



1st July 2009

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Sir Christopher Kelly KCB
The Committee on Standards in Public Life
35 Great Smith Street
London
SW1P 3BQ

Dear Sir Christopher

Review of MPs' Expenses

This is a short note to follow up on my previous submission of 21 May.

Over the past weeks it has become clear that many MPs are indeed being deterred from taking part in legitimate market research activities as a direct result of the new disclosure regime.

In my earlier letter I expressed my concern that in future, it will be much more difficult for outside bodies, including charities and those in the corporate sector, to understand the thinking of MPs. I am sorry to report that I am witnessing this gloomy prediction coming true.

There is a substantial appetite for organisations to understand what parliamentarians think about the issues that affect them. If they cannot acquire this understanding through market research they will seek it via other routes. My fear is that instead of Parliament becoming more transparent, the new regime coming into effect today will result in a return to the dark days of the 1990s when lobbyists like Ian Greer traded on their private access to the views of MPs.

I appreciate that this letter is sent well after your closing date for submissions but hope it is helpful in providing evidence of my earlier concerns.

Yours sincerely,

A Hawkins
Chief Executive



21st May 2009

Sir Christopher Kelly KCB
Chairman
The Committee on Standards in Public Life
35 Great Smith Street
London
SW1P 3BQ

RECEIVED
28 MAY 2009

Dear Sir Christopher

Review of MPs' Expenses

I am writing to address question 13 of the "Issues and questions to be addressed" as part of the Committee's Review of MPs' Expenses. This also relates to the House of Commons motion on the "Registration of members' Financial Interests" (Hansard 30 Apr 2009; Column 1131-2).

ComRes is a market research company and operates according to the Code of Conduct of the Market Research Society. We conduct regular surveys of legislators including MPs, Peers, MEPs, and members of devolved legislatures. We are one of several such companies.

It is standard practice in the market research community to make available a small fee to MPs in return for completing survey questionnaires. Such fees are also paid in respect of surveys among other opinion-former audiences such as journalists and think-tanks. Most such payments are directed to a charity or to other third party such as a local party association. This is such a good way to fundraise that ComRes offers respondents a different charity each month as a means of encouraging awareness of good causes to support during the economic downturn. Through this channel we have raised a significant amount of money for charity; we calculate more than £300,000 over the past six years.

The surveys also provide an important conduit for MPs' views and therefore make a meaningful contribution to enhanced relationships between Parliament and the outside world.

I ought to emphasise that we never, ever, seek to influence respondents. Were we to do so it would merely detract from the research validity of our survey research. Furthermore, MPs (and other legislative audiences) would quickly see through any attempt to do so.

Our concern with the House of Commons motion of 30 April is that to require MPs to disclose every penny remunerated, whether or not it is properly defined as 'remuneration', would be both disproportionate and likely to lead to a substantial reduction in the number of MPs who are willing to participate in what is widely accepted as a legitimate research activity.

We would like to offer two alternative arrangements, both of which would be a significant improvement on the absolutist approach of the House of Commons motion.

When ComRes began surveying Members of the House of Lords in 2004, we obtained an opinion from the Registrar of Lords' Interests that survey payments in respect of research among Peers fell under the same exemption from declaration as 'occasional income from speeches, lecturing, broadcasting and journalism' (section 12f of the House of Lords' Code of Conduct adopted on 2 July 2001 as amended on 24 July 2001). This, I submit, should be the model for the House of Commons on the basis that it represents a common-sense approach while allowing for more substantial employment or remuneration to be registered – which I accept should be required.

An alternative approach, if the House of Lords model were considered inappropriate, would be to exempt payments to MPs of less than, say, £200 per annum, thus enabling the continuation of a successful element of the current system.

One of the Committee's "Seven Principles of Public Life" is openness. The Committee states that **"Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands."**

I suggest that a regime which discouraged MPs from taking part in market research would, perversely, be detrimental to openness as it would deny the hundreds of organisations that wish to understand the decisions and actions of MPs having the opportunity to do so. It would make MPs' views much harder to obtain or to understand, thus placing a financial premium on old-fashioned lobbyists who used to trade on their personal contacts.

Such an outcome would be costly for the charities who benefit from the fundraising impact of market research activities, frustrating for those organisations with a legitimate desire to understand the thinking of MPs, and to no obvious benefit in terms of your Committee's aims.

We urge you to give full consideration to our concerns in coming to your conclusions.

Yours sincerely,

A Hawkins
Chief Executive