Speakers’ Working Group on All-Party Groups: report to the Speaker and Lord Speaker

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1. You established our Working Group to examine the activity of All-Party Groups (APGs) in Parliament. The most recent broad examination of these issues took place in the 2005-06 Session by the House of Commons Standards and Privileges Committee (on the basis of a memorandum by the then Parliamentary Commissioner for Standards), but there have been inquiries by various Committees dating back to at least 1984.

2. We do not view APGs as an area of activity for which the Houses should apologise. They can enable Members of both Houses, working together, to inform themselves about specific subjects, make common cause on issues, and – perhaps most importantly - respond to outside concerns and have direct contact with those who express them. We were struck by the commitment of Members, and those outside Parliament, to APGs and note how effective they can be in raising issues with the government. We are also aware of this from our personal experience. A glance through the weekly All-Party Notices shows the quality of the speakers these meetings attract and the diversity of issues under discussion. At a time when politicians are felt by some to be remote we must not cut ourselves off from the wider world.

3. However, we must also recognise that there is intense pressure and scrutiny at the moment on Members as individuals, on Parliament as an institution and on the nature of lobbying. We note that the Government is currently consulting on the introduction of a statutory register of lobbyists, and that the House of Commons Political and Constitutional Reform Committee is conducting an inquiry on that issue. While this debate has tended to focus on the relationship between government and outside interests, Parliament must be seen to be self-critical and pro-active. The fact that some APGs receive material benefits from companies, charities and other organisations (and, in the case of Associate Parliamentary Groups – a type of APG - allow such bodies to have voting rights) necessitates a regular examination of the registration rules.

4. While APGs are ‘parliamentary’ in the broadest sense of the word, because Members of both Houses make up their core membership, they are not official House Committees. Those Committees are established under each House’s Standing Orders and are ultimately responsible to the House which appointed them. APGs, on the other hand, are free to conduct their business as they wish, subject to certain financial and administrative requirements. Some have no secretariat at all; others have staff provided by outside organisations. Such flexibility is not a bad thing - groups can be formed as and when Members see a need and so can be responsive to new issues or specialised on a particular topic. We are aware that increasing the bureaucracy in this area to an excessive degree might not only frustrate legitimate and valuable activity (particularly that of APGs formed
simply of Members working together on an issue of common interest) but also give APGs as a whole a stamp of official parliamentary approval which is at odds with their nature.

5. We have borne in mind the fact that Members are free to work together in groups which are not APGs. One possible implication of additional regulation is that more activity is conducted which is not subject to Group registration at all (although there is a modest incentive to be an APG as registered Groups take priority over unregistered Groups when booking rooms in the Palace of Westminster).

6. The number of APGs has grown during every recent Parliament, reaching a peak of nearly 600 just before the 2010 General Election. Following a dip immediately after the Election (when Groups have to re-register) this trend has continued during the current Session and the current number of Groups stands at 566 [see Figure 1]. For the sake of comparison, the Scottish Parliament (which is reviewing its own Rules) has 71 Cross-Party Groups, the National Assembly for Wales has 46 Cross-Party Groups and the Northern Ireland Assembly 22 All Party Groups. Even the US Congress currently lists only around 380 Congressional Member Organizations.

7. More fundamentally, concerns have been expressed about the potential combined effect of the involvement of outside interests and misconceptions about the Groups’ status. The most striking statistic from the survey we conducted was that of those Members and Peers who responded 48% “agreed strongly” or “tended to agree” with the proposition that “APGs are prone to be manipulated by public affairs and lobby groups for their own purposes” (25% “tended to disagree” or “disagreed strongly”).¹ APGs must not be seen as enabling outside interests to ‘buy the logo’ of Parliament. That risk requires the Houses to demand the highest standards of transparency from APGs, both in terms of their funding and the rules on how they present themselves to the media and the wider world.

8. Our view is that a degree of reform is needed and will be accepted, indeed welcomed, by Members and Peers. The recommendations we make would increase the transparency – financial and non-financial – of APG work. We also make the case for measures which would ensure that parliamentarians establishing, or becoming qualifying members of, APGs fulfil certain additional requirements. An important principle which underlies our conclusions is that it must be the responsibility of Members and Peers to run APGs, no matter who provides the secretariat. Members’ freedom of association must be exercised responsibly either when deciding to establish a new Group or becoming a qualifying member.

