



Department  
for Business  
Innovation & Skills

**TRANSPARENCY OF LOBBYING,  
NON-PARTY CAMPAIGNING AND  
TRADE UNION ADMINISTRATION  
ACT 2014**

**Government Response to the  
Consultation on Trade Union  
Assured Register of Members**

**MARCH 2015**

# Contents

<b>1. Introduction .....</b>	<b>3</b>
Background.....	3
<b>2. Summary of Responses.....</b>	<b>3</b>
Numbers of Responses Submitted and by Whom .....	3
General comments.....	4
Question 1 .....	4
Question 2 .....	5
Question 3 .....	6
Question 4 .....	6
Question 5 .....	7
Question 6, 7, 8 on guidance .....	7
Questions 9 to 17 relating to the Impact Assessment.....	9
Questions 18 to 21 relating to the Impact Assessment: .....	12
<b>3. Conclusion.....</b>	<b>16</b>
List of respondents to the consultation: .....	16

# 1. Introduction

## Background

1. The existing statutory duty<sup>1</sup> (the section 24 duty) on all trade unions to keep a register of their members' names and addresses and ensure that, as far as reasonably practicable the register is kept accurate and up-to-date, has applied since 1984.
2. However, the law currently does not contain a statutory mechanism to provide assurance that this duty is being met. At present, complaints about a union's failure to meet this duty can only be made by a trade union member. Whilst the Certification Officer (CO) has the power to investigate and issue a declaration and/or enforcement order against a union, this is limited to the individual member's complaint. As a union member is entitled only to see their own entry, in practice it is difficult to know the accuracy of the membership as a whole, for example whether the register accurately records all new joiners and leavers.
3. The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (the Act) amends the Trade Union and Labour Relations (Consolidation) Act 1992 (TULRCA) and introduces a new statutory obligation on trade unions subject to the section 24 duty. This new obligations requires them to provide annual assurance by way of a Membership Audit Certificate (MAC) that their systems are satisfactory to ensure compliance with the section 24 duty. Unions with more than 10,000 members will have to appoint an independent, qualified person (an "assurer") to complete the MAC on their behalf. The Government launched a 10-week public consultation seeking views on the proposed implementation of Part 3 of the Act in relation to the MAC, assurers and the content of the Order setting out who can act as an assurer. A full Impact Assessment was attached, which presented 14 questions to improve understanding of the practical impact as a result of these new requirements. A final Impact Assessment which takes account of new data is published along with this response document.
4. Set out below is a summary of the consultation responses and the Government's response.

## 2. Summary of Responses

### Numbers of Responses Submitted and by Whom

5. A total of 27 responses were submitted in answer to the questions put forward in the consultation.
6. Eighteen (67%) responses were submitted by trade unions with over 10,000 members; three (11%) responses came from the legal community. The remaining six (22%) responses were submitted by one federated trade union, one union with 10,000 or fewer members, one listed staff association, one local government body, one business representative and one individual.
7. A list of the respondents is set out at Annex 1.

---

<sup>1</sup> See section 24 of the Trade Union and Labour Relations (Consolidation) Act 1992

## General comments

8. Most respondents, in particular unions, expressed that they did not welcome the new provisions, some adding that they felt that there was little evidence that the current system was failing or inadequate. An employer representative organisation expressed broad support for improved assurance as it had in the past pursued legal action to ensure a trade union in its sector improved its membership record keeping.
9. Seven respondents, mostly unions and the legal community legal firms expressed concern that the measure could be in breach of Article 8 (right to privacy) and Article 11 (right to assembly) of the European Convention of Human Rights (ECHR). Eight respondents, all unions, expressed concerns regarding provisions of Data Protection Act 1998 (DPA) due to sensitivities relating to trade union membership.

