



**Industry and Parliament Trust**

# **Fellowship Guidelines**

**Version 3.9**

*September 2015*



"Since it was founded in 1977, the IPT has dedicated itself to building bridges between legislators and the business community. All parliamentarians need a good understanding of business, as it is the creators of wealth who produce the jobs and prosperity we need. The IPT Fellowship programme is a unique opportunity to acquire a greater understanding of commerce and industry through direct experience. It helps immensely in developing a two-way dialogue that can only benefit us all."

**The Rt Hon David Cameron MP, Prime Minister**



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# Chapter 1: Introduction

## About this guide

This document provides information about the process and rules governing Industry and Parliament Trust (IPT) Fellowship programmes.

**Chapters 2 and 3** contain important specific guidance on the conduct of Fellowship programmes and if you are applying for or currently participating in a Fellowship you must follow the guidance set out in these chapters.

**Appendices A and B** contains important information on the use of expenses and the registration of interests and record sheets that you should routinely complete during your Fellowship.

## About the Industry and Parliament Trust

The Industry and Parliament Trust is a registered charity operating under a non-lobbying, non-partisan and educational ethos, which is dedicated to promoting mutual understanding between Parliament and business, industry and commerce for public benefit. It works with politicians of all parties and businesses of all sectors to create constructive and beneficial dialogue between legislators and wealth generators.

The IPT believes that a more business-aware Parliament is a better Parliament. Its mission, therefore, is to facilitate educational activities that enable parliamentarians to learn directly from the business community – the principal mechanism for achieving this is the Fellowship programme.

Since it was founded in 1977, the IPT has worked with thousands of parliamentarians and business representatives, enabling them to learn from each other in a non-partisan, non-lobbying and explicitly educational setting.



## Chapter 2: Fellowships

### Overview

Fellowships are non-lobbying, non-partisan and structured programmes of placements that are bespoke to each individual's learning objectives. Fellowships allow parliamentarians to gain first-hand experience, environment and of the challenges facing industry by spending time focusing on a set of issues in one or more businesses.

Most Fellowships consist of 15 days of placements with one or more host organisations over a period of around 18 months. The ethos of all IPT programmes is educational, and Fellowships are intended to give parliamentarians an insight into the wider issues facing business and the British or wider global economy.

Fellowships provide parliamentarians with an opportunity to learn about an issue affecting a range of organisations or to understand an organisation at every level, from the shop floor to the boardroom. As well as working with senior management and leadership teams, parliamentarians also have an opportunity to gain hands-on experience at an operational level. This means that a parliamentarian will not only sit in on high-level discussions and board meetings, but that they will also do placements with specific divisions within the organisation.

The IPT has organised more than 600 Fellowships since it was founded in 1977, and the hundreds of Fellows currently in Parliament include ministers, select-committee chairs and privy councillors.

In addition, the IPT offers **Postgraduate Fellowships**: shorter programmes (usually 5 – 10 days) that are only open to parliamentarians who have already completed a full Fellowship programme.

### Principles of Fellowships

As a charity, the IPT works for the wider public interest, seeking to achieve better legislation by creating a more informed and knowledgeable Parliament. Its role with respect to parliamentarians is to educate rather than to promote the particular interests of its corporate supporters. In this regard, Fellowships are not limited to time spent with those organisations that support the IPT, and parliamentarians are matched to businesses that can best suit the learning objectives of each individual participant.

#### **FELLOWSHIPS ARE EDUCATIONAL**

Fellowships are explicitly educational, bespoke to the objectives and learning outcomes agreed with each parliamentarian at the outset.



## **FELLOWSHIPS ARE OPEN TO ALL AND NON-PARTISAN**

Fellowships are open to all parliamentarians (MPs, UK MEPs and peers) regardless of party.

The IPT also offers Fellowships to senior staff from both Houses of Parliament. Fellowships are nevertheless subject to certain criteria (see ‘Who can I do a Fellowship with?’ below).

## **FELLOWSHIPS ARE INDEPENDENT AND NON-LOBBYING**

Fellowships are arranged by the IPT independently of any specific organisation, and may not be used for the purposes of lobbying. They may take place in any organisation (subject to the criteria set out in the section below).

Hosting organisations should not use Fellowships to gain any particular advantage beyond the educational ethos of the IPT and in accordance with each parliamentarian’s objectives agreed at the outset.

Parliamentarians should not use Fellowships to gain an unfair advantage in their parliamentary work or to lobby on behalf of their host organisations.

Any benefits – such as travel and subsistence – provided during a Fellowship should be proportionate and relevant to the programme being pursued.

A Fellowship is not intended to lead to offers of engagement of a parliamentarian’s services on a fiduciary basis and, should this happen, the IPT must be informed.

## **FELLOWSHIPS ARE TRANSPARENT AND ACCOUNTABLE**


Fellowships are a matter of public record and, while detailed Fellowship schedules are not normally published for reasons of commercial confidentiality, all Fellowships are publicised on the IPT website and social media, and through its broader media engagement.

Fellowships are specifically recognised as educational through supporting the on-going learning development of parliamentarians. Special rules apply to the recording of Fellowships on the *Register of Members’ Interests*. Please see the appendices of this booklet for more information.

## **Why take part in a Fellowship?**

Fellowships improve parliamentary scrutiny by giving MPs, MEPs, peers and senior House staff first-hand experience of the challenges facing UK plc. A more business-aware Parliament is a better Parliament and there is no substitute for practical experience.

