3. Were you aware of the Rules regarding the use of House provided stationery?
4. Did you take advice from the House authorities before using House-provided stationery for this communication?
- a) If you did, please describe the advice given and provide copies of any correspondence you exchanged with House officials on the matter.
- 10 5. Please say how many surveys were distributed with your letter as part of this mailing and the dates that these were sent.
6. Have you distributed any similar requests for assistance, using House-provided stationery and/or postage pre-paid envelopes since the start of the 2017 Parliament?
- 15 a) If yes, please provide copies of each communication and the details of each mailshot (number of letters and whether sent first or second-class)
7. How did you deploy, or intend to deploy, any volunteers contacting you as a result of this/these communications? Please describe, or provide copies of, the material that they were to deliver/to use to stuff envelopes.
- 20 a) Please say whether you consider that material to relate to your parliamentary activities or to your party political activities, and say why you hold that view.

25 It would be helpful to receive any supporting evidence you have at the same time as receiving your response to these questions. Any other points you may wish to make to help me with this inquiry would also be most welcome.

## Important information

30 As you will be aware, my inquiries are conducted in private. Following the decision taken by the House on 19 July 2018, I will not publish the fact that I am conducting an inquiry into this matter. My office will not comment on any aspect of the inquiry to third parties. They will answer direct factual questions about the processes I follow and the standards system more generally but will neither confirm nor deny that I have begun an inquiry.

## Procedure

I enclose a copy of the *Commissioner's Information Note*, which sets out the procedure for inquiries. Please note that this has not yet been updated to reflect the changes flowing from the decision of 19 July 2018.

- 5 This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published. All the relevant evidence, including our correspondence, will be published when I have concluded my work.

10 While I do not, at this stage, know whether it will be necessary to interview you about this matter, it would be open to you to be accompanied at any such interview. I am, of course, very happy to meet with you at any stage if you would find that helpful.

I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry.

## 15 Action

I would be grateful to have your response to this letter as soon as possible and no later than 13 August 2019.

*25 July 2019*

### **3. Letter from Ms Anna Turley MP to the Commissioner, 2 August 2019**

- 20 Thank you for your letter dated 25th July 2019. I am very happy to assist with your inquiry and appreciate that you have contacted me for clarification.

In answer to your questions:

- 25 1. Yes, I am aware of the rules and my responsibilities as a Member of Parliament, as are my staff. I firmly believe that no communication distributed has breached the rules.
- 30 2. No, I did not seek advice prior to the mailout as I was, and remain, confident that the rules were not breached.
3. In total 5,719 surveys were distributed throughout the constituency during May to July 2019. The majority of the mailings were sent second class, which is how I would routinely send any mailings of this type. A small number were sent first class to enable my office to utilise some older stock retained in the office and to prevent the cost of ordering additional second class envelopes. The only reason that I would deliver mailings of this type first class is to ensure



that stock is rotated before it deteriorates in condition, as experience has shown that these envelopes quickly lose adhesion with age and will not seal. This can mean that mailings are occasionally sent first class where we have stock which needs using.

5 It is very important to me that I can appropriately represent my constituents and requesting direct feedback on an issue which matters to them enables me to do so more effectively. I am acutely aware that many find it difficult to contact their elected representative, particularly those who may be elderly or vulnerable. By reaching out directly I am removing those barriers and gain a  
10 clearer idea of the issues that matter and the action that my constituents wish for me to take on their behalf.

4. In summer 2018 I issued a mailing regarding anti-social behaviour and policing, in total 2500 mainly second-class letters were sent (mailing attached).

15 In spring 2019 I issued a mailing about the changes to the retirement age and pension entitlement. In total 4563 second class letters were sent, over a six to eight week period from March 2019. (mailing attached).

5. At the present time, we have only collated the details of those that have offered support as a result of this communication.

20 I am keen to develop a team of volunteers to assist with correspondence relating to my parliamentary duties. This could include letter stuffing for mailings of this type, or delivery to minimise the need to pay postage to distribute such communications, significantly reducing the cost to the public purse. Currently I am reliant on my staff to complete much of this work, and  
25 the ability to pass on the time consuming elements to volunteers is of clear benefit to them in terms of effective time management.

