



BRIEFING PAPER

Number CBP-4919, 4 July 2019

Public sector pensions: GMP-related overpayments

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Summary

In December 2008 the Government announced incorrect payments had been made affecting some 95,000 (or 5 per cent) members of five public service pension schemes. Overpayments amounting to an estimated £126 million had been made over 30 years. A small number of people had been underpaid. The reason was that Guaranteed Minimum Pension (GMP) entitlement had been incorrectly recorded, with the result that the schemes did not apply correct annual increases.

The UK Government decided not to recover money already paid to individuals but to correct ongoing payments from April 2009. This meant that “some pensioners would have their payments reduced and others will see increases in their payments in 2009 which are less than the annual inflation uprating.” Those who had been underpaid the arrears in full, with interest. ([HC Deb, 16 December 2008, c111-2WS](#))

The Scottish Government decided to protect current levels of pension for Scottish local government, police and fire pensioners but was unable to do so for members of the teachers and NHS schemes ([Scotland Government Press Release, ‘Public pension overpayments’, 16 December 2008](#)).

The NAO published the report of its [Review of Errors in Guaranteed Minimum Pension Payments](#) on 16 July 2009. It said that no-one had taken responsibility for overseeing the whole process and that it had therefore broken down in a number of ways:

Despite the complexity of the administrative processes involved and the known history of problems – some of the parties involved raised concerns about the process as far back as the mid 1990s – few checks and controls were in place, which meant that missing information on the Guaranteed Minimum Pension went undetected, in some cases for over 20 years. No one party has taken responsibility for overseeing the whole process, ensuring it runs smoothly and resolving errors. The process therefore broke down in a number of ways.

Further overpayments were identified during another GMP reconciliation exercise conducted following the end of contracting-out in 2016. The Government said that the decision on recovery was one for the relevant government department or local authority, taking into account HM Treasury guidance on [Managing Public Money](#) (July 2013, Annex 4.11) ([PQ 133859, 29 March 2018](#)).

As in 2008, the Scottish Government has decided to allow the overpaid element of the pension to be converted to a pension entitlement from the scheme. It will decide whether all overpayments should be non-recoverable when the full extent is known (SPPA, [Guaranteed Minimum Pension FAQs](#)).

Private sector schemes in which people have accrued GMP rights were also identifying incorrect payments due to the GMP reconciliation exercise.

1. Background

1.1 What is a GMP?

The State Pension for people who reached State Pension age before 6 April 2016 had two tiers - the basic State Pension (which was flat-rate and dependant on individuals' NI record) and the additional State Pension – which was partly earnings-related.

It was possible to contract out of the additional State Pension into an occupational pension scheme that met set criteria. Where an employee was contracted-out, they and their employer paid a reduced rate of National Insurance (NI), to reflect the fact that they were foregoing additional State Pension rights for that period.

Between 1978 and 1997, contracted-out schemes were required to provide a Guaranteed Minimum Pension (GMP). Since 1997, a different test has applied but contracted-out schemes still have to provide a GMP for rights accrued between 1978 and 1997.¹

The option to contract-out having ended for defined contribution pension schemes in April 2012, it was ended for salary-related pension schemes from April 2016 when the new State Pension was introduced.²

1.2 How are GMPs increased annually?

Pension schemes are required to index GMP rights accrued between 1988 and 1997, in line with prices, subject to a 3% cap. The increase required by schemes each year is provided for in a Statutory Instrument – the *Guaranteed Minimum Pension Increase Order*.

There is a link between the GMP and the additional State Pension in that, when a person reaches pensionable age, the total amount of GMP is subtracted from the total amount of additional state pension built up between 1978 and 1997, and any net amount is paid. This is referred to as a 'contracted-out deduction'. It reflects the fact that reduced National Insurance (NI) was paid during the period of contracting out in return for meeting legislative requirements. This calculation is performed each year that the pension is payable.

