

The Parliamentary Commissioner for Standards



Parliamentary Commissioner for
Standards

Annual Report 2017–18

**Presented to the House of Commons
pursuant to Standing Order No. 150 (11)**

*Available on the Commissioner's web pages at
www.parliament.uk/pcs*

*Ordered by the House of Commons
to be printed 26 June 2018*

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Foreword

This is the first Annual Report of my term as Parliamentary Commissioner for Standards. I took up my post on 1 January 2018 and now have an opportunity to reflect on my first few months in office, as well as on the work of this office over the whole of 2017–18. After this short time, I am already aware of the great range of activity which goes on here; most of which attracts little attention or appreciation but is, nonetheless, a fundamental part of ensuring transparency is maintained.

I have appreciated the welcome I have received from Members whom I have so far had the opportunity to meet. I would like to pay tribute to my predecessor, Kathryn Hudson, and in particular, for her work to revise and update the Code of Conduct and the Guide to the Rules. After only a few months in office, I realise what a significant task such a review represents. While it must have deeply frustrating for her to see the continuation of that work held in abeyance for so long after the General Election in June 2017, I hope that I will - with the Committee on Standards - be able to build on that solid foundation—and to close some of the gaps in the system of regulation which had concerned her.

Much of this report relates to work undertaken during Kathryn Hudson's period of tenure. I am personally grateful for her helpful contribution to my induction period and for ensuring a careful handover of current work.

There were five inquiries on hand at the start of the last business year on 1 April 2017. During 2017–18, 139 formal allegations were made, of which twentytwo were accepted for inquiry. Eighteen were resolved. Thirteen of those inquiries were concluded using the rectification procedure; four were not upheld; and one was referred to the Committee on Standards. There were nine active inquiries carried forward into the new business year on 1 April 2018.

The snap General Election in June 2017 created an unexpected body of work for the team; we were fortunate to secure some assistance from colleagues whose own work had also been interrupted, and to be able to recruit some additional staff from elsewhere, but it was, nonetheless, a mammoth task to meet new Members within the first month after the election and to ensure the production of a complete new Register before the House rose for the summer recess.

Alongside that work, the office continued with the day-to-day tasks of helping Members, the staff of Members and All-Party Parliament Groups to ensure that their interests are properly disclosed by way of registration and declaration, as appropriate, and in accordance with the relevant rules. As my predecessor noted at the beginning of her own term of office, there remains room for improvement in the timeliness of registration. There is also a small but steady trickle of complaints concerning declaration (the ad hoc disclosure of interests when they are relevant to the matter in hand). This suggests that there is scope for improved compliance in that area too.

In her first annual report in July 2013, my predecessor expressed her concern that the House had not considered proposed revisions to the Guide to the Rules relating to the conduct of Members which had been made by her own predecessor. She hoped then that the House would soon have a chance to reconsider its decision to prevent the Commissioner from investigating the conduct of any Member in his or her private and personal lives

when that conduct had significantly damaged the reputation and integrity of the House or its Members generally. The House did not, in the end, accept the proposed change. It is, therefore, perhaps not so surprising that one of the urgent and important tasks in my in-tray is the question of how I can support the House authorities and the Committee on Standards to ensure that the House's standards framework aligns more closely with best practice for handling allegations of bullying and harassment, and sexual harassment.

I do not think that I can expect others to have trust and confidence in an office and an individual they have never heard of. I therefore aim, in the first instance, to improve knowledge and awareness of my role among Members and their staff. In the longer term, I hope, with the Committee on Standards, to raise awareness of the House's standards system more generally, as well as to improve the accessibility of information through my webpages; and to obtain the agreement of the House to allow the electronic submission of concerns direct to my office. In 2018 it is not reasonable to insist on hard copy and, since so many of those who make allegations to my office do so by email first anyway, it is an artificial and bureaucratic device, which I hope can be removed.

Kathryn Stone OBE

Parliamentary Commissioner for Standards

3 July 2013

1 Review of the year

1. This Report covers the year which began on 1 April 2017. Barely three weeks had passed when a General Election was called unexpectedly. The impact of that election on the work of the office reverberated through much of the 2017–18 year.

The 2017 General Election

2. My predecessor published the final registers of the 2015 Parliament on 2 May 2017, the last day of that Parliament.

3. The General Election was held on 8 June 2017. 99 new MPs were elected and 551 established Members were returned. Each was required to submit details of their interests, including donations they had received, within one month, i.e. by 7 July 2017. In order to ensure that new MPs were fully aware of the House's Code of Conduct and the rules on registration, the Commissioner's office offered each of them a one to one briefing. 96 of the 99 new MPs accepted this offer. (The remaining three were Sinn Fein members, who declined.)

4. It is to the credit of all the staff involved, who worked together as a team, that the first Register of the new Parliament, which contained all the items submitted to us by 7 July 2017, was published on 20 July 2017. This was two weeks earlier than after the 2015 General Election and more than two months earlier than registers following previous elections. It contained 1,545 new items and 51 updates to items already registered. It included entries of all 650 Members except one.

5. The other Registers were published as follows:

- The Register of interests of Members' Secretaries and Research Assistants: on 11 August 2017. It contained register entries for 1,751 staff, of whom 144 were new. 202 returning staff updated their register entries.
- The Register of Journalists' interests: on 11 August 2017. It contained register entries for 419 journalists, of whom 48 were new;
- The Register of All-Party Parliamentary Groups as at 15 September 2017, on 28 September 2017. It contained details of 525 groups.

