



Ministry
of Defence

A Review by the Ministry of Defence of the Armed Forces' Pay Review Body

March 2014

TRIENNIAL REVIEW REPORT OF THE ARMED FORCES' PAY REVIEW BODY

Executive Summary

This report records the observations and recommendations that have emerged from the Triennial Review of the Armed Forces' Pay Review Body (AFPRB). The Review has examined evidence both in relation to the continuing need for the AFPRB and its status as a non departmental public body (NDPB) (Stage One) and that the governance arrangements in place are compliant with Cabinet Office guidance (Stage Two).

The Review was conducted by a comprehensive stakeholder engagement exercise that included representatives from Defence, other Government Departments (OGDs) and the House of Commons Defence Select Committee.

The Review concluded that the AFPRB is fit for purpose, delivering relevant and beneficial functions for Defence, in an appropriate governance framework. However, the Review notes that as the management framework for dealing with Service personnel issues within the Department undergoes significant change, the relationship with the AFPRB may also need to evolve over time.

In keeping with other Pay Review Bodies, this report recommends slight amendments to the Appointments process literature. There is also a firming up of the performance monitoring regime recommended to ensure Defence is fully compliant with Cabinet Office governance guidelines. These amendments are minor in nature and do not detract from the overarching message that the AFPRB is a valued, and valuable, asset to Defence.

31 March 2014

Introduction

In its “Guidance on Reviews of Non Departmental Public Bodies” published in June 2011, the Cabinet Office set out the principles and process which departments should follow in conducting reviews of their Non Departmental Public Bodies (NDPBs). Reviews of NDPBs should be carried out no less than triennially, in accordance with Cabinet Office guidelines, and by individuals who are independent of the sponsoring relationship. These reviews have two principal stages and concomitant aims:

Stage One. Provide a robust challenge for the continuing need for individual NDPBs – both their functions and form; and

Stage Two. Review the control and governance arrangements in place to ensure that the public body is complying with recognised principles of good corporate governance.

In relation to the Review of the Armed Forces’ Pay Review Body (AFPRB), the process started with a Ministerial submission to the sponsoring Minister, the Defence Secretary. The submission sought clearance of a draft Written Ministerial Statement (WMS) and letters to the Opposition Defence Spokesmen and the Chairman of the Defence Select Committee announcing the start of the Review.

The WMS announcing the review of the AFPRB was published on 27 February and the process of stakeholder engagement began with contacting those individuals or organisations considered to be stakeholders of the AFPRB’s output. The stakeholders included the House of Commons Defence Committee (HCDC), Defence Ministers, HM Treasury (HMT), the Cabinet Office, the AFPRB, the Office of Manpower Economics (OME) (who provide secretarial support to all pay review bodies), each of the single Services, the Head of Defence Resources, and the Chief of Defence Personnel (CDP). Each stakeholder was invited to answer a series of questions regarding the form, function and governance of the AFPRB dependent on their status and knowledge of the AFPRB. In the event, not all stakeholders chose to contribute to the Review. The question set used by the MOD for this Review is at Annex A. In addition, a generic Control and Governance Assessment form was submitted to the OME who provided a consolidated response in relation to Stage Two on behalf of all Pay Review Bodies.

On receipt of the feedback, the responses were analysed, including recommendations for improvement to either the output or governance of the AFPRB. This report encapsulates that activity and will be subject to Ministerial clearance prior to official publication. The publication of the Review’s report will again be announced in a WMS. The publication of that WMS and the placing of the Review Report in the Parliamentary Libraries marks the end of the Triennial Review process. The Cabinet Office directed that the 2013/2014 Triennial Reviews should be completed by 31 March 2014.

Background

History. The AFPRB was one of three pay review bodies appointed in May 1971 for the purpose of advising Government on the remuneration of certain groups for whom no negotiating machinery is, for one reason or another, available. The AFPRB is an advisory NDPB. It comprises seven members and one Chair who are selected for their personal qualities and experience. Ideally, there is a representative balance of age, experience, gender, ethnicity and location within the UK. Members may come from any walk of life, but since the key element of the Review Body’s work is pay comparability with equivalent jobs in the public and private sectors, it is important that there is a broad balance of skills and experience from both those areas. The Chair and members receive £350 and £300 respectively per day of employment.

