

Sir Ian Kennedy,  
MPs' Expenses Consultation,  
Independent Parliamentary Standards Authority,  
Steel House,  
11 Tothill Road,  
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8<sup>th</sup> February 2010-02-08

Dear Sir Kennedy,

Having attended the IPSA consultation meeting for MP's staff today, I felt it would be useful to write to you to pass on my response to your consultation document. Firstly, however, I'd like to say how grateful I am for the opportunity to take part in the consultation, and for the meeting that you took part in earlier today. It is very positive to feel that the opinions of staff are not only being taken into consideration, but actively sought. It was also mentioned at the meeting that it may be useful to organise a consultation meeting specifically with parliamentary interns, and I understand that Dick Gardener, editor of w4mp.org, passed on my contact details in relation to this.

Phil Willis MP and I have been campaigning on the issue of parliamentary interns for some time, and if there is anything that I can do to help organise a consultation meeting for interns I would be only too happy to do so. As the proposals by IPSA could fundamentally change parliamentary internships I certainly think that a specific consultation with those that it will most affect would be extremely useful.

As you will undoubtedly have an extremely large number of submissions to read I will try to keep mine fairly brief, and will stick specifically to the topic of Parliamentary Internships. It is a shame that there is no question posed in the consultation that refers directly to Parliamentary Internships, and I am afraid that for this reason my comments may not appear to be in direct response to the questions posed.

Firstly, I would be grateful for some clarification regarding paragraph 8.10. You state that the failure to pay interns '*is not in accord with the House's guidance, which provides that interns are expected to be at work at specific times or to complete specific work. **Interns are employees**, and relevant employment legislation will apply, such as the National Minimum Wage*'. The reference provided relating to the 'House Guidance' refers to the House of Commons Commission, *Employment of Members' Staff by the House, HC 1059 26 October 2009*. However, on my understanding, this document does not clearly back-up the point that you are making. The document referred to states: '*There is no problem if interns are genuinely working [unpaid] as*

*volunteers...unpaid interns cannot be employed by the House as they are not employees at all.'*

The intention to pay all interns National Minimum Wage is extremely welcome, and indeed overdue, but I would be grateful for clarification that this would apply to all parliamentary interns. As the system currently stands, and as the House of Commons Commission document states, all interns who work set hours or perform set tasks qualify for National Minimum Wage. However, this is routinely avoided by including a cursory statement in interns' contracts (where these exist) stating that they are free to work the hours they choose, in other words classing them as 'volunteers'. In practice, very few interns have this flexibility, and almost all have set tasks to complete. I would argue that this is actually beneficial to the interns' experience, providing a more realistic understanding of work in an MP's office and allowing them to make a more valuable contribution. However, it does not qualify them for National Minimum Wage. Under the new arrangements I believe that the National Minimum Wage should be applied to *all* Parliamentary Internships, regardless of the apparent flexibility of the position or whether it appears to necessitate payment under National Minimum Wage legislation.

I would also like to comment on the delivery of the minimum wage for interns. In the consultation it was suggested that Members' staffing allowances (or whichever alternative system is selected following consultation) could be adjusted to incorporate money to pay minimum wage to interns. The point was raised that unless this happened MPs may reduce the number of internships available in order to save money. However, I believe that this will always be the case unless the funds to pay interns are held in a central, ring-fenced allocation specifically for that purpose. If funds to pay interns are absorbed into a general staffing budget, it will be seen that employing an intern will have a direct negative impact on the salaries of other members of staff. In many cases the money provided to pay for an intern will be absorbed into the salary of one or more senior staff members.

It is important to note at this point the reasons *why* it is crucial that we offer paid internships in MPs' offices. The vast majority of salaried researcher positions go to applicants who have previously interned for several months in an MP's office. For as long as internships remain unpaid, this will limit access to parliamentary researcher positions to those with the private funds to support themselves whilst working for free, or a place to stay in London. Those from less affluent backgrounds or with no family in London are severely disadvantaged in getting a job within parliament. It is not simply important that money is available to pay parliamentary interns, but it is crucial that the money is set aside *solely* for this purpose to actively encourage Members to take interns, and give more people the valuable opportunity to experience Parliament first hand.

It is also necessary to address the quality of internships in Parliament. Internships should be subject to the same high standards of employment practice that need to apply for all permanent staff. That is to say that internships should be openly advertised, that they should meet industry standards for good employment practice and that interns should have access to training and development opportunities.

I believe that it is necessary in some sense to distinguish, however, between an internship and position as a junior member of staff. The minimum wage falls a long way short of the bottom of the parliamentary pay-scales, so it is important that salaried interns are not taken on long-term as cheap staff. An internship should be a relatively short-term position that is a valuable learning opportunity. It should provide an individual with the relevant skills and experience to get a permanent job within the sector if they should decide to do so. It should not in itself be a permanent position, if only because this would entirely undermine the system of parliamentary pay-scales. I would therefore recommend that parliamentary internships be capped in length at a maximum of six months; after this point an internship ceases in large part to be a mutually beneficial learning experience, and becomes a low-paid job.

It is stated in paragraph 8.12 that there are industry standards for employment of staff such as those issued by the Advisory, Conciliation and Arbitration Service. I would like to draw the Authority's attention to similar standards for internships that have been drawn up by Internocracy, a social enterprise working to improve internships. The Internocracy Guide has been created specifically with MP's offices in mind; a copy of which is attached with this submission. I feel that it is important that MPs are also committed to meeting these industry standards for the employment of interns.

In relation to all staff the consultation states in paragraph 8.12 that 'MPs have a responsibility to determine what is necessary to meet those [industry] standards'. I would be grateful for clarification on this point that it will not *solely* be MPs themselves who are responsible for ensuring that these standards are met. It is important that there is an independent audit of MPs' offices to ensure that industry employment standards are met consistently and across all offices, and that this also applies to parliamentary interns.

Should it be decided following the consultation that many of these proposals are not workable and a separate fund for interns cannot be created, I would argue that it is still crucial to continue to insist that all interns be paid minimum wage. It was put forward in the consultation this afternoon that this would reduce the number of internship opportunities available. However, I would counter this by arguing that two hundred salaried internships are more valuable than four hundred that are only available to an elite group in society. The reform of parliamentary expenses is fundamentally about increasing trust and transparency in parliament. To be truly accountable and transparent we must make sure that the doors to our offices are open to people from all backgrounds, not just those who can afford to pay for the privilege; I believe therefore that the issue of pay for interns is far more fundamental to the ongoing reforms than is commonly accepted.

Thankyou for taking the time to consider my submission, and if you require any further information about any of the points made I would be happy to discuss this further.

Yours Sincerely,

Helen Undy  
*Parliamentary Researcher to Phil Willis MP*