6. Since these initial editions, we have published our usual updates to the Members', Staff and Journalists' Registers.

The Code of Conduct and the Guide to the Rules

7. During 2016–17 my predecessor consulted on how the Code of Conduct for Members and the Guide to the Rules associated with it might be changed. In April 2017 she submitted formal proposals for the Committee on Standards to consider before making its own recommendations to the House. However, this was delayed by the General Election. With the Dissolution of Parliament, the Committee on Standards ceased to exist and it was only in October 2017 that a new Committee was formed.

8. Shortly after it was formed, the new Committee began to consider the recommendations my predecessor had submitted in April 2017. In November, following a series of media reports which included allegations of bullying, harassment and sexual harassment within the parliamentary community, the Working Group on an Independent Complaints and Grievance Policy was established. The House approved its Report on 28 February 2018.

9. The Working Group's Report set out wide-ranging proposals, including a new Behaviour Code which would apply to everyone working with or for Parliament or on the parliamentary estate; an independent complaints and grievance scheme, to include procedures for dealing with sexual harassment, harassment and bullying; a system of training to support the Code, and a human resources support service for staff of Members. The Working Group envisaged that the Commissioner and the Committee on Standards would have a role in adjudicating on investigations into MPs. A team of officials is developing these proposals and I look forward to considering them further along with the Standards Committee. I hope to continue the important work of the Commissioner in the implementation of the procedures when they are agreed.

2 External Relationships, Information and Advice

Responding to enquiries from the public

10. Every year, my office responds to large numbers of enquiries from the public by telephone, email and letter. In 2017–18 the office handled over fifteen hundred complaint-related calls, emails and letters. Some of these enquiries are very general in nature, others are specifically complaints about MPs. That figure does not include enquiries made direct to the Registry team about the four Registers, for example, enquiries about All-Party Parliamentary Groups. (There were 639 APPGs on 31 March.)

11. Very often individuals approach my office as a last resort, perhaps because their MP is unable or unwilling to help them with a specific issue. Sometimes they hope that my office will be able to instruct their MP to do what they ask. In other cases, their complaint is not about an MP but about an organisation, either public or private. We try to be as helpful as possible by providing information, and where appropriate advice, to those who contact us. We will signpost individuals to more appropriate sources of assistance where that might be helpful. Generally, this approach seems to be effective and to be appreciated, occasionally resulting in expressions of thanks. However, correspondents are sometimes reluctant to accept that their concerns are outside my remit and will engage in extensive correspondence or repeated telephone calls to try to persuade me to take up their case when I simply cannot do so.

12. If an individual has concerns about a named MP, we explain my role and the allegations that I am able to consider. Where appropriate, we explain the procedure for submitting an allegation formally (the rules currently require that it should be put to me in writing) and the need to provide evidence to justify beginning an inquiry. I explain in more detail how such cases are resolved in chapter 3.

Responding to enquiries from the media

13. My office responded to 181 media enquiries during 2017–18. Most concerned allegations I had received, or current inquiries. In such cases, in accordance with the policy agreed by the House, my office will confirm that an allegation has been received and whether the matter is under inquiry. I do not comment on the progress of current inquiries, nor do I give timescales for completing my inquiries. Also in accordance with the procedures agreed by the House, when I begin an inquiry the name of the MP and the relevant rule(s) of conduct are listed on my webpages. The inquiry is then conducted in private. My decision and all the relevant evidence is published at the end of the process.

Freedom of information requests

14. During the year my office responded to 21 formal requests made under the Freedom of Information Act. They included questions about decisions on the progress of specific inquiries; statistical information about allegations received and investigated; complaints made to me via the House of Commons' Respect policy; my procedures for obtaining

independent advice; my remit; and for copies of private correspondence. Some of this information was already in the public domain and some was exempt from disclosure. The House responded to these enquiries in accordance with the statutory requirements.

Relationships with standards and other bodies

15. In October 2017 we attended the Standards Network conference with colleagues across the UK and Ireland. My office continues to maintain good working relationships with other standards bodies, including those in the devolved administrations. We maintain positive links with the Compliance Officer for the Independent Parliamentary Standards Authority (IPSA); with IPSA itself; the Electoral Commission; the Committee on Standards in Public Life and the Metropolitan Police Service.

International work and other outreach

16. My office regularly meets inward delegations from the Commonwealth and elsewhere who are interested in our structures for promoting standards. Since my own appointment I have met with delegations who have commented on the esteem in which our system is regarded. Although it is important not to be complacent, it is also important to remind ourselves occasionally of the strengths of our arrangements.

Advice to MPs and others

17. One of my responsibilities is to “*provide advice confidentially to MPs and other persons subject to registration*”. In practice much of the responsibility for advice is delegated to the Registrar. Advice given to an MP is confidential and would be disclosed only if relevant to one of my inquiries.

18. The Registry team also provides advice on the Registers for Members’ Staff, Journalists and All Party Parliamentary Groups.

3 Inquiries into MPs' conduct

The process for submitting an allegation

19. A new *Commissioner's Information Note* was approved in February 2015 and there have been no changes to the procedures within which the Parliamentary Commissioner for Standards operates during 2017–18. Although I may begin an inquiry on my own initiative or following a self-referral by an MP, allegations by others must be received in hard copy, signed and including the name and postal address of the individual making the allegation of a breach of the rules. Initial discussions often take place by telephone or email and, if the subject matter appears to fall within my remit, my staff explain the procedure. Individuals are often surprised that an allegation must be sent to me in hard copy. But once we have explained this, it is rare for someone not to do this if advised that their allegation appears to fall within my remit.