Organisations have an opportunity to engage in a meaningful and constructive dialogue with parliamentarians and to learn about the political process from those most intimately involved in it.



Parliamentarians benefit by gaining:

- A practical understanding of the core issues facing a business and sector;
- An understanding of the impact on business performance of government policy and of British and European legislation.
- A clear overview of an organisation's structure, objectives and strategy;
- A practical appreciation of an organisation's operations, including its grassroots activities, senior management, employee relations and its relationship with investors;
- An understanding of the decision-making, planning, investment-appraisal and budgeting processes;

## Who can I do a Fellowship with?

Fellowships are open to all parliamentarians (the term "parliamentarian" in this document refers to MPs, UK MEPs, peers and senior parliamentary staff). However:

- A parliamentarian must be willing to make a commitment to complete a Fellowship within a reasonable time period. We usually expect a Fellowship to be completed within 18 months, but in some circumstances may require that it is completed sooner (e.g. if a general election is imminent);
- A parliamentarian must have a *bona fide* interest in doing a Fellowship in order to advance their work in Parliament. In a very small number of cases (e.g. if a parliamentarian is due to step down at a forthcoming election), the IPT may be unable to facilitate a Fellowship programme;
- If the IPT cannot always find a suitable host organisation immediately, we will work to find a suitable organisation as soon as possible or re-address the learning objectives with the individual concerned.

While we do not allow host organisations to influence the matching process, there are a number of circumstances where they might reject a parliamentarian, for example:

- If a parliamentarian has a conflict of interest resulting from an interest-group membership (e.g. a particular trade union);
- If a parliamentarian has constituency or business interests that may give rise to a conflict of interest;
- If an organisation does not have the capacity to host a parliamentarian due to internal changes or staffing issues.

## Further information

All Fellowship queries should be directed to the IPT Fellowship Team:

**LIZ DAWSON, PARLIAMENTARY AFFAIRS MANAGER**

T: +44 (0)20 7839 9405 F: +44 (0)20 7839 9401

E: [ElizabethDawson@ipt.org.uk](mailto:ElizabethDawson@ipt.org.uk)





## Chapter 3: Fellowship Process

### Applying for a Fellowship

Any parliamentarian may apply to take part in a Fellowship, subject to the criteria outlined in the previous pages. Before completing an application form, we encourage parliamentarians to talk to us informally about their interests and objectives.

Once we have received a completed application form, we will suggest potential host organisations based on a parliamentarian's background, interests and objectives. This process is carried out internally and independently of any specific host organisation.

Host organisations should not seek to influence the matching process, although there are some circumstances where they may be unable to accommodate a particular parliamentarian.

### Meeting a host organisation and planning your Fellowship

With a parliamentarian's agreement, the IPT will facilitate an initial 'introductory meeting' with a potential host organisation, usually in the Houses of Parliament. This meeting is an opportunity to discuss:


- A parliamentarian's interests and objectives;
- Placements and opportunities available within a host organisation;
- A mutually convenient timeframe for the placements to take place;
- Issues such as commercial confidentiality, potential conflicts of interest and publicity.

If the parliamentarian and host organisation are both happy to proceed after this initial meeting, then the host organisation is tasked with putting together a draft programme of placements and activities.

Once a programme has been drafted, this should be sent to the parliamentarian and also to the IPT's Parliamentary Affairs Manager. When this programme has been approved by the IPT, parliamentarians should sign a Fellowship agreement form and return it to the IPT.

A clear programme must be in place before a Fellowship begins. Fellowships can sometimes take a long time to finish and may take place during periods of organisational change or staff turnover. If a clear plan is in place, it is much easier for both the parliamentarian and the host organisation to move forward at every stage.

IPT Fellowships represent a real commitment. By signing a Fellowship agreement form, parliamentarians are committing to make all reasonable efforts to complete their Fellowship programme within an agreed time period. It is however recognised that parliamentary commitments can sometimes impact on a scheduled visit. If this is the case, then the



parliamentarian must make every effort to inform the host organisation and the IPT as soon as possible.

Once a programme has been agreed to, significant variations should only be made in consultation with the IPT.

Fellowship programmes and placements should not be set up independently of the IPT. Any arrangements made outside the auspices of the IPT:

- Are not eligible for expenses claims under parliamentary allowances and will need to be registered in the *Register of Members' Interests*;
- Will not count towards a Fellowship;
- May not be compatible with the IPT's educational, non-lobbying and non-partisan values;
- May cause difficulties for the IPT if they come into conflict with other IPT activities or Fellowship programmes.

## Fellowship structure

MPs, MEPs and peers only become Fellows of the IPT when they have completed a full 15-day Fellowship programme. House staff must complete a full 12-day programme to become a Fellow.

Some other IPT programmes and activities can count towards a Fellowship (such as study programmes, IPT industry visits and *Policy Events*), up to a combined total of no more than six days. These include IPT study programmes, missions abroad for groups of parliamentarians and group visits to businesses.

A full Fellowship day would typically consist of around five to six hours of activities and meetings across a working day. Therefore IPT programmes such as a breakfast event can count as a proportion.