9. In your appointment letter, you said that the Group should be a “bicameral initiation of change, and ... a pathfinder identifying the key issues to be dealt with, perhaps by more

¹ Survey conducted using Survey Monkey January 2012. 114 Members and Peers responded.
detailed select committee inquiry”. This reflects the fact that implementation of any new system will be a matter for the relevant Committees of both Houses in the first instance, and ultimately the Houses themselves. We recognise that there could be quite significant resource implications – for the Commissioner’s office and for Groups themselves – if our set of recommendations was implemented. On balance we believe that they would represent a proportionate cost given the benefits that a demonstrably more transparent and coherent registration regime will bring.

The work of the Group

10. You asked us to report our findings by the Easter recess. We held informal meetings with the Chairs of the House of Commons Administration Committee and the House of Lords Sub-Committee on Lords’ Conduct; conducted an email survey of Members and Peers; and held two discussion meetings on the basis of an issues and questions paper, one with Chairs and officers of APGs, and the other open to all Members of the House of Commons and the House of Lords. We sought written contributions and received responses from the Chartered Institute of Public Relations, the Public Relations Consultants Association, the organisation Spinwatch, CPA UK and the British Group of the IPU. We send them to you with this report. Informal contributions were received from a number of Members and Peers. We are grateful to all those who contributed to our work.

11. In your letter appointing us you identified “the issues which the Group might address”:

- Are there too many groups (250 in 1985, 501 in March 2011)
- If so, how might they be reduced (cap at the start of a Parliament and fairly restrictive rules for new groups, for example)
- Should the quorum be increased?
- Should there be a limit on the number of groups to which an individual may belong?
- What demands do APGs make on publicly provided resources?
- How are APGs funded?
- To what extent might APGs be open to improper influence?
- How far can concerns on this score be addressed by transparency? Are changes to the basic rules required? A cap on donations (individual/total?)
- Is the payment of travel costs by outside agencies acceptable? How might this be addressed? Cap? Publication of details? Or a rule change?
- To what extent do APGs risk confusion with formally constituted Select Committees of both Houses, with their reports perhaps assuming the authority of such committees?
- What is the risk of such reports being used by lobby groups to gain publicity and authority for their views?
- Should outside secretariat members be passholders? Does this mean that they may appear to be part of the Parliamentary establishment?
• Should APGs be required to publish minutes and accounts? Should they continue to have the right to exclude people from their meetings? Should meetings open to the public be open to all?
• Does the operation of APGs raise any security issues?

We have endeavoured to answer all these questions.
SECTION 1: THE TOTAL NUMBER OF APGs

12. The trend here is very clear – an increase in the number of APGs during a Parliament, with a fall-back in numbers at the beginning of a new Parliament when Groups have to re-register: April 2010 (end of last Parliament): 599; July 2010 (first register of this Parliament): 339; 31 March 2011: 501; March 2012 (latest register): 566. The increase is more marked in subject groups than country groups, and is most marked of all in respect of “Groups with registered benefits” (which includes Groups from both the country and subject categories).

13. In the survey we conducted 43% of those who responded “strongly agreed” or “tended to agree” that there are currently too many subject\(^2\) APGs (32% “tended to disagree” or “disagreed strongly”). The equivalent figures for country\(^3\) groups were 34% (agreeing) and 43% (disagreeing). 58% of those who responded “tended to disagree” or “strongly disagreed” with the proposition that “There should be a limit imposed on the total number of APGs”.

14. The increase in the number of Groups is likely to be due to a series of factors. It could be argued that it indicates the popularity among Members of APG activity. It may have been facilitated by increases in the numbers of Members’ staff. Alternatively, it could reflect the fact that Members’ activity has become less generalist over time, meaning that instead of

\(^2\) A Group on a particular subject.
\(^3\) A Group relating to a country or region.
being a member of a general ‘Health’ APG (for example), Members may now be involved in a series of APGs each covering specific health topics. The recent large influx of new Members and the increase in the overall size of the House of Lords may have led to increased APG activity.

15. Whatever the reasons, it is desirable that the increase is halted – even, we hope, reversed. The multiplicity of groups adds to the pressure on the diaries of members of both Houses and makes it impossible for them to attend many Groups on subjects in which they might wish to take an interest. It costs the Houses money to administer the register and to provide rooms – which are publicly funded resources. Members and others find it confusing that there are multiple Groups on essentially the same issue. Is there a point at which the fact there are so many APGs devalues the entire system (one Member we spoke to drew a parallel with House of Commons Early Day Motions)? If so, have we already passed it?