20. When I receive an allegation I decide first whether it falls within the remit established for me by the House of Commons, that is, does it relate to paragraphs 10–16 of the Code of Conduct for Members? Over 60% of the total number of allegations received in 2017–18 were outside my remit, concerning matters I could not investigate.

21. If the allegation falls within my remit, I then decide whether the evidence justifies beginning an inquiry. I aim to make a decision within working five days of receipt. If I begin an inquiry, I tell the MP concerned and the person making the allegation. If I decide not to begin an inquiry I write to person making the allegation and explain briefly my reasons. I do not usually tell MPs who are the subject of complaints about the allegations I receive and do not investigate, although I may do so if the allegation has been put into the public domain before I have reached a decision. This happens regrettably often.

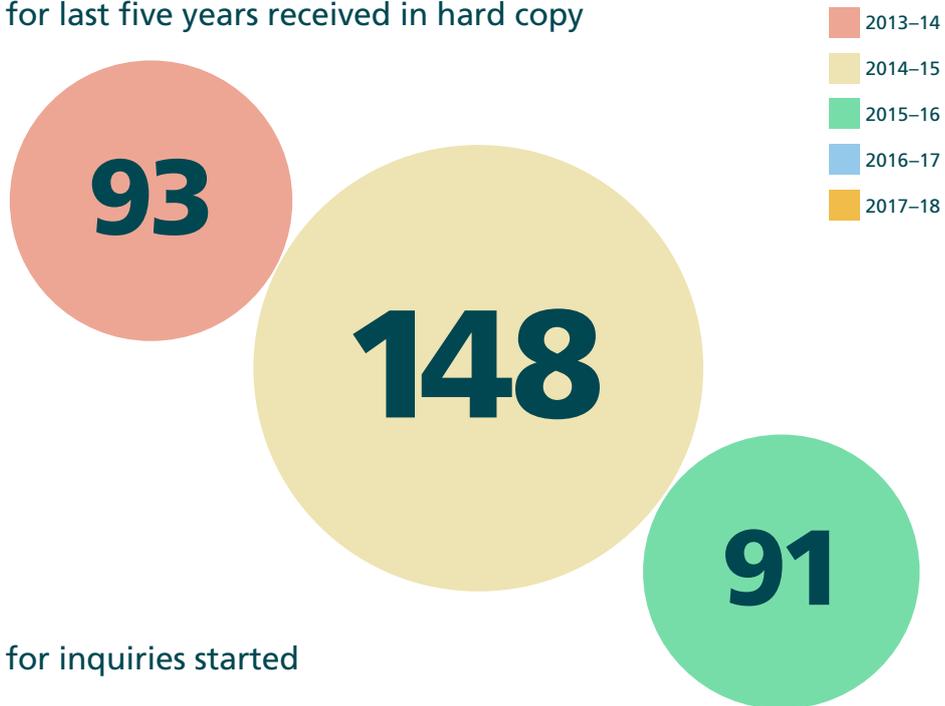
Formal allegations received in 2017–18

22. As explained above, formal allegations include only those submitted to the Commissioner in hard copy.

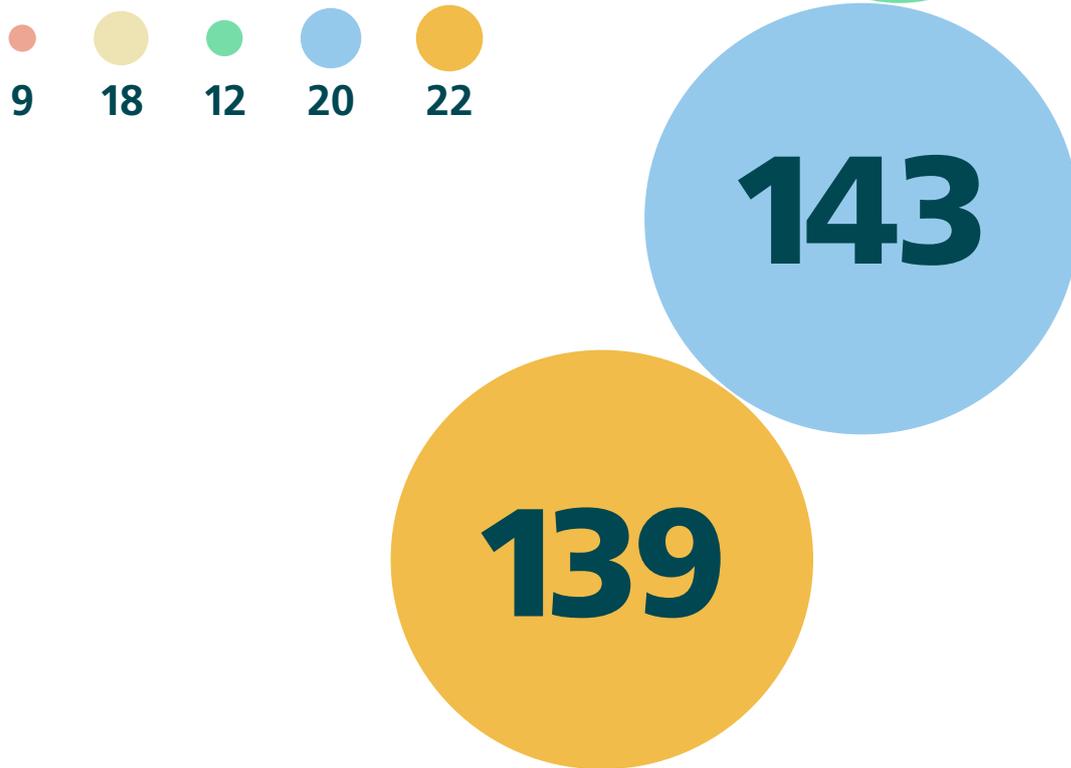
23. In 2017–18 we received 139 formal allegations and began 22 inquiries, one of which arose from a self-referral by the Member. These figures are broadly similar to those for 2016–17, when the Commissioner received 143 formal allegations and began a total of twenty inquiries.

