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Summary

I opened an inquiry on 24 April 2023, after receiving a complaint alleging that the All-Party Parliamentary Group (APPG) for Education (the Group) had breached the Rules for APPGs.

5 The APPG Guide to the Rules states that each group's Chair is responsible for ensuring that the group complies with the rules. The complainant alleged that, by failing to provide income and expenditure statements for the years 2019 and 2020 and failing to include mandatory information on its website, the Group had acted in breach of paragraphs 21 and 28 of the Rules for APPGs. I therefore initiated an
10 investigation into the Group's Chair, Mr Marcus Fysh MP.

My investigation found that Mr Fysh had breached the Rules for APPGs by failing to provide income and expenditure statements for the years 2019 and 2020; and failing to include mandatory information on the Group's website. I consider these breaches to be inadvertent and that they arose from an inattention to the Rules for
15 APPGs. Mr Fysh accepted my decision, acknowledged and apologised for his breach of the Rules for APPGs, and agreed to meet with the Registrar of Members' Financial Interests to discuss his responsibilities as a Chair of an APPG.

This meeting took place on 19 July 2023, and I have now concluded my inquiry using the rectification procedure available to me under Standing Order No. 150.

20

Resolution Letter: Mr Marcus Fysh MP

Letter from the Commissioner to the complainant, 24 July 2023

5 I wrote to you on 24 April 2023 to tell you that I had begun an inquiry into your allegation that the All Party Parliamentary Group for Education (the Group) had breached the rules for APPGs. I write today to tell you that my investigation found that the Group had breached paragraphs 21 and 28 of the APPG rules.

The full rationale for my opinion can be found in my letter to Mr Marcus Fysh MP, dated 15 June 2023 (item 8 in the written evidence pack), which you can access once the evidence pack has been published.

10 In his capacity as Chair of the Group, Mr Fysh has acknowledged and apologised for the breach of the APPG rules, and he has taken measures to ensure further breaches do not occur.

15 I consider this breach to be at the less serious end of the spectrum and have decided that this inquiry should be concluded through the rectification procedure, available to me through House of Commons' Standing Order No. 150. I will publish my opinion and the written evidence pack later today on my webpages [[Rectifications: 2023 - UK Parliament](#)] and I will report the outcome to the Committee on Standards in due course.

20 Thank you for bringing this matter to my attention. I confirm that the matter is now closed.

24 July 2023

Written evidence

1. Email from the complainant to the Commissioner, 21 March 2023

I would like to make a formal complaint about the [redacted] Education APPGs.

5 Both group's Secretariat is listed as being the British Educational Suppliers Association (BESA) with the administrative services contracted to Ranelagh Political Communications.

On the 27th of July 2022, I wrote to Ranelagh asking for various information including the income and expenditure statements for 2019 and 2020 for both APPGs. The reply I received on August 27th 2022 noted:

10 *You have requested the 2019 and 2020 Income and Expenditure forms for both APPGs. These were inadvertently not completed, and this is in the process of being done. I will send them to you once they have been approved by the parliamentary standards office.*

15 As far as I can see this information for both APPGs is still outstanding which would seem to be a serious and serial breach of the required standards. Similarly, in the most recent Register of APPGs (Feb. 2023) there is no listing for either APPG. Does this mean they are defunct or simply still not adhering to the required standards of operation and transparency?

20 The Education APPG says it has its AGM Jan. 11th 202 however there is no information about the outcome of this event and the most recent meeting or activity that seems to have actually occurred was on 15 months ago on Nov. 23rd, 2021. [Redacted].

25 As far as I can ascertain, both APPGs appear to not meet the reporting and other requirements mandated of all APPGs. I would therefore ask that you to investigate why these ongoing breaches have been allowed to occur, why despite promises by Ranelagh the mandated statutory information has still not been published and finally (if it is within your powers) to formally censure both APPGs and to seek formal compliance undertakings BESA, Ranelagh and both APPGs.

I shall look forward to your reply¹.

30 *21 March 2023*

¹ 29 March 2023, the Office of the Parliamentary Commissioner for Standards wrote to the complainant and requested copies of their correspondence with the APPG for Education Secretariat.

2. Email from the complainant to the Office of the Parliamentary Commissioner for Standards, 29 March 2023

Attached (below) is my correspondence with Ranelagh UK where they do not provide any of the details about their income and expenditure, which I believe is in the region of £25,000 for each APPG and funded by the British Educational Suppliers Association. In terms of absolute evidence that the turnover is over £12,500 this is impossible to state categorically as neither BESA nor Ranelagh will say publicly and nor do either show this transaction in their annual accounts. I have checked back for multiple years and while BESA's Companies House accounts (from 2019-2022) include a pro-forma Profit and Loss account (Ranelagh does not and uses the exemption for small enterprises) these documents do not give any detail of specific items. I have also asked Ranelagh for details of what they are paid by BESA and as you will note their response was, *'As regards a breakdown of Ranelagh's hours in supporting the APPGs, and other company costs, I am not required to provide such detailed information. I hope that you appreciate that this is commercially sensitive information. The overall value of support provided to the APPGs is covered in the banding as provided by the Parliamentary Commissioner for Standards and in line with their rules governing APPG support'*. In addition [the secretariat] also noted, *'I am not at liberty to disclose any financial information in relation to fees paid.*

These are non-answer to important questions, i.e. how much do BESA pay Ranelagh to run both APPGs and why are the minimum reporting standards not met year after year?

Ranelagh's additional reply to my query about the income and expenditure statement stated, **'These were inadvertently not completed, and this is in the process of being done. I will send them to you once they have been approved by the parliamentary standards office'**.

Given this was 7 months ago and these have still not been done or published anywhere, I would argue both Ranelagh and BESA (who are the secretariat) are in breach of the relevant standards and it is up to them to say how much these sums were for.

Frankly, the lack of transparency regarding [redacted] Education APPGs is rather shocking as is the fact they their recent absence from the government's official list of APPG's indicates they are either defunct or serial abusers of the mandated standards.

29 March 2023

Enclosures:

1. **Email from the complainant to the APPG Secretariat's Public Enquiry Point, 26 July 2022, 11:47.**

Dear [Name redacted]

I understand the British Educational Suppliers Association (BESA) is the nominated Secretariat for the [redacted] Education APPGs, and that they contract with Ranelagh to provide the administrative services?

5 In relation to this and pursuant to Guide to Rules on All-Party Parliamentary Groups, I would like to ask the following:

- Why does the Education APPG website not contain many of the reporting requirements set out in the Guide? This includes accounts, a list of members, up to date meeting notes, etc?

10 • [Redacted information]

15 • Can you please provide me with the income and expenditure statements for 2019 and 2020 for both APPGs? These should be published on the Education APPG's website but are not. [redacted information] If not can you please provide me with printed copies for both APPGs (as required in Appendix 2 point 5 inc. footnote 28 as well as in the format listed in Appendix 2). Please note this must also specifically include of Ranelagh's staffing costs services including hours worked (and the hourly rate) as well as overheads and Benefits In-Kind such as accommodation, subsistence, pensions contributions, etc, for both the Education and [redacted information] APPG

20 • [Redacted information]

- Does the amount paid by BESA to Ranelagh (for both the Edu & [redacted information] APPGs) exceed the statutory reporting requirements (there are two main ones set at £5000 & £12,500)? I believe this needs to be done within 28 days or whenever it is requested? If so can you provide them please?

25 • Can you also provide as required a complete list of Ranelagh's clients for the previous 12 months as required by point 32 subsection (a)

30 If a consultancy provides a secretariat or support services whose value exceeds the threshold for registration: a list of any commercial organisations who were clients of the consultancy during the preceding twelve months;

- Can you provide a list of BESA's commercial clients over £5000 (for both APPGs) as they are listed as the Secretariat and so are bound by point 32 subsection (b);

35 If a charity or other not-for-profit organisation provides a secretariat or support services whose value exceeds the threshold for

registration: a list of any commercial organisation(s) from which the organisation has received donation(s) of more than £5,000 in total during the preceding twelve months

5 While I appreciate this is a substantial request it falls within the Guidelines and what I find concerning about these omissions, is that on your website you claim; Ranelagh is fully versed in all the rules governing the provision of secretariat services for APPGs and we ensure that all Groups for which we provide support comply with these regulations.

I shall look forward to your response.

10 Yours, etc

[Name redacted]

2. Email from the APPG Secretariat's Public Enquiry Point to the complainant, 28 July 2022, 15:10.

15 Dear [name redacted]

Thank you for your email.

As you mention, this is a substantial request for information. I will respond in detail within 20 working days.

Kind Regards

20 [name redacted]

3. Email from the APPG Secretariat's Public Enquiry Point to the complainant, 26 August 2022, 16:15.

Dear [name redacted]

25 I have now had the opportunity to take some advice regarding the questions you have posed regarding the Education and [redacted information] APPGs. I hope that the email below answers your questions regarding BESA and Ranelagh's support for the All-Party Parliamentary Groups.