16. We discussed at length the merits of some kind of filter or test for new APGs. Both ideological objections (if Members wish to form a Group within the rules, why should they be stopped?) and practical concerns (who acts as the filter and on what grounds would that person, Group or Committee be stopping the creation of new Groups?) were expressed to us. However, we believe that the growth in the number of Groups renders the current laissez faire regime unsustainable.

17. We propose that a Panel of Members of both Houses should be nominated by the appropriate House of Commons and House of Lords Committees: three Members of the House of Commons and two Members of the House of Lords. The Panel should not have the power to block a new Group but should (on the advice of the Commissioner) draw the attention of prospective new groups to issues concerning overlaps or appropriateness. The Panel should also be able to take the advice of the CPA and IPU when considering proposals to create new country APGs. A mechanism should be put in place to enable the findings of the Panel to be reported to both Houses (possibly through its sponsoring Committees). The operation of the Panel should be reviewed after five years. It would be for the Speakers to determine which should be the nominating Committees.

18. We recommend that the current requirement that Groups are required to re-register at the beginning of each new Parliament stays in place.
SECTION 2: FUNDING AND INFLUENCE

19. Of those Members and Peers who responded to the survey 48% “agreed strongly” or “tended to agree” with the proposition that “APGs are prone to be manipulated by public affairs and lobby groups for their own purposes” (25% “tended to disagree” or “disagreed strongly”). This is a striking statistic, particularly given that 89% of those who responded were a qualifying member of at least one Group. The risk of ‘corporate capture’ must be reduced by the regulatory system (although in the end it is for the Parliamentarians who are members of APGs to ensure that this does not happen).

20. An APG is currently required to register, within 28 days of receipt, donations from the same source outside Parliament of one or more financial or material benefits whose total value is £1,500 or more in a calendar year. ‘Financial benefits’ means money received by the group (for example donations, grants, subscriptions). ‘Material benefits’ means the provision of goods or services, not money (for example administrative services, hospitality, gifts).

21. The APG register lists the financial and material benefits received by Group. They vary widely. Material benefits such as the provision of secretariat services, the costs of receptions, printing costs, air fares and accommodation and tickets to events do not need to be quantified (Rules, paragraph 90). Such costs are declared as follows if they have been met directly by the outside body: “Quality Products Ltd. Paid for air fares and accommodation when members of the group visited Italy from 16-20 July 2010” (para 92). If an outside body makes a financial donation which is then used to fund a trip, under the current rules only the financial benefit would be registered (along the lines of “£10,000 from Quality Products Limited”).

22. Costs such as air fares and accommodation are usually quantified by the MP concerned in the Commons Register of Members’ Financial Interests. In the House of Lords, visits paid for and benefits received by Lords members of APGs must be registered if they exceed £500, but there is no requirement for them to be quantified.

23. In the most recently published version of the register the number of Groups registering benefits has risen sharply, as can be seen in Figure 1 in Section 1.

24. 66% of those who responded to the survey “agreed strongly” or “tended to agree” with the proposition that “All benefits that members receive from being members of APGs should be declared and quantified.” We agree. In our view the test here has to be transparency. We accept that some form of external funding should be permissible for those Groups which need a professional secretariat or wish to undertake a substantial work programme – we are aware that not all Members share that view. We do not believe that types of financial
support (for example for travel) should be prohibited, or that a cap should be imposed on the value of donations.

25. However, this freedom must bring with it a strict obligation to be absolutely clear and open about what resources are being provided to each Group, what they are worth, who they are being provided by and what they are being spent on. Some Members expressed particular concerns to us about the funding of certain country Groups – in this case too we believe that transparency is key.

26. Against this test we think there are weaknesses in the current rules – for financial donations Groups are only required to register the amount received and name the donor; they are not required to say what they spend the money on, and for material benefits Groups are only required to describe the benefit received and name the donor; they do not have to provide the financial value. This has also led to a lack of consistency across the Registers in the House of Commons, as individual Members receiving material benefits through their membership of an APG normally quantify them in the Register of Members’ Financial Interests.