Formal allegations received

Figures for last five years received in hard copy

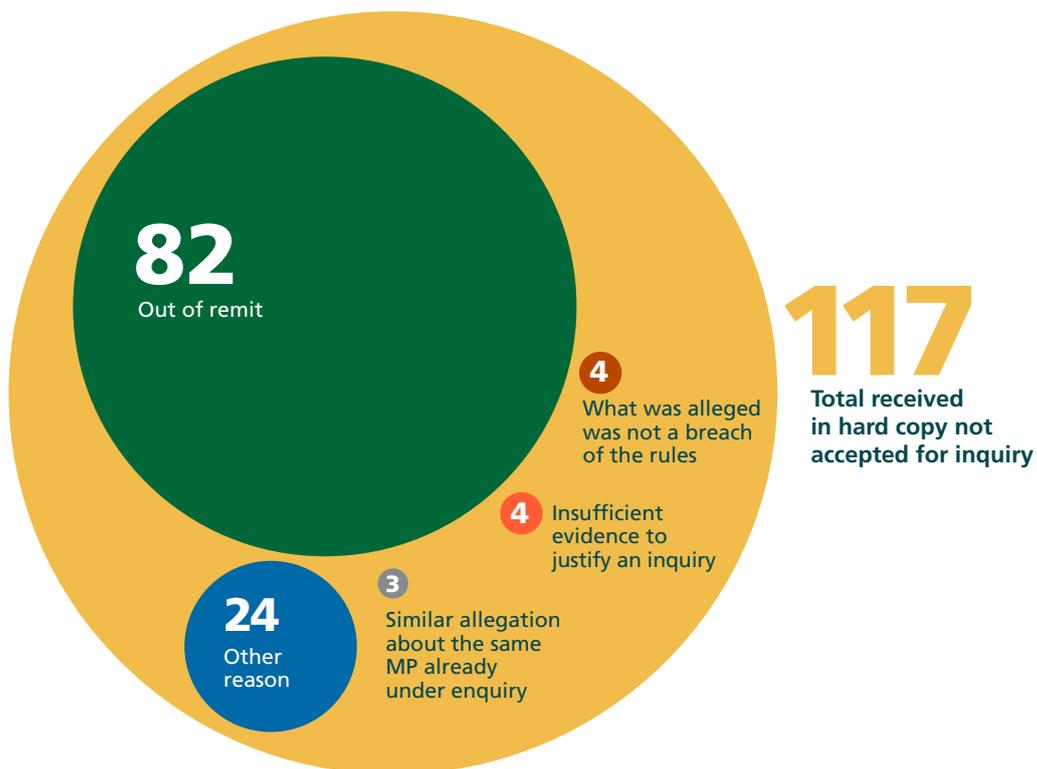


Figures for inquiries started



Formal allegations not accepted for inquiry in 2017–18

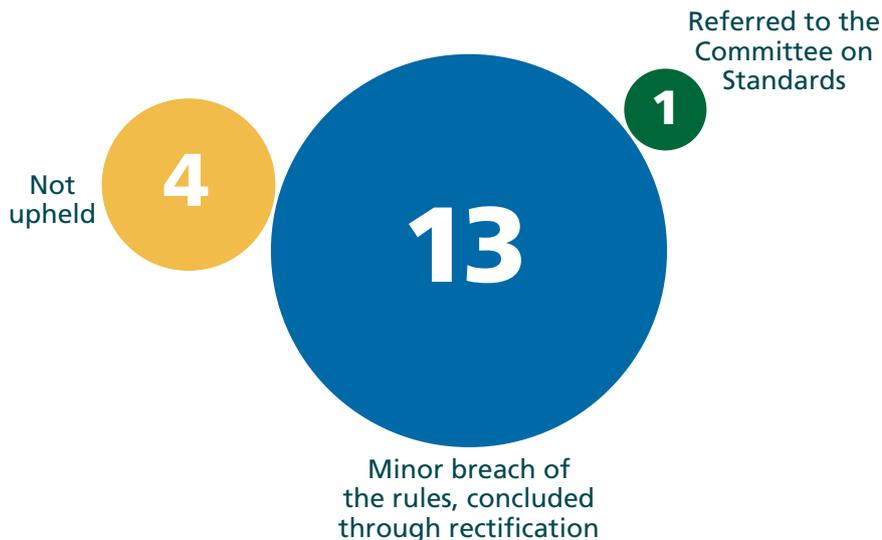
24. Of the 139 formal allegations received 117 did not lead to an inquiry. Since the office of the Commissioner was first created most of the allegations received are about matters which the Commissioner cannot investigate. 2017–18 was not significantly different from other years, with approximately 60% (82) of the 139 formal allegations received concerning matters out of remit. That percentage is lower than in 2016–17, when 77% were out of remit. None of the allegations received between the Dissolution of Parliament on 3 May 2017 and the start of the new Parliament after the General Election could be accepted for inquiry, because there were no MPs during that period; this accounts for almost all of the 24 referrals rejected for “other” reasons. A very small number of allegations were not accepted for inquiry because what was alleged was not a breach of the rules (4); there was insufficient evidence to justify an inquiry (4) or because the Commissioner had already begun an inquiry (3).



