

The Parliamentary Commissioner for Standards

Annual Report 2022–23

Presented to the House of Commons pursuant to Standing Order No. 150

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Foreword

This is the first Annual Report of my term as Parliamentary Commissioner for Standards, having taken up my post on 1 January 2023. It provides me with an opportunity to reflect on my first months in office, as well as to report on the work of the office in 2022-23.

The period covered by this report includes work undertaken during my predecessor's term. Kathryn Stone OBE set an extremely high standard for her successors to follow. Having advised her for some of her tenure in my capacity as a member of the Office of Speaker's Counsel, I know as much as most people about the pressures and challenges of her time in the role, and she won admiration from all whose opinions are worth having for the way in which she performed it.

I am particularly grateful to my predecessor for having recruited and trained new members of the office which now comprises an investigations team, a registry team, a correspondence and office team and a dedicated policy adviser. Each of them is an expert in their own field and I have been enormously grateful to them for the way in which they have welcomed me to the role. In particular, they have provided a rare and challenging combination of clarity in explaining to me how and why business is conducted in a particular way, with a readiness to listen to new ideas and to implement decisions in the most supportive and effective way imaginable. The office is a challenging environment owing to the nature of the work: we deal with many people who are upset, demanding, angry and often aggressive, and we hear narratives that are often traumatic even to listen to. That the office remains focused, calm and good-humoured is an immense testament to each member of the team.

It is necessary for there to be something of a constructive tension between my office and the Committee on Standards because of the peculiar constitutional position that affects each of us. It is essential that regulatory power in relation to Members of Parliament should vest in the Committee and not in me. It would be constitutionally and politically intolerable were I to be able to wield disciplinary power in relation to Members of Parliament. But the system also requires the credibility that comes from Members of Parliament not appearing to "mark their own homework". For this reason, the Committee respects my operational independence and my right to exercise my discretion under the Code of Conduct and the Guide to the Rules relating to the Conduct of Members entirely in accordance with my own judgment.

Against this background, I have been grateful from the start to all Members of the Committee for their patience as I learn my way into the role, and for their encouragement and support generally and particularly in relation to the outreach and engagement activities that I describe elsewhere in this Report. I take this opportunity to offer my thanks to the superb Clerking team to the Committee, to every Member of the Committee, and to its Chair for what has been, and I hope will continue to be, a constructive and mutually supportive relationship.

The new revised Code of Conduct and Guide to the Rules, which came into effect on 1 March 2023, was a key development in this reporting year. In addition, the publication of the Procedural Protocol in respect of the Code of Conduct consolidates procedural information on complaints and investigations, from allegation to appeal and each possible outcome at each stage between, and represents an important step forward in strengthening the process for complaints, investigations and decision-making in Code of Conduct cases.

I welcome the improved clarity of these authorities and, later in this report, discuss the practical and proactive support that my office and I have provided and continue to provide to Members, including through the publication of practical Advice Notes to assist them in applying the Code of Conduct.

I am mindful that under House of Commons Standing Orders, I make this report to the House, exercising functions delegated to me by the House, as an independent officer appointed by the House. The role of Parliamentary Commissioner for Standards is highly unusual among officers of the House, and indeed of Parliament, in that it is a direct interface with the public: anyone can contact my office; and public engagement is a priority of my tenure.

This direct public engagement, and my duty to report annually, mean that I am able to provide insight to the House on the public's perceptions of politicians and their trust and confidence in the standards system and Parliament more widely. The engagement of the parliamentary standards system with the experiences and views of the public is of particular importance because levels of public trust and confidence in politicians are low.

I am grateful to the thousands of members of the public who contact my office each year with their experiences, views and concerns relating to parliamentary standards. Every email and letter is read; and every telephone call during office hours receives a response. At one end of the spectrum a complaint may trigger a formal investigation which (if the complaint is upheld) will result either in rectifying action being taken by the Member concerned or, at the most serious end, report to the Committee for sanction. Other complaints may not trigger an

investigation, but I may decide to give words of advice to the Member concerned. Even in cases where I cannot take any direct action, however, the concern is noted and I consider whether I can do something to address the general issue. For example, I discuss two commonly-raised concerns, on responsiveness of MPs to constituency correspondence, and language and tone of MPs' views and opinions, later in this report.

The parliamentary standards system, and the Commissioner's role within that system are much more than the investigation of complaints. Their wider purpose is to raise public confidence and trust in Parliament by promoting and supporting a culture among Members that encourages ethical behaviour. It can be easy to lose sight of this, as media coverage of, and to an extent consequently public opinion about, parliamentary standards is dominated by individual cases of breaches and alleged breaches of the Code of Conduct. This almost entirely silences the positive side of the standards story, on which the improvement of public trust and confidence in Parliament depends. The effect has been to reduce the public reputation of politicians as a class to a level that is dangerously low for the safe and secure operation of the rule of law, in a parliamentary democracy which depends on government by consent.

I believe that the majority of Members go about their public lives strongly committed to maintenance of high standards. Yet there is no impartial authority tasked with rebalancing the narrative to demonstrate the preponderance of good behaviour to bad, and so the tone and content of media coverage and commentary about the parliamentary standards system remains tilted towards the negative. This matters because parliamentary standards are inherently positive, based on inspiring and timeless values of public service. The Code of Conduct is underpinned by the Seven Principles of Public Life: honesty, integrity, openness, accountability, objectivity, selflessness and leadership. Taking the time to consider, engage with and understand those Principles is key both to ensuring adherence to the rules and to the promotion of positive and ethical behaviour in the House of Commons, as the public rightly expects.

As a result, one of the priorities for my term, as well as continuing to apply and enforce the Code of Conduct effectively, is to bring more visibility to the positive public service undertaken by the majority of Members. When I took up my role at the beginning of this year, one of my aims was to try to create a space, in which Members from all sides of the political spectrum could demonstrate their commitment to high standards in public office, articulate and refine best practice, and indeed share their experience and inspire each other. My initial reflections on how this might be done are set out later in this report.

The first six months of my tenure have not been without challenge. I remain determined not to allow the need to address individual events in an effective and timely fashion to distract me from the long-term and crucially important task of supporting and publicising best practice in standards of public life in the House of Commons.

Thank you for reading this report: all comments and questions on my work, and suggestions for the future, will be very gratefully received and can be sent to me at standardscommissioner@parliament.uk.

Daniel Greenberg CB

Parliamentary Commissioner for Standards

Office of the Parliamentary Commissioner for Standards: organogram

Parliamentary Commissioner for Standards Daniel Greenberg CB

Policy & Procedure Adviser Registrar of Members` Financial Interests Senior Investigations & Complaints Manager

Assistant Registrar x2

Investigations & Complaints Manager x3

Registry Assistant

Investigations & Complaints Officer

Office Manager

Assistant Office Manager

Staffing costs

Year	2020-21	2021-22	2022-23	
Office Staffing Costs	£893,570	£929,916	£1,067,174	

1 Code of Conduct – overview of the year

New Code and Guide, and new Procedural Protocol

1. The publication of the new Code of Conduct together with The Guide to the Rules relating to the Conduct of Members, which came into effect on 1 March 2023, was a key development in this reporting year. I have sought to implement an effective program of parliamentary engagement to explain the new Code and Guide.