It may assist if I provide context regarding the complaint you have received from [name redacted]. [name redacted] is an active participant of an anti- Labour social media group entitled 'Deselect Anna Turley'. I have long been aware of the divisive,  
30 intimidating nature of the group and some of its libellous content. I am in regular contact with my local police force and the Parliamentary Liaison and Investigation Team regarding posts made on the page and the action of its members.

The group has organised two rallies calling for my deselection, which have been publicised and attended by far-right activists. During the recent local elections,  
35 where I was not standing as a candidate, the group distributed leaflets to properties throughout the constituency calling for my deselection as parliamentary candidate. Their political attacks are direct, clear and targeted at me as an individual. The motive and intention of the group is very clearly stated and it would not be possible for an individual to post in the group without having an awareness of its purpose.

[Name redacted] has made several posts to the group regarding her communications with your office and the outcome that she anticipates. She has clearly indicated, on a public forum, that she has submitted a complaint despite the fact that the investigation is protected by parliamentary privilege and as such should remain confidential. She has shared the content of the letters she has received in respect of the investigation with administrators of the group. There is an overt political motivation to the nature and content of her complaint and her posts clearly demonstrate that her intent is to cause damage to my reputation, rather than to genuinely seek clarification regarding the rules and my role as Member of Parliament. I have attached several posts from the group for your attention.

I hope that this serves to clarify matters. If there is anything further that I can do to assist you during the course of your investigation, please let me know. I look forward to hearing from you in due course regarding your conclusions.

*2 August 2019*

15 **Enclosures:** Letters and surveys

1. Letter and survey on crime and anti-social behaviour sent in Summer 2018
2. Letter and survey on women's retirement age sent Spring 2019

Both surveys included the question - Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time?

20 *2 August 2019*

#### **4. Letter from the Commissioner to the complainant, 6 August 2019**

I wrote to you recently to tell you that I had begun an inquiry into your allegation that Ms Anna Turley MP had acted in breach of the House of Commons' Code of Conduct for Members.

25 When you first wrote to my office in July 2019 you did not provide sufficient information for me to commence an investigation. My office wrote to you on 16 July 2019, to explain my remit and to provide a copy of the Code of Conduct for Members.

30 You subsequently wrote to clarify your complaint, saying "*It is apparent that I did not make myself entirely clear*". On that basis, I decided to begin an investigation. In my letter of 25 July 2019, I said;

All your correspondence with my office, including this letter, is now part of the evidence for this inquiry and is protected by parliamentary privilege. You must not discuss this matter, or share the contents of our correspondence, with any third party.

I explained that the House had taken a decision in July 2018 which meant I would not publish the fact that I am conducting an inquiry and I would neither confirm nor deny that I had begun an inquiry if asked by any third party.

5 I have since been made aware that you have shared information about your correspondence with my office on social media. Your comments clearly imply that I have begun an inquiry. Breaching confidentiality not only fails to respect the decision taken by the House of Commons but could also risk prejudicing my inquiry.

I am writing to you now to seek written assurance, by return, that you will make no further comment about this matter until such time as I notify you of the outcome.

10 As I have already explained, when I conclude my investigation, my decision, the reasons for it and all the relevant evidence, will be put into the public domain. Until then, it must remain confidential.

*6 August 2019*

#### **5. Letter from the Commissioner to Ms Anna Turley MP, 6 August 2019**

15 Thank you for your letter of the 2 August 2019. The information you have provided is helpful. I will review this material carefully and may seek advice from the parliamentary authorities before I reach a decision. I will share any such advice with you first.

20 In the meantime, I thought I should confirm that when I wrote to [name redacted] to tell her I was beginning this inquiry, I explained that our correspondence about it is protected by parliamentary privilege. I said that she must not discuss the matter or share the contents of our correspondence with any third party.