## During your Fellowship

### SCHEDULING A FELLOWSHIP

Once a Fellowship programme has been agreed, a parliamentarian (or his or her diary secretary) and a host organisation should work to find mutually-convenient dates to complete this programme. The IPT can help with the process but in most cases it is easier for the host organisation and parliamentarian to communicate directly in order to do this. However the IPT must be copied into all relevant correspondence.

### COMMERCIAL CONFIDENTIALITY

Parliamentarians should respect the confidentiality of any commercially-sensitive information learnt during their Fellowship. It may be necessary to sign a Non-Disclosure



Agreement with a host organisation before beginning a programme. It is the decision of the host organisation whether or not to do this, however parliamentarians should always respect the sensitivity of information discussed.

### **FULFILLING COMMITMENTS**

A Fellowship represents a real commitment, both for a parliamentarian and for a host organisation. A parliamentarian should make all reasonable efforts to complete a programme in the agreed timescale, and should make every effort to attend dates for visits and activities once they have been agreed. A visit to a company or a site as part of a Fellowship can mean significant disruption, and repeated cancellations can be a major frustration for host organisations. If a parliamentarian has no choice but to cancel a commitment, they should give the maximum possible notice in order to avoid inconveniencing the host organisation.

### **LOBBYING AND ABUSE OF ACCESS**

Fellowships should not be used for the purpose of lobbying or in order to gain an unfair political or commercial advantage. It would be inappropriate for any parliamentarian undertaking a Fellowship through the auspices of the IPT to receive a financial reward or benefit in kind in exchange for instigating or altering legislation.

### **KEEPING THE IPT INFORMED**

Parliamentarians and host organisations should keep the IPT regularly informed on the progress of a Fellowship.

### **EXPENSES AND THE REGISTRATION OF INTERESTS**

Before beginning a Fellowship, you should check the IPT's guidelines on the registration of interests and the use of parliamentary allowances (see Appendices A for more information). Any benefits provided during a Fellowship should be proportionate and relevant to the programme being pursued.

### **TRAVEL OUTSIDE THE UNITED KINGDOM**

If a Fellowship programme involves travel outside the United Kingdom, this should be notified to and approved by the IPT in advance.

### **GROUP FELLOWSHIP VISITS**

IPT Fellowships are bespoke programmes for parliamentarians pursuing agreed educational objectives. Visits and activities undertaken as part of a Fellowship should only be available to those already undertaking an agreed Fellowship programme. These visits and activities should not be offered more widely to parliamentarians not participating in a Fellowship.



## LIABILITY AND INSURANCE

The IPT is not responsible for insuring parliamentarians or host organisations during their Fellowship programmes. It is the responsibility of individual parliamentarians to ensure that they are appropriately insured when travelling outside the UK. In most cases they will be covered by the House's own general insurance policy but it is recommended that parliamentarians check that this is the case before travelling.

## RECORD-KEEPING

A parliamentarian should maintain a record of each Fellowship day they complete, including details of activities that they participated in. A host organisation may also wish to keep such a record.

A host organisation must also keep a record of food, subsistence, accommodation and other benefits provided to a Fellow using the IPT's Fellowship expenses record form (see appendix B1).

## PUBLICITY

Publicity is essential to every Fellowship programme: it ensures that the work of the IPT is fully transparent and widely understood, and helps raise the profile of the IPT, as well as that of the parliamentarians taking part. Typically, Fellowships are publicised:

- In company newsletters and magazines;
- Through editorial material on the IPT website (<http://www.ipt.org.uk>);
- In local media, trade magazines and newspapers;
- On a parliamentarian's own website, blog or other social media;
- In parliamentary publications such as *House* magazine.

The IPT's Communications Manager will work with each parliamentarian and host organisation to draft press releases, identify PR opportunities and co-ordinate enquiries during and after a Fellowship. Photographs are a useful aid to record what took place and for use in subsequent publicity material.

The IPT must be consulted in relation to all media enquiries and publicity material and the contact details of the IPT Communications Manager should be made available to the media.

## IPT BLOG

The IPT also runs its own blog on its website and parliamentarians (or their researchers) are asked to contribute to this at key points during Fellowships.

## MEDIA CONTACT INFORMATION

### ALEX SMITH, COMMUNICATIONS OFFICER

T: +44 (0)20 7839 9409      F: +44 (0)20 7 839 9401

E: [alexsmith@ipt.org.uk](mailto:alexsmith@ipt.org.uk)



## Finishing your Fellowship

A Fellowship programme is completed when a parliamentarian has undertaken 15 days of placements. Upon completion, parliamentarians become Fellows of the Industry and Parliament Trust.

### **FELLOWSHIP PRESENTATION AND FEEDBACK SESSION**

A parliamentarian is awarded his or her Fellowship at a formal presentation in the Houses of Parliament. This is organised by the IPT and attendees include the Fellow, senior IPT officers and senior staff from host organisations. The presentation is an opportunity to reflect on the Fellowship, its successes and any issues that emerged from it. A specially-commissioned cartoon, marking the completion of the Fellowship, is also presented to the parliamentarian and copies given to the host organisations.

### **DECLARING AN INTEREST**

When speaking publicly or in Parliament on issues related to his or her Fellowship, a parliamentarian may need to declare an interest if they are using specific knowledge or experience gained on that Fellowship.