So, although schemes are not required to provide increases on GMP rights accrued between 1978 and 1988, or in excess of 3% on rights accrued between 1988 and 1997, the additional State Pension built up during that period is subject to increases. When the contracted-out deduction is subtracted, the remaining additional State Pension includes an increase linked to prices. The effect is that, an amount broadly equivalent to the GMP, but which is in fact additional State Pension is subject to an increase.³

For more detail, see

Library Briefing Paper
SN-04956
[Guaranteed Minimum Pension \(GMP\) increases](#) (February 2019)

¹ *Pension Schemes Act 1993*, Part 3; *Social Security Contributions and Benefits Act 1992*, s4

² [The Pensions Act 2007 \(Abolition of Contracting-out for Defined Contribution Pension Schemes\) \(Consequential Amendments\) Regulations 2011 \(SI 2011/1245\)](#); [Pensions Act 2014](#), s24 and Sch 13 See RP 13/37 [Pensions Bill](#) (June 2013), s2.4

³ [HC Deb, 6 January 2014, c51W](#)

1.3 How do public service pensions take account of this?

Public service pensions are increased under powers in the *Pensions (Increase) Act 1971* and the *Social Security Pensions Act 1975* (s59 and 59A). This provides for them to be increased each year by the same percentage as additional pensions (State Earnings Related Pension and State Second Pension) i.e. in line with prices – currently estimated using the Consumer Prices Index.⁴ However, there are arrangements to prevent double pension increase on the GMP element:

11.8 To prevent double pensions increase on the GMP element, section 59(5) of the 1975 Act limited public service pensions increase to the part of the public service scheme pension which exceeds the GMP (which is either in effect uprated by DWP, or, in respect of GMP earned between 6 April 1988 and 5 April 1997, wholly or partly uprated by the scheme under general occupation pensions legislation). Where the Additional State Pension paid by DWP equals or exceeds the GMP element in payment in a public service pension, the GMP entitlement is deducted from the public service pension before any pensions increases are applied at the next annual uprating.⁵

⁴ HM Treasury, [Guidance on the operation of pensions increase legislation for public service pension schemes](#), April 2016

⁵ Ibid

2. Overpayments identified in 2008

In debate on the Queen's speech on 15 December 2008, the then Liberal Democrat Treasury spokesperson Vince Cable said that he had been informed that overpayments had been made to members of public sector pension schemes. He asked for an explanation, details of the numbers involved and the approach the Government intended to take. The then Chancellor of the Exchequer, Alistair Darling, explained that people would not be required to repay money wrongly paid to them but that things would need to be "put right from next year."⁶

A more detailed explanation was provided the following day by the then Chancellor of the Duchy of Lancaster, Liam Byrne. He said that the GMP information for some public service pensioners had not been correctly recorded, with the result that their full pension had been index-linked, rather than the adjusted amount:

Public service pensions are uprated in April each year in line with the Retail Prices Index. The occupational pension scheme pays for all the uprating before state pension is claimed, but thereafter part of the uprating is paid with the state pension, depending on the GMP entitlement.

To enable the correct pension increases to be applied, pension scheme administrators need accurate GMP information derived from the individuals' National Insurance contribution record. Our investigations have revealed that in 95% of cases this information is correctly recorded. But, in some cases it is not. In those cases schemes have paid the annual increase on the full pension each year instead of on an amount adjusted to reflect the GMP entitlement.⁷

Home Office circular 031/2008 gave the following explanation for members of the Police Pension Scheme:

1. In 2008 it became apparent that several public service pension schemes had been overpaying a minority of pensions because of the incorrect indexation of the Guaranteed Minimum Pension (GMP) element. In some cases, the overpayments go back several years.

Why did this happen?

2. Public service pensions are contracted out of the State Second Pension (and SERPS before it). To allow for this, there needs to be a way of ensuring that pensioners will be at least as well off in their occupational schemes as they would have been under S2P/SERPS. Between 1978 and 1997 the way this was done was to require the schemes to provide a Guaranteed Minimum Pension (GMP).

3. Public service pensions are uprated in April each year in line with the RPI. Public servants tend to retire before State Pension age (SPA). The scheme pays for the all the uprating before SPA is

⁶ [HC Deb, 15 December 2008, c856](#)

⁷ [HC Deb, 16 December 2008, c111-2WS](#)

reached but thereafter part of the uprating is paid with the State Pension, depending on the GMP.

4. To enable correct pension increases to be applied when an individual reaches SPA, the scheme or its administrator use GMP information supplied by HMRC. Investigations have revealed that schemes do not always have this information recorded and as a result have, in some cases, been applying a higher uprating than they should have done.