2. In particular:

- My office sent the new Code and Guide electronically to each Member on 27
 February 2023², accompanied by a summary of and presentation on the main changes to the Code and Guide to assist Members.
- I have attended meetings of all parliamentary party groupings that invited me, to draw attention to and introduce the new Code and Guide.
- The Registrar joined the regular call convened by Member Services Team, open to all MPs' Office Managers, to explain the changes to the Code and provide sources and contact details for further information and advice.
- I published a brief guide to the changes on my webpage.
- At the House Services Fair in May 2023, I spoke about the Code of Conduct, and that speech is at Appendix 1.
- 3. Key changes in the Code and Guide include a ban on Members providing, or agreeing to provide, paid parliamentary advice; the removal of the distinction between "initiating" and "participating" in proceedings or approaches, so that the paid lobbying rules apply equally to both; and a requirement that any Member taking on any formal paid employment with an outside body must obtain a written contract or statement of particulars detailing their duties. As requested by the Committee on Standards in its report on the new Code, I have published and circulated to all Members a template clause on lobbying to assist them in complying with this requirement.³

¹ Parliament.uk, <u>The Code of Conduct together with The Guide to the Rules relating to the Conduct of Members</u>, 10 February 2023

² Parliament.uk, Parliamentary Commissioner for Standards, PCS letter to all Members 27 February 2023

³ Parliament.uk, Parliamentary Commissioner for Standards, Advice Note: <u>Template Provision on Lobbying for Reward</u>, 3 January 2023

4. In addition, the publication of the Procedural Protocol in respect of the Code of Conduct⁴ consolidates procedural information on complaints and investigations, and represents an important step forward in strengthening the process for complaints, investigations and decision-making in Code of Conduct cases.

Confidentiality

- 5. The Code makes clear that Members must not disclose details in relation to any investigation by the Parliamentary Commissioner for Standards.⁵ The existing confidentiality arrangements approved by the House, pursuant to which a list of current investigations is published on my office's webpages, giving the name of the subject MP and the broad area of the investigation, are designed to balance confidentiality with public accountability. In circumstances where significantly incorrect information about the allegation has been made public, the injured party (the subject Member, or a complainant where relevant) may apply to me for permission to issue a brief and factual public rebuttal.
- 6. I am aware of and sympathetic to arguments on both sides that would seek respectively to tighten or loosen confidentiality requirements. But Members must adhere to the rules as passed by the House, and at present we are seeing too many breaches of confidentiality in Code cases. Breaches of confidentiality are not capable of rectification, so any Member who breaches confidentiality should expect to find themselves referred to the Committee on Standards.

Role of the Principles of Public Life

7. The new Code makes clear that the Commissioner is not able to investigate alleged breaches of the Principles of Public Life in themselves, but will take the Principles into account when considering allegations of breaches of the rules. As I reflect throughout this report, the Code is itself underpinned by the Principles of Public Life, and conduct which fails to uphold or which risks eroding them has a deleterious effect on parliamentary standards, and by extension, public trust and confidence in the political system.

⁴ Parliament.uk, <u>Procedural Protocol in respect of the Code of Conduct</u>, 24 February 2023

⁵ Code of Conduct and Guide to the Rules relating to the Conduct of Members, rule 13, HC 1083, published 10 February 2023

Words of advice and indications of concern

- 8. The powers of the Parliamentary Commissioner for Standards reflect the fundamental role of the Principles in underpinning the Code. I am empowered by the House under Standing Order No. 150, without opening an investigation, to indicate concern and give words of advice to a Member in response to their reported conduct, behaviour or attitude, which need not engage a specific rule or rules in the Code of Conduct.
- 9. The specific exercise of these powers is confidential and subject to parliamentary privilege. In the case of reported conduct that does engage one or more rules in the Code, the Member is warned of the possibility of a formal investigation should the conduct continue, new evidence emerge or in other circumstances.
- 10. To improve transparency and openness in respect of these powers, within the system recommended by the Committee on Standards and approved by the House,⁶ I have published an explanatory note on my office's webpages.⁷

Commissioner's Advice Notes

- 11. As the Code and Guide to the Rules make clear, all Members are individually responsible for their adherence to the Code. To improve the level of proactive support and information available to Members, I have published (and circulated electronically to Members) a suite of Advice Notes, under House of Commons Standing Order No. 150, to assist Members in applying the Code of Conduct.
- 12. Advice Notes are designed to supplement and clarify (and not to supersede or contradict) provisions of the Code. Each Advice Note makes clear that where specific or formal advice is required by a Member for a particular situation, my office will be happy to provide it and since commencing my term I have met and advised many Members in confidence in response to such requests.

⁶ See Standing Orders of the House of Commons - Public Business, Standing Order No. 150(5); Committee on Standards, Seventh Report of Session 2019–21, Sanctions in respect of the conduct of Members, HC 241; and Committee on Standards, Twelfth Report of Session 2019-21, Sanctions and confidentiality in the House's standards system: revised proposals, HC 1340

⁷ Parliament.uk, Parliamentary Commissioner for Standards, <u>Explanatory Note on the Commissioner's powers to indicate concern and issue words of advice to Members without opening an investigation, 5 June 2023</u>

- 13. Appendix 2 shows the Advice Notes published since the start of my term.
- 14. As the Code of Conduct is underpinned by the Principles of Public Life, it is natural that the practical advice in my Advice Notes reflects these values. The subject and content of Advice Notes are also informed by the concerns with which members of the public contact my office. For example, my Advice Note on 'Transparency of registration of income, donations and other financial interests' encourages Members to be led by the principles of openness and accountability in registering their interests, in order to deliver genuine transparency:
 - "3. The principle of the registration system as set out in the Code of Conduct and the Guide engages two of the Nolan principles of public life in particular: openness and accountability. The overall purpose of the Register is to provide transparency about financial interests and other benefits which Members receive and which might reasonably be thought to influence them in performing their functions.
 - 4. It is helpful for Members, when considering registrable interests, to ask themselves, "Am I registering my interests in a form that provides effective transparency and accountability?"
 - 5. The answer to that question should in particular include consideration of whether a register entry describes the real-world source of income or donations. For payments, this includes the name and address of any client to whom the Member has personally provided services, if different from the payer, and a brief description of their business (if not self evident). For donations, this includes the name and address of the donor and of any organisation acting as an intermediary (including trust details where relevant).
 - 6. Accurate information may still fall short of transparency. For example, registering a donation made through an intermediary company will generally not provide a useful degree of transparency. Registering a source that appears to be a mere conduit for payment may lead to suspicion that the recipient is anxious to conceal the true origin of the donation.
 - 7. Giving full details of an interest serves an additional and important purpose: it reduces the risk of the media, social media and others representing donations in a way that is inaccurate, intentionally or unintentionally.
 - 8. In the case of monetary donations, transparency is enhanced if Members add, where appropriate, a brief description of what they are to be used for.

This can reduce the risk of donations for political activity being aggregated with personal earnings of a Member and distorting the true picture of their private income."

15. As ever, Members who have questions or comments about Advice Notes and their application to their individual circumstances are welcome to contact me at standardscommissioner@parliament.uk.

Visibility and clarity of the rules underlying the Code of Conduct

16. Rule 8 of the Code provides:

"Excepting modest and reasonable personal use, Members must ensure that the use of facilities and services provided to them by Parliament, including an office, is in support of their parliamentary activities, and is in accordance with all relevant rules."

- 17. Several Members and other stakeholders in the parliamentary standards system have raised with me that the relevant rules referred to can be difficult to locate. The Governance Office oversees the Rules Register on the parliamentary intranet, described as a "topical index of Commons rules on access to and use of the Parliamentary Estate, House of Commons and bicameral facilities and Parliamentary digital services", and says that it "works with rule owners to ensure that rules pages continue to be the dedicated source of information for rules, and that the pages are kept up-to-date when the rules change."
- 18. Having looked through the Rules Register, I have noticed that there are topics included that solely provide information rather than being a statement of rules, and that the rules for some topics in the Register run to many pages in length. I recently, in conjunction with the Clerk of the Journals, advised the Committee on Standards on its updating of the House of Commons stationery rules, which significantly simplified the previous rules by implementing a principles-based approach, in accordance with modern regulatory practice. Such an approach will often involve an exercise of judgment on the part of Members, who are encouraged, when in doubt, to seek advice in their specific circumstances.
- 19. Using the revision of the stationery rules as an instructive example, I plan to work with rules owners and the Governance Office to encourage the revision and redrafting of rules

⁸ For example, on 'Heritage Collections', '[location of] showers and toilets', and 'fire safety best practice'.

to improve their clarity, transparency and effectiveness, and to ensure reasonable certainty for Members and those advising them. The revised rules should be available in a central online repository, that the parliamentary community can be confident is accessible, clear and certain, authoritative and up-to-date.