- 5
- MPs who Chair APPGs do not need to include in their entry in the Register of Member's Financial Interests any support given to them in that capacity by external Groups providing Secretariat. This changes if the support given to an MP extends beyond APPG Secretariat services, which does not apply to either of the two aforementioned APPGs.
 - **You have requested the 2019 and 2020 Income and Expenditure forms for both APPGs. These were inadvertently not completed, and this is in the process of being done. I will send them to you once they have been approved by the parliamentary standards office.**
- 10
- As regards a breakdown of Ranelagh's hours in supporting the APPGs, and other company costs, I am not required to provide such detailed information. I hope that you appreciate that this is commercially sensitive information. **The overall value of support provided to the APPGs is covered in the banding as provided by the Parliamentary Commissioner for Standards and in line with their rules governing APPG support.**
- 15
- BESA's full membership list is on their website and can be found here.² **I am not at liberty to disclose any financial information in relation to fees paid.**
 - [Redacted information]
- 20
- Both APPG social media feeds comply with the rules from the Registrar.
 - You have requested a list of Ranelagh's clients from the last 12 months. They are:
 - British Art Market Federation
 - British Educational Suppliers Association
- 25
- British Entertainment Industry Radio Group
 - British International Education Association
 - Children's University
 - Federation of Racecourse Bookmakers
 - GL Assessment

² <https://www.besa.org.uk/about-us/members/>

- Independent Ambulance Association
- Patient Transport Action Group
- Real Group
- [Redacted information]

- 5 — Details of the Officers of the APPG for Education are detailed on the website, which can be found here,³ as are details of formal meetings of the Group. Our next one is on 12 September.
- We do not hold a formal membership list, but instead open our meetings to all MPs and Peers who wish to attend.

10 Wishing you pleasant Bank Holiday weekend.

Kind Regards

[name redacted]

[Complainant also added] (this included a copy of the relevant meeting minutes from Wed 20th July 2022 provided as a PDF)

15 *29 March 2023*

3. Letter from the Commissioner to Mr Marcus Fysh MP, 24 April 2023

I am writing to you as Chair of the All-Party Parliamentary Group for Education (“the Group”). Following receipt of an allegation from [name redacted] regarding the Group’s compliance with the Rules for APPGs,⁴ I have decided to open a formal inquiry. I enclose a copy of [the complainant’s] submission dated 21 March 2023 and his follow up email and enclosures dated 29 March 2023, for your information.⁵

Please note that [name redacted] made a complaint about another APPG and reference to this has been redacted from the enclosures.

The scope of my inquiry

25 On 26 July 2022, [the complainant] emailed the APPG for Education’s Public Enquiry Point, [name redacted] of Ranelagh Ltd, and asked why the Group’s website did not

³ <http://www.educationappg.org.uk/about-the-appg/officers-and-members/>

⁴ <https://www.parliament.uk/about/mps-and-lords/members/apg/rules-on-appgs/>

⁵ See enclosures submitted with the complaint above.

contain up to date information about the Group's meetings. [The complainant] also requested the Income and Expenditure statements for the Group for the years 2019 and 2020. [The complainant's] complaint states that this information is still outstanding.

- 5 My inquiry will focus on whether the Group has acted in breach of paragraphs 21 and 28 of the APPG Rules by:
1. Failing to provide income and expenditure statements for the years 2019 and 2020.
 2. Failing to include mandatory information on its website including details of the Group's AGM, which was advertised on the website for 11 January 2023.
- 10

If the scope of my inquiry changes, I will update you in writing.

The relevant rules of the House

Paragraph 3 of the APPG Guide to the Rules says:

- 15 *3. Each group's Chair and Registered Contact, who must be a Member of the House of Commons, is responsible for ensuring that the group complies with the rules of the House, and that is any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with those rules.⁶*

20 On the rules regarding **Maintaining Transparency** found in Paragraph 21 of the Guide to the Rules for APPGs it states that an APPG must;

c) publish on its website (or provide on request) the following information:

ii. dates of meetings, both past and future;

25 *iii. minutes of past formal meetings (which should record both attendance and decisions);*

v. income and expenditure statements

Paragraph 28 states, *A group which has received over £12,500 from outside Parliament, in money or in kind, in its reporting year must undertake the following actions;*

⁶ <https://www.parliament.uk/about/mps-and-lords/members/appg/rules-on-appgs/>

- a) *Complete an income and expenditure statement, in accordance with the requirements at Appendix 2; and*
- b) *Arrange to have this approved at its AGM (or, if not possible, at another General Meeting);*
- 5 c) *Publish the approved statement on the website within 28 days of its approval and within four months of the end of the relevant reporting year; and*
- d) *Publish a closing income and expenditure statement, approved by the officers of the group, within four months of the end of a Parliament – or*
 10 *within four months of the group's decision to cease to exist.*

Next steps

I would welcome your comments on the allegation that your alleged actions have amounted to a breach of the APPG Rules. I would also be grateful for your answers to the following specific questions:

- 15 1. Please detail the steps you have taken to ensure the secretariat is aware of, and complies with, the Guide to the Rules for APPGs.
2. Please confirm whether you were aware of the requirements in paragraphs 21 and 28 above, as set out in the Guide to the Rules for APPGs.
- 20 3. Whether the Group's website includes dates of meetings, both past and future, the minutes of past formal meetings and the income and expenditure statements. If not, please explain why this information is not published on the Group's website.
- 25 4. Whether the Group's website includes the Group's income and expenditure statements. If not, please explain why this information is not published on the Group's website.
5. Please provide the Group's income and expenditure statements from 2019 onwards and confirm when these statements were created.
6. Whether, in your view, the Group has adhered to the requirements set out in paragraphs 21 and 28 of the Guide to the Rules for APPGs.
- 30 It would be helpful to receive any evidence to support your responses when you reply to this letter. You can consult the Group's secretariat insofar as is necessary for you to answer the questions above but please do not discuss the matter or my investigation with them, as I may need to write or speak to them myself. Any other points you wish to make to help me with this inquiry would also be welcome.

Important information

My inquiries are conducted in private. However, following the decision taken by the House on 21 April 2021, I will shortly publish on my webpages the fact that I am conducting an inquiry about your alleged breach of the Code of Conduct. If
5 contacted, my office will not comment on any aspect of this specific inquiry to third parties. They will answer direct factual questions about the processes I follow, and the standards system more generally, but will not provide any comment or details about the particulars of this inquiry.

10 This letter and any subsequent correspondence between us in connection with this inquiry is protected by parliamentary privilege. It should be kept confidential until the outcome of my inquiry is published. The same requirement extends to [the complainant].

15 The Members' Services Team (MST) can support and signpost you and/or your staff to appropriate support services. You can contact them confidentially on [details redacted] for a range of issues, including support with handling the impact of media attention.

Procedure

20 Please see the Procedural Protocol in relation to the Code of Conduct,⁷ which was approved by the House on 18 October 2022. This sets out detailed information about the House's standards procedures, including the procedure I follow.

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

25 I should say now, as a matter of courtesy, that I may seek the advice of the House authorities and others as part of this inquiry. If I do so, I will share that correspondence with you.

30 Information provided to me during the course of my inquiry will be retained, and disposed of, in accordance with the House of Commons' Authorised Records Disposal Policy.

Potential outcomes

Inquiries are generally concluded in one of three ways.

⁷ <https://publications.parliament.uk/pa/cm5803/cmcode/1084/1084.pdf>

1. If the evidence does not substantiate the allegation, I will report that I consider there has been no breach of the Code. If the allegation is particularly serious or the investigation raises matters of wider interest or relevance, I may decide nevertheless to submit a memorandum to the Committee on Standards, which the Committee will consider and then submit its own report to the House.
2. If the evidence demonstrates a breach of the rules, I may, in circumstances defined by Standing Order No. 150, report that I consider there has been a breach of the Code, and conclude the inquiry using the rectification procedure, without making a referral to the Committee on Standards.
- For inquiries that either result in a not upheld outcome or a rectification of the breach of the Rules, the investigation material, including our correspondence, will be published on the Parliament website, and the Committee will be notified.
3. If I consider there has been a breach of the Code, and
- it is either unsuitable for the rectification procedure; or
 - you do not accept my opinion that there has been a breach of the Code;
- or
- you do not take (or do not agree to take) any remedial action required; or
 - the investigation raises issues of wider importance
- I must make a referral to the Committee on Standards. The Committee will then decide whether there has been a breach of the Code. My memorandum to the Committee will be published as an appendix to the Committee's own Report.