Inquiries completed in 2017–18

25. In the year ending 31 March 2018, 18 inquiries were concluded. Having started the year with five inquiries on hand, and having accepted 22 for inquiry, I carried forward nine inquiries into 2018–19. Of those, six had been initiated within the previous six weeks.

Outcomes of inquiries completed during 2017–18



Inquiries not upheld

26. There are generally three possible outcomes to an inquiry. If, after investigating, the alleged breach of the rules has not been established, the allegation is not upheld. If that happens, I write to the individual who made the allegation and to the MP concerned to explain the decision and I inform the Committee on Standards of the outcome. The decision, the reason for it and the relevant evidence are published on the Parliament website on my webpages.¹ In four inquiries, all of which concerned alleged misuse of House-provided stationery, that was the outcome.

Inquiries concluded by rectification

27. The second possible outcome to an inquiry is a “rectification”. In certain circumstances, if it is established that an MP has acted in breach of the rules of the House the inquiry may be concluded through this procedure, provided the MP acknowledges their breach of the rules, apologises and takes appropriate action to put the matter right, for example, by a repayment for misused resources or by making an apology to the House for having failed to make a declaration of a relevant interest during proceedings. When

¹ <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-not-upheld/allegations-not-upheld-2017-18/>

an inquiry is concluded in this way, the outcome is published on the Parliament website on my webpages. The reason for the decision and the evidence associated with it are also published. The Committee on Standards is informed of the outcome.

28. Thirteen inquiries were concluded using the rectification procedure. Seven of these concerned the misuse of House-provided stationery and/or postage pre-paid envelopes; two related to breaches of the All-Party Parliamentary Groups rules; two concerned the use of House of Commons' Committee rooms; one related to the use of House-provided ICT and one was a breach of the rules on registration. The details of each of these inquiries can be found on my webpages.²

Inquiries referred to the Committee on Standards

29. Following an inquiry, the Commissioner must refer a Memorandum to the Committee on Standards if (s)he finds a serious breach of the rules. If the Commissioner identifies an issue of wider significance (s)he may also send a Memorandum to the Committee. Minor breaches of the rules are otherwise referred to the Committee only if the MP does not accept, will not apologise for, or will not take the required action in respect of, the breach identified. When a matter is referred to the Committee on Standards, the Committee—which includes lay members as well as MP members—will reach its own conclusion on whether there has been a breach of the rules of the House. The Committee publishes its own report on the allegation, together with its findings. The evidence is also published. In such cases, it is for the Committee to decide what further action, if any, to recommend to the House. It can recommend a range of sanctions, including an apology, repayment of money or a period of suspension from the House.

30. One inquiry was referred to the Committee on Standards. In that case my predecessor found that an MP had used parliamentary resources including House-provided stationery, telephony and office space in support of some outside work commissioned by a non-parliamentary organisation. My predecessor accepted that the MP had not been motivated by financial gain, but noted that she had, nonetheless, accrued a financial benefit. The use of those facilities gave the impression that her activity was in some way on behalf of, or otherwise connected, with the House itself and that her work carried the authority of the House when it did not. The use of House-provided resources also benefited a third party. While the value of the stationery that had been misused was relatively low, my predecessor found that this was a serious breach of the rules and of the Code of Conduct.

31. The MP did not accept the Commissioner's finding and the matter was referred to the Committee on Standards. The Committee found that the MP had acted in breach of paragraph 15 of the Code. She subsequently apologised to the House for that breach. The MP also refunded, unsolicited, the estimated value of the stationery she had misused. The Committee published its own report, including the Commissioner's formal Memorandum, on its webpages.

2 <https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/parliamentary-commissioner-for-standards/complaints-and-investigations/allegations-the-commissioner-has-rectified/rectifications-2017-18/>