Terms of Reference. The AFPRB’s Terms of Reference (TORs) stipulate that the Body is to provide independent advice to the Prime Minister and the Secretary of State for Defence on the

remuneration and charges for members of the Naval, Military and Air Forces of the Crown. In reaching its recommendations, the Review Body is to have regard to the following considerations:

- a. the need to recruit, retain and motivate suitably able and qualified people taking account of the particular circumstances of Service life;
- b. Government policies for improving public services, including the requirement on the Ministry of Defence to meet the output targets for the delivery of departmental services;
- c. the funds available to the Ministry of Defence as set out in the Government's departmental expenditure limits; and,
- d. the Government's inflation target.

The Review Body shall have regard for the need for the pay of the Armed Forces to be broadly comparable with pay levels in civilian life and, in reaching its recommendations, take account of the evidence submitted to it by the Government and others. The Review Body may also consider other specific issues as the occasion arises. Reports and recommendations are submitted jointly to the Defence Secretary and the Prime Minister.

Annual Pay Cycle. Engagement with the AFPRB is through an annual cycle comprising of three key components. First, at the beginning of the annual pay round, which coincides with the start of the financial year, the AFPRB conducts an extensive visit programme to allow the Review Body members to engage with Service men and women. Secondly, this is complemented by written evidence, composed of a range of papers covering issues such as manning levels, remuneration proposals, food and accommodation charges. This evidence is subject to Public Sector Pay Committee (PSPC) and HMT clearance and cannot be submitted to the OME until this clearance has been granted. Thirdly, a series of formal meetings and oral evidence sessions with various senior officials from the MOD, including the Defence Secretary, are held that allow the AFPRB to explore further any issues that members heard on visits or read in the papers of evidence. The annual cycle culminates in the AFPRB submitting its report, the Government accepting or rejecting the recommendations contained therein, and then formal announcement and implementation of those recommendations.

Recruitment. As an advisory NDPB, appointments to the AFPRB are regulated by the Office of the Commissioner for Public Appointments (OCA) and the Cabinet Office. The OCA Code of Practice (April 2012) sets out the regulatory framework for public appointments within the Commissioner's remit. The Code is based on three core principles – merit, openness and fairness – and sets out the essential requirements for meeting those principles. In conjunction with the Code of Practice, the Cabinet Office's Centre for Public Appointments team also provides guidance to Departments on the processes for making and managing public appointments. Regular engagement with the Cabinet Office, HMT and No10 is required to ensure that Departments remain compliant with the OCA code throughout the recruitment campaign.

In terms of execution, Defence Business Services (DBS) fulfil a co-ordinating and supporting role in the conduct of the recruitment campaigns for the MOD. They compile the applications and conduct the initial sift to ensure all applicants have met all of the relevant essential criteria. The long list of applicants is then passed to the sponsoring team within the Department to commence the process of producing a short list and determining those successful candidates deemed appointable at interview by the recruitment panel. Appointment length is usually three years, although there are occasions where individuals can serve subsequent terms, up to a maximum of ten years in any one appointment. Such reappointments are considered on the basis of NDPB composition and the skills sets and performance of the individual under consideration.

Cost Base. The annual Resource Control Total (RCT) for the AFPRB within CDP's budget was £204K for the financial year (FY) 2013/14, although actual spend was only £110K. This includes the fees for AFPRB members, the costs of the production of the annual report, recruitment costs

and any surveys that are not accounted for within the core Defence Statistics budget. The capitation costs for the two-person cell¹ currently responsible for the sponsoring relationship between MOD and the AFPRB are £154K per annum using capitation rates for FY13/14. The cross-secretariat support provided by the OME to all pay review bodies, funded through the Department for Business Innovation and Skills (BIS), means that allocating staffing and administrative costs to each Review Body is not meaningful. It is understood that the overarching support provided by BIS has been subject to separate review. Therefore the total distinguishable cost of the AFPRB to the Government is less than £300K set against the MOD military manpower bill of £8.6BN.

Review – Stage One (Challenge the continuing need for the AFPRB).