Source of the error and putting it right

5. The precise source of the errors is not always the same for each individual. But the interaction between the State Pension system and occupational pension schemes is particularly complex, with a split responsibility for uprating. Hence it is vulnerable to error unless the procedures for passing information are robust. The process by which pension schemes receive GMP information is complex and is dependent on timely actions being completed by a number of organisations and individuals. The Department for Work and Pensions, HMRC, employers, pensions administrators, pension payroll providers and pension scheme members themselves all need to take action to ensure that schemes receive notification of GMP information at the right time so that they can apply the correct increase to individuals' pensions.

6. It seems clear that the problem has no single cause. Further work is required before we can be confident that the process, from start to finish, is working properly. This will include a review of the process and policy for GMP uprating in public service schemes.

The extent of the problem in the police pension scheme

7. Indications are that the public service pension schemes which are not administered centrally (the Firefighters Pension Scheme, the Local Government Pension Scheme and the Police Pension Scheme) are not affected by this problem to the same extent as the centrally-administered schemes because of the systems which they have in place to check an individual's GMP entitlement. Information provided by police authorities bears this out: many have reported that they have no pensioners who have been overpaid because a GMP record is lacking. However, regardless of the procedures in place it cannot be assumed that there are no problems and police authorities which have not already done will need to carry checks to confirm whether they have any cases of overpayment.⁸

Information was also provided for members of other schemes:

- [Teachers' Pension Scheme](#)
- [NHS Pension Scheme](#)
- [Armed Forces Pension Scheme](#)

And the Pensions Advisory Service provided some information on its [website](#).

⁸ Home Office circular 031/2008; See also NHS Pensions, '[Your Pension Payments leaflet](#)' 16 December 2008

2.1 How did this happen?

The NAO was asked by the Government to conduct “a review of the end-to-end process to pin-point accountabilities.” It found a complex and fragmented administrative process, prone to error. No one party had taken responsibility for overseeing the whole process, ensuring it ran smoothly and resolving errors. It had therefore broken down in a number of ways:

A review by the National Audit Office of overpayments to public service pensioners totalling £90 million has found a complex and fragmented administrative process, prone to error, and for which there is no clear overall responsibility. The process requires effective joint working between the parties involved (the five public service pension schemes, HM Revenue and Customs (HMRC), and the Pension, Disability and Carers Service (PDCS)) but they have failed to achieve this.

The overpayments, and a smaller number of underpayments, have affected over 90,000 retired soldiers, doctors, nurses, teachers and civil servants. The errors occurred because the pension schemes did not have Guaranteed Minimum Pension information recorded for these members, which meant that the schemes did not apply correct annual cost of living increases [...]

Despite the complexity of the administrative processes involved and the known history of problems – some of the parties involved raised concerns about the process as far back as the mid 1990s - few checks and controls were in place, which meant that missing information on the Guaranteed Minimum Pension went undetected, in some cases for over 20 years. No one party has taken responsibility for overseeing the whole process, ensuring it runs smoothly and resolving errors. The process therefore broke down in a number of ways.⁹

2.2 How many people were affected?

The Government’s initial estimate was that 95,000 people across five schemes had been overpaid an estimated £126 million:

...I wish to alert the House to new checks which have uncovered a problem with payments to an estimated 5% of public service pensioners paid, by successive administrations dating back as much as 30 years, by the NHS, Teachers, Armed Forces, Judicial and Civil Service pension schemes, as a result of the incorrect indexation of an element known as the Guaranteed Minimum Pension or GMP...

The five schemes mentioned are administered by central government departments. Scheme administrators and HMRC have now checked more than 2 million pension records.

An estimated 95,000 people are currently affected across the five schemes. This represents around 5% of the total number of pensioners in those schemes. The total amount of overpayments made by successive administrations over the 30 years since 1978 to these pensioners is estimated at £126m. There are separate NHS and teachers schemes in Scotland and Northern Ireland and a separate civil service scheme in Northern Ireland. Separate

⁹ NAO Press Release, 16 July 2009, [Review of errors in Guaranteed Minimum Pension Payments; NAO, Review of Errors in Guaranteed Minimum Pension Payments, July 2009](#)

statements are being made in respect of these schemes by the Scottish and Northern Ireland Executives today.¹⁰

The NAO found that over 90,000 public service pensioners had been affected. 31,208 would receive a lower pension in 2009-10 than in 2008 as a result:

5 At the time of our report, the five pension schemes had identified overpayments totalling some £90 million to 85,509 people, and also a much smaller number of underpayments (Figure 1). The total number of people affected so far represents six per cent of scheme members over state pension age. The schemes are working to resolve some 26,000 further cases, which are not included in these figures, and expect final data to be available by August 2009.