25 I wrote to [name redacted] yesterday to remind her of this and to seek her written assurances that she will make no further comment while my inquiry is ongoing. I have also reiterated that relevant evidence, including all correspondence, will be put into the public domain when I have concluded my inquiry.

I will write to you again when I have more information to share with you. As I am away from the office between 8 August 2019 and 2 September, it may be a little after that before I contact you again.

30 *6 August 2019*

#### **6. Letter from the Commissioner to the Director of Customer Service and Service Delivery, 5 September 2019**

35 I would like to ask for your advice on a complaint I have received, from [name redacted], concerning the conduct of Ms Anna Turley MP. In essence the complaint is that Ms Turley misused House of Commons stationery and postage pre-paid

envelopes to send out a letter and questionnaire, in spring 2019, in which the following question was asked.

5                    *5. Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time or stuffing a few envelopes?*

*Leaflets*            *Yes / No / Maybe*

*Stuffing*            *Yes / No / Maybe*

10 I enclose a copy of the relevant correspondence, and envelope, used by Ms Turley. In addition, I have also enclosed copies of two further questionnaires, sent by Ms Turley in the Summer of 2018 and the Spring of 2019, which are of a similar nature.

I would be grateful if you would tell me how you would have advised Ms Turley, had she sought your advice about using House-provided stationery and postage pre-paid envelopes for these questionnaires.

15 I appreciate that the published guidance regarding the use of stationery cannot cover every eventuality, and it would be helpful to have your observations on the factors you have taken into account in reaching a view in this instance.

It would be very helpful to have your response to this letter as soon as possible and no later than 19 September 2019.

20 *5 September 2019*

### **7. Letter from the Commissioner to Ms Anna Turley MP, 5 September 2019**

25 In my first letter to you, sent on 25 July 2019, I explained that I might seek the advice of the House authorities as part of my inquiry. In accordance with my usual practice, I have today written to the Director of Customer Service, [name redacted], to ask how he would have advised you, had you sought advice about using House-provided stationery and postage pre-paid envelopes for the mailing you sent out in Spring 2019. I enclose a copy of that letter for information.

30 I will write to you again when I have the Director's advice, and to give you an opportunity to comment. In the meantime, our correspondence remains protected by parliamentary privilege.

*5 September 2019*

**8. Letter from the Commissioner to the complainant, 5 September 2019**

I wrote to you on the 6 August 2019, regarding information you had shared on social media, which was a breach of confidentiality regarding my investigation.

5 In my letter I requested from you “...written assurance, by return, that you will make no further comment about this matter until such time as I notify you of the outcome.”

I have not received a reply.

As I have already explained, when I conclude my investigation, my decision, the reasons for it and all the relevant evidence, will be put into the public domain. Until then, it must remain confidential.

10 I must ask you for an urgent reply, confirming that you will make no further comment about our correspondence until my investigation is concluded. You can write to me at this address [address redacted]. Alternatively, you can email me at [address redacted] if this is more convenient.

*5 September 2019*

**15 9. Letter from the complainant to the Commissioner, received 12 September 2019**

Thank you for your letter dated 5 September. I apologise for the delay, an oversight on my part.

20 I did not actually state on social media that you were investigating Ms Turley's behaviour although I did say that I hoped she had a bad weekend. I do not know, nor do I wish to know who gave you this information, but it is not quite accurate.

However, the last thing I want to do is jeopardise your investigation so I will ensure that nothing bearing any resemblance to commenting on your investigation is mentioned.

25 *12 September 2019*

**10. Email from the Director of Customer Service and Service Delivery to the Commissioner, 23 September 2019**

Thank you for your letter of 5 September 2019.

30 You asked me to let you know what advice I would have given Ms Turley if she had sought my advice about using House provided stationery and postage pre-paid envelopes for his letter.

I can confirm that I have no record of my team being consulted by Ms Turley, though I would note there is not a requirement for Members to do so.