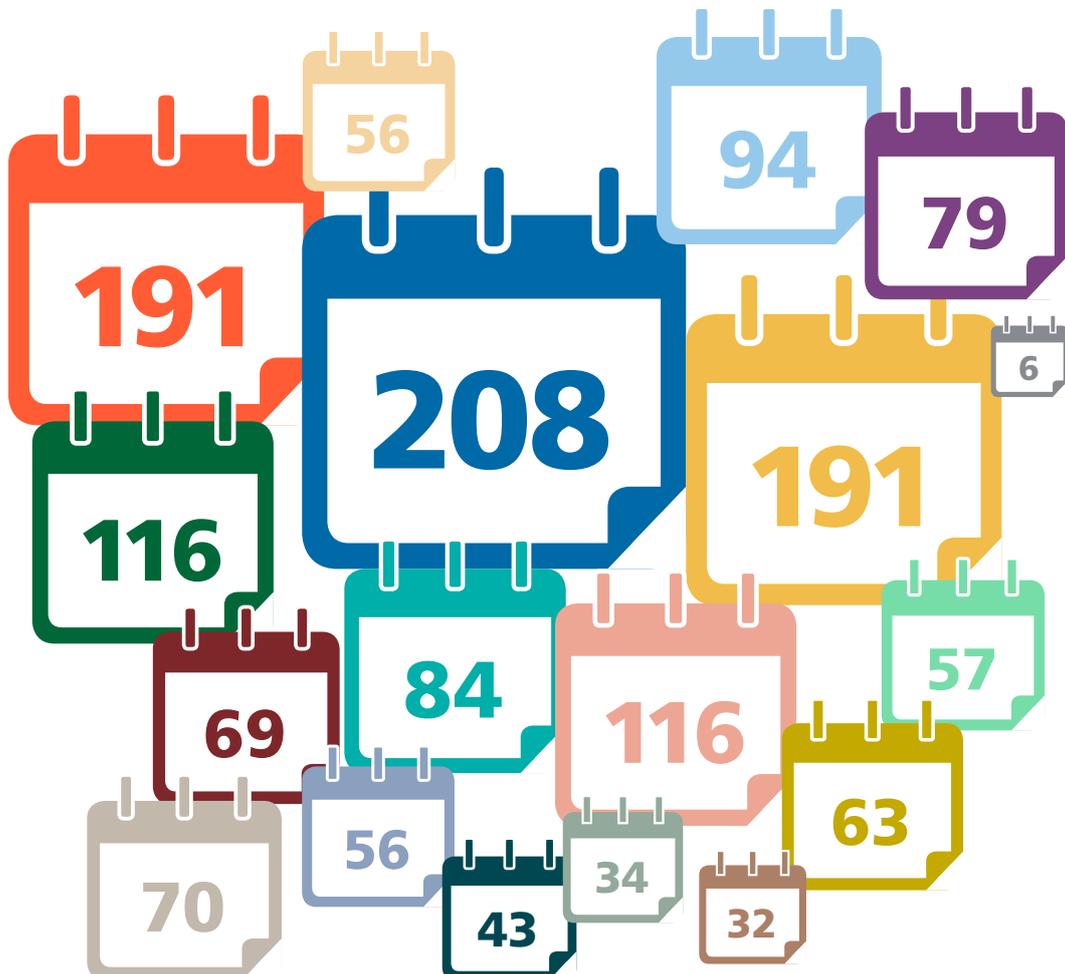
Time taken to complete inquiries

32. The time to conclude an inquiry varies enormously. The shortest inquiry took just six working days. In that case, immediately the matter was brought to the MP's attention, he acknowledged and apologised for his breach of the rules. He agreed promptly, when asked to refund the cost of the stationery and prepaid postage involved, and the matter was concluded by way of the rectification procedure.

33. Four of the inquiries concluded during 2017–18 were delayed by the Dissolution of Parliament when work on them ceased for the General Election period. One of those inquiries was further delayed because the MP lost her seat and the inquiry could be resumed only after the Commissioner was able to consult the Committee on Standards more than five months later. That inquiry took, in total, 208 working days to complete. Excluding those delayed by the General Election, the next longest inquiry took 191 days to complete.

34. There are many reasons for the variation in the time taken to conclude inquiries. These include: the complexity of the matter under inquiry; whether there is a need to seek evidence from third parties; the co-operation of the MP and other witnesses; whether the matter is suitable for the rectification process; the impact of parliamentary recesses on the availability of MPs; and whether there is agreement on the interpretation of the rules.

Number of working days taken to conclude each inquiry in 2017–18



Total number of allegations received in all formats

35. The preceding paragraphs deal with formal allegations; those made in hard copy and accompanied by the name, postal address and signature of the person making the allegation. These are a relatively small proportion of the allegations made to my office each year. This section focuses on the totality of allegations received, in whatever format, during 2017–18.