6 The majority of people affected were overpaid and their corrected pensions for 2009-10 are lower than they would have expected. Despite the five per cent annual cost of living increase, 31,208 of the overpaid pensioners are receiving a lower pension in 2009-10 than they did in 2008-09. The smaller number who were underpaid are receiving, in 2009-10, money to which they were entitled in previous years.¹¹

A table on page 5 of the report gave a breakdown by scheme. Its press release said:

The overpayments, and a smaller number of underpayments, have affected over 90,000 retired soldiers, doctors, nurses, teachers and civil servants...

The errors, which affect six per cent of pensions being paid to members over state pension age in the five schemes, occurred over many years. So far, the pension schemes have identified 85,509 individual overpayments totalling £90.2 million, and 4,917 underpayments totalling over £191,000. The pension schemes are still working to resolve more than 26,000 cases and so these figures are likely to rise.¹²

2.3 How did Government respond?

Liam Byrne explained that it was unlikely to be cost effective to recover amounts already overpaid. However, ongoing payments would be corrected from April 2009:

The advice of the Accounting Officers of the five schemes is that it is unlikely to be cost-effective to attempt recovery of these monies from individuals. Correct pension payments will be ordered immediately from April 2009. This means that some pensioners will have their payments reduced and others will see increases in their payments in 2009 which are less than the annual inflation uprating.

Scheme administrators for the five schemes mentioned have written to all those pensioners affected and will write again with full details in the new year. Helplines to respond to their questions and concerns have been set up and advice and guidance has been placed on scheme websites. Support will include advising people

¹⁰ [HC Deb, 16 December 2008, c111-2WS](#)

¹¹ NAO, [Review of errors in Guaranteed Minimum Pension overpayments](#), July 2009

¹² NAO Press Release, 16 July 2009, [Review of errors in Guaranteed Minimum Pension Payments](#)

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to enquire what additional state benefits they may be entitled to.¹³

A small number of people had been underpaid. They would all “receive their pension arrears in full, with interest.”¹⁴

The Scottish Government announced that it would take action to protect current levels of pension for Scottish local government, police and fire pensioners but that it was unable to do this for members of the teachers and NHS schemes:

The UK Government has decided to correct the overpayment from April 2009, and some pensioners will see a fall in their pensions next year as a result.

The Scottish Government has vigorously lobbied UK Ministers to ensure no pensioner loses out as a result of errors that rest with others. However, on December 12, the Treasury refused consent for Scottish Ministers to amend the Scottish NHS and Teachers schemes in order to consolidate overpayments going forward.

Where decisions ultimately rest with Scottish Government – in relation to the Local Government, Police and Fire schemes – we will act to protect current levels of pension, while applying the correct increases going forward. Any past overpayment will be written off.

Helpline for NHS and Teachers’ pensioners 01896 892 463¹⁵

An estimated cost to the Scottish Executive was reported in the *Scotsman*:

Continuing to make the overpayments will cost the Scottish Government £6 million over ten years, which averages out at £600,000 a year. The UK government will also claw back £5 million from the Scottish Government for the overpayments.¹⁶

¹³ [HC Deb, 16 December 2008, c111-2WS](#)

¹⁴ [HC Deb, 25 March 2009, c562W](#)

¹⁵ [Scotland Government Press Release, ‘Public pension overpayments’, 16 December 2008](#); The Scottish Parliament’s decision in SSI 2009/184, SSI 2009/185 and SSI 2009/186

¹⁶ Hamish Macdonell, ‘Public pension overpayments to remain for Scots, says SNP’, 17 December 2008

3. Post April 2016 -GMP reconciliation

The option to contract-out ended for defined benefit (DB) pension schemes from April 2016 when the new State Pension was introduced.¹⁷ To support this, DB schemes have been required to conduct a reconciliation exercise to make sure that members' entitlements resulting from contracted-out employment are protected.¹⁸ This involves checking their data on individual's contracting-out records with that held by HMRC by December 2018.¹⁹

Further overpayments were identified as a result of this exercise. The reasons for this were set out in FAQs from the Scottish Public Pensions Agency (SPPA):

Q6: How will the overpayments have occurred?