Statistics for Code of Conduct work

Number of written allegations and enquiries received







Turnaround time to reply to enquiries (% answered in 5 working days)







Number of Code of Conduct inquiries started

2020-21

26

2021-22 **32**



Code of Conduct inquiries completed & outcome



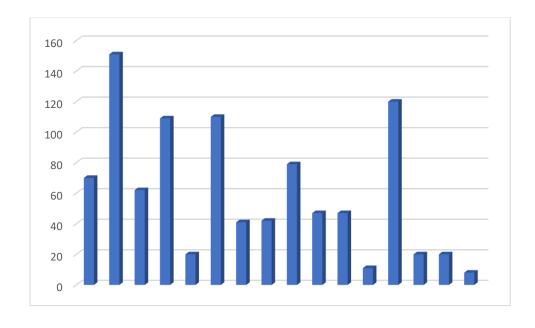




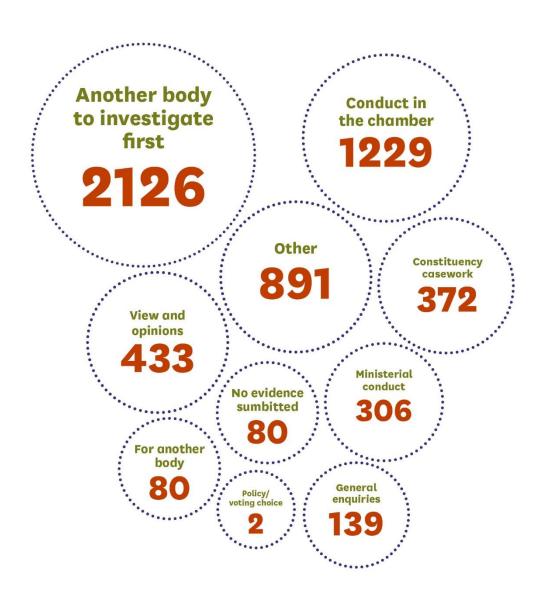
Average number of working days to close an inquiry



Number of working days to conclude each inquiry



Reasons for not starting a Code of Conduct inquiry



2 Engagement and outreach

Public correspondence received by the Commissioner

- 20. One of the key ways in which I engage with members of the public is through the hundreds of emails and letters that my office receives each month. Engagement with the public, and engagement with the causes of public disaffection and disengagement with the political system and Parliament, are priorities of my tenure.
- 21. The Parliamentary Commissioner for Standards has a vital role in actively engaging with levels of public trust and confidence in the political system and Parliament for two reasons.
- 22. First, the Commissioner is the independent keystone within the parliamentary standards system, and is duty-bound to fulfil the functions, roles and responsibilities of the job independently. The public, Members and the House of Commons look to the independence of the Commissioner to demonstrate unequivocally that parliamentary standards is not wholly a self-regulating system, while Parliament rightly maintains exclusive control over its own affairs. While the Committee on Standards is tasked with oversight of the Commissioner, it is to the House itself that the Commissioner is bound to report annually.
- 23. Secondly, the Commissioner is one of Parliament's few entirely open public interfaces: anyone may contact the Commissioner's office directly, and thousands do so each year, with their unfiltered experiences, in their own words, of their representation by Members and by Parliament. Their correspondence provides information on public perceptions of the functioning of the standards system, and trust and confidence in politics. My duty to report annually is an opportunity to provide insight to the House, MPs and stakeholders on the key issues that matter to the public in their experience of the political system and Parliament.
- 24. The statistics for this reporting year show that responses to 99 per cent of the 5,672 written complaints received by my office were turned around within five working days. This volume of complaints represents a large increase on the previous two reporting years in which well under 2,000 complaints were received by my office in each year. In accordance with the Procedural Protocol, my office will make reasonable adjustments where necessary to allow anyone to access the complaints process, and responses to

complaints that are outside of my investigations remit, or that I consider are not justified and proportionate to investigate, are provided with reasoning.

- 25. In this report I reflect on two key themes of public correspondence received by my office in 2022-23. Discounting miscellaneous complaints and complaints about conduct in the Chamber (which falls under Mr Speaker's remit), the second and third most complained about topics in this reporting year by volume were about:
 - Members' views and opinions, which includes complaints about social media posts (see Appendix 3); and
 - Members' handling of constituency casework (see Appendix 4).
- 26. While the Procedural Protocol makes clear that I cannot investigate these matters unless as part of an investigation of breach of rule 11 of the Code⁹, my powers and responsibilities, as set out in the Standing Orders, are wider than investigations. My thoughts on these two key themes are at Appendices 1 and 2.

Seminars on the Principles of Public Life in practice

- 27. The importance of shining a light on best practice and the sharing of it among MPs and their offices led me to initiate a series of seminars, initially for Members' staff, on the practical application of the principles to the everyday life of a Member's office. These seminars are cross-party and follow the Chatham House Rule. They are focused on exploring the experiences of attendees in order to articulate what best practice looks like in the application of the principles to the daily business of a Member's office, and to sharing case studies and other materials in the hope and with the intention that they will provide opportunities to reflect, inspiration, and reminders where necessary.
- 28. A positive side-effect of these seminars is to support and develop a sense of commonality and community between parts of the parliamentary workforce that otherwise may not directly interact, and that may in some respects experience some level of isolation given the nature and terms of their work. I look forward to extending this as I plan to organise further seminars outside Westminster, engaging Members' staff in constituency offices.

⁹ That is, that Members shall never undertake any action which would cause significant damage to the reputation and integrity of the House of Commons as a whole, or of its Members generally.

- 29. Some of the principles-driven day-to-day work of MPs' offices discussed at the seminars to date have included:
 - the different ways in which Members are nowadays making themselves open and accountable to constituents through the use of everything from physical surgeries to social media;
 - the lengths to which many Members and their staff go to fulfil their parliamentary duties in Westminster and to make themselves accessible in their constituencies throughout the UK, often at the expense of family and other demands in their private lives;
 - upholding integrity and objectivity in the course of political negotiations, and in debating public policy including use of data; and
 - leadership and selflessness driving effective liaison with public authorities including Government departments and health and local authority services, to provide rapid interventions for constituents facing urgent problems.
- 30. Anonymised real-world insights and case studies of how MPs and their offices apply and live up to the Principles, discussed at or prompted by these seminars, are reproduced in Appendix 5 of this report.
- 31. So far we have held four seminars (as well as a pilot seminar kindly supported by colleagues from the House Service). The first two took place in Westminster. The third was held in Cardiff for local constituency staff, and was very kindly hosted by the Senedd Cymru.
- 32. The fourth was held in Lincolnshire and was very kindly hosted jointly by Rt Hon Sir John Hayes MP and South Holland District Council; a particular pleasure of this seminar was the attendance of a number of sixth-form politics students from local schools, whose insights and observations brought an insightful additional perspective to our discussions.
- 33. I am very grateful to all Members' staff who have engaged with these seminars to date, including representatives from the offices of: Bim Afolami MP, the Scottish National Party staff group, Sir Peter Bottomley MP, Wendy Chamberlain MP, Stephen Doughty MP, Rt Hon Sir Michael Ellis MP, Chris Evans MP, Ruth Jones MP, Rt Hon Dame Eleanor Laing MP,

- Seema Malhotra MP, Rt Hon Mrs Theresa May MP, Jessica Morden MP, Rt Hon Sir John Hayes MP, Rt Hon Sir Stephen Timms MP and Nadia Whittome MP.
- 34. Keeping these seminars small enough to allow constructive discussion means that there is no intention that they will be attended by more than a very small proportion of the parliamentary community. I hope that they will, however, have a wider influence through the circulation of the case studies and other material representing our discussions and conclusions.
- 35. Any Member whose staff wish to attend a seminar (or who wishes to attend one of the seminars which I hope to hold for Members in the second tranche of seminars) is warmly invited to contact my office at standardscommissioner@parliament.uk.