Role and functions. The key role of the AFPRB is to provide the Prime Minister and the Defence Secretary with independent advice and critical review of MOD thinking on remuneration and charging policies, in a way that is justified and fully transparent. In the absence of trade union representation, the AFPRB acts as a voice for Service personnel, representing relevant issues as required. In its guidance for the creation of new NDPBs, the Government sets out three tests² against which NDPBs should be judged to evaluate how the functions should be delivered in the future. The functions outlined above meet two of these three tests and therefore it is assessed that remaining as an advisory NDPB is appropriate for the AFPRB. As part of its work, the AFPRB also researches remuneration levels and policies in other public and private sector workforces in order to ensure that the remunerative offer for Service personnel is sufficient to recruit, retain and motivate suitably able and qualified people. The AFPRB also maintains oversight of the totality of the remuneration package for Service personnel to help ensure it is appropriate, effective and efficient, offering best value for money for Defence and the Government. The AFPRB delivers these roles and functions via an annual programme of work culminating in a report that makes recommendations to the Government on Armed Forces pay and charges, based on evidence gathered from across Defence and more widely. In addition, it endorses Financial Incentives and other targeted measures, including doing so, if required, outside the annual cycle. It provides a point of independent reference for high level change programmes, against which the MOD can evaluate its own proposals, for example the New Employment Model (NEM).

Contribution of role/functions to Defence. Stakeholders agreed that it is the AFPRB's independence and the breadth of experience that the Review Body members draw upon, that add real value to their work and thus assist in the delivery of their key functions. The AFPRB's independence assures public and political legitimacy for the MOD in its management of the remuneration of Service personnel, thereby facilitating trust between the Armed Forces and the Department. In turn, this ensures a remuneration policy response that reflects and addresses internal and external market forces, and supports MOD in ensuring sufficient, motivated and capable personnel join and remain with the Armed Forces. The injection of business acumen and experience into MOD human resources considerations ensures a coherent and effective remuneration package that keeps the Defence offer sufficiently competitive. Where that competitiveness appears to be eroding, resulting in an increased outflow of personnel, the AFPRB can help the MOD to introduce targeted measures and ensure that the MOD demonstrates due diligence in the development of such measures. The AFPRB also ensures that Defence considers the wider implications of high level change programmes, such as the NEM, by providing independent, expert and informed challenge that helps to ensure that the programmes are more credible and effective than they would be without AFPRB engagement.

Continuing relevance of role and functions. The absence of a Trade Union mechanism for Service personnel underlines the continuing relevance of the AFPRB, and that all of the functions

¹ 1 x military OF4 (NATO rank structure: Commander/Lieutenant Colonel/Wing Commander and Civil Service equivalent) and 1 x civilian OF3 (NATO rank structure: Lieutenant Commander/Major/Squadron Leader and Civil Service equivalent).

² The "three tests" are: is this a technical function; is this a function which needs to be, and be seen to be, delivered with absolute political impartiality; or is this a function which needs to be delivered independently of Ministers to establish facts and/or figures with integrity.

outlined above remain relevant. Indeed, stakeholders judged the AFPRB's function to be even more important in the context of public sector austerity while there are signs of recovery in the private sector, to ensure that the Armed Forces' overall offer remains competitive. However, the implementation of the new Defence Operating Model within the MOD, with the associated greater delegation to Top Level Budgets (TLB), invites careful consideration of how the AFPRB delivers its functions to ensure that they retain the oversight of the totality of the package that is so critical for its contribution to Defence.

Review - Stage Two (Control and Governance arrangements)

Accountability. Assessed as GREEN³ by stakeholders, the AFPRB is appropriately compliant with this aspect of NDPB governance that includes the publication of an annual report. The OME assures that all Pay Review Bodies are compliant with Data Protection legislation and the Public Records Acts of 1958 and 1967. The Prime Minister appoints the Chair and the Defence Secretary appoints members of the AFPRB. The AFPRB is accountable to the Defence Secretary, as the sponsoring Minister, and it is confirmed that the administration and oversight of appointments is conducted correctly and indeed has been highlighted as best practice both within Defence and among Other Government Departments (OGD).

Role of the Sponsoring Department. With the exception of one item, all components were judged compliant and therefore assessed as GREEN overall by stakeholders. As distinct from the individual performance of the Chair and members, the AFPRB's performance has been subject to discussion by the Defence Board, although it is not a standing agenda item. The AFPRB's TORs are readily available either on the GOV.UK website or in their report and are reviewed as part of the Triennial Review process, as outlined above under Stage One of the Review. In keeping with other Pay Review Bodies, the annual appraisals of the Chair and members are carried out by the Director of the OME and the AFPRB Chair respectively. There is a dedicated sponsor team within the MOD, comprising one military and one civilian official, with responsibility for the mechanics of the annual pay round (the visit programme, funding etc) and the presentation of oral and written evidence. That team is also responsible for maintaining the sponsoring relationship between the Department and the AFPRB. The individuals' TORs reflect those responsibilities.