### **CONTINUED INVOLVEMENT IN THE IPT**

The IPT relies upon the goodwill of parliamentarians in order to endorse Fellowships to parliamentary colleagues, provide speakers and tutors on its courses, briefings and other educational activities in Parliament. The IPT will encourage all Fellows to continue this goodwill.

### **INCLUSION IN BIOGRAPHICAL LISTINGS**

When a parliamentarian is awarded a Fellowship, he or she should update their listings in *Who's Who* and *Dod's Parliamentary Companion* to include the following entry, where 2014 is the year that he or she was awarded their Fellowship:

*Fellow, Industry and Parliament Trust, 2014*

A full list of Industry and Parliament Trust Fellows is available on request from the Parliamentary Affairs Manager.



## Chapter 4: Expenses & Registration of Interests

### Members of Parliament: Guidance on expenses and the registration of interests

**Please ensure that you read the guidance below and circulate this document to your staff. It is important that you follow the guidance that it contains.**

This guidance note applies to MPs only. Separate guidance is available for UK MEPs, Peers and parliamentary staff.

This guidance note was updated in **September 2015**

#### GENERAL GUIDELINES

1. The Industry and Parliament Trust (IPT) will not reimburse any expenses incurred by an MP or host organisation during the course of a Fellowship.
2. Under no circumstances should the direct exchange of money take place between an MP and a hosting company or organisation.
3. A hosting organisation may themselves incur accommodation, travel and subsistence expenses on behalf of an MP.

#### EXPENSES FOR FELLOWSHIP VISITS


Under certain circumstances subsistence and accommodation costs incurred during IPT Fellowships may be claimed back through the parliamentary expenses scheme. Expenses cannot be reimbursed by the IPT and should be proportionate, reasonable and relevant to the Fellowship programme being undertaken.

A hosting organisation should keep a record of costs incurred on behalf of an IPT Fellow using IPT Expenses Record Sheet B1.

In certain circumstances, travel and subsistence costs incurred during an IPT Fellowship may be claimed back through the Independent Parliamentary Standards Authority (IPSA) *MPs' Expenses Scheme*. This falls within chapter 9, *Travel and Subsistence Expenditure*, paragraph 9.3, *Extended UK Travel* of the *MPs' Expenses Scheme*. Ultimately the decision whether to claim will depend on whether each individual MP is satisfied that the journey falls within paragraph 9.3.

Paragraph 9.3 describes what is known as 'extended UK travel', a type of travel comprising journeys undertaken for one of the following reasons where funding is not provided by another source:

- a) Journeys from Westminster or the constituency to anywhere in the UK if the journey was required for one of the following:
  - i. a matter currently before the House;

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- II. a matter currently before a Select Committee on which the MP serves
  - III. a journey made as part of an All Party Parliamentary Group (APPG) if the journey has been expressly and formally requested by the APPG;
  - IV. a constituent or general constituency matter; or
  - V. opposition front bench or shadow ministerial travel.

b) Journeys from Westminster to the constituency (or vice versa) that involved a diversion for a non-parliamentary purpose. The maximum claimable fare is the anytime standard open fare of the direct journey between Westminster and the constituency.

c) Journeys necessarily incurred in the performance of the MP's parliamentary functions from anywhere in the UK to Westminster or the constituency. The amount that can be claimed is the lesser of the anytime standard open fare of the direct journey between the constituency and Westminster, or the value of the claim from the starting location to the destination.

If the MP is satisfied the trip falls into one of these categories, and it is necessary for the performance of their parliamentary functions and complies with the other the other rules of the *MPs' Expenses Scheme*, they can submit a claim for the costs. That claim will be subject to the usual IPSA validation process. Each claim for extended UK travel should include an explanatory note.

In these circumstances, travel costs may be claimed back through the IPSA expenses scheme in accordance with paragraph 9.3 and if necessary, subsistence costs in accordance with paragraphs 9.26 – 9.30. Claims should be submitted by the MP in the usual fashion in accordance with the IPSA rules and regulations.


To read the IPSA expenses rules in full and the necessary evidence requirements, please visit: <http://www.parliamentarystandards.org.uk>.

## **REGISTER OF MEMBERS' INTERESTS**

Visits within the UK that are part of an IPT Fellowship must be recorded in the *Register of Members Interests* if the cost of these visits equate to more than £300 during one calendar year and are paid for by the host organisation. This is in accordance with Category 3 of *The Code of Conduct together with the Guide to the Rules relating to the conduct of Members, 2015* (HC1076, 2015). All visits outside of the UK must also be recorded with the *Register of Members Interests* if more than £300.

### **Within the UK:**

- Costs which can be claimed back through public funds, i.e. the IPSA expenses scheme are exempt from registration.
- Costs equating to more than £300, which are not paid for by IPSA must be registered with the *Register of Members Interests*, in accordance with *The Code of Conduct*



together with *The Guide to the Rules relating to the conduct of Members 2015*, (HC 1076, 2015) Category 3:

“Gifts, benefits and hospitality from UK sources: Members must register any gifts, benefits or hospitality with a value of over £300 which they receive from a UK source. They must also register multiple benefits from the same source if these have a value of more than £300 in a calendar year.”