Meetings with stakeholders, panel events and talks

- 36. As part of my wider engagement and outreach activities I have met with members of the Whips' offices to promote awareness of the rules, and I regularly meet with individual Members to provide confidential advice.
- 37. Where the principles of an issue or the advice provided appears to be of more general application, I have produced and published Advice Notes to support all Members in applying the Code of Conduct, described in this report. In producing Advice Notes, I have consulted and engaged with the Lord Chief Justice and the Judicial Office, the Electoral Commission and IPSA, as well as other stakeholders, to ensure that the advice is practical and consistent, and I am grateful to all of them for their engagement and assistance. Appendix 2 lists Advice Notes issued to date.
- 38. In the first weeks of my tenure, I held meetings with a number of key stakeholders to discuss priorities for my time in office, including the Leader of the House, the Shadow Leader of the House, Mr Speaker, Clerks and others.
- 39. This year I have appeared in panel discussions and as a speaker at internal events on the parliamentary standards system and in the inter-parliamentary community: those

speeches where possible are published on my webpages¹⁰ to promote transparency. My office provides three days of in-person expertise at the House Services Fair, to give information and enable Members and their staff to ask questions about any aspect of the parliamentary standards system.

- 40. While I do not comment on individual cases, I have also sought to build on public openness and transparency about my role and responsibilities by undertaking proactive media work in my capacity as Commissioner. My media work draws on my general reflections on my first months in office and explains my views on the priorities for the parliamentary standards system and improving trust between the public and the political system.
- 41. As part of my outreach programme I have met with school and university students, both in and outside of Westminster, to introduce, and engage in question and answer sessions about, the parliamentary standards system and public engagement with politics and Parliament. This is a particularly exciting part of my job and I hope to maintain and increase it throughout my term.
- 42. I have attended meetings with the Committee on Standards in Public Life, the House of Lords Commissioners for Standards and members of the Lords Conduct Committee, and I have also met with the Independent Adviser on Ministers' Interests.
- 43. I delivered the Public Law Wales Annual Lecture in June 2023 on the subject of building bridges between Parliament and the public, and am due to address the Speakers of the Isles Conference in Ireland in July 2023.
- 44. Appendix 6 lists selected meetings that I have attended since the start of my term in January 2023.

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¹⁰ Parliament.uk, Parliamentary Commissioner for Standards, Talks and materials

3 Independent Complaints and Grievance Scheme (ICGS)

- 45. Under Standing Order No. 150, one of my duties as Commissioner is "to oversee investigations and make findings in cases against Members under the Independent Complaints and Grievance Scheme; to refer such cases to the Independent Panel of Experts where a sanction beyond his powers is contemplated; and to assist the Panel and its sub-panels in its work."
- 46. As this is my first annual report of my term as Commissioner, I take the opportunity to underline the value of the ICGS, as a Parliament-wide scheme that recognises that everyone in the parliamentary community has the right to a safe workplace environment, free from sexual misconduct and bullying and harassment. As the parliamentary standards system builds on its work to ensure positive cultural change across Parliament, I remind Members that in connection with their parliamentary work, whether in Westminster or elsewhere, they are subject to the Behaviour Code, which includes the principles—based requirements to:
 - Recognise your power, influence or authority and don't abuse them
 - Think about how your behaviour affects others and strive to understand their perspective
 - Act professionally towards others
 - Ensure Parliament meets the highest ethical standards of integrity, courtesy and mutual respect
 - Speak up about any unacceptable behaviour you see.
- 47. My tenure as Commissioner started shortly before Thea Walton took up her post as the Director of the Independent Complaints and Grievance Scheme. I thank Thea for her part in supporting a positive relationship between our offices in the first months in our respective roles. During this time, we have agreed a revised oversight arrangement¹¹ that will maintain the operational independence of ICGS investigations, while supporting effective and thorough oversight. My key priority regarding the role of my office within the

¹¹ Independent Complaints and Grievance Scheme website, <u>PCS oversight of investigations conducted under the ICGS</u>, February 2023

processing of complaints under the Scheme is to improve the quality, including the timeliness, of those investigations, and my office has taken steps to support delivery of this across all cases in which I am decision-maker.

Confidentiality and the Commissioner's power to correct the record in ICGS cases

48. On 21 April 2021, the House approved a recommendation of the Committee on Standards to grant the Parliamentary Commissioner for Standards a discretionary power in exceptional cases publicly to correct inaccurate or incomplete information in ICGS cases:

'The power to set the record straight

While as a general rule, the Commissioner will not disclose to the public or the media the details of an ICGS case either while it is under investigation or afterwards, she should have the discretion in exceptional cases publicly to correct inaccurate or incomplete information. She might wish for example to confirm whether an investigation is taking or has taken place, and the broad nature of the case. She would only give out minimal information, and would only do so after consulting the parties involved and considering their mental and emotional wellbeing.'12

- 49. The first use of this power was on 30 March 2023, when I issued a statement at the request of both parties in an ongoing ICGS case, in response to inaccurate information published in several news articles on 29 March 2023. The statement avoided naming the parties in the case, both protecting and restating the importance of the confidentiality of the Scheme.
- 50. That statement was published on my office's press notices webpage¹³ and was also sent by the House of Commons Media team to specific media outlets that had published relevant inaccurate information. The exercise of the power was successful in that it resulted in inaccurate articles being removed by media outlets, one major outlet published a clarification, and the statement was reproduced in several further articles demonstrating the effective prevention of proliferation of inaccurate information.

¹³ Parliament.uk, Office of the Parliamentary Commissioner for Standards, <u>Commissioner's statement following media reports of 29 March 2023 on an ICGS case</u>, 30 March 2023

¹² Committee on Standards, <u>Sanctions and confidentiality in the House's standards system: revised proposals</u> (Twelfth Report of Session 2019–21), which originated from recommendations made by the Commissioner to the Committee, were agreed by resolution of the House of 21 April 2021.

51. This was a positive outcome for the first use of this power, but I remain mindful that this can only be a mitigating and reactive measure. Breaches of confidentiality, particularly while investigations are ongoing, damage the Scheme, and all parties to complaints must observe that and act accordingly. Parliamentary standards do not and cannot operate in a vacuum: all members of the parliamentary community need to test their decisions against the benchmark of improving public trust in politics.

4 Register of Members' Financial Interests

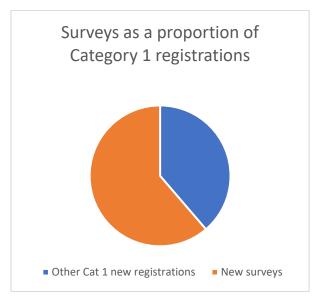
- 52. Over the last 12 months the Registry Office has been engaged in a project to overhaul all of the Registers maintained by the Office. The project will first deliver a "self-service" portal for Members to submit their interests to the Registry Office alongside a Register that will be published in an electronic form that is fully searchable by our outside stakeholders. We hope that it will go live in Autumn 2023. Work will then start on digitising the Register of Interests of Members' Secretaries and Research Assistants. After that, the project will focus on the APPG Register. This is an exciting project which will significantly enhance the utility of the Register, and I am very grateful to all those in the Registry Office and elsewhere who are working so hard to deliver it.
- 53. All of the Registers will be covered by life-long support by the Parliamentary Digital Service so that enhancements and improvements can be made in an iterative manner.
- 54. The Register of Members' Financial Interests is published online every two weeks while the House is sitting, and less frequently in recess. It is no longer published in hard copy. Every interest remains on the Register for one year after it has ended.
- 55. During 2022–23 we published 21 editions of the Register. These included 3,368 new registrations. The top three categories were:
 - Category 1: Employment and earnings at 1,638 entries (48.6 per cent of new registrations)
 - Category 3: Gifts, benefits and hospitality from UK sources at 595 entries (17.7 per cent of new registrations)
 - Category 2: Donations and other support for activities as a Member of Parliament at 541 entries (16.1 per cent of new registrations)
- 56. In addition to new registrations, there were 274 updates to existing entries. Overall, there were 3,642 changes to the Register. A full breakdown is provided in the table below.