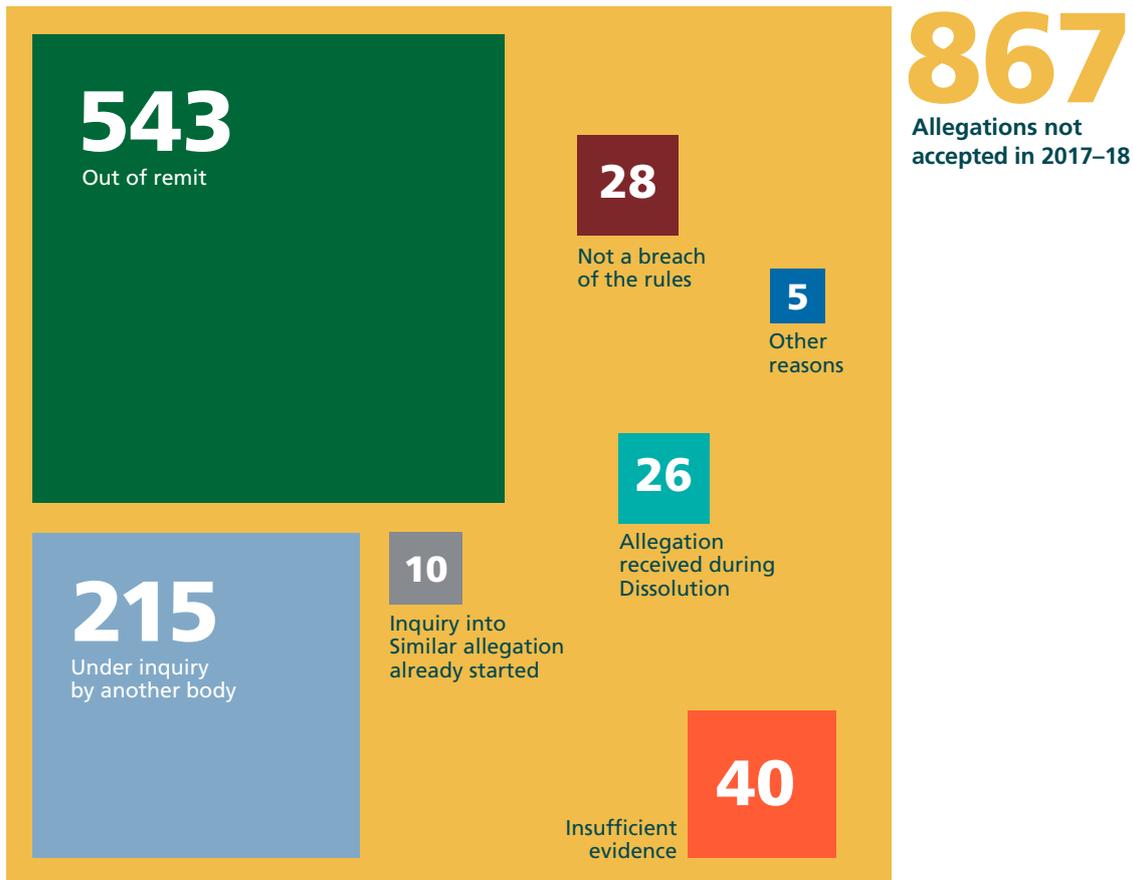
Total allegations received in the last four years



36. The vast majority (750) of the 889 allegations received in total during 2017–18 were submitted by email and telephone. As I have explained above, where an allegation is received by email or telephone and it appears to fall within my remit, my office will explain to the person making the allegation how to submit it formally. Very few such allegations are not followed up in hard copy. Nonetheless, I would welcome a change in the rules to allow submission by email. Given that I may begin an inquiry on my own initiative if I have sufficient evidence to justify doing so, it seems incongruous that I may not begin an inquiry based on an allegation made by another person unless it is sent to me in hard copy. Although this makes little difference in practice, it might be interpreted as an unnecessary barrier and it is one that may be particularly irksome for some.

Reasons for allegations not accepted for inquiry

37. Allegations put to my office by email and by telephone are considered carefully. If they appear to be in remit, we explain the how to submit a formal allegation. If it seems unlikely that an inquiry would be possible, we will explain that to the correspondent as well; we try to avoid encouraging people to go to the trouble of sending hard copy unnecessarily.



Time taken to make decisions on allegations received in 2017–18

38. The Commissioner's office is small and fewer than half of the staff are deployed on this aspect of my work. The decision to accept an allegation for inquiry is for the Commissioner alone, and the Commissioner's role is part-time (three days per week in 2017–18). The complexity of each referral and the volume of supporting evidence to be considered both have an impact on the amount of time necessary to decide whether to begin an inquiry.

39. Our aim is to give decisions on 95% of allegations within 5 working days of receipt. During 2017–18, of the 872 allegations received in all formats, 98% were decided within that timeframe.

Feedback

40. In November 2017 my predecessor published a statement about how complaints about the service provided by the office would be handled. I have adopted the same policy. We both undertook to publish statistics about the number of complaints received in future annual reports. In five months, we received complaints from three individuals. None of those complaints were upheld. In the same period, we received 50 expressions of thanks.

41. It is important to note that the complaints about our service statement does not cover disagreement with my decisions. The Commissioner is appointed by the House of Commons to, among other things, decide whether to begin an inquiry into alleged breaches of the rules of conduct. The Committee oversees the Commissioner's work but does not direct her decision-making and cannot instruct her to begin an inquiry into any particular allegation. When an allegation concerns a former MP or matters which occurred more than seven years earlier the Commissioner is expected to consult the Committee before beginning an inquiry. The Committee expects to authorise such an inquiry only in exceptional circumstances.

4 Registers of Members' Financial Interests, Members' Secretaries and Research Assistants, Journalists and All-Party Parliamentary Groups

Introduction

42. It is one of my formal responsibilities to compile and maintain the four registers of interest required by the House of Commons, which are:

- the Register of Members' Financial Interests (the Members' Register);
- the Register of Interests of Members' Secretaries and Research Assistants (the Register of Members' Staff, or the staff register);
- the Register of Journalists' Interests; and
- the Register of All-Party Parliamentary Groups (the Groups' Register).

43. We update and publish the Members' Register online every two weeks while the House is sitting, and less frequently during recess. We update and publish the other three registers online approximately every six weeks.

Register of Members' Financial Interests

44. The main purpose of this register is to provide a publicly available record of the interests which might be thought to influence the parliamentary actions or words of MPs. MPs have to register any interest they have which falls within nine specific categories of interest which the House has approved. In addition, there is a Miscellaneous category where they must list any other interests which meet the purpose of the register but which do not fall clearly under the other headings.

45. During 2017–18 my office published 17 online editions of the Register. These contained a total of 2,475 new Register items, and 253 updates to interests already registered. The Register which contained the largest number of new items was that of 7 July 2017, the first after the General Election. This included 1,545 new Register items.