**Outside the UK**, visits as part of an IPT Fellowship where the cost equates to more than £300 are no longer exempt from registration (*The Code of Conduct together with The Guide to the Rules relating to the conduct of Members 2015*, (HC 1076, 2015), Category 4, Section 31). Therefore:

*“Members must register any visits to destinations outside the UK where the cost is over £300 if that cost is not wholly borne by the Member or by UK public funds. They must also register multiple visits funded by the same source if taken together these have a value of more than £300 in a calendar year.”<sup>1</sup>*

Registration for overseas visits must follow Category 4 and Category 5 of the *Rules relating to the conduct of Members*. In the majority of instances registration will follow Category 4:

“[Category 4]...the Member must register:

Name of donor

Address of donor (the address of individuals will not be published)

Amount of donation

Destination of visit

Date(s) of visit

Purpose of visit

Groups themselves must register any visit which exceeds the relevant threshold set out in the Guide to the Rules for All-Party Parliamentary Groups. Each Member benefiting should also make a Register entry if the value of the benefit to them exceeds the threshold for visits in the Members’ Register. If the ultimate funder is identifiable, Members should give their details, as well as naming the Group.”<sup>2</sup>

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<sup>1</sup> House of Commons, *The Code of Conduct together with the Guide to the Rules relating to the conduct of Members 2015*, Category 4, section 31 p 24:

<http://www.publications.parliament.uk/pa/cm201516/cmcode/1076/107604.htm#n27> [accessed 24/09/15]

<sup>2</sup> House of Commons, *The Code of Conduct together with the Guide to the Rules relating to the conduct of Members, 2015*, Category 4, Section 38, p 26,

<http://www.publications.parliament.uk/pa/cm201516/cmcode/1076/1076.pdf>: Accessed [24-09-15]





*“[Section 5] Donations or other assistance given to a Member to support his or her parliamentary or political activities, or for candidacy at an election for parliamentary or non-parliamentary office, which (if permissible) should be registered under Category 2: Donations and other support for activities as a Member of Parliament. NB: There are legal restrictions on acceptance of benefits from sources outside the UK which amount to such support for a Member of Parliament, and before accepting any such support of more than £500 (including a credit facility or a loan which exceeds £500 in value) Members are required to satisfy themselves that it is from a permissible donor, and to notify the Electoral Commission within 30 days of any impermissible donations”<sup>3</sup>*

Any reportable visit should be reported within 30 days of beginning a visit. The first day of a visit (or the day that an MP flies out, if earlier) is usually viewed as the day that a ‘donation’ is ‘accepted’ by an MP, who then has 30 days to register it.

If a reportable visit is not registered within 30 days, it constitutes a late return but must still be reported as soon as possible. In the event of a late return, the procedure to report the visit remains unchanged, but it could give rise to a complaint. As a matter of courtesy, we recommend that any late return is accompanied by an explanatory letter.<sup>4</sup> The IPT can provide further guidance notes on late returns if required.

To read *The Code of Conduct together with the Guide to the Rules relating to the conduct of Members, 2015* (HC1076) in full, please visit:

<http://www.publications.parliament.uk/pa/cm/cmcode.htm>.

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<sup>3</sup> House of Commons, *The Code of Conduct together with the Guide to the Rules relating to the conduct of Members 2015*, Category 5, section 42(c) p 27:  
<http://www.publications.parliament.uk/pa/cm201516/cmcode/1076/107604.htm#n27>: Accessed [24-09-15]

<sup>4</sup> Foreign visits where appropriate (i.e. where they are valued at more than £1500) are also published by the Electoral Commission.



## Members of the European Parliament: Guidance on expenses and the registration of interests

**Please ensure that you read the guidance below and circulate this document to your staff. It is important that you follow the guidance that it contains.**

This guidance note applies to MEPs only. Separate guidance is available for MPs, peers and parliamentary staff.

This guidance note was updated on **September 2015**

### GENERAL GUIDELINES

1. The Industry and Parliament Trust (IPT) will not reimburse any expenses incurred by an MEP during the course of a Fellowship.
2. MEPs will not seek reimbursement from the European Parliament (EP) for travel, accommodation and subsistence expenses incurred by an MEP during the course of a Fellowship.  
on visits connected with an IPT Fellowship.
3. Under no circumstances should the direct exchange of money take place between an MEP and the hosting company or organisation.
4. A hosting organisation may themselves incur accommodation, travel and subsistence expenses on behalf of an MEP.

### EXPENSES FOR FELLOWSHIP VISITS


Travel, subsistence and accommodation costs incurred during IPT Fellowships cannot be claimed back through EP allowances. In the vast majority of circumstances, therefore, these costs will therefore be met by a hosting organisation. These expenses cannot be reimbursed by the IPT and should be proportionate, reasonable and relevant to the Fellowship programme being undertaken. Expenses should also be registered as per the guidance outlined below in Section C.

### RULES OF PROCEDURE AND REGISTRATION OF INTERESTS

In accordance with the *Code of Conduct for Members of the European Parliament with respect to financial interests and conflict of interest*, each MEP is required to make a declaration within 30 days of any changes (to the original declaration) pursuant to Rule 9, Annex I and the EP's *Rules of Procedure*.

MEPs should register a Fellowship visit in accordance with Article 5.3:

"... reimbursement of travel, accommodation and subsistence expenses of Members, or to the direct payment of such expenses by third parties, when Members attend, pursuant to an invitation and in the performance of their duties, at any events organised by third parties..."