Regardless of the outcome of my inquiry, I must emphasise that all the relevant evidence, including our correspondence, will be published when this inquiry is concluded. I routinely redact the personal data of third parties unless it is relevant to my decision(s) and/or opinion(s). Please tell me if you provide sensitive material that you think I should redact. I will consider carefully any such request.

Action

I would be grateful to have your response to this letter as soon as possible and no later than 9 May 2023.

If you would prefer me to communicate with you by email, or via a different postal address, please give the details when you reply to this letter. It would also be helpful if you were willing to provide a telephone number through which I might contact

you. I would be grateful if you could send your response electronically to [details redacted]

Thank you for your cooperation with this matter.

24 April 2023

5 **4. Letter from Mr Marcus Fysh MP to the Commissioner, 9 May 2023**

Thank you very much for your letter of 24th April and for taking the time to set out potential issues with the reporting of the All Party Parliamentary Group on Education that I chair.

10 I am working with the Group's secretariat to make sure that everything is reported and published and to correct any potential deficiencies without discussing your inquiry. I am organising an EGM as soon as possible to get statements such as may be required agreed and published.

15 As you may know, I assumed the role of Chairman of this All Party Parliamentary Group (the "APPG") in February 2020, when the Group was re-formed after the general election. As it was a Group of long standing with what I believed to be an experienced secretariat I did not think to audit its previous reporting and I sought and received assurances at the meeting that all had been done and was being done to comply with the Rules in respect of All Party Parliamentary Groups. The APPG is sponsored by BESA which is a well respected trade association rather than a single
20 company or interest group. Its only item to report has been a benefit in kind in respect of BESA's payment to Ranelagh Communications for the latter to organise the secretariat, speakers and events and there has been no income or expenditure of its own. This was a longstanding arrangement that was in place before I took over as Chairman and which I assumed had been performed in compliance with the Rules,
25 and it was and had been registered with your office.

Just after taking on the role of Chairman we entered the Covid era and I was proactive in stopping guest events, meetings and my office's operation on the Parliamentary estate before the lockdown restrictions were put into effect, as it seemed the right thing to do. I thought that APPG AGMs had to be held in person and
30 that they were not advisable and had been advised against. It also meant that the APPG was not able to run as full a speaking programme as we would have liked. Rules about APPG meetings changed during the period and there were many other responsibilities related to the fight against Covid so formal meetings for the APPG officers were not something prioritised. Nevertheless we managed to hold some
35 really insightful speaker meetings such as with the Schools' Commissioner about children's wellbeing during the pandemic; with experts about school building design; and with Minister Will Quince and Special Education Needs. These were all I believe announced in accordance with the guidelines and my team and I circulated details with other Parliamentarians, always being clear that the group is sponsored
40 by BESA, whose sponsorship was declared on the website, through the Register of APPGs and on the Parallel Parliament site.

Most recently we attempted to hold an AGM for 2023 to bring the APPG formally up to date, but due to events in the Commons we were not quorate and the meeting reconvened on February 22nd 2023 when sadly due to a Select Committee visit I had to be away. It has taken me longer than expected to review that meeting and see what should be published for which I apologise.

With regards to the APPG's website, I thought that statements had to be available on request and had been advised as such. I accept that was incorrect and that I had not looked closely enough at the detail of the requirements. As mentioned I am now making sure all required are agreed and published online and an EGM will be held next week in that respect. I will seek to ensure that this provides full transparency on the APPG's operations prior to my becoming Chairman as well as since. I have also written to the APPG's secretariat to stress the importance of total transparency and compliance with the detail of the Rules and Guidance to which I have directed them.

Not to minimise any deficiencies in the APPG's approach to date, I have in looking into this issue noticed that a number of other All Party Parliamentary Groups seem not to have published income and expenditure statements despite apparently meeting the threshold criteria as stated in the Register, and I wonder whether this may have been because there was guidance informal or otherwise previously that may have confused some as to whether publication was required.

In any event I would be very keen, having rectified any deficiencies in the APPG's approach, to apologise to the House and draw its and other APPG's and the Chairs' attention to the need to be very particular about compliance with the Rules and Guidance.

In answer to your questions:

1. Please detail the steps you have taken to ensure the secretariat is aware of, and complies with, the Guide to the Rules for APPGs.

From the outset I sought and received assurances from the secretariat that all in respect of the APPG's formal meetings was in order and compliant. I have now written to the secretariat on the need for them to be meticulous about this and attach a copy of that letter.⁸ We will hold an EGM next week to agree any documents needed for full transparency and will publish them on the website as soon as that is done.

2. Please confirm whether you were aware of the requirements in paragraphs 21 and 28 above, as set out in the Guide to the Rules for APPGs.

Whilst I was generally aware that there were APPG rules, I inherited an established group with what I assumed was an experienced and knowledgeable secretariat on

⁸ See enclosure below

whose advice I could rely. I had not made myself fully aware of the particular responsibilities of the Chairman in respect of the secretariat nor had I chaired an APPG before and Covid took everybody's attention. For the most recent meeting I was away on committee business and so not there in person to approve any statements and now I am fully aware of the particular responsibilities I will ensure that I directly oversee formal meetings, approvals and publications. Notwithstanding the above I accept that I should have made myself fully aware and apologise for not having done so.

- 5
- 10 3. Whether the Group's website includes dates of meetings, both past and future, the minutes of past formal meetings and the income and expenditure statements. If not, please explain why this information is not published on the Group's website.

15 Dates of meetings and reports have been published. Other information needs to be published. The reason for non-publication is that the APPG's secretariat interpreted the rules as that this information had to be available on request and that as it has no direct income or expenditure it was an unnecessary duplication of what was submitted on the registration forms. I realise now this was incorrect and apologise for not having been aware.

- 20 4. Whether the Group's website includes the Group's income and expenditure statements. If not, please explain why this information is not published on the Group's website.

25 As mentioned above, I was advised by the secretariat that this information had to be available on request. Notwithstanding that there may have been good reasons why meetings were not held and publication by certain dates did not occur, I accept that compliance should have been brought up to date at the first opportunity and I undertake to ensure this happens.

5. Please provide the Group's income and expenditure statements from 2019 onwards and confirm when these statements were created.

30 We will get these approved as soon as possible at an EGM. They were not approved before because the secretariat services provided by BESA via Ranelagh were interpreted by the APPG secretariat as a benefit in kind not technically meaning income or expenditure that needed statements, and that this information that had been provided through registration needed to be provided elsewhere only on request.

- 35 6. Whether, in your view, the Group has adhered to the requirements set out in paragraphs 21 and 28 of the Guide to the Rules for APPGs.

Although I asked the secretariat and received assurances at our first and subsequent meetings that everything to do with the APPG's compliance was up to date, I think a combination of the wrong interpretation of whether the APPG's benefit in kind

required income and expenditure statements to be produced and published and the difficulty in holding formal meetings during Covid meant that not all the documents required to be approved and published were. I was advised that a December reporting year end was in place and that an AGM in early 2023 would be sufficient opportunity to bring all up to date. I now believe the first opportunity should have been taken to bring all reasonably relevant years' reporting into compliance with the Rule and Guidance as I now know them to be. I apologise for that not having occurred and intend to rectify this completely in the coming days.

9 May 2023

10 **Enclosure: Letter from Mr Marcus Fysh MP to the public enquiry point for the APPG for Education secretariat, 9 May 2023**

I am writing following the media coverage that you will have seen regarding the reporting of the Education APPG.

15 It has been a challenging few years in which to run groups such as this, not least as we could not meet in Parliament for some time. The work we have done has been very positive and focused on really important areas, such as pupils' overall wellbeing and special educational needs, which have been particularly relevant as we try to make up for the disruption caused by Covid.

20 The financial arrangements of the group are very simple and BESA is a well respected group that have contributed positively.

25 However, we must make sure and I ask that you ensure that the APPG is always in full and meticulous compliance with Parliament's Rules and Guidance for All Party Parliamentary Groups. This is so we can prove that we are always, as we know we intend to be, completely transparent in the Group's reporting. I intend to hold an EGM forthwith to ensure that the APPG's compliance is up to date.

30 The Guidance must be followed in all particulars, including its footnotes, to make sure the APPG is completely compliant and I would ask that you ensure that you make yourself and any Chairs of the APPG and their staff fully aware of them and that you support the Chair fully and proactively in ensuring that the APPG is compliant in every respect at all times.

The Guidance can be found and is brought to your attention here: [details redacted]

35 I would also like to discuss before each meeting this Guidance and any steps the APPG may need to take to make sure the APPG is compliant in full, and to include in each meeting of Officers a forward programme that details all relevant regulatory dates and intended compliance actions related to them.

I would also ask that any and all correspondence you receive or have received for or on behalf of the APPG, and any notices and confirmations of payments and requests for payments related to the business of secretariat services for BESA and any other business related to the APPG, be immediately provided to the Chairman.