## Government response

10. As membership organisations it is important that trade unions reflect the will of their members; knowing who their members are and being able to engage them is fundamental to unions' democratic accountability. And as trade union activity has the potential to affect the daily lives of union members as well as the general public, there is a public interest that voting papers and other communication should reach union members so that members have the opportunity to participate in union activities.
11. The Government has noted the concerns regarding Article 8 and Article 11 of the ECHR. However, as the current system relies on an individual union member actively checking their own details, there cannot be certainty that unions are compliant with the section 24 duty and it follows that there should be an appropriate and effective enforcement regime. The Government is of the opinion that, as the principle behind these measures is already in place the new obligations in Part 3 of the Act are consistent with Convention Rights, including articles 8 and 11 ECHR.
12. The memorandum on ECHR issues produced for the Joint Committee on Human Rights during the passage of the Act through Parliament discusses this compliance [http://www.parliament.uk/documents/joint-committees/human-rights/Transparency\\_of\\_Lobbying\\_etc\\_Bill\\_ECHR\\_Memorandum.pdf](http://www.parliament.uk/documents/joint-committees/human-rights/Transparency_of_Lobbying_etc_Bill_ECHR_Memorandum.pdf)
13. In relation to any concerns regarding the Data Protection Act 1998 (DPA), the Government wants to be clear that the CO and assurers' access to personal data as a result of these requirements are subject to the Data Protection Act. This will be made clear in the guidance to ensure that all parties are fully aware of the sensitive nature of any personal data they collect and that these new requirements must be in compliance with data protection laws.

## Question 1

### Do you have any comments regarding the proposed operation of the MAC? Please indicate why.

14. Four respondents expressed overall or some support for the proposed operation of the MAC, including a business representative which considered the MAC to present a robust and reliable way of providing assurance of the membership register. Another respondent, a union, stated that it was content with the proposed approach and agreed that the MAC should be form part of the AR21 template. Partial agreement was expressed by two larger

unions who proposed that the MAC template should be of a simple design and on the basis that the timing for the completion of the MAC appeared to be reasonable.

15. Twenty-one respondents, mainly unions but also the legal community expressed disagreement with the new requirement to produce a MAC in addition to the existing section 24 duty to maintain accurate membership records. One union sought a longer transitional period to amend union rule books. A legal firm suggested that there should be a transitional period of 3-4 years allowing flexibility in the submissions of MACs to enable further familiarisation with new processes. One respondent, a union, proposed specific text for the MAC in order to clarify the role of the assurer.

## Government response

16. The question was directed at Government proposals for the introduction of the new requirement to supply a MAC to the CO. These are that the obligation will apply for reporting years which begin on or after 6<sup>th</sup> April 2015. The Government has noted respondents' comments with interest. Most respondents considered the proposed timeline for completion of the MAC to allow sufficient time for it to be prepared. The Government will therefore adopt the proposed timeline for the completion of the MAC which will follow existing time requirements relating to the submission of trade unions' annual reports.
17. In terms of the AR21 form, this is expected to remain a simple template which will clearly state whether a union's systems are satisfactory to fulfil its section 24 duty. The final template of the AR21 will be available in due course from the CO's website.

## Question 2

### **Do you agree with the Government's proposed approach? (that is, that solicitors and qualified auditors are to be eligible to be assurers) Please indicate why.**

18. Three respondents, a union, a business representative and a local government body agreed with the Government's approach to reflect the existing content and structure set out in the Trade Union Ballots and Elections (Independent Scrutineer Qualifications) Order 1993 (the Scrutineer Order). The union added that it appeared reasonable to ensure members are kept informed about important business or the issuing of ballot papers.
19. Whilst opposed to the measure, twelve unions and two respondents from the legal community agreed that if implementing this measure, the Government should follow the form of the Scrutineer Order. Six unions, a legal firm and a listed staff association expressed fundamental disagreement with the new requirement. One union added that analysis of its membership records should not be opened out to a competitive market.
20. Ten unions considered the process for the appointment and removal of an assurer too onerous and time consuming; one of whom added that the limited detail on the assurer's role made it difficult to quantify costs or evaluate the impact of the new measures. One union expressed its view that the assurer will require technical, legal and administration expertise in order to understand a union's IT systems and that this could drive up costs.
21. Two unions felt that the assurer should be obliged to identify any concerns to the union so that these can be rectified before the submission of the MAC to the CO. A legal firm thought that unions should have the right to challenge a negative MAC before the MAC is submitted to the CO. Another union expressed long-standing concerns regarding one of

the provisions in the Scrutineer Order which prevents recent or current union members from acting as a scrutineer but do not impose similar restrictions on recent employees of an employer organisation.

### Government response

22. Most respondents supported the Government's proposal to broadly reflect the existing content of the Scrutineer Order. The Government will therefore prepare an Order which will be consistent with the Scrutineer Order, where appropriate. This means that a solicitor or a qualified auditor or a person who may act as a scrutineer under the Scrutineers Order will be able to act as an assurer.

### Question 3

**Are there any other groups that should be able to act as an assurer? If so, please state who these should be and give your reasons why.**

23. Fifteen unions, two respondents from the legal community and one staff association stated that solicitors, auditors and scrutineers should be considered as qualified to be appointed as assurers. Three unions added that it is essential that assurers are familiar with unions' democratic structures and membership systems.