A formal annual programme of engagement between the MOD and AFPRB is in place that includes oral evidence sessions with CDP, the three single Service Principal Personnel Officers, the Surgeon General, the Chief Executive of the Defence Infrastructure Organisation, the Service Families' Federations, and culminates with the Defence Secretary. These evidence sessions are augmented as required for particular strategic change programmes: for example, in 2013 there were three additional briefings to the AFPRB on the New Employment Model. Briefings are repeated on an ad hoc basis each year to share progress and thinking on change programmes as they develop. Informally, at the OF4 level,⁴ there are weekly meetings as well as routine, daily dialogue with both the OME and the AFPRB. This contact is complemented by monthly/six-weekly meetings at the OF6 level⁵ and quarterly meetings at CDP/AFPRB Chair level. There is also an opportunity for the Defence Secretary and the Chair of the AFPRB to engage informally, should they wish, around the time that the Government's formal Remit to Review Bodies is issued by Chief Secretary to the Treasury (CST) and, subsequently, specifically to the AFPRB by the Defence Secretary.

Role of the Board Members. This aspect of governance was also fully compliant and assessed as GREEN by stakeholders. The MOD maintains a succession plan that safeguards the composition of the AFPRB in terms of diversity,⁶ skills⁷ and experience.⁸ In addition, the MOD has

³ GREEN: Good – requires refinement; AMBER/GREEN: Mixed – some aspects require substantial attention; AMBER/RED: Problematic – some aspects need urgent attention; RED: Highly problematic – requires urgent and decisive action.

⁴ NATO rank structure: Commander/Lieutenant Colonel/Wing Commander and Civil Service equivalent.

⁵ NATO rank structure: Commodore/Brigadier/Air Commodore and Civil Service equivalent.

⁶ Government aspiration is that 50% of all new appointments will be women by 2015.

run successful recruitment campaigns for the AFPRB over a number of years and has confirmed its compliance with OCPA regulations accordingly. The Public Appointments Assessor allocated to the Department for the conduct of the Chair recruitment campaign in 2013 was satisfied that the MOD ran the campaign in accordance with the Commissioner for Public Appointments' Code of Practice for Ministerial Appointments to Public Bodies, and commented so in her final report. The OME run an induction process for new members of the AFPRB and this is complemented by a programme of familiarisation visits to each of the Services.

Role of the Chair. Assessed as GREEN by stakeholders and fully compliant. The TORs for the Chair, a non-executive appointment, recruited to the AFPRB are set out in the Appointments pack that is available during the recruitment campaign. These TORs, issued by the Defence Secretary, incorporate the required activity as set out in the Corporate Governance Arrangements. The annual appraisal of the Chair by the Director of the OME assesses performance against these TORs and includes assessment on whether the AFPRB has operated efficiently and effectively. Additionally, the terms of office and remuneration are set out in the Appointment letter sent by the Defence Secretary to the successful applicant. All Appointments literature is scrutinised by the Cabinet Office to ensure it is compliant with both OCPA regulations and Cabinet Office guidelines. Additional direction is issued by the CST and the Defence Secretary as part of the Remit Letter process. Any discussions regarding the AFPRB's output will be assessed in that context. As part of the TORs, the Chair of the AFPRB conducts annual appraisals of Board members and acts as the Chair of the selection panel for member recruitment campaigns.

Communication and Engagement. With one minor exclusion all aspects are compliant and this is therefore assessed as GREEN by stakeholders. All Pay Review Bodies, including the AFPRB, are named in Schedule 1 of the Freedom of Information Act along with the OME, and they operate in line with the requirements contained therein. The formal annual process includes opportunities for the AFPRB to collect written and oral evidence from the MOD, members of the Armed Forces and more widely. The AFPRB is committed to openness but is careful not to inhibit frank discussion on matters that enable the AFPRB to fulfil its role and functions, and that could potentially erode the trust of Service personnel in the Review Body and its independence. The agendas and minutes of the AFPRB's meetings are therefore not publicly available. However, the AFPRB's annual report, which draws and comments on their extensive evidence base, is published on the OME pages on the GOV.UK website and contains excerpts where relevant to support recommendations. Independent research commissioned by the OME in support of AFPRB deliberations is also made publicly available via the website.