- 5 I hope you can please work on this forthwith and that we can continue with what has been a very positive agenda.

9 May 2023

5. Letter from the Commissioner to the Registrar of Members' Financial Interests, 22 May 2023

- 10 I would like to ask your advice on a complaint I have recently received about the APPG for Education. In essence, the complaint is that the APPG for Education acted in breach of paragraphs 21 and 28 of the Guide to the Rules on APPGs, by failing to publish on its website up to date information about the Group's meetings and failing to provide copies of the 2019 and 2020 income and expenditure statements when
15 requested.

I enclose a copy of my initiation letter to the Member, dated 24 April 2023, and their reply of 9 May 2023. For your information I have also enclosed copies of the correspondence and supporting evidence which led to me initiating this inquiry.

- 20 In the letter from Mr Fysh dated 9 May 2023, he states in relation to measures put in place to tackle the spread of the Coronavirus virus, "**Rules about APPG meetings changed during the period** and there were many other responsibilities related to the fight against Covid so formal meetings for the APPG officers were not something prioritised." [My emphasis]

- 25 It would be helpful to receive your view on whether the actions of Mr Fysh, in his capacity as APPG chair, breached the Rules for APPGs. It would also be helpful if you could provide the following information:

1. Whether Mr Fysh or the APPG for Education secretariat have approached your office for advice on paragraphs 21 or 28 of the APPG rules, since Mr Fysh became chair of the Group in February 2020.
- 30 a) If they did, please could you share their request and the advice that was given.

- 35 Mr Fysh has stated that he has noticed, "*...a number of other All Party Parliamentary Groups seem not to have published income and expenditure statements despite apparently meeting the threshold criteria as stated in the Register, and I wonder whether this may have been because there was guidance informal or otherwise previously that may have confused some as to whether publication was required.*"

2. Whether there has been any previous guidance issued, informal or otherwise, which has addressed the issue of publishing income and expenditure statements?

5

a) If there has, please could you share that guidance and the date it was issued with me.

3. A copy of the guidance issued in Advice Note 7: Coronavirus and APPGs, and,

a) the date this Advice Note was issued, and,

b) details about how that Advice Note was circulated to APPGs.

10 I'm aware that an email was sent to all APPG chairs on 1 April 2022, and updated on 7 April 2022, informing APPG chairs that Advice Note 7 would be rescinded on 2 May 2022.

4. Did your office publish any further guidance for APPGs, related to formal meetings during the pandemic, between first issuing Advice Note 7 and rescinding that advice on 2 May 2022?

15 5. Whether Mr Fysh or the APPG for Education secretariat approached your office for advice on holding formal meetings between holding their AGM in February 2020 and their most recent AGM on 22 February 2023?

a) If they did, please could you share their request and the advice that was given.

20 Any other comments you wish to make regarding the response provided by Mr Fysh would be most welcome. It would be very helpful to have your reply by 2 June 2023.

If you require further information from Mr Fysh before giving your advice, I would be happy for you to contact them directly. Thank you for your assistance.

25 *22 May 2023*

6. Letter from Mr Marcus Fysh MP to the Commissioner, 2 June 2023

Thank you for your letters of 22nd May.

...

Reporting Details:

As per my previous letter I have been looking at the detail of the reporting and want to make sure that the APPG is compliant and transparent in every respect. In particular this includes my identification of an issue that the Register may not recently have properly reflected the revised reporting date after the APPG had been
5 deregistered during COVID lockdown but was then reconstituted on 8th December 2021 and changed its reporting year end date to 7th December.

In addition to the above I have identified that the APPG might potentially need a formal meeting to agree a retrospective closing statement in respect of the Parliament that ended in 2019 before I became Chairman, but as I understand it
10 updating the Register for the correct details as to reporting date and notification of the filing or otherwise of Income and Expenditure Statements may not need a formal APPG meeting. There was no need for an Income and Expenditure statement in 2020 as the period following the February 2020 inaugural meeting was covered in the 2020-2021 Income and Expenditure Statement.

15 I also now understand fully that if a group has a website then its documents should be clearly published on it rather than made available on request.

I understand that as the Chairman I have an obligation to ensure the APPG's reporting is correct and I would like to make sure this is fulfilled as quickly as possible. I would like your advice please therefore as to whether I should hold a
20 formal APPG meeting to approve the above mentioned closing statement or await further instructions from you.

2 June 2023

7. Letter from the Registrar of Members' Financial Interests to the Commissioner, 5 June 2023

25 Thank you for your email in relation to the APPG on Education. My responses to your questions are set out below.

Regards [Name redacted]

Registrar of Members' Financial Interests
Office of the Parliamentary Commissioner for Standards
30

1. *Whether Mr Fysh or the APPG for Education secretariat have approached your office for advice on paragraphs 21 or 28 of the APPG rules, since Mr Fysh became chair of the Group in February 2020.*

35 a) *If they did, please could you share their request and the advice that was given.*

I have looked back over our records and there are no emails from either the secretariat or Mr Fysh requesting advice in the stated time period. (The full email correspondence is set out at Annex 2).

5 *Mr Fysh has stated that he has noticed, "...a number of other All Party Parliamentary Groups seem not to have published income and expenditure statements despite apparently meeting the threshold criteria as stated in the Register, and I wonder whether this may have been because there was guidance informal or otherwise previously that may have confused some as to whether publication was required."*

10 2. *Whether there has been any previous guidance issued, informal or otherwise, which has addressed the issue of publishing income and expenditure statements?*

a) *If there has, please could you share that guidance and the date it was issued with me.*

15 The Guide to the Rules sets out the requirements for publishing income and expenditure statements when they reach the threshold. The Registry Office has not issued any guidance that went against those requirements.

3. *A copy of the guidance issued in Advice Note 7: Coronavirus and APPGs, and,*

a) *the date this Advice Note was issued, and,*

b) *details about how that Advice Note was circulated to APPGs.*

20 *I'm aware that an email was sent to all APPG chairs on 1 April 2022, and updated on 7 April 2022, informing APPG chairs that Advice Note 7 would be rescinded on 2 May 2022.*

4. *Did your office publish any further guidance for APPGs, related to formal meetings during the pandemic, between first issuing Advice Note 7 and rescinding that advice on 2 May 2022?*

25 The first version of Advice Note 7 was issued on 16 March 2020⁹ and was effective from 27 April 2020. It was emailed to all Chairs of APPGS. A second version was emailed to all Chairs of APPGs on 8 June 2020 and was effective from that day.

A number of updates followed, and the last iteration was issued on 7 April 2022. The last version is available on the APPG webpage.¹⁰

⁹ See enclosure below

¹⁰ <https://www.parliament.uk/about/mps-and-lords/members/appg/rules-on-appgs/>

All iterations of the Advice Note were emailed to all APPG Chairs

5. *Whether Mr Fysh or the APPG for Education secretariat approached your office for advice on holding formal meetings between holding their AGM in February 2020 and their most recent AGM on 22 February 2023?*

5 a) *If they did, please could you share their request and the advice that was given.*

10 I have looked back over our records and there are no emails from either the secretariat or Mr Fysh requesting advice on either AGM. However, as you will see from the attached correspondence in Annex 2,¹¹ there was a brief exchange between the Registry Office and the secretariat about the deregistering of the group for not holding an AGM within the required time period. On 25 April 2022 the APPG queried why we sent it an AGM reminder when the group had only recently held an AGM. It was explained that the AGM was held late and related to the group's previous, not current reporting year, so the reminder was valid.

15 **Enclosure: Advice Note 7 issued 16 March 2020, effective from 27 April 2020**

ADVICE NOTE 7: Coronavirus and APPGs – Advice Effective from 8 June 2020

Email sent to all APPG chairs on 8 June from the Parliamentary Commissioner for Standards:

Virtual meetings and elections for APPGs

This email updates you on the rules for formal meetings by APPGs.

Many APPGs have adapted flexibly to the lockdown rules, and are already holding virtual meetings for informal discussion. However, until now it has not been possible to hold elections or to take decisions, as these have needed a formal meeting in person on the parliamentary estate.

This email sets out new rules which will apply until close on 17 September 2020 for APPG inaugural meetings, decision taking and other elections, which we hope will help you. Until further notice, these must take place at a virtual meeting. It is unlikely that you need to hold an AGM this summer. (If your group held an inaugural meeting in this Parliament in early 2020, your reporting year will end in early 2021. To check the date of your reporting year please see your register entry.)