5 The House provides the stationery budget to assist Members in performing their parliamentary duties but, as you noted in your email, the rules cannot be expected to cover every eventuality. You will be aware that while my team and I can provide guidance on usage, ultimately Members should always behave with probity and integrity when using House-provided stationery and postage, and should regard themselves as personally responsible and accountable for the use of it. If a complaint is made, whatever guidance we might have provided cannot bind your ability to  
10 come to a different conclusion.

If I had been asked, in my opinion the survey and therefore the correspondence as sent by the complainant falls outside the rules. Point three of the rules states:

15 *House-provided stationery and pre-paid envelopes are provided only for the performance of a Member's parliamentary functions. In particular, this excludes using stationery or postage: in connection with work for or at the behest of a political party (including fund-raising for a political party, advocating membership of a political party or supporting the return of any person to public office);*

- *for business purposes;*
- 20 • *for newsletters (including annual reports or general updates to constituents on a range of issues);*
- *for birthday or other greetings cards;*
- *in a way that can be construed as campaign expenditure within the scope of the Political Parties, Elections and Referendums Act 2000.*
- 25 • *In addition: Items which may not be sent in pre-paid envelopes on their own, such as newsletters or cards, must not be attached to correspondence legitimately sent using pre-paid envelopes.*
- *House stationery, House emblems and pre-paid envelopes should not be used during the period of dissolution.*

30 In my view, Q5 on the survey relating to TV licences for the over 75s (“Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time or stuffing a few envelopes”) breaks the initial part of this guidance, namely by being “*in connection with work for or at the behest of a political party*”. This is the also the question highlighted in your letter.

You also included a number of other enclosures of similar surveys sent out by the Member. I would note that the same question appears in each and therefore I would have advised that this was also not acceptable under the guidance. However, I would also note that while the survey on TV licences was clearly sent out using House of Commons Stationery and postage, it is not clear whether the other two surveys were sent out using House stationery and postage and therefore the rules may not apply.

I am of course happy to discuss this further.

23 September 2019

### 11. Letter from the Commissioner to Ms Anna Turley MP, 2 October 2019

10 When I wrote to you on 5 September 2019, I said that I was seeking the advice of the House Authorities, and that I would give you the opportunity to comment on that advice before I reach any decision. I have now received a response from the Director of Customer Experience and Service Delivery. A copy of that advice is enclosed.

15 In his reply the Director of Customer Experience references paragraph 3 of the *Rules for the use of stationery and postage-paid envelopes provided by the House of Commons*:

20 *3. House-provided stationery and pre-paid envelopes are provided only for the performance of a Member's parliamentary functions. In particular, this excludes using stationery or postage:*

- *in connection with work for or at the behest of a political party (including fund-raising for a political party, advocating membership of a political party or supporting the return of any person to public office);*

...

25 In his advice he states, *"In my view, Q5 on the survey relating to TV licences for the over 75s ("Can you help me stay in touch with local residents by delivering a few letters in your neighbourhood from time to time or stuffing a few envelopes") breaks the initial part of this guidance, namely being in connection with work for or at the behest of a political party"*.

30 His advice goes on to consider the other letters and surveys, which you provided. He says, *"You also included a number of other enclosures of similar surveys sent out by the Member. I would note that the same question appears in each and therefore I would have advised that this was also not acceptable under the guidance."*

35 I would be grateful to receive any comments you wish to make in light of the enclosed advice.

Further to this I would appreciate your answers to the following questions;

1. How many of the 5,719 surveys on the licence fee for over 75s were sent first-class and how many were sent second-class?
- 5 2. Did you use House-provided A4 embossed paper and postage-paid envelopes in your mailing on *Crime and anti-social behaviour*, sent in the summer of 2018?
  - a) If yes how many were sent first-class and how many were sent second-class?
- 10 3. Did you use House-provided A4 embossed paper and postage-paid envelopes in your mailing on the *Changes to the retirement age*, sent in the spring of 2019?
  - a) If yes how many were sent first-class and how many were sent second-class?
- 15 4. Have you used House-provided A4 embossed paper and postage-paid envelopes on any other occasion which, having seen the advice from the Director of Customer Experience, you now realise is outside of the rules?
  - a) If so, please say when and provide details about the quantities.