Conduct and Behaviour. Assessed as GREEN by stakeholders and broadly compliant. The AFPRB works to the highest personal and professional standards in accordance with the Code of Conduct issued as part of the Appointment acceptance letter. Where required, the Director of the OME provides advice and guidance on potential conflicts of interest and acceptable activities both as part of the recruitment process and in regard to serving members. The OME scrutinise and approve expenses claims from members of the AFPRB and ensure that the rules and procedures for claiming expenses are adhered to. The posts of Review Body member or Chair are public appointments rather than employment, and thus restrictions on the acceptance of appointments after resignation or retirement are not appropriate. However, AFPRB members must discuss with the Chair any offers of other appointments they receive while serving on the Review Body, or shortly after stepping down, which may raise questions about independence or impartiality.

Recommendations and Conclusions

Despite the GREEN assessment for the Role of the Sponsoring Department, the MOD is not compliant in one minor aspect of governance in that discussion of the AFPRB's overall performance and existence is not a standing agenda item for one of the Department's

⁷ Trade union background with experience of pay negotiations; labour market economists to interpret market evidence; operating HR policies and determining and implementing remuneration systems; understanding of military life and ethos.

⁸ 3-4 members from a business background; 1-2 labour market economists or economists; 1-2 members with a trade union background; and a recently retired former member of the Armed Forces at Director level or higher.

management boards.⁹ Instead, currently, senior MOD boards discuss the overall performance of the AFPRB where required. The Service Personnel Board (SPB), or its replacement, discusses the Command Brief¹⁰ and forthcoming pay round in the early Spring, and to address the non-compliance, stakeholders suggested that this might provide an ideal opportunity to consider the AFPRB's overall performance. Alternatively, a meeting later in the Spring, following the publication and implementation of the AFPRB's annual report, might be more appropriate.

The Department should implement this recommendation to bring it into overall compliance with the recognised principles of good corporate governance for NDPBs, as set out in the Cabinet Office guidance.

Stakeholder feedback proposed minor changes to the Appointments literature better to define political activities and reflect Code of Conduct requirements of new members of the AFPRB as follows:

- a. the Appointments packs should explicitly state that perceived political lobbying is incompatible with Review Body membership and perhaps set out acceptable political activities; and,
- b. reference to the Cabinet Office Code of Conduct be included in the appointment letters in order to form part of the terms and conditions of appointment for AFPRB members.

It is recommended that these amendments should be made to the Appointments literature for the AFPRB, with the exception of listing acceptable political activities, which it is considered would not be effective. The changes will be made in conjunction with Cabinet Office and OME guidance to ensure coherence across the Pay Review Bodies.

Following the introduction of the new Defence Operating Model in 2012, with its greater delegation to TLBs, stakeholder feedback indicated that it would be better if the AFPRB's annual pay review round could be aligned with the Department's annual budgetary cycle, as it would make planning and implementing changes to pay, allowances and charges simpler and easier to prioritise.

The Cabinet Office directs, through the Public Sector Pay Committee, the annual cycle for Pay Review Bodies. Therefore this alignment is likely to be difficult for the MOD to achieve, however, the Department should consider what minor adjustments or workarounds could be employed to bridge the gap between these two fixed cycles.

Stakeholder feedback emphasised the importance of the AFPRB's role during the introduction of NEM and progress towards reaching Future Force 2020 targets. This would include the AFPRB continuing to challenge the MOD's thinking in relation to the overall remuneration package; to help the MOD to understand how the remuneration package and non-remuneration measures can play a part in the recruitment and retention of Service personnel; and, to work with the MOD to ensure that the total remuneration package is effectively and clearly communicated to Service personnel.

Engagement with the other stakeholders suggests that this activity is already happening, but there may be merit in reinforcing to Defence the benefits of these aspects of the AFPRB's function.

The introduction of the new operating model has prompted some stakeholders to consider the continued role of the AFPRB in approving Financial Incentives. A tension potentially exists between the reality of the delegated financial model and the continuing relevance, as set out at Stage One, of the AFPRB's overarching view of the totality of the package offered to Armed Forces

⁹ Defence Board; Armed Forces' Committee; Defence People Board; Service Personnel Board; People Committee.