1. We ask you to avoid holding face to face APPG meetings on the estate, even if some members participate remotely. To hold a virtual formal meeting, you must:
 2. Advertise it at least one week in advance on the All-Party Notices. Your notice must give
 - the date and time of the meeting, whether it is an Inaugural, AGM or EGM or other meeting, and if it involves an election. It must be on a day when both Houses are sitting;

¹¹ See Appendix 2 below

- the time of any voting (if different);
 - the deadline for registering to attend the meeting, which should normally be no later than 6pm on the day before the election;
 - contact details for someone with a parliamentary email address who will act as administrator for the meeting and the voting. They must provide the log in details (if needed), and send out and receive any ballot papers (if used).
3. Advertise the meeting on your group's website if it has one. You may also want to send details to all parliamentary members of your group. But do not send mass emails to all parliamentarians.
 4. Check that the meeting is quorate. The quorum is set out at paragraphs 20 d and e of Guide to the Rules for APPGs.
 5. After any vote, arrange a count. You must count only votes which come from parliamentary email addresses and are from current members of the House of Commons or House of Lords.

Prepare minutes of the meeting in the usual way, and include the result of any voting. These do not have to include the names of those who voted. In accordance with paragraph 27 of the Guide to the Rules for APPGs, your group must publish the minutes on its website if it has one. If your group has no website it must keep copies of the minutes and provide them to enquirers on request.

We do not prescribe how elections are to be conducted, or what software to use for votes. However, if it is to be a single yes/no decision you may find it easy to use Outlook voting buttons.

We hope that these new rules will help APPGs to carry out their work while keeping meetings on the parliamentary estate to a minimum.

If you need more information, the Registrar (Heather Wood) and the Assistant Registrar (Philippa Wainwright) are happy to help and advise. Please do feel free to contact them (via groupsregister@parliament.uk or on 0207 219 3277 or 0401).

Useful links

- [Guidance on using MS Teams](#) (via Sharepoint on the parliamentary intranet)
- [Guidance on using MS Outlook voting buttons](#)
- [Registration form for group's Inaugural Meeting](#)

Document owner: Registrar of Member's Financial Interests, Office of the Parliamentary Commissioner for Standards
Date of document: 16 March 2020. Updated: 23/03/2020; 26/03/2020; 27/04/2020 and 08/06/2020
For advice contact: groupsregister@parliament.uk or call the Commissioner's office on 020 7219 0401

8. Letter from the Commissioner to Mr Marcus Fysh MP, 15 June 2023

Thank you for your letter dated 2 June 2023, and your answers to my additional questions. I have also received a reply from the Registrar of Members' Financial Interests and enclose a copy of his letter for your information.

5 I now have sufficient information to consider whether there has been a breach of the rules for APPGs. This is in respect of the allegations that you, in your role as Chair of the APPG for Education, failed to provide income and expenditure statements for the APPG for the years 2019 and 2020, and failed to include mandatory information on the APPG's website, including details of the Group's AGM on 11 January 2023.

10 ...

My decision

I have considered our correspondence, the published rules, advice from the Registrar of Members' Financial Interests and available guidance. I consider that there has been a breach of the APPG Rules. However, for the reasons outlined below,
 15 I do not intend to refer this matter to the Committee on Standards. Instead, I have decided to conclude this matter using the rectification process provided by Standing Order No. 150.

Rationale

Paragraph 3 of the APPG Guide to the Rules says:

20 *"Each group's Chair and Registered Contact, who must be a Member of the House of Commons, is responsible for ensuring that the group complies with the rules of the House, and that if any person or organisation provides a secretariat or support services, that person or organisation is aware of and complies with those rules."*

25 The rules regarding "Maintaining Transparency" found in Paragraph 21 of the Guide to the Rules for APPGs state that an APPG must:

"c) publish on its website (or provide on request) the following information:

...

ii. dates of meetings, both past and future;

30 *iii. minutes of past formal meetings (which should record both attendance and decisions);*

...

v. income and expenditure statements”

Paragraph 28 states,

“A group which has received over £12,500 from outside Parliament, in money or in kind, in its reporting year must undertake the following actions....

- 5 a) *Complete an income and expenditure statement, in accordance with the requirements at Appendix 2; and*
- b) *Arrange to have this approved at its AGM (or, if not possible, at another General Meeting);*
- 10 c) *Publish the approved statement on the website within 28 days of its approval and within four months of the end of the relevant reporting year; and*
- d) *Publish a closing income and expenditure statement, approved by the officers of the group, within four months of the end of a Parliament – or within four months of the group’s decision to cease to exist....”*

15 In respect of the allegation that you failed to provide income and expenditure statements for the years 2019 and 2020, you have accepted that these statements were not completed, and that this was in breach of paragraph 28 of the Guide to the Rules for APPGs. You said this occurred as a result of an incorrect interpretation of whether a benefit in kind required statements to be produced and published.

20 Turning to the failure to include mandatory information on the APPG’s website. You have accepted that this was a breach of paragraph 21 of the Guide to the Rules for APPGs. You have explained that, during the pandemic you believed APPG AGMs had to be held in person; and that the difficulty in holding formal meetings during the COVID pandemic meant you did not publish all of the documents that required approval and publication. However, the Registrar has provided a copy of the Advice

25 Note issued on 16 March 2020 and effective from 27 April 2020, confirming that formal meetings could be held remotely. The Advice Note was sent to all Chairs of APPGs.

30 In your letter of 9 May 2023 you said the AGM was held on 22 February 2023, as you were not quorate previously. You did not attend the meeting due to other commitments, and you have apologised because it took longer for you to review the meeting and see what should be published. You have accepted the statements needed to be published, telling me you had previously been incorrectly informed that they had to be available on request.

35 You said you took on the role of Chair in February 2020. It was a long standing APPG with what you believed to be an experienced secretariat who assured you that the APPG Rules were being adhered to. I note from your letter of 9 May 2023 that you

are already working with the Group's secretariat to ensure compliance with the APPG Rules going forward. You said that you are now fully aware of the APPG Rules and your responsibilities as Chair. You have apologised for the breaches identified above and have taken steps to get the income and expenditure statements for the years 2019 onwards completed and published.

Next Steps

I consider these breaches to be inadvertent and arising from an inattention to the Rules on APPGs.

As I explained above, Standing Order No. 150 makes provision for me to conclude an inquiry using the rectification process, rather than by making a referral to the Committee on Standards. The Committee would generally expect the Member to have acknowledged and apologised for their breach of the rules, and to have taken any steps necessary to rectify their breach.

To resolve this breach of the rules through rectification, the Committee would generally expect the Member to provide the following:

- a) Confirmation you have accepted my opinion;
- b) A clear acknowledgement that you have breached the rules;
- c) An apology for the breach; and
- d) Information of the steps you have taken to rectify the breach and to ensure there is no recurrence of the breach.

The above can be provided by way of your formal response to this letter. You have already acknowledged and apologised for your breach of the rules and explained the steps you have taken to prevent further breaches. Therefore, in order to progress this through rectification, I will require the following from you:

- a) confirmation you have accepted my decision; and
- b) an undertaking that you will meet with the Registrar of Members' Interests to discuss your responsibilities as a Chair of an APPG, with specific reference to:
 - i) whether the Group's income and expenditure statements are completed and up to date,
 - ii) whether the information currently available on the Group's website meets the requirements as stated in the rules for APPGs.

If you are content for me to conclude the inquiry in this way, please write to me with the above information by 22 June 2023.

5 If you agree to my proposal, I will share my written evidence pack with you, so that you can check its factual accuracy before publication. I will also report the outcome to the Committee on Standards in due course as a matter of routine.

10 If you do not accept my opinion and decision, you should tell me the reasons for that by reply. After which, I will prepare a Memorandum to the Committee on Standards, so that they may consider the matter. I would give you the opportunity to see and comment on a draft of the Memorandum, but the content of it would, in the final analysis, be for me alone.

In the meantime, our correspondence remains protected by parliamentary privilege and I must ask that you continue to maintain the strict confidentiality of the inquiry.

15 June 2023

9. Email from Mr Marcus Fysh MP to the Commissioner, 15 June 2023

15 Thank you for your letter of today's date 15th June 2023.

I hereby confirm that I accept your decision and will happily meet with the Registrar as you have suggested to ensure all information that may be required of the APPG for Education is provided and displayed correctly in the right format.

Thank you for your time and for that of the Registrar in considering this matter.

20 *15 June 2023*

10. Letter from the Commissioner to Mr Marcus Fysh MP, 27 June 2023

Further to your emails of 2 June and 15 June 2023, I now have sufficient information to conclude my inquiries, and I have outlined my decisions below.

APPG for Education

25 Further to your email of 15 June 2023, in which you agreed to my proposal to conclude my inquiry into the Group by way of the rectification procedure, I would like to thank you for your acknowledgement and apology.

30 I enclose a copy of the draft written evidence pack, which includes the correspondence exchanged during the investigation. In this pack you will find a draft copy of the letter I plan to send to the complainant; it is the first item in the pack, after the summary. While the content of the letter is a matter for me alone, I would welcome any comments on the factual accuracy of this and the draft written

evidence pack. The complainant's name will be redacted from the published pack; please let me know if there are any further redactions you think should be made, and I will consider your request.