Therefore, IPT Fellowships should be recorded on the European Parliament's *Declaration of Financial Interests* under Section I, 'Any additional information I wish to give', in the following format (usually one entry per Fellowship visit):

[Date]. Travel, accommodation and subsistence by [host organisation] as part of a visit to [location] as part of my Industry and Parliament Trust Fellowship.

## **ELECTORAL COMMISSION REGISTER OF DONATIONS TO REGULATED DONEES**

If an MEP undertakes a visit or a series of visits as part of their IPT Fellowships and the combined value of travel, accommodation and subsistence received in any one year from a host organisation exceeds £1,500, then this needs to be reported to the Electoral Commission (EC). This is considered to be a 'donation' under EC rules.

Any reportable visit should be reported within 30 days of beginning a visit. The first day of a visit (or the day that an MEP flies out, if earlier) is usually viewed as the day that a 'donation' is 'accepted' by an MEP, who then has 30 days to register it.

The EC provides form RD1A with which to register visits and the rules are outlined in full in *Donations and loans: guidance for regulated donees in Great Britain*, both of which can be downloaded from the EC website. The IPT can provide guidance on how EC donation registration forms should be completed upon request.

If a reportable visit is not registered with the EC within 30 days, it constitutes a late return but must still be reported as soon as possible. In the event of a late return, the procedure to report the visit remains unchanged, but it will be marked as late on the *Register of Donations*. As a matter of courtesy, we recommend that any late return is accompanied by an explanatory letter. The IPT can provide further guidance notes on late returns if required.

EC Guidelines can be read in full on their website<sup>5</sup> where also copies of the submission form, RD1A can be accessed<sup>6</sup>, as well as, information about EC sanctioning powers.

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<sup>5</sup> Electoral Commission, *Donations and loans: guidance for regulated donees in Great Britain*, [http://www.electoralcommission.org.uk/\\_data/assets/electoral\\_commission\\_pdf\\_file/0019/1370/8/026-regulated-donees-guidance-final.pdf](http://www.electoralcommission.org.uk/_data/assets/electoral_commission_pdf_file/0019/1370/8/026-regulated-donees-guidance-final.pdf): Accessed [24-09-15]

<sup>6</sup> Electoral Commission, *RD1A Form: Reporting a donation or visit*, [http://www.electoralcommission.org.uk/\\_data/assets/electoral\\_commission\\_pdf\\_file/0016/1350/7/form-rd1a-rd.pdf](http://www.electoralcommission.org.uk/_data/assets/electoral_commission_pdf_file/0016/1350/7/form-rd1a-rd.pdf): Accessed [24-09-15]



## Peers: Guidance on expenses and the registration of interests

**Please ensure that you read the guidance below. It is important that you follow the guidance that it contains.**

This guidance note applies to members of the House of Lords only. Separate guidance is available for MPs, UK MEPs and parliamentary staff.

This guidance note was updated on **September 2015**

### GENERAL GUIDELINES

1. The Industry and Parliament Trust (IPT) will not reimburse any expenses incurred by a peer during the course of a Fellowship.
2. Under no circumstances should the direct exchange of money take place between a peer and a hosting organisation.
3. A hosting organisation may themselves incur accommodation, travel and subsistence costs on behalf of a peer.

### EXPENSES FOR FELLOWSHIP VISITS

It may be possible to meet the travel costs incurred during IPT Fellowships visits within the UK the *Financial Support for Members'* scheme.

All claims are subject to prior approval and the limitations on travel expenses set out in section 5 of the *Guide to Financial Support for Members'*<sup>7</sup>. Requests for approval should be made on form UKT(A) or UKTFBS(A) and claims should be made using form UKT(C).


Applications are subject to the following conditions:

- The application for advanced approval, including the proposed itinerary and agenda of the visit, must be submitted to the Members' Finance Section at least one week before the proposed journey;
- The purpose of the visit must be clearly related to Parliamentary business and should not include party political, personal or private business;
- Travel claims are subject to the limitations set out in section 5;
- The expenses must not be recoverable from any other source.

For more information, see section 13, '*Travel on UK Parliamentary Business*' of the '*Guide to Financial Support for Members'*' or speak to the Members' Finance Section of the House of Lords Finance Department.

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<sup>7</sup> House of Lords, Guide to Financial Support for Members 2013, Section 5, p 12, <http://www.parliament.uk/documents/lords-information-office/2013/Guide-to-Financial-Support-For-Members-2013.pdf>: [Accessed 24-09-2015]



All other costs incurred by peers during IPT Fellowships cannot be claimed back through parliamentary allowances. In the vast majority of circumstances these costs will therefore be met by a hosting organisation. These expenses cannot be reimbursed by the IPT and should be proportionate, reasonable and relevant to the Fellowship programme being undertaken.

### **REGISTER OF LORDS' INTERESTS**

If the costs of an IPT Fellowship visit are met through the Members' Reimbursement Allowance Scheme then these visits do not need to be recorded on the *Register of Lords' Interests*.

If the costs of a visit (travel, subsistence or accommodation) are met by a hosting organisation, this must be recorded on the *Register* although the monetary values of these costs do not need to be recorded. This applies to any visit regardless of the size of the costs accrued on behalf of a peer by a host organisation.

Fellowship visits should be recorded, where applicable, in the following format:

Visit on ([date(s)]) to [location] as part of my Industry and Parliament Trust Fellowship. Cost of travel, accommodation and subsistence [delete as appropriate] met by [host organisation].