27. We therefore recommend that, in addition to the current requirements on APGs:

- any APG receiving more than £3,300\(^4\) in total, including both financial and material benefits, over a financial year should be required to prepare an income and expenditure statement listing all financial and material benefits received (in the case of material benefits, with an estimate of their value); the source of the benefits; and details of expenditure, to be supplied to the Commissioner’s office and electronically available via a link from the online version of the Register; and

- the threshold for the registration of both financial and material benefits on the APG register should be lowered to £660 (to be at the same level as the threshold which is currently used in certain categories of the Register of Members’ Financial Interests, but is subject to review).\(^5\)

28. We see these as our key recommendations to increase the financial transparency of APGs.

29. Particular reference was made in the submissions we received, and when we talked to Members, about the status of ‘Associate Parliamentary Groups’ These are a sub-category of All-Party Group which allow non-parliamentarians full membership (ie voting rights). There are currently 34 such Groups, including the Afghanistan, Sudan and South Sudan and

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\(^4\) Based on the current visits, gifts, benefits and hospitality threshold of £660 and our proposed quorum of 5.

\(^5\) The threshold for the registration of sponsorship is currently £1,500 and that for the registration of overseas visits or gifts, benefits and hospitality is £660. These figures are currently under review, with the possibility of harmonising them at a level between £330 and £1,500.
Corporate Responsibility Groups, the Parliamentary and Scientific Committee, the Lords and Commons Cricket Club and the Parliamentary ICT Forum.

30. We believe that there is a fundamental problem of having a Parliamentary Group which allows non-parliamentarians a say – possibly the controlling say – in its affairs. We think that this status should be discontinued. Existing Groups with Associate Parliamentary Group status may wish to convert to All-Party Parliamentary Group status (i.e., with only parliamentarians having voting rights).

SECTION 3: REGULATION AND REGISTRATION

31. Of those Members and Peers who responded to the survey, 58% “agreed strongly” or “tended to agree” with the proposition that “APGs are open in the way they work”. 59% of respondents felt that the parliamentary rules surrounding APGs were “neither too strict nor too lax” (9% considered them too strict; 23% too lax).

Membership

32. To establish a group the names of exactly 20 qualifying members (who must be a Member of either the House of Commons or the House of Lords) must be registered, 10 who are from the same political party (or parties) as the government and 10 who are not from the government party (or parties). At least 6 of the latter 10 must be from the main opposition party. No group’s Register entry lists more than 20 qualifying members (Rules, paragraph 41). Paragraph 38 of the Rules states that “it is the group’s responsibility to maintain a comprehensive and up-to-date membership list.” Some Members told us that they were frequently lobbied to be a qualifying member for particular groups, or even listed as a Member without their knowledge.

33. Data produced from the February 2011 register were published by the Guardian last year. This included a breakdown of Members by the number of APGs of which they were a qualifying member. According to this data 113 Members or Peers were qualifying members of 20 APGs or more, 285 were qualifying members of more than 10 APGs, 539 were qualifying members of more than 5 APGs and 1179 were qualifying members of 1 or more APGs. 22% of the 114 Members and Peers who responded to our survey stated that they were qualifying members of more than 10 APGs.

Quorum

34. The current rules are that “The quorum for any meeting of the group is three members, at least one of whom must be an officer of the group. Each of the three must be a Member of either the House of Commons or the House of Lords.” (Rules, paragraph 70). The Administration Committee considered this matter in 2000. On 8 February it resolved that
“groups will be required to keep a record of their meetings and those attending so that, if challenged, they can demonstrate that they have met at least 3 times per year and that there were never less than 5 Members of the Commons present at each meeting.” However, following representations the Committee resolved on 20 May of the same year that “three Members only need to be present at a meeting, provided one of those Members was an officer of the Group. Those Members present may come from either House, or from both Houses.”

Other rules relating to meetings

35. Turning to the rules relating to meetings, currently APGs must meet at least twice per calendar year. An AGM counts as one meeting. The other meeting must be held on a different day from the AGM to qualify as a separate meeting. The current rules on AGMs require APGs to: hold an AGM every 12 months at Parliament and on a day when both Houses are sitting; advertise the meeting, making clear that it is an AGM, in advance on the All-Party Notices compiled by the Whips’ Office; ensure the AGM is quorate; hold an election of officers at the AGM; and register the result of the AGM by sending the Assistant Registrar, by whatever deadline the group has been given, a copy of the group’s Register entry, annotated by hand with any additions or deletions required and signed by an officer.

36. The form, content and distribution of minutes is currently a matter for individual Groups “except that the Group must keep sufficient records to enable it to prove that every meeting of the group is quorate and that the group meets at least twice each calendar year” (Rules, para 78).