5 I would be pleased to receive any comments you wish to make on these items as soon as possible, and no later than 4pm on 4 July 2023.

Once I have any comments you wish to make, I will finalise the pack, which will then be published on my webpages. I will notify you of the publication of the pack. I will also notify the Committee on Standards of the outcome of my inquiry in due course.

[Communications about a further matter redacted]

10 In the meantime, our correspondence continues to be protected by parliamentary privilege and you should continue to keep this matter strictly confidential.

27 June 2023

11. Email from Mr Marcus Fysh MP to the Commissioner, 4 July 2023

Thank you for your letter of 27th June and the accompanying documents.

15 I would only wish to add that I am seeking clarification from the Registrar about how to get the rectification exactly correct in terms of reporting for the APPG.

As the dates for AGMs slipped it seems that the year end changed and I am just seeking clarification on that to make sure things are updated in the right way.

4 July 2023

20

25

Appendix 1, Communications sent to APPG Chairs during the pandemic

From: Communications
 Sent: 08 April 2020 10:08
 To: [Redacted Chair of APPG]
 5 Subject: Coronavirus pandemic: help from the parliamentary standards team

Dear Members,

I hope that you and your loved ones are safe and well.

10

During the pandemic it is more important than ever for public figures to uphold the seven principles of public life and to show leadership. I am writing to remind you that Parliament and the electorate continue to expect high standards of behaviour from you. This email contains information to help you to maintain those standards.

15 Sources of advice

We are happy to advise by phone or email even if we cannot meet with you. To ask what to include in the Register, about APPG procedures or any other Standards related matters, contact us via phone or email and we will do our best to help. Please
 20 do not send information in hard copy since we are all working remotely.

For advice on registering and declaring interests and the rules more generally:
 email commonsregistrar@parliament.uk, [details redacted]
 For advice on the use of House stationery: email [details redacted]

How to find the Code of Conduct and rules of the House online

Since your working patterns will have changed, you may not have access to the ringbinder containing the hard copy of the Code of Conduct and supporting rules of
 25 the House which we sent to you after the General Election. Here are links to the key documents:

- The Code of Conduct for MPs
- The Guide to the Rules for MPs, which contains the rules on registering interests and on paid advocacy
- 30 • The Rules Register (Intranet link only), where you can find the rules on using House resources such as stationery and prepaid envelopes, ICT equipment and networks
- Registration Forms (Intranet link only)
- 35 • The APPG webpages, where you can find the Guide to the Rules for APPGs and guidance about the pandemic.

A reminder about disclosing interests

5 You are still expected to be open about your interests. For example, don't forget to register payments for outside work (including shifts worked as a health professional; the Registrar can suggest some wording even if you do not yet know how much you will be paid).

If you chair an All-Party Parliamentary Group

You should bear in mind that the pandemic means that at this point any meetings have to be virtual ones, and you cannot take formal decisions or elect officers.

For advice on APPG matters email [details redacted]

10 Social media

Please do be mindful of the impact of social media. A tweet or retweet made in haste can result in offence being caused and lead to complaints to my office, as well as causing you and your staff unnecessary work.

15 Investigations

On my webpages you can find a statement of my operational priorities at this time. I will continue with my investigations into breaches of the Code of Conduct with some changes to take account of remote working. Investigations into allegations of bullying, harassment and sexual misconduct will also continue.

20 I hope you are able to stay safe and healthy.

Kind Regards

Kathryn Stone OBE

25

Parliamentary Commissioner for Standards
8 April 2020

From: [Assistant Registrar]
Sent on: Monday, June 8, 2020 3:07:16 PM
To: [Redacted Chair of APPG]
Subject: Coronavirus and APPGs - Advice Effective from 8 June

30 Dear Chair & Registered Contact

All-Party Parliamentary Group [name redacted]

Virtual meetings and elections for APPGs

This email updates you on the rules for formal meetings by APPGs.

5 Many APPGs have adapted flexibly to the lockdown rules, and are already holding virtual meetings for informal discussion. However, until now it has not been possible to hold elections or to take decisions, as these have needed a formal meeting in person on the parliamentary estate.

10 This email sets out new rules which will apply until close on 17 September 2020 for APPG inaugural meetings, decision taking and other elections, which we hope will help you. Until further notice, these must take place at a virtual meeting. It is unlikely that you need to hold an AGM this summer. (If your group held an inaugural meeting in this Parliament in early 2020, your reporting year will end in early 2021. To check the date of your reporting year please see your register entry.)

- 15 1. We ask you to avoid holding face to face APPG meetings on the estate, even if some members participate remotely. To hold a virtual formal meeting, you must:
 - 20 • the date and time of the meeting, whether it is an Inaugural, AGM or EGM or other meeting, and if it involves an election. It must be on a day when both Houses are sitting;
 - the time of any voting (if different);
 - the deadline for registering to attend the meeting, which should normally be no later than 6pm on the day before the election;
 - 25 • contact details for someone with a parliamentary email address who will act as administrator for the meeting and the voting. They must provide the log in details (if needed), and send out and receive any ballot papers (if used).
- 30 3. Advertise the meeting on your group's website if it has one. You may also want to send details to all parliamentary members of your group. But do not send mass emails to all parliamentarians.
4. Check that the meeting is quorate. The quorum is set out at paragraphs 20 d and e of Guide to the Rules for APPGs.

5. After any vote, arrange a count. You must count only votes which come from parliamentary email addresses and are from current members of the House of Commons or House of Lords.

5 Prepare minutes of the meeting in the usual way, and include the result of any voting. These do not have to include the names of those who voted. In accordance with paragraph 27 of the Guide to the Rules for APPGs, your group must publish the minutes on its website if it has one. If your group has no website it must keep copies of the minutes and provide them to enquirers on request.

10 We do not prescribe how elections are to be conducted, or what software to use for votes. However, if it is to be a single yes/no decision you may find it easy to use Outlook voting buttons.

We hope that these new rules will help APPGs to carry out their work while keeping meetings on the parliamentary estate to a minimum.

15 If you need more information, the Registrar [name redacted] and the Assistant Registrar [name redacted] are happy to help and advise. Please do feel free to contact them [details redacted].

Kind regards

20 Kathryn Stone OBE
Parliamentary Commissioner for Standards

Useful links [details redacted]

From: [Assistant Registrar]
Sent on: Tuesday, September 15, 2020 2:50:56 PM
To: [Redacted Chair of APPG]
Subject: Coronavirus and APPGs - Advice Effective from 15 September

25 Dear Chair & Registered Contact

All-Party Parliamentary Group [name redacted]

30 **Virtual meetings and elections for APPGs**

This email updates you on the rules for formal meetings by APPGs. Formal meetings must be virtual and not face to face until the end of the parliamentary session (which we expect to be in early May 2021, unless unforeseen events intervene).

Since 8 June 2020, APPGs have been required to hold their formal meetings virtually. Formal meetings include inaugurals, and meetings involving decision taking and elections. It is unlikely that you need to hold an AGM in 2020, but if you do hold such a meeting before the end of the session, this too must be virtual. (For most groups
5 their reporting year will end in early 2021, and an AGM would need to take place within the 4 months after the end of that reporting year. To check the date of your reporting year please see your register entry.)

We ask you to avoid holding face to face APPG meetings on the estate, whether formal or informal, even if some members participate remotely. To hold a virtual
10 formal meeting, you must:

1. Advertise it at least one week in advance on the All-Party Notices. Your notice must give
 - the date and time of the meeting, whether it is an Inaugural, AGM or EGM or other meeting, and if it involves an election. It must be on a day when
15 both Houses are sitting;
 - the time of any voting (if different);
 - the deadline for registering to attend the meeting, which should normally be no later than 6pm on the day before the election;
 - contact details for someone with a parliamentary email address who will
20 act as administrator for the meeting and the voting. They must provide the log in details (if needed), and send out and receive any ballot papers (if used).
2. Advertise the meeting on your group's website if it has one. You may also want to send details to all parliamentary members of your group. But do not send
25 mass emails to all parliamentarians.
3. Check that the meeting is quorate. The quorum is set out at paragraphs 20 d and e of Guide to the Rules for APPGs.
4. After any vote, arrange a count. You must count only votes which come from
30 parliamentary email addresses and are from current members of the House of Commons or House of Lords.
5. Prepare minutes of the meeting in the usual way, and include the result of any voting. These do not have to include the names of those who voted. In accordance with paragraph 27 of the Guide to the Rules for APPGs, your group must publish the minutes on its website if it has one. If your group has no
35 website it must keep copies of the minutes and provide them to enquirers on request.

We do not prescribe how elections are to be conducted, or what software to use for votes. However, if it is to be a single yes/no decision you may find it easy to use Outlook voting buttons.