¹⁰ A formal engagement in the annual calendar between the MOD and AFPRB that marks the start of the evidence gathering process for the forthcoming pay round.

personnel. Nonetheless, the MOD recognises the value in retaining the AFPRB's independent perspective on the remuneration package as a whole.

The Review notes this potential for tension and that it will need to be worked through between the Department and the AFPRB over time.

Finally, stakeholders looked forward to the AFPRB being able to operate fully independently, free from the restrictions set out in the Government's formal Remit to Review Bodies. The concern was that the existence of the restrictions gave the perception that without such direction, the AFPRB would be unable to recognise what was affordable; and, that its independence had been compromised. It recommended that the AFPRB should, at the earliest possible opportunity, have the freedom to return to its stated overall remit and key functions as an independent Review Body, able to take account of the Government's evidence on affordability.

Acknowledging the role of Public Sector pay restraint in the Government's fiscal policy, nonetheless, the Government and Defence Ministers should be mindful of this recommendation when preparing the formal Remit to Review Bodies later this year.

Summary

Stakeholders who provided feedback to the review were content that the AFPRB was fit for purpose, delivering functions which continued to be relevant and beneficial to Defence within an appropriate governance framework. There were two minor recommendations for change to the governance and appointments arrangements. Those aside, the bulk of the recommendations for change looked ahead to how the relationship between the MOD and the AFPRB might need to develop in relation to the evolving landscape of the new Defence Operating Model and the New Employment Model. That will be a continuing debate between stakeholders, but it does not detract from the overarching message of this review, which is that the relationship between the Department and the AFPRB remains sound, and the AFPRB is a valued, and valuable, asset to Defence.

Annex:

A. Stakeholder Engagement Question Set.

AFPRB TRIENNIAL REVIEW QUESTION SET

- **STAGE 1: Challenge to the continuing need for the AFPRB:**
- What do stakeholders understand to be the key functions of the AFPRB?
- How do stakeholders judge that these key function(s) contribute to the core business of the MOD?
- Are all of the functions still needed?
- Are there any changes that could enhance the contribution of the AFPRB to Defence?
- Assessing the function of the AFPRB against three tests of whether an advisory NDPB is the correct model:
 - Is the function provided by the AFPRB a technical function?
 - Is the AFPRB's function one which needs to be, and be seen to be, delivered with absolute political impartiality?
 - Is the AFPRB's function one that needs to be delivered independently of Ministers to establish facts/figures with integrity?
- Can the functions be delivered another way:
 - By the sponsoring Department (MOD)?
 - By a new or existing Executive Agency?
 - By another existing central Government body?
- Is an advisory NDPB the most appropriate and cost-effective model for delivering the functions of the AFPRB?

- **STAGE 2: Control and Governance Arrangements:**
- Does the sponsoring minister (SofS) exercise appropriate scrutiny of the AFPRB?
- Are appointments to the AFPRB made in line with the Code of Practice issued by the Commissioner for Public Appointments?
- Does the SofS meet the AFPRB Chair on a regular basis? (this can vary depending on the nature of the NDPB but must be at least annually)
- Does the AFPRB produce an annual report?
- Is the AFPRB compliant with Data Protection legislation?
- Is the AFPRB compliant with the Public Records Acts 1958 and 1967?
- Are there clear terms of reference for the AFPRB?
- Is there a dedicated sponsor team within the MOD? Is the role of the sponsor team clearly defined?
- Are members of the AFPRB subject to annual performance evaluations?
- Does the Chair carry out effective leadership of the AFPRB and ensure the Body's overall effectiveness?
- Are members of the AFPRB properly independent of the MOD?
- Are members drawn from a wide range of backgrounds and does the AFPRB have an appropriate balance of skills, experience, independence and knowledge?
- Is there a proper induction process for new members of the AFPRB?
- Does the AFPRB operate in line with the statutory requirements and spirit of the Freedom of Information Act 2000?
- Are there robust and effective systems in place to ensure that the AFPRB, and its members, is/are not, and is/are not perceived to be, engaging in political lobbying?
- Is there a Code of Conduct setting out the standards of personal and professional behaviour expected of all members? Does the Code form part of the terms and conditions of employment?
- Are there clear rules in place for the claiming of expenses?
- Are there clear rules in place about the acceptance of appointments or employment after resignation or retirement? Are these rules enforced effectively?

In addition, the OME were sent a blank questionnaire template covering all aspects of Stage Two to which they provided a consolidated response on behalf of all Pay Review Bodies currently under Review.