24. A legal firm and business representative organisation considered qualified accountants also to be suitably independent and qualified. One union further thought that the categories should also include barristers and senior academics, such as professors.

### Government response

25. Most respondents suggested that a person who can act as a scrutineer should also be able to fulfil the assurer role. In response to the suggestion that accountants, barristers and senior academics should be added to the categories, the Government is of the view that the professional skills of these professionals differ too greatly in practical terms to the skills required for the role of an assurer. Therefore the Government will legislate for solicitors, auditors and those who can act as scrutineers to act as assurers.

### Question 4

**Which is your preferred option? Please give your reasons why.**

26. The first option was for the Order to set out which professional qualifications enable a person to be eligible to act as an assurer and also to list persons who do not have these qualifications but are also able to act as an assurer. The second option was for the Order to only list the qualifications required for a person to be eligible.

27. Twenty-six respondents stated that they preferred option 2. Six unions and two legal firms considered option 1 as bureaucratic as this would require a public competition and result in a list of named organisations which can only be amended by a further statutory instrument

28. Five unions considered that enabling auditors, solicitors and scrutineers to act as assurers would allow for a reasonable degree of competition. There was a concern that a public competition (as required by option 1) would delay the unions' ability to work with an assurer, thus raising uncertainty and negatively impacting upon the unions ability to comply with the new duty.

## Government response

29. Most respondents opted for option 2: that the content of the new regulations should set out categories as to who can act as an assurer and not require a public competition. The Government will therefore adopt the proposal as set out in option 2 and prepare an Order that lists solicitors, auditors and existing scrutineers as groups able to act as an assurer.

## Question 5

**Do you have any other suggestions with regard to the content of the Order? Please explain your answer.**

30. Nine unions stated that the content of the Order for assurers should mirror that of the Scrutineer Order. One legal firm felt that the Order should set out the assurer's role in greater detail. One union stated that consideration should be given to an approved list of assurers to be maintained by the CO or BIS without requiring the need for a further Order to be made. Another union suggested that where a union is challenged about compliance with the section 24 duty and is able to demonstrate compliance through its MAC, then liability for any costs incurred should fall to those making the challenge.

## Government response

31. Most respondents re-asserted that the new Order setting out who can act as an assurer should reflect those in the Scrutineer Order. As the powers introduced into TULRCA by the Act only allow the Secretary of State to provide who may act as an assurer, they are not wide enough to cover other matters such as the assurer's role or the consequences of challenging a MAC. The Government is therefore of the view that where a union has detailed or specific requirements relating to an assurer's role, such matters are best set out in the contract between a union and its assurer, as opposed to in general guidance where such detail this may not be appropriate for other unions.

## Question 6

**Do you propose any amendments to the guidance for trade unions? Please clearly state what these are and set out your reasons for the proposed changes.**

32. Twenty-six respondents answered this question; four of which answered they had no comments and the remaining twenty-two providing more detailed comments on the guidance for trade unions. One union questioned the need for three separate sets of guidance where one would suffice, provided that this guidance dealt with the process from all perspectives.

33. Twenty-two (seventeen unions, three respondents from the legal community, one local government body and one employer representative) respondents identified the following main areas that could benefit from improved clarity or more specific guidance, as follows:

- Advice regarding international members in terms of membership threshold;
- Clarity when the duty to appoint an assurer is triggered;
- Clarity that the assurer's role is to determine the union's systems are satisfactory to comply with the section 24 duty;
- To reflect modern technology in addition to postal means of communication;
- When the CO's investigative powers will be triggered
- Process where a MAC is submitted later by the assurer and the remedies available to unions;

- Liability should DPA provisions be breached;
- Strengthen the text relating to DPA provisions throughout;
- Parties considered not independent (for the purpose of being an assurer);
- That that assurer should be independent from employers, and not hold shares or have any business relationship;
- CO should first approach unions when seeking information or documentation to avoid undue anxiety or confusion for members and officials;
- Set out clear process to ensure consistent approach by assurers and the CO;
- Union ability to comment on the MAC before completion to that inaccuracies and anomalies can be rectified;
- Union opportunity to be heard by CO before any enforcement Order is issued.