5 We hope that these new rules will help APPGs to carry out their work while keeping meetings on the parliamentary estate to a minimum.

If you need more information, the Registrar [name redacted] and the Assistant Registrar [name redacted] are happy to help and advise. Please do feel free to contact them [details redacted].

10 Kind regards

Kathryn Stone OBE
Parliamentary Commissioner for Standards
Useful links [redacted]

15

From: [Assistant Registrar]
Sent on: Friday, April 1, 2022 2:13:42 PM
To: [Redacted Chair of APPG]
Subject: Rescinding of Advice Note 7 on Coronavirus and APPGs - Effective 2 May 2022

Dear Chair

[Redacted] All-Party Parliamentary Group

20

1. I am writing to provide an update on the rules for APPG formal meetings with effect from Monday 2 May.
2. Under the provisions of Advice Note 7: Coronavirus and APPGs, APPGs were until recently required to hold all meetings virtually, including formal ones. A formal meeting is defined in the House's rules as 'one at which one or more decisions is, or is to be, taken, or a vote is to be held; or which includes an outside speaker'.
25
3. Following the updated Covid-19 guidance issued by the Commissions of both Houses, the Committee on Standards wrote to the Speaker recommending that Advice Note 7 Coronavirus and APPGs be rescinded and that the Rules requiring formal meetings to be held physically be reinstated. The Speaker has
30 approved the Committee's recommendation.

4. This means that from **Monday 2 May**, all formal meetings will need to be held physically, and any meeting that involves elections must be held at Parliament and when both Houses of Parliament are sitting. **Virtual formal meetings will no longer be allowed to take place after Monday 2 May.**
5. For ease, I have set out the relevant section (on APPG meetings) of the Guide to the Rules at the end of this note. Chairs receive a reminder about AGM requirements when their group's AGM is due.
6. If you need more information, the Registrar [name redacted] and the Assistant Registrar [name redacted] are happy to help and advise. Please do feel free to contact them [Details redacted]

Kind regards

Kathryn Stone OBE
Parliamentary Commissioner for Standards

15

Guide to the rules on All-Party Parliamentary Groups (APPGs)

20. Groups must comply with the following rules about meetings:

- a) Each group must meet at least twice during its reporting year;
- 20 b) One of these meetings must be an Annual General Meeting (AGM) or a meeting which involves an inaugural election of officers;
- c) Formal meetings of the group must be advertised (normally at least one week in advance) in the All-Party Notices, together with details of a parliamentary contact for the group and a list of any external speakers;
- 25 d) The quorum for a formal meeting of the group is five Members of either House;
- e) Annual General Meetings must take place on the parliamentary estate and when both Houses are sitting. They must be advertised (normally at least one week in advance) on the All-Party Notices, which must provide details of a parliamentary contact for the group and list any external speakers. In addition, at least five Members of either House, including at least one MP, must be present at an AGM. There are two standard items of business for an AGM: the election of officers, and the approval of an income and expenditure statement for publication (if the group is required to produce one for the previous reporting year (see paragraphs 28 and 29 below and Appendix 2). Within 28 days of the meeting, and in any case no later than four months from the end of the group's reporting year, the group must register the outcome of the election and (if an income and expenditure
- 30
- 35

statement is required) that it has approved and published (or made available) that statement.

- 5 f) Other elections of officers If there is a need to elect officers other than at an Annual General Meeting (AGM); for example, at the group's inaugural meeting, or to fill a vacancy or create a new role, a formal Extraordinary General Meeting (EGM) must be held, on the parliamentary estate, and when both Houses are sitting. If the group needs to elect a replacement for one of the four officers required by the House, the election must be held within 28 sitting days of the vacancy arising. The elections must be advertised (normally at least one week in advance) on the All-Party Notices, which must provide details of a parliamentary contact for the group and list any external speakers. In addition, at least five Members of either House, including at least one MP, must be present at the election. The group must register the outcome of any election within 28 days of it taking place.
- 10
- 15

From: [Assistant Registrar]

Sent on: Thursday, April 7, 2022 11:59:53 AM

To: [Redacted Chair of APPG]

Subject: Clarification on the rescinding of Advice Note 7 on Coronavirus and APPGs

Dear Chair

20 **All-Party Parliamentary Group on [name redacted]**

Following the rescinding of Advice Note 7, a number of APPGs have sought advice on the ability of outside speakers and guests to attend meetings virtually.

The following advice sets out the requirements for formal meetings (which were defined in the advice sent on 1 April to all chairs) from Monday 2 May 2022.

25 **AGMs and meetings to elect officers**

AGMs and meetings to elect officers must be held physically on the parliamentary estate and when both Houses are sitting. At least five Members of either House, including at least one MP, must be present.

- 30 All parliamentarians may vote at the meeting (but must be present at the meeting to do so); no-one else may vote.

Hybrid or virtual meetings are not allowed for AGMs and meetings to elect officers. Outside speakers, guests and members of an APPG may not attend AGMs and meetings to elect officers virtually.

- 5 The meetings must be advertised on the All Party Notice (normally at least one week in advance) published by the Whips' office.

Other formal meetings

There is no requirement for these meetings to be held physically on the parliamentary estate or when both Houses are sitting.

- 10 For the meeting to be quorate at least five Members of either House must be present physically at the meeting. However, other members of the APPG may attend virtually subject to the discretion of the APPG.

Outside speakers may deliver speeches and presentations virtually. It is up to APPGs to decide whether to issue invitations to other guests to attend virtually.

- 15 The meetings must be advertised on the All Party Notice (normally at least one week in advance).

If you need more information, the Registrar [name redacted] and the Assistant Registrar [name redacted] are happy to help and advise. Please do feel free to contact them [details redacted].

- 20 Kind regards

Kathryn Stone OBE
Parliamentary Commissioner for Standards

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Appendix 2, Correspondence between the Registry Office and the APPG for Education

Emails exchanged in 2020:

From: Education APPG
 Sent on: Friday, March 13, 2020 12:15:22 PM
 To: APPG Register
 Subject: APPG for Education registration form
 Attachments: registration-form-for-appgs.docx (91.78 KB)

- 5 Please find attached APPG registration form for the APPG for Education – I have scanned the last page with the Chair’s signature.

Kind Regards

- 10 [Name redacted]
 All-Party Parliamentary Group for Education

From: APPG Register (Assistant Registrar)
 Sent on: Friday, March 13, 2020 1:45:20 PM
 To: APPG Register
 Subject: [BCC] All-Party Parliamentary Group for Education - Confirmation of Registration
 Attachments: Register-2020-Mar-13-13-45.docx (41.26 KB)

- 15 Dear Chair & Registered Contact,

Thank you for the registration form the group sent us.

- 20 A copy of the entry we have accordingly made in the Register of All-Party Parliamentary Groups is enclosed for your records. The entry will appear in the next edition of the Register, a new edition of which is published every 6 weeks or so.

- 25 Please bear in mind that the group must keep its Register entry up to date by notifying us of any changes required to it. Mostly this requires the group to email details of the amendment to groupsregister@parliament.uk within 28 days of the change occurring (eg within 28 days of the group receiving a donation of over £1500 in money or in kind).

The House's rules on APPGs are set out in the Guide to the Rules on All-Party Parliamentary Groups. As the group's Chair you are responsible for ensuring the group complies with the House's rules, and that any person or organisation

providing secretariat or support services to the group is aware of and complies with those rules.

5 The Registrar would particularly like to take this opportunity to draw APPGs' attention to the rules on data protection as the guidance on this has recently been enhanced to help you conduct a data protection audit for your APPG. Please see Advice Note 5 on the APPG page of the parliamentary website for full details. The Commissioner's office runs regular seminars on how to support an APPG. If there are any staff who you think might find this useful please ask them to
10 email commonsregistrar@parliament.uk for details.

A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

Yours sincerely,

15 Office of the Parliamentary Commissioner for Standards
Email: groupsregister@parliament.uk
Tel: 020 7219 0401

20 **Emails exchanged in 2021:**

From: [Assistant Registrar]
Sent on: Tuesday, June 15, 2021 9:01:44 AM
To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Education - Removal from the Register of APPGs
Attachments: Register-2021-Jun-15-10-01.docx (41.28 KB)

This message was originally sent to: Mr Marcus Fysh [Email address redacted].

Dear Chair

25 **Removal of the group from the Register of APPGs**

We sent the group two reminders about the requirement to both hold an AGM and register the AGM result by the group's reporting deadline. That deadline has now passed and the group has therefore been de-registered and will not appear in future
30 in the Register of All-Party Parliamentary Groups.