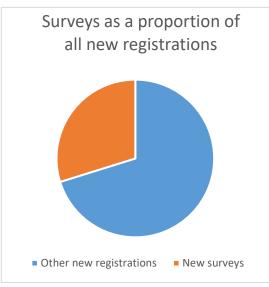
Category in the	New	% of	Updates	% of	Total	% of all
Register	entries	all new entries	to existing entries	updates to existing entries	changes	changes
Category 1: Employment and earnings	1,638	48.6%	104	38.0%	1,742	47.8%
Category 2: Donations and other support for activities as a Member of Parliament	541	16.1%	30	10.9%	571	15.7%
Category 3: Gifts, benefits and hospitality from UK sources	595	17.7%	22	8.0%	617	16.9%
Category 4: Visits outside the UK	411	12.2%	12	4.4%	423	11.6%
Category 5: Gifts and benefits from sources outside the UK	13	0.4%	0	0%	13	0.4%
Category 6: Land and property	8	0.2%	21	7.7%	29	0.8%
Category 7: Shareholdings	19	0.6%	16	5.8%	35	1.0%
Category 8: Miscellaneous	138	4.1%	63	23.0%	201	5.5%

Category 9: Family	0	0%	0	0%	0	0%
members employed						
Category 10: Family	5	0.2%	6	2.2%	11	0.3%
members engaged in						
lobbying						
Total	3,368	See	274	See	3,642	See
		note		note		note
		below*		below*		below*

* Because of rounding, percentages may not sum to 100.

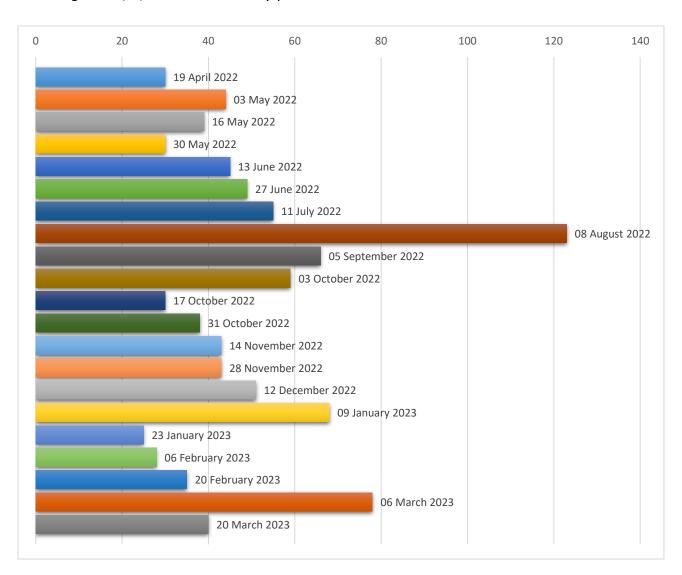
- 57. Of the 1,638 new registrations under Category 1: Employment and earnings, 1,004 were payments for opinion surveys. These typically take under an hour and generate a payment which is often under £300. Many Members arrange for these payments to be paid directly or indirectly to their party organisation or to good causes locally. Payments for opinion surveys accounted for 61.3 per cent of the new registrations under Category 1, and 30.0 per cent of new registrations overall.
- 58. Under the new revised Guide to the Rules, which came into effect on 1 March 2023, Members are no longer required to register payments for opinion surveys.



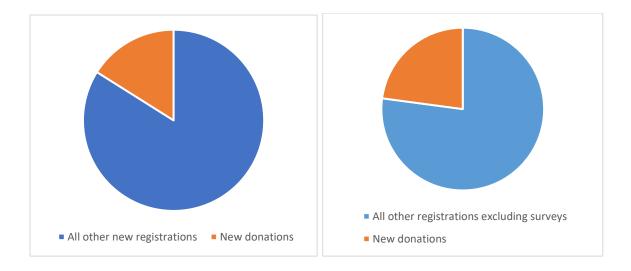


59. There was another annual increase in interests registered under categories 3, 4 and 5, which cover gifts, benefits and visits. In total, these three categories made up over 30.3 per cent of all new registrations, or 43.1 per cent excluding survey payments.

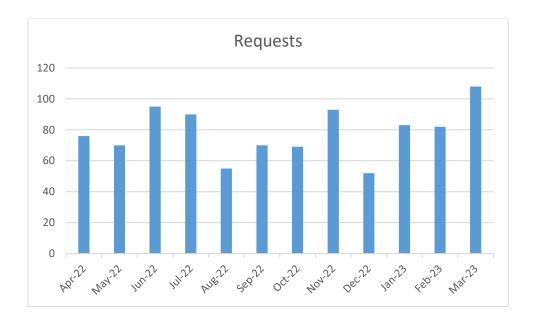
60. Categories 3, 4, and 5 combined by publication:



61. New entries under Category 2: Donations and other support for activities as a Member of Parliament accounted for 16.1 per cent of all new registrations, or 22.9 per cent if survey payments are excluded.



- 62. The Register grew from 433 pages on 19 April 2022 to 604 pages on 20 March 2023. (Between the 2015 General Election and the start of the pandemic, it had been roughly between 450 and 550 pages long.)
- 63. There were 943 requests for non-standard registration advice and declaration. Requests peaked in March 2023; which we believe was a result of the new revised Code of Conduct and Guide to the Rules coming into effect on 1 March 2023.



64. Because there have been three general elections in the space of five years and the Covid-19 pandemic, it is difficult to establish what a "normal" year would look like under the current registration thresholds, which were introduced at the 2015 General Election. However, at different points in the year, we have taken three-year averages that exclude pre and post general election periods, and the post-Covid period. The table below provides a comparison.



- 65. Registrations peaked in December 2022. Including the post-election period in 2019, this was the busiest December for registrations to date. Similarly, the office processed more registrations in August 2022 than in any previous August.
- 66. Excluding surveys, 13.5 per cent of registrations were registered late and 21.5 per cent of updates were also submitted outside of the 28-day timescale.

5 Register of All-Party Parliamentary Groups

67. APPGs are informal groups of parliamentarians who share an interest in a particular subject. APPGs must register the names of their officers and also any benefits received by the APPG (e.g. money, goods, services), subject to a financial threshold. APPGs are listed in the APPG register as being either a Country Group or a Subject Group.

Year	Total Groups	Subject Groups	Country Groups	Groups with registered benefits	Editions
2018-19	697	559	138	365	9
2019-20	355	275	80	164	7
2020-21	717	585	132	360	9
2021-22	762	626	136	389	9
2022-23	758	621	137	399	8

68. The Committee on Standards has conducted a review of the rules on APPGs¹⁴ and published proposals for change¹⁵. My Office has provided expert advice on those changes and is helping to draft a new Guide to the Rules for APPGs that reflect those proposals.

¹⁵ Committee on Standards, Eighth Report of Session 2022–23, All-Party Parliamentary Groups: final proposals, HC 228

 $^{^{14}}$ Committee on Standards, Seventh Report of Session 2021–22, All-Party Parliamentary Groups: improving governance and regulation, HC 717

6 Register of Members' Secretaries and Research Assistants

69. MPs' staff who hold a parliamentary photo-identity pass must register any occupation or employment which is advantaged by the privileged access to Parliament afforded by their pass. They must also register any gift or benefit (e.g. hospitality, services) that they receive, if it in any way relates to or arises from their work in Parliament. In both cases a financial threshold applies.

Year	Total staff	Staff with registered interests	Editions
2018-19	2022	408	9
2019-20	1795	348	8
2020-21	1531	257	8
2021-22	1713	323	9
2022-23	1889	383	9

7 Register of Journalists' Interests

70. Journalists who hold a parliamentary photo-identity pass must register any occupation or employment which is advantaged by the privileged access to Parliament afforded by their pass, subject to a financial threshold.