20 Finally, in your letter of 2 August 2019, you also told me that "*At the present time, we have only collated the details of those that have offered support as a result of this communication*". Could you tell me:

5. How you have stored the contact details of the volunteers who have replied to your survey question?
  - a) If it is on a database, who has had access to that information?
- 25 6. What steps have you put in place to ensure that the volunteers assist **only** with your work in connection to your Parliamentary duties, and not with work for your political party?

It would be helpful to receive your reply by 17 October 2019. In the meantime, our correspondence remains protected by parliamentary privilege and I must ask that you continue to maintain the strict confidentiality of the inquiry.

30 2 October 2019



## 12. Letter from Ms Anna Turley MP to the Commissioner, 24 October 2019

Thank you for your letter dated 2 October 2019. I appreciate you providing me with the reply from the Director of Customer Experience.

5 I would refute entirely the assumption that any volunteer information gained through this survey and others I have sent have been used for political purposes. This is an extremely serious and untrue allegation and I would ask him and yourselves to provide evidence of this accusation which is entirely an assumption without basis.

10 I have an extremely busy and responsive constituency office (I have previously had to seek extra funding to deal with the extra casework resulting from the closure of the steelworks in my constituency and 3000 job losses) and the use of a volunteer workforce to assist with administrative tasks such as letter stuffing and delivery would minimise the burden on my staff to complete work of this nature and restrict the requirement to send correspondence in prepaid envelopes, thus reducing the  
15 cost to the public purse and to try to keep my expenses down. I would only ever ask such volunteers to assist with minor tasks associated entirely with my parliamentary duties. I am well aware of the split between my parliamentary and political work, and my office is entirely IPSA funded and separate from my political work. I am always completely mindful of this.

20 The manner in which volunteers for political work are gained is entirely different. Political work by its very nature requires a sympathetic political viewpoint which would need to be established. I have an entirely separate network of political volunteers. I have an active local party of over 500 members who undertake all manner of political work from stuffing envelopes, delivering political leaflets and  
25 knocking on doors within the constituency. This work is organised and co-ordinated by the local Constituency Labour Party Campaign Coordinator and is held on a separate database in accordance with the Labour Party Guidance on GDPR.

30 At no point on the surveys is there any suggestion that the work that I am seeking assistance with is political, politically motivated, or for any reason other than allowing me to maintain regular contact with my constituents at minimal cost as a support to my parliamentary staff. I therefore fail to see how this breaches paragraph 3 of the rules and would appreciate further clarification on how that conclusion has been drawn from the correspondence which was sent. Specifically, I am formally requesting confirmation from you of where I have indicated that the  
35 work I would expect to be completed is political in nature.

Volunteering is a fully recognised resource for MPs in the course of their parliamentary work. Indeed guidance is issued by IPSA regarding volunteer labour used to support parliamentary offices. IPSA fully appreciate that assistance of this nature can be essential and cost effective to the public purse. To this end, they  
40 provide a volunteer model agreement template (attached) and allow for the payment of expenses to cover the costs of unpaid volunteers. Section 7.24 of the Scheme of MPs Business Costs and Expenses states:

*MPs who engage volunteers must submit a signed arrangement with the volunteer to IPSA before claims for incidental expenses can be made. The signed arrangement must comply with the model volunteer arrangement published by IPSA. Incidental expenses are limited to reasonable travel and food, and non-alcoholic drinks.*

5 This is the type of volunteering I had in mind with my request. Given that the use of labour of this type is standard practice and approved by IPSA, I fail to see why there is an assumption that I intended to utilise volunteers to complete political work. Nothing in the distributed surveys indicates that I would expect political work to be completed, it is in my opinion entirely an assumption without basis and should be  
10 withdrawn.

I feel that it is also important to note that I employed a communications consultant to assist me with these mailings. This consultant has extensive experience of working for Members of Parliament in support of their parliamentary roles and has used the same or very similar templates extensively for many other Members of  
15 Parliament, which included the volunteer question. I therefore had full faith that the mailings were entirely within the rules, the precedent had been set and use of this volunteer labour would be well within the IPSA guidelines. I would assume if this assumption is made in regard to me it would have to be applied to all Members using this format.