For as long as the group remains de-registered it

- is not allowed to use the words 'All-Party' or 'Parliamentary' in its name;

- is not allowed to use the bespoke APPG logo or any other form of the crowned Portcullis;
- 5 • is not allowed to use the All-Party Notices to advertise any meetings (apart from an AGM that is being held in order to apply for reinstatement on the Register);
- has a lower priority than groups that are on the Register when booking rooms in the Palace of Westminster;
- is no longer recognised by Parliament;
- 10 • the group's 'Chair & Registered Contact' must include in his or her entry on the Register of Members' Financial Interests details of financial or material support that the group receives from now on, subject to the rules governing that Register. Members requiring advice on this point should contact the Registrar on 020 7219 3277.

15 **How to apply for Reinstatement on the Register**

The group can apply at any time for reinstatement on the Register. If you have already held the AGM in question, simply register the result. If you have yet to hold the AGM you will first need to hold one then register the result.

20 For the rules on what groups must do before, during and after an AGM see Advice Note 3 (Organising an AGM). However, ignore any references in the advice note to the group's reporting deadline as they do not apply to de-registered groups like yours since your reporting deadline has already passed. When it comes to registering the AGM result, be sure to complete the right form (ie the one called 'Registering the Result of an AGM' not the one called 'Registration Form for APPGs').

25 **Disbanding the group**

Should the group decide to disband please inform us at [email address redacted] and we will advise you on the procedures involved.

30 Yours sincerely,

Office of the Parliamentary Commissioner for Standards

From: Education APPG
Sent on: Wednesday, December 8, 2021 4:53:02 PM
To: APPG Register
Subject: APPG for Education

Attachments: registering-the-result-of-an-agm-form Education December 2021.docx (80.56 KB)

Please find attached the APPG for Education form to register the AGM which we held today.

If you have any queries, please do not hesitate to contact me.

5

[Name redacted]

Secretariat

10 All-Party Parliamentary Group for Education

From: [Assistant Registrar]
Sent on: Wednesday, December 8, 2021 5:21:11 PM
To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Education - Confirmation of Register Amendment
Attachments: Register-2021-Dec-08-17-21.docx (41.28 KB)

15 Dear Chair & Registered Contact,

Thank you for the amendments submitted by the group following its Annual General Meeting.

20 A copy of the entry we have accordingly made in the Register of All-Party Parliamentary Groups is enclosed for your records. The entry will appear in the next published edition of the Register. We publish a new edition every 6 weeks or so

We will send the group a reminder about its next AGM at the end of its reporting year. The AGM must be held at some point between the end of the group's reporting year and its reporting deadline. Both dates are shown on the group's Register entry.

25 The House's rules on APPGs are set out in the Guide to the Rules on APPGs. As the group's Chair you are responsible for ensuring the group complies with the House's rules, and that any person or organisation providing secretariat or support services to the group is aware of and complies with those rules.

30 The Commissioner's office runs regular seminars on how to support an APPG. If there are any staff who you think might find this useful please ask them to email commonsregistrar@parliament.uk for details.

A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

Yours sincerely,

5 **Office of the Parliamentary Commissioner for Standards**

Emails exchanged in 2022:

10 From: [Registration Office]
Sent: 19 April 2022 10:27
To: [Secretariat] Education APPG
Subject: All-Party Parliamentary Group for Education - Final Reminder about
AGM

15 Dear Chair & Registered Contact

This is a final reminder that the group has reached the end of its reporting year so its AGM is due.

20 Please see Advice Note 3 (Organising an AGM), which tells you what the group must do before, during and after the AGM to comply with the House's rules. This includes information about when to hold your AGM.

Thank you if you already have this in hand.

Yours sincerely

25 Office of the Parliamentary Commissioner for Standards
Email: groupsregister@parliament.uk

[Telephone number redacted]

30 A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for that person).
Please note that this email was generated from a database that cannot accept incoming mail.

35 From: Education Appg
Sent: 25 April 2022 18:36
To: APPG Register
Subject: RE: All-Party Parliamentary Group for Education - Final Reminder
about AGM

40 Good afternoon

I am a bit confused – we held our AGM in December 2021 and registered it with you. Do we need to hold another one before December 2022?

Thank you for the clarification

5

[Name redacted]

All-Party Parliamentary Group for Education
Secretariat

10

From: APPG Register
Sent on: Tuesday, April 26, 2022 9:05:52 AM
To: Education APPG
Subject: RE: All-Party Parliamentary Group for Education - Final Reminder about AGM
Attachments: [BCC] All-Party Parliamentary Group for Education - Confirmation of Register Amendment.msg (121 KB)

Hi [name redacted]

15 The AGM the group held in Dec 2021 related to the group's previous, not current, reporting year and was held late.

20 The start and end of the group's reporting year, and its reporting deadline, are shown on the group's entry in the Register of APPGs. For your group I see those dates are 11 Feb 2022 and 12 June 2020 respectively. This means the group must hold an AGM between those dates, which is what triggered the final reminder below. The day and month in both dates remains the same for each successive reporting year in any given parliament, irrespective of the date on which you hold any particular AGM during that parliament.

25 Kind regards

Assistant Registrar

Office of the Parliamentary Commissioner for Standards

30

From: APPG Register
Sent on: Monday, June 13, 2022 10:47:04 AM
To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Education - Removal from the Register of APPGs
Attachments: Register-2022-Jun-13-11-47.docx (41.28 KB)

Dear Chair

Removal of the group from the Register of APPGs

5 We sent the group two reminders about the requirement to both hold an AGM and register the AGM result by the group's reporting deadline. That deadline has now passed and the group has therefore been de-registered and will not appear in future in the Register of All-Party Parliamentary Groups.

For as long as the group remains de-registered it

10

- is not allowed to use the words 'All-Party' or 'Parliamentary' in its name;
- is not allowed to use the bespoke APPG logo or any other form of the crowned Portcullis;
- is not allowed to use the All-Party Notices to advertise any meetings (apart from an AGM that is being held in order to apply for reinstatement on the Register);
- has a lower priority than groups that are on the Register when booking rooms in the Palace of Westminster;
- is no longer recognised by Parliament;

15

20

- the group's 'Chair & Registered Contact' must include in his or her entry on the Register of Members' Financial Interests details of financial or material support that the group receives from now on, subject to the rules governing that Register. Members requiring advice on this point should contact the Registrar on 020 7219 3277.

25

How to apply for Reinstatement on the Register

The group can apply at any time for reinstatement on the Register. If you have already held the AGM in question, simply register the result. If you have yet to hold the AGM you will first need to hold one then register the result.

30

For the rules on what groups must do before, during and after an AGM see Advice Note 3 (Organising an AGM). However, ignore any references in the advice note to

the group's reporting deadline as they do not apply to de-registered groups like yours since your reporting deadline has already passed. When it comes to registering the AGM result, be sure to complete the right form (ie the one called 'Registering the Result of an AGM' not the one called 'Registration Form for APPGs').

5 **Disbanding the group**

Should the group decide to disband please inform us at groupsregister@parliament.uk and we will advise you on the procedures involved.

10

Yours sincerely,

Office of the Parliamentary Commissioner for Standards

Email: [redacted]

15

Emails exchanged in 2023:

From: Education APPG
Sent on: Thursday, February 23, 2023 5:45:38 PM
To: APPG Register
Subject: Education APPG
Attachments: registering-the-result-of-an-agm-form Education Feb 2023.docx (79.12 KB)

20 Please find attached registration form for the Education APPG – AGM was held yesterday.

[Name redacted]

All-Party Parliamentary Group for Education

25 Secretariat

From: APPG Register
Sent on: Monday, February 27, 2023 2:30:38 PM
To: APPG Register
Subject: [BCC] All-Party Parliamentary Group for Education - Confirmation of Register Amendment

Attachments: Register-2023-Feb-27-14-30.docx (41.24 KB)

Dear Chair & Registered Contact,

Thank you for the amendments submitted by the group following its Annual General Meeting.

- 5 A copy of the entry we have accordingly made in the Register of All-Party Parliamentary Groups is enclosed for your records. The entry will appear in the next published edition of the Register. We publish a new edition every 6 weeks or so.

- 10 We will send the group a reminder about its next AGM at the end of its reporting year. The AGM must be held at some point between the end of the group's reporting year and its reporting deadline. Both dates are shown on the group's Register entry.

The House's rules on APPGs are set out in the Guide to the Rules on APPGs. As the group's Chair you are responsible for ensuring the group complies with the House's rules, and that any person or organisation providing secretariat or support services to the group is aware of and complies with those rules.

- 15 The Commissioner's office runs occasional seminars on how to support an APPG. If there are any staff who you think might find this useful please ask them to email commonsregistrar@parliament.uk for details.

A copy of this email has been sent to the group's Public Enquiry Point (if the group has registered an email address for him or her).

- 20 Yours sincerely,

Office of the Parliamentary Commissioner for Standards

Email: [Redacted]

- 25