Year	Total Journalists	Journalists with registered interests	Editions
2018-19	438	85	9
2019-20	467	79	8
2020-21	413	70	8
2021-22	419	71	9
2022-23	470	72	9

Appendix 1 Commissioner's speech on 'Code and Behaviour' at House Services Fair, May 2023

- 1. Many thanks to those of you who have joined this session. To be honest, I was relieved to see any audience at all. When you look at the various stalls operating at the Members Services Fair each year, there is one that is normally conspicuous by being considerably less crowded than the others, and that is the stall run by the staff of the Office of the Parliamentary Commissioner for Standards and the Registrar of Members' Financial interests.
- 2. For a reason that is very simple, very clear and very wrong, some Members and their staff are frightened of the standards system. Too many of them see it as a series of landmines on which you have to avoid stepping, but which are cunningly hidden so that the ground can blow up under any Member at any time and lead them to be at best pilloried in the press, and at worst facing suspension from the House and effectively the end of their Parliamentary career.
- 3. The main reason why this is wrong is that in so far as the Code of Conduct should be seen as a series of landmines at all, it is in itself is a short, simple and clear map of where those landlines are buried, and every Member, and indeed every member of the public, has easy access to that map. The primary rules of the Code occupy no more than a few short paragraphs, and they alert the Member and their staff to the main clusters of buried explosives.
- 4. Even taken with the Guide to the Rules relating to the Conduct of Members, which is conveniently printed alongside the Code, the entire set of rules occupies no more than about 40 pages, much of it is never going to be relevant to most Members in most situations, and there is no reason why a Member and their staff should not easily remain sufficiently familiar with the content of the rules to avoid trouble throughout their career. Which is of course precisely what happening for the vast majority.
- 5. Yes, I have also heard the occasional Member bemoaning the fact that the rules have all become so complicated, and it wasn't like this years ago, and the system is now so complex that it is becoming impossible to do the job of an MP.

- 6. Perhaps they would rather join the accountancy profession and have to master and be constantly aware of several thousand pages of professional rules issued by the Financial Conduct Authority, or join one of the medical professions and have Codes of Conduct and Guides to the rules again numbering many hundreds of pages (I know, because I have been involved in writing more than one of those); or join the legal profession, or indeed any other trade or profession, where they will find today that every workplace environment and every professional and trade organisation has rules which reflect the increasing complexity of modern life, and the regulatory demands that go with higher consumer expectation, which is, in itself, a good thing, whether it is expectations of public officials or private professionals and tradespeople.
- 7. And that is the bottom line: Members of Parliament must understand that they are public officials here to serve the public, and therefore if they understand the expectations that a modern public has of its officials, they are unlikely to go wrong. Of course, anybody who believes that she or he has arrived at an entitled position, which gives them some kind of superiority over the public, and in which they are here to receive not to give, will undoubtably quickly fall foul of the rules and rightly so.
- 8. But let me be clear, that last group of politicians is small and, I believe, growing smaller all the time. The vast majority of Members of Parliament today not just accept that they are public servants of whom the public have high expectations, but welcome and embrace that as defining their opportunity to serve.
- 9. And that is the second reason why it is wrong to see the Code of Conduct as a series of unexploded landmines. The Code is best understood as an inspiring document that supports Members in their ambition to serve the public in the best way possible.
- 10. The Seven Principles of Public Life the Nolan Principles although articulated relatively recently, embody timeless ideals that have motivated, inspired and guided public servants of all kinds for all time. The Code of Conduct recites these principles as underpinning all the specific and technical rules found later in the Code and Guide, to emphasise that this is not some kind of highly complex technical regulatory regime: almost all of it is simple, common sense based on these principles, and supports the natural inclination of a public servant towards honesty and integrity, openness and accountability, selflessness and objectivity, and leadership in all.

- 11. I am not here to investigate and punish wrongdoing under the Code: that is one of my functions, but it is not why I am here. What attracted me to the role, and what actuates me in my daily performance of it, is the wish to support the vast majority of Members of Parliament, and their staff, for whom those principles are inspiring, and who wish to be supported in pursuing them, and to be given the space to articulate in public how those principles fashion the daily life of a Member. The wider importance of this work is to support public trust and confidence in politics and Parliament.
- 12.So I conclude with this: I and my entire team are indeed a Members' Service, in the sense that we are here to help you to uphold the highest standards of the political profession in accordance with the principles of public life. We will do that by guiding and advising where that is helpful. But primarily we will do that by facilitating you in your pursuit of those ideals.
- 13.I look forward to welcoming you to one of our future Members' staff Principles in Practice seminars at which we explore together what best practice looks like and compile case studies of the application of the Nolan principles to your daily professional lives. I look forward to discussing with you issues of professional standards that you find helpful to raise with us. And above all, I look forward to working with you effectively to improve the performance and reputation of the political profession in the United Kingdom.
- 14. Thank you for coming, and please accept my best wishes for your continued endeavours.

Appendix 2 Commissioner's Advice Notes

Advice Note	Summary of Advice Note	Date of publication	Revisions
Template provision on lobbying for reward	"Advice Note provided in accordance with paragraph 95 of the Committee's First Report of Session 2022-23, in which the Committee proposes to ask the Commissioner to advise "on wording for a template clause and letter of undertaking which satisfies the requirements of the new rule."	3 January 2023	
Transparency of registration of income, donations and other financial interests	"When considering registrable interests Members should aim to maximise transparency and accountability. Register entries should aim to describe the real-world source of income or donations. Giving full details of income reduces the risk of confusion or misrepresentation."	11 January 2023	
<u>Late registration of interests</u>	"Too many Members are registering interests late. This undermines the registration system. Members are personally responsible for timely registration. Future breaches will be investigated and reported for sanction."	3 February 2023	

Advice Note	Summary of Advice Note	Date of publication	Revisions
Registration of charitable	"Money paid to charity (or to any other third party) at the	22 February 2023	
donations	direction of a Member remains registrable by the Member."		
MPs writing to judges	"MPs should not generally write to judges. Letters from MPs	24 February 2023	Paragraph added on
	will generally appear as attempts to interfere with legal		coroners as judges (27
	proceedings, which is a breach of the separation of powers.		March 2023)
	MPs can provide character references in cases in the same		
	way as anyone else."		
Paid Parliamentary advice	"When applying the new prohibition against the provision of	16 March 2023	
	paid Parliamentary advice and consultancy, Members should		
	ask themselves whether the potential payer is seeking to		
	"buy" the services of an MP in their capacity as such (which		
	is prohibited) or to take advantage of non-Parliamentary		
	professional or other skills or expertise which the Member		
	happens to have (which is permitted)."		

Advice Note	Summary of Advice Note	Date of publication	Revisions
Lobbying after visits	"When a Member goes on a funded visit, the rules on paid lobbying prevent the Member from seeking a benefit for the body that funded the visit; they do not prevent any other lobbying about the place visited or related matters."	3 May 2023	
Crowdfunding	"There is no objection to Members using crowdfunding campaigns to raise money; but it is their responsibility to ensure that registration requirements are met, and permissible donation laws are observed, in respect of all donations. Fully anonymous donations should not be accepted."	7 July 2023	

Appendix 3 MPs' views and opinions (language and tone)

- 1. I am concerned about the volume of complaints I receive from the public about the language and tone that some MPs choose to use in expressing their views and opinions, including on social media.
- 2. One of the largest volumes of correspondence I received this year related to public concern at the language in which a number of Members chose to criticise the work of a Committee of the House. I took the view that the language concerned could possibly constitute a contempt of Parliament, and that it would therefore be proper for me not to take any action until the Committee concerned had considered the possibility of taking action in respect of the contempt. My standard reply to complainants therefore explained that I would not be taking any investigatory action at this point so as not to prejudice any possible action by the Committee, but that I would continue to monitor the situation. And that remains the position.
- 3. I have seen numerous examples of MPs' language that could reasonably be regarded as offensive or aggressive, or which contains what could be construed as personal attacks.
- 4. In the Chamber, the Speaker enforces rules designed to ensure that however sharply Members may disagree on an issue they are required to do it in language which remains respectful. I see no reason why Members should not set themselves similarly exacting standards in their political debates outside the Chamber.
- 5. A decision of the Independent Expert Panel in June 2023¹⁶ decided that I had wrongly classified a particular interaction between Members on social media as amounting to an instance of bullying, having regard to the overall circumstances of the case including the social media history of both parties. I make no comment, of course, on the substance of that case, but it is important to remind Members that the IEP in its report concludes that:

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¹⁶ Independent Expert Panel, <u>The Conduct of John Nicolson MP</u> (published 20 June 2023)

"We agree with the Commissioner that 'liking' or 'retweeting' are not neutral acts. They might potentially lead to a breach of the Policy. In our view it was unwise of this respondent to like or retweet some of the tweets in question, albeit this was a much less direct act than to tweet in such terms himself. But we can conceive of tweets which would be so intimidating, hostile, degrading, humiliating or insulting that to 'like' or retweet them would breach the policy. It would be wise for Members to exercise considerable care before they associate themselves with messages in Twitter (or indeed any other social media) which might fall into that category, or even come close to it."¹⁷

- 6. It therefore remains important for Members to consider the tone and language that they adopt on social media and in other forums outside the Chamber. This is not merely so as to avoid a breach of the Behaviour Code, but more importantly to reflect the concern that many members of the public have expressed that they wish to be able to respect Members for their restraint and care in the language that they use to each other, following the Nolan Principle of leadership in setting an example of how sharp disagreement on policy can be expressed and explored without resorting to obscenity, abuse or merely personal insult.
- 7. In bringing this matter to the attention of the House, I remind Members that they are obliged to uphold the Principles of Public Life, including the principles of integrity and leadership. I remind Members that in their Parliamentary activities, whether in Westminster or elsewhere, they are subject to the Behaviour Code, which includes the principles—based requirements to:
 - Recognise your power, influence or authority and don't abuse them
 - Think about how your behaviour affects others and strive to understand their perspective
 - Act professionally towards others
 - Ensure Parliament meets the highest ethical standards of integrity, courtesy and mutual respect
 - Speak up about any unacceptable behaviour you see.
- 8. This is an issue that has troubled me particularly because it clearly troubles so many members of the public, and is therefore clearly capable of damaging trust between the

¹⁷ ibid, paragraph 2.72

¹⁸ Parliament.uk, Behaviour Code

public and politicians. I earnestly encourage all Members to take stock of their present practices and I look forward very much to being able to report next year that best practice has become the norm.

Appendix 4 MPs' responsiveness to constituency correspondence

- I am concerned about the very large number of complaints that I receive about lack of responsiveness to constituency correspondence, which suggest that there is a general perception on the part of some members of the public that some MPs are not attaching sufficient importance to responding to enquiries and other correspondence from constituents.
- 2. My concern about MP responsiveness to constituency correspondence arises from the general perspective of the importance of Members upholding the Principles of Public Life in the performance of their duties and functions. In particular, in handling correspondence with members of the public, Members clearly need to reflect the principles of openness and accountability.
- 3. I believe that the large majority of MPs operate impressively effective systems for responding to the large volume of correspondence that they receive from their constituents, and that they have a consistently impressive track record of taking up issues raised by constituents in a timely and helpful manner. My assessment takes into account that there are instances where the Member simply cannot intervene or offer substantive help.
- 4. There are, however, a number of Members about whom I receive a sufficient number of complaints of failure to respond to constituents to make me wonder whether they are operating as effectively as they should be. I would urge Members to seek and share best practice with their colleagues, in the interests of individual constituents and of Parliament itself.¹⁹

¹⁹ Total spend data published by IPSA (specifically 'Remaining staffing budget' data) shows that most MPs operate well within their staffing budget limits. Therefore the evidence does not suggest that staffing budget is responsible for non-response to constituency correspondence. I am of course aware that MPs may receive extremely large volumes of constituency correspondence in response to specific and urgent events of national and international importance, and handling of such events is not the intended subject of commentary in this report.

- 5. It would be wrong for me to be in any sense prescriptive about what standards of responsiveness are appropriate for Members in order for them to maximise the transparency and accountability of their operations. Each Member must decide for themselves what works best for them and their constituents.
- 6. Open surgeries are immensely valued by constituents; but I am aware that many Members have reluctantly been forced to change their surgery arrangements in various ways as a result of security concerns. Obviously, security of Members, their staff and visitors to surgeries must be paramount.
- 7. While each Member will determine their own arrangements for practical transparency and accountability, I do not consider that it is acceptable in today's environment for any Member to refuse to receive electronic communications, or to insist on receiving only electronic communications. Writing a physical letter and posting it is expensive and slow, and is counter-intuitive for many constituents. Equally, it should not be assumed that every constituent has access to email or internet, and some of the most vulnerable constituents most in need of their MP's help may not have that kind of access.
- 8. Overall, it is one of Parliament's proudest boasts over the decades that it is open to the public: that a member of the public can arrive and ask to see their MP who will, where they reasonably can, make themselves available. That is a high standard of accountability of which Parliament can be justly proud. But not all constituents are in a position to travel to Westminster, and so Members' other arrangements should be designed to maximise their availability to all who need them.

Appendix 5 Principles in practice — insights and case studies from Members' offices

"The constituent contacted the MP as he was not receiving sick pay from his employer, and had claimed but not yet received his state pension, and had no money. We [MP's staff] contacted his employer about the sick pay and DWP about his state pension claim and as a result he received sick pay and his state pension two weeks later. We checked if he had enough money for food and fuel, which he did. Had he not we would have submitted an application for Welsh Government's Discretionary assistance fund (we are a partner organisation so can apply directly for constituents meaning those in financial crisis can obtain a cash payment within 24 hours).

He had deferred taking his state pension and had finally retired at age 75. As he had deferred taking his pension, we discovered that he was entitled to a £140,000 lump sum. He had never had any money and was nervous about any implications this may have. He told [MP's staff] that he couldn't fill forms in and was nervous on the phone. We explained that we cannot advise on options, but he said he had been so confused when he spoke to DWP directly that he ended up putting his phone down, so we offered to and did meet with him a number of times and sat with him in all contact with the DWP, Money and Pensions service and Tax Help for Older people, ensuring he understood the information he was provided with and was happy with the choices he was being asked to make.

We made a note in Caseworker [casework management system] to contact him in the new financial year which we did and again met with him as he needed to complete further actions. He was worried about feeling lonely as a result of retiring. We put him in touch with Community Connectors and with the umbrella organisation for volunteering in the constituency."

"The constituent attended a cost of living advice surgery organised by the MP who had also invited various support agencies.

As experienced caseworkers, we are able to ask questions and take a holistic approach to ensure we have the fullest picture of a constituent's circumstances rather than simply addressing the presenting issue or signposting. On talking to the constituent, it was found

that he was struggling financially. He had a number of debts and was on benefits, but we felt he may not be receiving his full entitlement. We did a referral to Citizens Advice where we asked them to complete a benefit check and gave full details as to why we felt he could be entitled to more than he was currently receiving. We also asked them to support with options for dealing with his debts. This approach we find far preferable to simply signposting, as simply giving someone yet another number to call when they have come to you for help is not the best approach. He was given the 'help with bills' information leaflet produced by the MP. Staff ran through a checklist and helped him apply for the local authority's Cost of Living Grant and Welsh Fuel Support Scheme. We also found that he was entitled to help with his water bills and submitted an application for a discount (we are registered partners so can apply on behalf of constituents)."

"During the Afghanistan, Sudan and Ukraine emergencies, [MP's] staff automatically worked out of normal office hours without ever questioning it. People needed our help to flee danger and we would never be able to rest without helping whenever needed. We spent hours on email and the phone over weekends and evenings, answering calls and messages and contacting Home Office, FCDO, embassies, support agencies, constituents and their families. For those who were able to get to the UK we followed up, in some cases for many months afterwards."