## Question 7

**Do you propose any amendments to the guidance for assurers? Please clearly state what these are and set out your reasons for the proposed changes.**

34. Twenty-four respondents answered this question; five of which answered they had no comment and the remaining nineteen provided more detailed comments on the guidance for assurers.
35. Nineteen respondents, (fifteen unions, two legal firms, one local government and one business representative organisation) identified the following main areas that could benefit from improved clarity or more specific guidance, as follows:
- Strengthen the text relating to data protection provisions throughout and additional protections/sensitivities of union membership ;
  - Assurers to raise concerns with the union first before completing the MAC;
  - That an assurer should be appointed as early as possible;
  - To reflect use of modern technology in terms of communications;
  - Detail on the complex contractual relationship between unions and assurers;
  - Union ability to comment on the MAC before completion so that inaccuracies and anomalies can be rectified;
  - Guidance to deal with an assurer's delays in provision of the MAC;
  - Clarity on the assurer's role to determine if the union's systems comply with the section 24 duty;
  - Liability should DPA provisions be breached.

## Question 8

**Do you propose any amendments to the guidance for employers? Please clearly state what these are and set out your reasons for the proposed changes.**

36. Twenty-five respondents (20 unions, 5 others) answered this question; five of which stated they had no comments. The remaining twenty responses provided general rather than detailed comments on the guidance for employers.



37. Fifteen unions considered it inappropriate for the Government to produce guidance for employers as these requirements have no link to employers since employers have no role in the maintenance of union membership systems.
38. A number of unions suggested ways in which employers could assist, including an obligation on employers to assist unions in obtaining members' data and through guaranteeing paid facility time for members attending conferences to implement changes to union rules.

### **Government response on all guidance (questions 6 to 8)**

39. The Government has noted the comments and suggestions for the guidance. Whilst greater clarity has been provided in terms of various processes, this has been carefully balanced to avoid becoming overly prescriptive to take account of the fact that, as democratic organisations, one union needs and rules may be different from another. The guidance has been consolidated for the ease of interpretation by unions and assurers and a section has been added on data protection to emphasise the importance of treating data sensitively.

### **Questions relating to the Impact assessment**

40. Twenty-two respondents, comprising trade unions, a legal firm, a local Government and an individual, responded to the questions under the section of the consultation document dealing with the impact assessment.

### **General comments on questions 9 to question 17:**

41. Several unions considered it difficult to estimate costs, but anticipated that increased costs to be as follows:
- contracting the assurer;
  - removing and replacing the assurer;
  - requests for information from the assurer, including meetings and site visits;
  - CO investigations;
  - adjustments to existing membership system;
  - familiarisation with legislation and guidance;
  - legal and time costs of rule book compliance;
  - training of staff;
  - time implications when removing staff from normal duties;
  - potentially needing to hold an extraordinary conference to change the rule book.

### **Question 9**

#### **Do you have any evidence that could help to refine the assessment of union familiarisation costs?**

42. Most unions found it difficult to provide detailed costs until the new requirements are implemented. However, they did consider that the familiarisation costs in the Impact Assessment were underestimated, particularly those relating to senior managers and directors. One union stated that the daily cost to re-train its membership department and database staff would run into the low thousands of pounds. Another union estimated costs for basic training for approximately 1,250 local reps to be around £53,000. One union

stated that it may be necessary to appoint a new officer with responsibility for overseeing the assurance process.

### Question 10

**[For unions with more than 10,000 members] What are the estimated costs of making an amendment to your rule book to provide for the appointment and removal of an independent assurer?**

43. Seven unions responded directly to this question.

44. Responses varied widely from the cost being minimal to a maximum of £1.2million for an extraordinary meeting needing to be held to change the union's rule book regarding the appointment / removal of an assurer. Based on the most recent annual conference in 2014, one union stated a special rules revision conference to cost in excess of £100,000. Others cited other additional costs to change their rule book including staff time, printing and travel to the conference.

45. However, most respondents were unclear what the impact would be and none stated that an extraordinary meeting to amend their rule book would be necessary. One union stated whilst it was able to change rules annually through its annual general meeting, some legal costs could be incurred in drawing up the new rules in order to comply with the requirement to change its union rules.

### Question 11

**[For unions with more than 10,000 members] How often will your union seek to re-tender the contract for an independent assurer?**

46. Seven unions responded directly to this question.

47. Based on current practices for the specialist suppliers, most unions expected to review and re-tender the contract every 3 – 5 years. One union annually reviews and re-appoints its auditors and estimated the annual cost to appoint an assurer to be in the region of £2,000 - £10,000 (exclusive of fee) depending on whether an internal review or full tendering process is carried out. Two unions expressed that it was difficult to foresee the process and that it will be dependent on how assurer approaches the role.