Please note that without exception, a hosting organisation should keep a record of costs incurred on behalf of an IPT Fellow using IPT Expenses Record Sheet B1.



## Parliamentary Staff: Guidance on expenses

**Please ensure that you read the guidance below. It is important that you follow the guidance that it contains.**

This guidance note applies to parliamentary officers only. Separate guidance is available for MPs, UK MEPs and peers.

This guidance note was updated on **September 2015**

### **GENERAL GUIDELINES**

1. The Industry and Parliament Trust (IPT) will not reimburse any expenses incurred by a Fellow-elect during the course of a Fellowship.
2. Under no circumstances should the direct exchange of money take place between a Fellow-elect and a hosting organisation.
3. A hosting organisation may themselves incur accommodation, travel and subsistence expenses on behalf of a Fellow-elect.

### **EXPENSES FOR FELLOWSHIP VISITS**

The House will meet these costs itself (by prior Departmental and line manager agreement).



## Fellowship Expenses Record Sheet

Organisations or companies hosting an Industry and Parliament Trust (IPT) Fellow who meet accommodation, travel and subsistence costs on behalf of that Fellow must record these costs on this sheet.

This sheet should be completed as and when these costs are incurred and returned to the Industry and Parliament Trust (with copies sent to the Fellow's office).

**Under no circumstances should the direct exchange of money take place between a hosting organisation and parliamentarian.**

<b>PARLIAMENTARIAN HOST ORGANISATION</b>			
<b>FORM COMPLETED (DATE)</b>		<b>FORM COMPLETED (BY)</b>	

DATE <small>(when incurred)</small>	DESCRIPTION <small>(e.g. "Flight Heathrow to Vienna")</small>	PURPOSE <small>(e.g. "Visit to Vienna head office")</small>	VALUE (GBP £) <small>(i.e. full retail value of the benefit)</small>
<b>TOTAL</b>			



## Chapter 5: Bribery and Corruption Policy

### Policy Statement

The Industry and Parliament Trust (IPT) works with its supporters in industry, Parliament, the Civil Service, and through partnerships with industry and academia, to further mutual understanding between the worlds of business and industry for public benefit. Embedded into the IPT's charitable aims is its non-lobbying, non-partisan and educational ethos. The IPT believes that corrupt practices (the misuse of any office or authority for private gain) undermine the fairness, efficiency and effectiveness of governments, NGOs, the private sector, civil society and community based-organisations. Corruption limits their ability to work effectively and acts as a disincentive to an open, honest and transparent parliamentary process.

The IPT is committed to conducting its business with the highest standards of honesty, integrity, transparency and openness in accordance with the Bribery Act 2010. The integrity of our staff, trustees, Management Board and those with whom we do business is critical to our success. The IPT operates a zero-tolerance approach to bribery and corruption within all our business dealings and relationships, and we are committed to implementing and enforcing effective systems to counter bribery. This Policy document outlines this stance.

The aims of this Policy are to:

- a) **set out our responsibilities, and of those individuals or organisations engaged in our activities, in observing and upholding our position on bribery and corruption; and**
- b) **provide information and guidance to our staff and those engaged in our activities on how to recognise and deal with bribery and corruption issues.**


We have conducted a Risk Assessment exercise considering the nature and extent of the potential risks of bribery faced by the IPT, taking into account all interactions the IPT has with third parties. We will continue to monitor our overall risk profile.

In this Policy, **third party** means any individual or organisation that comes into contact with IPT staff during the course of its activities, and includes: supporters; industry representatives; civil servants; business contacts; government and public bodies (including their advisors); representatives and officials; politicians and political parties. All third parties should also refer to their internal Bribery and Corruption Policy documents and procedures in addition to those provided by the IPT.

### Who is covered by this Policy?

Under Section 7 of the Bribery Act the IPT may be liable to be prosecuted for an offence if a person associated with it bribes another person, intending to obtain or retain business or a business advantage for the organisation. It is a defence for the organisation to show that it





has in place "adequate procedures" designed to prevent bribery by its "associated persons". A person is associated with an organisation where he or she performs services for, or on behalf of, that organisation; the association could be as a result of being an employee, or through another role such as a subsidiary, agent, third party, intermediary or supplier.

Care needs to be taken where working (or deciding whether to work) with 'partners' on an event or activity. Whether or not they are, strictly, "associated persons", it is wholly contrary to IPT policy to work with partners of any sort who engage in bribery or corruption, or who permit it to happen.

This Policy applies to all individuals working at all levels and grades, including: senior management; trustees; employees (whether permanent, fixed-term or temporary); consultants; casual staff and agency staff; volunteers; interns; or any other person associated with us or their employees, wherever located (collectively referred to as **staff** in this Policy).

## What is bribery?

Within the context of this policy bribery is defined as: 'the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical, a breach of trust, breach of an expectation that someone will act in good faith or impartially, or the improper performance of a contract in order to gain any commercial, contractual, regulatory or personal advantage'.

Inducements can take the form of gifts, fees, rewards, jobs, internships, favours or other advantages.


Corruption is: 'the misuse of entrusted power for personal gain'.