Registered contacts

37. The group’s ‘registered contact’ is the person nominated by the group as its main contact and as the person ultimately responsible for ensuring the group’s compliance with the House’s rules. That person must be an officer of the group [it does not have to be the Chair] and must also be a Member of the House of Commons, since the Register of All-Party Groups falls under the jurisdiction of the Commons (Rules, paras 35-6). This requirement was introduced in 2011 following the Standards and Privileges Committee inquiry in 2006. Representations were made by Peers in March 2011 once the rule was in place, and we also received complaints about it.

Conclusion

38. Observance of the current rules is policed by the Commissioner’s office. We note that over the last six months 14 Groups were removed at some point from the Register for failing to hold an AGM; 3 Groups disbanded and 1 Group was removed because it was absorbed into another Group.
39. While we have no wish to introduce an overly bureaucratic system (for the reasons that we outlined in the introduction to this report) there is a need to make APG registration requirements more rigorous.

40. We believe that it is time to revisit the quorum issue. We are aware that this might not be popular, but do not think that it is unreasonable to increase the APG quorum to 5 when formal decisions are made, given that this is only 25% of the number of qualifying members and a very small proportion indeed of the total membership of both Houses.

41. We also recommend that, in addition to the current requirements, APGs should be required to produce basic minutes of their meetings (recording who was present and what decisions were made) and make them available on request.

42. We considered the idea that a limit should be placed on the number of APGs for which a member may be a qualifying member. Some members told us that this would be useful as it could be cited if they were lobbied to be a qualifying member of a proposed Group; others made the point that those who had a variety of interests should be able to be a qualifying member of all the relevant APGs. We were struck by the statistics produced by the Guardian.

43. We have concerns that individual ‘mass membership’ has the potential to dilute parliamentarians’ control of APGs. Again, a balance has to be struck between preserving the integrity of the system and not putting unreasonable restrictions on members. At this time we do not believe that a limit should be put in place, but we recommend that when each new edition of the APG Register is published a table should be generated listing, in rank order, the number of Groups for which every Member and Peer is a qualifying member. We would expect that those who are qualifying members of more than, say, 20 APGs would use that opportunity to reconsider their commitments. We believe that this aspect of the rules should be specifically reviewed at the end of this Parliament.

44. Concerns were expressed to us that in some cases the process of electing officers of APGs was dominated by a small clique of Members. We recommend that if (a) an election is contested, or (b) if any officer seeks re-election for a third or further parliamentary term for the same post, the rules should require that election to be held by secret ballot.

45. We are content with the current rules relating to subscriptions (that Group members may be charged a membership fee, not exceeding £5 for Members and Peers, no limit for others).

46. We are aware that the fact that the ‘registered contact’ has to be a Member of the House of Commons causes problems for some APGs. The reason for this rule is that the Register is
policed through the House of Commons Parliamentary Commissioner for Standards and the House of Commons Standards and Privileges Committee, which enables Parliament to operate a consistent and effective registration system. We propose no change.

SECTION 4: CONFUSION WITH SELECT COMMITTEES

47. Of those who responded to the Group’s survey 54% “tended to agree” or “agreed strongly” with the proposition that “the media and others confuse reports by APGs with those of reports of select committees of both Houses.” (29% “tended to disagree” or “strongly disagreed”). This is not a new concern. Mr Speaker wrote to all All-Party Groups in July 2011 in the following terms:

In 2006, my predecessor wrote to the officers of each All Party Parliamentary Group (APPG) following a report from the Standards and Privileges Committee which expressed concern that there was a risk that the reports of APPGs could be confused with those produced by Select Committees. This issue has recently been raised with me again by the Chair of the Liaison Committee, and I am writing to you to seek the cooperation of you and your Group in taking steps to avoid such confusion.

APPGs have an important role as informal bodies which act as forums for cross-party discussions among Members of both Houses and those interested in a particular subject. Select committees, however, have a formal status, being established by the House to carry out functions on its behalf. APPGs therefore need to be distinct, in their activities, the language they use and the way in which their reports are presented, from committees of the House, so that they do not appear in the public mind to be select committees. I very much hope that you and your colleagues will follow this approach and do your best to ensure that it is clearly understood that your group is a body that has come together for a particular shared interest or policy discussions, but which has not been appointed by the House, nor is part of its official structure.

The Chair of the Liaison Committee also suggested it would be helpful for there to be a single contact point through which APPGs could access clear and authoritative advice on the rules they should follow, for instance on registration and the use of the Portcullis symbol. The Registrar of Members’ Interests has brought together existing advice on these points in a new edition of the Guide to the Rules for All Party Groups, which now also includes a list of contact points for advice on all aspects of All Party Groups. The Guide is available on the Parliament website at: www.parliament.uk/about/mmps-and-lords/members/apg/

I hope that you and your colleagues find this helpful.