Register of Interests of Members' Secretaries and Research Assistants

46. Anyone who has a parliamentary security pass as an MP's secretary or research assistant must record their details in the Register of Interests of Members' Secretaries and Research Assistants. They must register any other occupation from which they receive income of more than 0.5% of a MP's salary (£370 from 1 April 2017 to 31 March 2018) in the course of a calendar year, if that occupation is in any way advantaged by the privileged access to Parliament afforded by their pass. They also have to register any tangible gift

(e.g. glassware) and any other benefit (e.g. hospitality, services or facilities provided) which they receive, if the value of the gift or benefit exceeds £370 and the gift or benefit relates in any way to their work in Parliament.

47. The number of registered staff on 31 March 2018 was 2,010. This includes 33 staff who both hold a spouse pass and work for an MP. The number of those staff with registered interests was 356 on 31 March 2018. These figures are similar to those for 31 March 2017, when 2,022 staff, of whom 354 had registered interests, appeared on the Register.

48. My office published seven editions of the Staff Register in 2017–18.

Register of All-Party Parliamentary Groups

49. An All-Party Parliamentary Group consists of parliamentarians who join together to pursue a particular topic or interest. Some groups also permit others to join as non-voting members.

50. There are three types of groups: subject groups, country groups and clubs. The number of registered groups rose during the year, from 626 groups registered on 31 March 2017, to 639 groups registered on 31 March 2018. Of the 639 groups, 131 were country groups (21% of the total) and 508 were subject groups (79% of the total): the same split as on 31 March 2017. The number of groups with registered financial or material benefits fell during the year from 338 (54% of the total) on 31 March 2017 to 318 (50% of the total) on 31 March 2018.

51. My office published six editions of the Groups' Register in 2017–18.

Register of Journalists' Interests

52. Anyone who holds a pass as a lobby journalist accredited to the Parliamentary Press Gallery or for parliamentary broadcasting must record in this Register any occupation or employment which is advantaged by the privileged access to Parliament afforded by their pass, if they earn from it more than 1% of an MP's salary in the course of a calendar year (£740 from 1 April 2017 to 31 March 2018).

53. The number of registered journalists on 31 March 2018 was 426, a slight increase on the 417 registered on 31 March 2017. The number of journalists with registered interests was 84 on 31 March 2018, an increase on the 66 with registered interests on 31 March 2017. My office published seven editions of the Journalists' Register in 2017–18.

5 Resourcing the work

Table 8: Costs of running the Commissioner's office 2011–12 to 2017–18

| Year | 2011–12 | 2012–13 | 2013–14 | 2014–15 | 2015–16 | 2016–17 | 2017–18 |
|---------------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Staffing, etc. | 450,000* | 373,987 | 442,733 | 402,551 | 423,838 | 433,556 | 457,933 |
| Other running costs | 6,871 | 5,194 | 3,713 | 4,213 | 1,116 | 415 | 3,525 |
| Total | 456,871 | 379,181 | 446,482 | 406,764 | 424,954 | 433,971 | 461,458 |

*Includes estimated costs for one secondment

54. The costs of my office are mainly staff costs. These were higher than usual in 2017–18 because we engaged additional staff to help to brief new MPs and to prepare the Registers promptly after the General Election. Our non-staff costs were principally incidentals and specialist advice needed for investigations.

6 Looking ahead

55. In addition to the very important work on developing and embedding the new Independent Complaints and Grievance Procedure, I intend to focus on three areas in the next twelve months: reviewing processes and procedures to ensure they support and are consistent with the independence of my office; raising awareness among MPs about how we can help them to ensure they comply with the House's rules; and improving awareness of the procedure for dealing with allegations that the rules have been broken.

56. During the 2010 Parliament, a tri-partite protocol was agreed between the Metropolitan Police Service (MPS), the Committee on Standards and my predecessor. I believe it is time to review those arrangements and I look forward to working with the Committee and MPS to agree a revised protocol. I believe it is also time to review the requirement for the Commissioner to consult the Committee on Standards before beginning inquiries into allegations concerning events which occurred more than seven years earlier. If exceptions to the general time-limit are to be permitted, confidence in the independence of the system might be better served by allowing the Commissioner to decide the exceptions. Ultimately, this is a matter for the House itself to determine but I look forward to working with the Committee to review this.

57. I have described elsewhere how the Registrar and her staff try to assist MPs and others to comply with the disclosure rules and I would welcome suggestions for how we might build further on that. I hope to work with the House authorities to build on my predecessor's work drawing together a single volume of rules which can be handed to all MPs at the start of each Parliament, to further improve understanding and awareness of the House's expectations of its Members. Those expectations are grounded in important principles. For example, while complaints concerning the misuse of House-provided stationery may at first glance appear trivial and may often involve relatively small amounts of public money, an important principle—that the weight and authority of the House should be reserved for parliamentary business—underlies the detail of the rules.

58. The core business of my office is currently adequately resourced, although there are inherent difficulties in managing peaks and troughs in work with such a small team. I am grateful for the assurances I have received that any extension of my remit, particularly as a result of the Independent Complaints and Grievance Procedure, will be properly resourced.

59. Maintaining and enhancing the independence of this office will be vital if there is to be trust and confidence in the new procedures. I came to this role committed to thorough, fair and impartial investigation. I remain committed to those objectives and I look forward to reporting on progress in my next Annual Report.