"The constituent was an Afghan interpreter. He went to Afghanistan and brought home 3 of his children aged 9,12 and 15. The rest of his family were turned away and refused boarding during the evacuation. His son was in the Afghan army and the Taliban have cut off three of his fingers.

His second wife was pregnant with the baby due in a few weeks. We requested full information for his family who remained in Afghanistan and sent this to the Home Office (HO) and followed this up with the HO by e-mail and then with a member of staff travelling from Wales to Westminster once a week purely to raise all our Ukraine and Afghanistan cases at the HO drop-in in Portcullis House.

We contacted the local authority's vulnerable person team to ensure the family were receiving support: housing, schools, health, benefits. Months later, delays issuing a UK passport to the

children meant that they were unable to access statutory services, so this was chased with UKVI. The MP also raised the case in Business Questions."

"The constituent lost all his family in the Turkey/Syria earthquake. His 15-year-old niece was the only survivor. He wanted to bring her to the UK to care for her.

Aware that this was an issue affecting many in the constituency, the MP wrote to the Home Secretary to ask whether there would be a temporary visa scheme and organised a community meeting inviting constituents and a number of support agencies. Constituents were able to share their stories and specific cases were taken up. Support was arranged for those affected."

"The constituent received Sec[tion] 4 [asylum support] card only so only had vouchers for set shops and no access to cash at all. During lockdown she was too embarrassed to tell the primary school she couldn't provide a laptop and data for her daughter to take part in online learning.

We contacted the headteacher who did not know of the family's situation. The school provided a laptop with an unlimited dongle as well as books, paper, pens, markers, crayons, and toys for the pre-school children, two huge food boxes, tubes of sweets, tins of chocolates and £100 in cash and the staff member delivered this to the family."

"The MP did a home visit as this 96-year-old lady was unable to attend the surgery. She wanted to discuss social isolation. She is a member of a history group, but they have not met since the pandemic. During the visit, it transpired that the lady was unable to use her bath and shower and found household appliances difficult to use. A referral was made to Care and Repair who will undertake a home assessment to see what adaptions are needed. A referral was made to her local councillor with a request to help with the submission of an application for a Disabled Facilities Grant for her to have a wet room. Information was provided about possible sources of grant funding for the history group. A meeting was arranged with a social housing provider to discuss possible opportunities for hosting the history group in one of their community locations."

"We have been supporting this constituent since 2016. She was a failed asylum seeker along with her sister and parents. They had been in the country for over 10 years on visas but claimed asylum and were refused.

Her twins were born in the UK and are British via their estranged father. They have British passports. The constituent was granted Limited Leave to Remain via the 10 year route to Settlement with no recourse to public funds [NRPF]. We tried to obtain benefits for the British children, even writing to a Minister, as they were being treated differently to other British children but were refused. The constituent also supported her parents, as she was the only family member with permission to work. The constituent was working three jobs to support her family, pay full rent, council tax, bills, food etc [and was in receipt of] no benefits whatsoever.

When the pandemic hit, the constituent was furloughed on 70-80 per cent. She was behind in her rent, bills and could not afford to keep her family of five. We arranged regular food parcels and obtained laptops and dongles so that the twins could join in class study. We lobbied the minister once more about the removal of the NRPF condition, as the constituent was facing eviction and the housing team referred the family to social services. Finally, we were able to get the condition removed, helped the constituent claim a discretionary payment for rent arrears, but the notice to quit still stood. She was temporarily housed by the council and is now in permanent housing.

In the meantime, we have advocated for her parents, both have been granted leave to remain but with NRPF in their late 60's after over 25 years in the country. We will look at challenging their NRPF."

"[A constituent] came to us in 2017, before the Windrush scandal to say that her ex-partner had destroyed all her paperwork, including her passport and visas etc and now she cannot prove her identity and right to live in the UK. She had showed the Home Office her paperwork when she successfully applied for her children's British passports, but they declined to look in their archives. She has lived here since she was six years old. She has made several new applications for Indefinite Leave to Remain [ILR] which were costly, and all were refused.

[The MP] wrote to the Home Office many times, but they declined to reissue documents. [The constituent] was left destitute with social services involvement.

When the Windrush scandal came to light, the same day, [the MP's office] referred her to the urgent enquiries unit. Eventually, the Home Office apologised to [the constituent] and reissued her ILR documentation and refunded her the monies she paid out over the years for proof of ILR in the UK."

"Local authority bailiffs were sent to this terminally ill woman for non-payment of council tax. We checked her eligibility for benefits including Council Tax support and found that she had not been claiming what she was entitled to.

Eventually, the local authority reviewed the file and removed debt and called off the bailiffs. We worked closely with Macmillan who were deeply concerned by the lack of engagement from officers at the local authority in the final months of their patient's life, especially as they had sent in the [Attendance Allowance] form which appeared to have been ignored in the first instance."

"[A constituent was] very ill with several serious diseases but was refused benefits despite having ILR [indefinite leave to remain] and working part time as a nurse whilst she studied part time to be a nurse (before deterioration of health). We challenged the DWP ESA [Employment and Support Allowance], DLA [Disability Living Allowance], Housing Benefit and Council Tax Benefit etc over a lengthy period of time for benefits to be paid. Eventually, with the help of [X] Hospital and the Terrence Higgins Trust, the constituent received backdated benefits."

"[A constituent was subject to] financial abuse from his father who had been receiving the constituent's PIP [Personal Independence Payment] and using his mobility car (the constituent can't drive and the father did not drive him anywhere in his own car). The constituent claimed that he was only living on his UC [universal credit] which was not enough to pay his bills, transport and food. We arranged food parcels to be delivered and contacted social services to report the alleged financial abuse. The constituent could not afford to stay at home in the

winter months so would spend all day on the buses, even as far as Bristol to keep warm. We raised concerns of financial abuse with the MP hotline at DWP who then liaised with Social Services. The constituent's father was removed as appointee and so his PIP started to be paid directly to him. Motability took back the car and issued the constituent with the money instead."

Appendix 6 Selected meetings of the Parliamentary Commissioner for Standards January-June 2023

Parliamentary officials and Parliamentary organisations

- Secretariat of the Commonwealth Parliamentary Association UK
- House of Commons Cultural Transformation team
- Speaker's Counsel
- House of Commons Members' Services Team
- Independent Complaints and Grievance Scheme stakeholders' forum
- Secretariat of Parliament's Modern Slavery Programme
- The Clerk of the House
- The Lords Commissioners of Standards
- The Director of the Independent Complaints and Grievance Scheme
- The Chair of the Independent Expert Panel
- The Clerk of the Journals
- House of Commons Education and Engagement Team

Meetings with external stakeholders and organisations

- A number of members of the public, to discuss matters relating to standards in Parliament
- Lord Chief Justice, to coordinate my Advice Note on MPs writing to Members with his guidance to judges on the same matter
- Director of Spotlight on Corruption
- Civic Future
- Chief Executive of the Supreme Court
- Lord Evans, Chair of the Committee on Standards in Public Life
- Professor Cristina Leston-Bandeira of Leeds University
- Aston University Politics and Law Faculty staff
- · Quakers in Britain
- Australian Human Rights Commissioner
- Dr Alan Renwick of the Constitution Unit
- The Committee on Standards in Public Life
- Faculty of the Institute of Legal and Constitutional Research, University of St Andrews

- Officials of the OSCE Office for Democratic Institutions and Human Rights
- Alderman & Sheriff Alastair King DL and HHJ Mark Lucraft KC, Recorder of London, at the Shrieval Lunch at the Old Bailey
- President of the Senate of Australia on her visit to the UK
- Members of the Ontario Parliament Ontario Legislative Internship Programme
- Members of the European Parliament Special Committee on Interference and Misinformation
- Committee and members of Public Law Wales, to deliver Annual Lecture
- Committee and members of Public Affairs Cymru
- Standards Commissioner, Clerk and Chair of Standards Committee, and Chief Executive,
 Senedd Cymru