48. The current rules state:

“104) It is important that groups distinguish themselves from committees of the House in their activities, the language they use and the way in which their reports are presented, so that they do not appear in the public mind to be select committees. This is particularly relevant when it comes to the group’s publications, which should not give the impression that the group has been appointed by the House or is part of its official structure.

“105) Groups may use the crowned portcullis on their official stationery, reports and websites provided that it is appropriate to demonstrate a connection with the House in this way, and provided that there is no risk that the use of the crowned portcullis might suggest that the group or its communications have the authority of the House. In addition, paragraphs 108-109 below apply in relation to websites.
“106) Group publications (for example reports, press notices) should make clear who authored them, name the group’s secretariat, and name any body that sponsored the production of the publication concerned (for example by meeting associated printing costs).”

49. We view the potential confusion of reports of APGs with those of Select Committees as a problem which needs to be addressed. This ties in to the comments in the introduction about the need to avoid any sense that outside bodies can be seen as ‘buying the logo’ of Parliament. The different status of the two types of reports – those of select committees, being House of Commons or House of Lords papers, are covered by parliamentary privilege, those of APGs are not – necessitates a clear distinction. We note that the Scottish Parliament’s rules for Cross-Party Groups state that “Cross-Party Groups may not make use of the Parliament logo (other than as may be provided for in the SPCB’s policy and in any SPCB terms and conditions on events).”

50. We recommend that the portcullis should not be used by APGs on reports. The text of paragraph 104 of the Rules should also be reworded to state that APG reports should not use the typeface of Committee reports of either House or their ‘House style’ (font, heading colour, etc). The possibility of a standard ‘cover page’ for APG reports should be investigated. Whether or not a standard layout is recommended, there should also be a rubric prominently displayed on the cover of all APG reports – along the lines of “This is not an official publication of the House of Commons or the House of Lords. It has not been approved by either House or its Committees. All-Party Groups are informal groups of Members of both Houses with a common interest in particular issues. The views expressed in this Report are those of the Group.”

51. We are aware that there have been recent points of order in the Commons Chamber about the Vote Office stocking APG reports. When (and only when) such reports are directly relevant to a debate (that is, they have been ‘tagged’ on the Order Paper) we have no objection to them being placed in the Vote Office for the convenience of Members – so long as their status is clear.

52. We further recommend that the use of the portcullis on APG websites and correspondence should not be permitted.
SECTION 5: PASSES AND SECURITY

53. A new category of parliamentary pass for staff who are solely or primarily staff of APGs was introduced in 2009. The Commons Committee on Standards and Privileges recently reported on the requirements on such passholders and noted that “the registration requirements for these staff are less comprehensive than for staff who also hold passes as Members’ secretaries and research assistants, since only employment is covered, while secretaries and research assistants are also required to register gifts, benefits and hospitality (subject to financial thresholds).” (paragraph 4 of the Committee’s report). That Committee therefore proposed that “in future staff who hold passes because of their work for an All-Party Group should be required to register:

- any paid occupation or employment for which they receive more than 0.5% of the parliamentary salary (currently £329) in a calendar year; and
- any gift, benefit or hospitality they receive, if the gift, benefit or hospitality in any way relates to or arises from their work in Parliament and its value is over 0.5% of the parliamentary salary (about £329 as at April 2011) in the course of a calendar year.

These recommendations were agreed to by the House of Commons on 12 March 2012.

54. We gather that there are currently 45 people holding this type of pass.

55. We accept that this is a valid category of pass but in our view there should be a higher test for eligibility. We recommend that only staff who work full-time or at least half-time for a Group - but not for a combination of Groups - should be able to apply for such passes and there should be a requirement on the sponsor of the pass to make a declaration to this effect.

56. We do not believe that APGs raise generic security issues. The Rules currently state that “Any Member of either House may turn up and speak at any meeting of the group; anyone else may only attend if invited by the group.” (para 71) and “Meetings of the groups must never be advertised anywhere as ‘public meetings’ as this may cause security problems.” (para 72). These are sensible restrictions.

57. Peter Mason, the Parliamentary Security Director, advised us that Chairs and officers of APGs should take a keen interest in the invitation list for Group meetings, and exercise their discretion and good sense when bringing people on to the Parliamentary Estate. In this respect ownership of a Group’s activities by parliamentarians is again crucially important.