### Question 12

**Do you have any evidence that could help to refine the assessment of the fee paid to an independent assurer?**

48. Ten unions responded directly to this question

49. Seven unions answered no to this question, with one adding that this cannot be answered at this time without a clear description of the assurer's actions. Two unions assumed the cost to be similar to that of a scrutineer or auditor, with one union adding that based on recent scrutineer expenditure for a single membership-wide exercise, assurer cost was estimated at £22k. Another stated that the costs were likely to be higher than currently estimated, and in the region of £15k and £30k.

### Question 13

#### **Do you have any evidence that could help to refine the assessment of the time costs to larger unions with more than 10,000 members?**

50. Nine unions responded directly to this question.

51. Six unions either answered no this question or stated that they were unable to answer this at this time. Three unions considered the cost estimate in the IA to be too low. One union added that with auditors several staff are involved for the period of a month. Auditors engage with senior managers in 5 hrs of discussions.

### Question 14

#### **Do you have any evidence that could help to refine the assessment of the time costs to smaller unions with fewer than 10,000 members?**

52. One union responded directly to this question.

53. It thought this would not be too onerous as its turnover of members was considered low enough to allow monitoring of members' contact details. The union added that it had already planned more rigorous system to check members' details so no additional cost as a result of the legislation.

### Question 15

#### **Do you have any evidence that could help to refine the assessment of the compliance costs?**

54. Ten unions responded directly to this question.

55. Eight unions either answered no this question or stated that they were unable to answer this at this time as it was unclear at this point what constitutes a negative MAC or what would trigger a CO inspection. One union considered that this requirement would lead to an "inestimable" number of vexatious complaints, and associated costs will be high. Another union stated that as it is already compliant with the section 24 duty, it hopes that such costs will be avoided.

### Question 16

#### **Do you have any evidence that could help to refine the assessment of the total costs to unions of implementing this legislation?**

56. Ten unions and one legal firm responded directly to this question.

57. Six unions either answered no to this question or stated that they were unable to answer it at this time. One union stated though that due to the number of staff likely to be involved, the cost has been considerably underestimated. Another union agreed and cited venue and transport costs to train lay activists in Local Associations to cost £20,000. Another union stated that its current IT systems had been developed in-house and are to be upgraded. As this upgrade is already planned and is not as a result of the MAC requirement, the cost is not considered too onerous.

## Question 17

### **Do you have any evidence that could help to refine the assessment of benefits of implementing this legislation?**

58. Ten unions, a legal firm and an individual responded directly to this question.
59. Seven unions and one legal firm answered that they had no direct evidence of any benefits. Three unions responded that as they are already diligent in maintaining an accurate database there was no additional benefit to their members as a result of this legislation.

### **General comments on questions 18 to question 21:**

60. Seven unions expressed that an emergency conference to change union rules would create inconvenience for employers who would need to provide facility time. They also stated that the legislation will increase work load and costs for the CO which will result in increased costs to the taxpayer.

## Question 18

### **Do you have any evidence that could help us assess whether it would be necessary to convene an extra, unscheduled rules conference in order to make the rule book changes to allow the appointment of an independent assurer?**

61. Ten unions responded directly to this question.
62. Six unions stated that an extraordinary meeting would not be required mostly due to being able to amend their rule books at annual AGMs. One union stated that its rules allow for amendments to be made through online consultation with its members; adding that whilst rules may need to be amended to reflect additional requirements this would not require a special meeting to be held.
63. Three unions stated a rules revision conference was necessary in order to amend the union rules but were as yet unable to say whether this would require an extraordinary conference. One union added that it would need to seek legal advice on making rule changes at a normal conference. Another union added that its legal advisers would not propose a rule change without viewing the final guidance and Order relating to assurers.

## Question 19

### **Do you have any evidence that could help us assess the costs of convening an extra rules conference should this be necessary?**

64. Eleven unions responded directly to this question
65. Four unions provided costs for an extraordinary meeting to change the union rules, ranging from £45,000 to £100,000 (2 unions) to £1.2million. Seven other unions either ranged to cost to minimal (due to ability to consult members online), or were unable to provide an estimate.