## Gifts and hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts and hospitality is not prohibited, if the following requirements are met:

- a) it complies with the IPT's Fellowship Guidelines (where these are engaged);
- b) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- c) it complies with relevant national law;
- d) it is given in the name of the IPT, with prior approval by the CEO to support an activity we are managing;
- e) it does not include cash or a cash equivalent (such as gift certificates or vouchers);

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- f) it is appropriate in the circumstances;
  - g) when taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given at an appropriate time;
  - h) it is given openly, not secretly; and
  - i) it is not offered, promised or given to, or accepted from, a government or public official or representative, or a politician or political party.

The CEO may approve a gift which does not satisfy the last of those requirements but which is otherwise permissible, but that approval must be given in advance. If there is any doubt as to whether any of these individual requirements are met in any particular case, the approval of the CEO should be obtained in advance. Any approval from the CEO must be given or recorded by the CEO in writing at the time.

The IPT appreciates that the practice of giving business gifts and hospitality varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, proportionate and justifiable. The intention behind the gift should always be considered.


## **Gifts and hospitality – what is not acceptable**

It is not acceptable for staff or third parties (or someone on your behalf) to:

- a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative
- c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) accept a gift or hospitality from a third party, if you know or suspect that it is offered or provided, with an expectation that a business advantage will be provided by us in return;
- e) threaten or retaliate against the IPT or a third party who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f) engage in any activity that might lead to a breach of this policy.

## **Facilitation of payments**

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary government action by a government official, when we have already paid for, or are entitled to, that action. They are not commonly requested in the UK, but this is a widespread form of bribery, despite being illegal in most countries. Under Sections 1 and 6 of the Bribery Act 2010, bribes and facilitation payments are illegal and the offer of any of these forms of payments in any of the countries in which we operate is against IPT Policy. Anyone (staff or third parties) involved in an IPT activity overseas is required to act in accordance with our zero tolerance approach to bribery.



If you are asked to make a payment whilst involved in our activities or on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Where practical, and safe to do so, you should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the IPT CEO.

You should never refuse to make a payment if faced with a threat of, or fear of, violence or loss of liberty. The safety of our employees and programme participants is of primary concern in all our operations both at home and abroad. The Guidance issued by the Ministry of Justice on the Bribery Act includes a defence of duress which is stated to be likely to be available in the case of payments made to protect “life, limb or liberty”.

## Your responsibilities

All staff and third parties must ensure that they read, understand and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or involved in our activities. All staff and third parties engaged in an IPT activity are required to avoid any actions that might lead to, or suggest, a breach of this Policy.


You must engage with third parties openly, honestly, fairly and transparently, and with a concern at all times to ensure that this policy is honoured and the reputation of the IPT thereby preserved and enhanced.

You must avoid the IPT working with those who are not committed to the avoidance of bribery and corruption.

You must identify bribery and corruption risks relating to IPT members and partners, particularly those who contract with government or the public sector. Having done so, you must undertake proportionate and risk-based due diligence. A brief record must be kept recording the risk identification process, and the results of the due diligence.

The terms of any arrangement with any 'partner' must have explicit provisions covering the IPT's core principles and this policy.

You must notify the IPT CEO or Trustee (as appropriate) as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future: for example, if a supporter offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business.



Further "red flags" that may indicate bribery or corruption are set out at the end of this Policy.

Any employee who breaches this Policy will face disciplinary action, which may ultimately result in dismissal for gross misconduct. The IPT reserves the right to dismiss staff if they breach this Policy.

## **Record keeping**

Financial records must be kept and appropriate internal controls must be put in place by staff which will evidence the business reason for payments to and from third parties activities related to the IPT.

Written records of all hospitality or gifts accepted, or offered, must be declared and kept, which will be subject to managerial review.

All expenses claims relating to hospitality, gifts or expenses incurred by and for third parties must be submitted in accordance with our expenses policy (staff) and Fellowship Guidelines. These should specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as supporters, partners, trustees, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **How to report a concern about bribery and corruption**

All staff and third parties are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your primary IPT contact, the CEO, or an IPT Trustee at the earliest possible opportunity. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The IPT is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that actual or potential bribery or another corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the IPT CEO and Company Secretary immediately.



## Who is responsible for this policy?

The Trustee Board has ultimate responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under its control comply with it. The CEO is the sponsor of this policy and has primary responsibility for dealing with any queries on its interpretation. Line Managers at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it. All staff are responsible for implementing this policy and should ensure they use it to disclose any suspected wrong doing.

## Potential risk scenarios: “red flags”

The following is a list of possible red flags that may arise during the course of your activities with the IPT and which may raise concerns under various anti-bribery and anti-corruption laws.

The list is not intended to be exhaustive and is for illustrative purposes only:

- a) you become aware that a third party engages in, or has been accused of engaging in, improper business activities;
- b) you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with foreign government officials;
- c) a third party demands lavish entertainment, gifts, or hospitality during the course of engaging in our activities;
- d) a third party offers excessive hospitality gifts or entertainment to an IPT official involved in our activities in the hope of preferential treatment
- e) a third party insists on receiving a fee payment before carrying out a government function or process for us;
- f) a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- g) a third party suggests that gifts or entertainment be passed through an IPT official on to a parliamentarian;
- h) a third party asks you or the IPT to arrange a gift or entertainment for a parliamentarian;
- i) a third party asks for a payment which is due to them to be made to someone other than themselves or their company;
- j) a payment received in connection with a third party's dealings with the IPT is received from someone other than that third party.



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