20 There has never been any intention to utilise the volunteer labour offered for political reasons, nor has any of the information been shared with the Labour Party. This was simply a cost-effective way of supporting my staff by potentially outsourcing some of the more time-consuming tasks associated with my parliamentary role, such as letter stuffing or letter delivery, enabling them to spend  
25 their time more effectively and meaning that I would not need to use prepaid envelopes. In practice, while this information was collated with the intention to use it in this manner, we had not accessed it as my staff had managed to effectively balance their workload without needing to utilise volunteer assistance. I did, however, continue to ask the question on later surveys in order to ensure that the  
30 volunteer database was current should it be required.

In answer to your questions:

1. As I explained in my previous correspondence the vast majority of the surveys were sent second-class, but a small number were sent in older first-class envelopes to allow for stock rotation. It is difficult to be entirely precise, but I  
35 would estimate that well under 10% of the surveys were sent in first-class envelopes. While I appreciate that standard practice would be to send communications of this nature second-class, it was cost effective to use the older first-class envelopes rather than purchase additional second-class envelopes. I would routinely send communications of this type second-class.
- 40 2. Embossed headed paper was not used for this mailing, or for the enclosed survey.

- a) Postage paid envelopes were used and I would estimate that well under 10% of the letters sent were sent first-class.
3. Embossed headed paper was used for the letter, but not for the enclosed survey.
- 5 a) Postage paid envelopes were used and these letters were sent second-class
4. I have sent you full details of all the large mailings from my office which enclosed surveys of this type. There is no additional information that I need to provide.
- 10 5. The data from the survey is all stored in a database used only for parliamentary work. The database is fully GDPR compliant in terms of location and security. Access to the database is strictly limited to the people who work for me. The data is collected under the attached privacy statement<sup>3</sup> and is never shared with the Labour Party. It is accessed only by my staff and the staff  
15 of the consultancy firm I employed to assist me with the mailings.
6. No political work takes place within my constituency office. It is where my staff are based and their work is entirely in support of my parliamentary duties. It is therefore easy to ensure that any work given to the volunteers would be entirely in support of my parliamentary duties as there is no crossover  
20 between the different work streams. There is no data sharing of the information collected on the survey with the Labour Party.

I hope that this serves to clarify matters. I would appreciate if we could meet to discuss this matter further and have asked my office to make the arrangements. If there is anything further that I can do to assist you during the course of your  
25 investigation, please let me know. I look forward to hearing from you in due course regarding your conclusions.

*24 October 2019*

### **13. Letter from the Commissioner to Ms Anna Turley, 9 January 2020<sup>4</sup>**

30 When I wrote to you on 5 November 2019, I explained I would stop work on my inquiry during the period of dissolution. I have now resumed work on it and, having reviewed again all the information you have provided, I have reached a decision.

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<sup>3</sup> Privacy Statement has been provided but is not replicated here

<sup>4</sup> The Dissolution of Parliament at 00:01 on 6 November 2019 meant that the Commissioner had to pause her inquiry for the General Election period.

## My Decision

I do not uphold the allegation of a breach of paragraph 16 of the Code of Conduct.

5 Having reviewed all of the evidence available, I have concluded that the evidence submitted does not demonstrate that House-provided stationery was used for party political purposes. Nonetheless, I can see why the complainant interpreted your letter in the way that they did, and my decision rests heavily on the assurances you have given about your intentions and subsequent actions.

10 A full explanation of my reasoning is set out in my letter to the complainant, please see the first item of evidence in the written evidence pack which is enclosed. The contents of my letter to the complainant are a matter for me alone. However, you are invited to comment on the factual accuracy of the written evidence pack, which will be posted on my webpages on conclusion of my inquiry.

I would be pleased to have any comments you wish to make on the evidence pack as soon as possible and no later than 23 January 2020.

15 *9 January 2020*