## Question 20

**Do you have any evidence that could help us assess whether there are any costs to employers of employees attending an additional conference to agree rule book change?**

66. Ten unions, two legal bodies, a local Government and a staff association responded directly to this question.
67. Five unions and a staff association either answered no this question or stated that they were unable to answer this at this time.
68. One union considered it unlikely that employers will offer conference delegates paid release from work to attend an event which qualifies as a trade union activity, rather than a trade union duty. Four unions thought there could be resourcing pressures and associated costs for employers if employees take unpaid leave or facility time to attend an extraordinary conference. A legal firm thought additional costs will arise where employees are also senior lay officials of the union and part of the “rules” committee.

## Question 21

**[For unions with 10,000 members or less] Do you have any evidence that the process of self-assurance will affect the cost of compliance with section 24 of TULRCA? If so, does your evidence indicate that the costs of compliance would increase or decrease? Please provide details of your rationale.**

69. One union responded directly to this question.
70. As it had already planned a more robust system for confirming members' details, this was not as a result of the proposed MAC requirements.

## Government response

71. The Government is grateful for the responses received which have helped to improve its understanding of the impact of these measures. As a result of these responses but also due to a number of meetings with unions, potential assurers and the CO during the consultation period, the following adjustments have been reflected in the final Impact Assessment.
- A clarification of how accurate and up-to-date a membership register will have to be, emphasising the focus on proving that systems are satisfactory;
  - The estimates and underlying assumptions for the number of enquiries the Certification Office will receive as a result of the new powers, based on current enquiries under Section 24 of TULRCA have been amended;
  - Pay level for senior staff at large unions has been amended to reflect the salaries reported in the CO's Annual Report;
  - Based on feedback from unions and potential assurers, improved analysis on the expected fee levels for assurance services;
  - Improved estimate of the number of small organisations affected based on meetings with unions and indications of their staffing numbers.

- More senior staff time has been allocated in the transition phase, with a breakdown of different stages such as familiarising, agreeing processes and tendering for an assurer;
- A new structure for on-going time costs for large unions has been put in place, reflecting the differing needs of unions and levels of involvement of IT and senior staff;
- A reduced cost to the CO has been allocated based on more recent feedback;
- All statistics have been updated where possible.

72. These changes have resulted in the EANCB increasing from £0.47m to £0.52m. The final Impact Assessment reflecting these changes was submitted presented to the Regulatory Policy Committee for its opinion and received a 'green rating' on 18th February 2015.

73. The Government has committed to a review of this measure four years after the first set of MACs have been issued.

## 3. Conclusion

74. The Government would like to express its thanks to all respondents for taking the time to respond to this consultation. It is also grateful to all organisations who took time to meet its officials during the consultation period in order to discuss in more detail the practical impact of these new requirements on their individual organisations.
75. It's worth clarifying the scope and intention of this consultation. Following Parliamentary debates in 2013, these legislative requirements are part of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act which received royal assent in January 2014. Therefore this consultation sought views on the proposed implementation of these new requirements and to gather further evidence to better quantify their likely impact. This Government's response document has therefore focussed on responding to issues raised relating to the proposed implementation or respond to any concerns raised.
76. The Government will now proceed to implement these new measures to ensure that these will come into effect on 6 April 2015.

# Annex 1:

## List of respondents to the consultation:

Aslef  
Association of School and College Leaders (ASCL)  
Association of Teachers and Lecturers (ATL)  
Broadcasting Entertainment Cinematograph and Theatre Unions (BECTU)  
Birmingham Law Society  
Chartered Society of Physiotherapy (CSP)  
Communication Workers Union (CWU)  
Employment Lawyers Association (ELA)  
FDA  
Fire Officers' Association (FOA)  
GMB  
Hull City Council  
James Reed  
Leeds Building Society Staff Association  
NASUWT  
National Association of Head Teachers (NAHT)  
Nautilus  
Prospect  
Public and Commercial Services Union (PCS)  
Royal College of Nursing (RCN)  
Thompsons Solicitors  
TUC  
Union of Construction, Allied Trades and Technicians (UCATT)  
Universities and Colleges Employers Association (UCEA)  
University College Union (UCU)  
Unison  
Unite





© Crown copyright 2015

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. Visit [www.nationalarchives.gov.uk/doc/open-government-licence](http://www.nationalarchives.gov.uk/doc/open-government-licence), write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

This publication is available from [www.gov.uk/bis](http://www.gov.uk/bis)

Any enquiries regarding this publication should be sent to:

Department for Business, Innovation and Skills  
1 Victoria Street  
London SW1H 0ET  
Tel: 020 7215 5000

If you require this publication in an alternative format, email [enquiries@bis.gsi.gov.uk](mailto:enquiries@bis.gsi.gov.uk), or call 020 7215 5000.

**BIS/15/141**