A: The annual indexation on a GMP for a scheme pensioner who reached state pension age before April 2016 is paid either by DWP or by a combination of DWP and the occupational scheme. Where a scheme does not hold details of a member's GMP or does hold a GMP but the amount held is incorrect then there will be an error on the annual indexation applied in the first year the GMP is applied which will then be compounded by each and every annual indexation. The reconciliation exercise is expected to identify cases where a GMP is not held where it should be or where the GMP held is incorrect.

Q7: A similar problem happened in 2008 why has this happened again?

A: Attempts were made after 2008 to rectify the processes whereby schemes were notified of both a member's correct GMP entitlement and when they had claimed their State Pension. This involved a co-ordinated approach from the schemes, HMRC and DWP but regrettably due in part to the complexities involved a robust system was not implemented

Q13: This problem has happened before how can you assure me it won't happen in the future?

A: Since April 2016 schemes have been paying the full indexation for those members who reach State Pension Age so there will be no duplication of GMP indexation for these members. The UK government introduced an interim solution to indexation of GMPs post April 2016. It consulted on a permanent solution to be applied from December 2018 and recently announced an extension of the interim policy to April 2021.²⁰

For more detail, see

Library Briefing Paper
CBP-[The new State Pension – background](#)
(August 2016) section 5.8

¹⁷ [The Pensions Act 2007 \(Abolition of Contracting-out for Defined Contribution Pension Schemes\) \(Consequential Amendments\) Regulations 2011 \(SI 2011/1245\); Pensions Act 2014](#), s24 and Sch 13 See RP 13/37 [Pensions Bill](#) (June 2013), s2.4

¹⁸ [The Occupational Pension Schemes \(Schemes that were Contracted-out\) \(No. 2\) Regulations 2015 \(SI 2015/1677\)](#); DWP consultation, [Occupational pension schemes: abolition of defined benefit contracting-out](#) May 2014

¹⁹ [HMRC: pension schemes and reconciliation services](#); DWP, [Occupational Pension Schemes – abolition of defined benefit contracting-out. A consultation on draft Regulations](#), Public consultation, May 2014

²⁰ SPPA, [Q&A: GMP overpayments arising from a scheme's reconciliation exercise](#)

3.1 Approach to under and over-payments

The Government said that decisions on whether and how to recover overpayments would be a matter for the relevant department or local authority, in line with Treasury guidance:

Where a ministerial department is responsible for the appropriate pension scheme, it is for them to determine, in accordance with [Managing Public Money](#) (July 2013, Annex 4.11), whether and how overpayments are to be recovered. If departments determine that it is not feasible to recover overpayments, they will need to bring the resultant losses to parliament's attention. In the case of the local government pension scheme, decisions on whether and how to recover overpayments are matters for the relevant local authority.²¹

An HM Treasury working group recommended that pensioners who had been underpaid should receive arrears in full. Decisions on overpayment recovery should be taken in the context of the overall extent of overpayments:

- Pensioners that have been underpaid should receive their pension arrears in full, with interest in accordance with scheme rules.
- Cases where pensioners have been overpaid should be considered in the context of the overall extent of any overpayments, and a view taken over whether there will be value for money recouping overpayments
- Where discrepancies are small, for example if a service period discrepancy is less than a year, or if the discrepancy in weekly GMP amount is no more than £2, schemes should use the data provided by HMRC in respect of any individuals who have not reached state pension age, or the data held by the scheme in respect of any individuals who have reached state pension age.²²

Civil Service Pensions has decided to correct payments going forward but not to recover overpayments:

Why have we adjusted your pension?

An exercise recently took place across the pension industry to reconcile pension information held by Her Majesty's Revenue & Customs (HMRC).

As a result, we have identified that the information we or HMRC held about your GMP was incorrect. This is because the information held by HMRC or the information supplied to the pension scheme by your employer was incorrect. Due to this, the increases that we have applied to your pension for the annual cost of living (Pensions Increase (PI)) were incorrect [...]

Can I challenge the decision to adjust my pension benefits?

We must ensure that members receive their correct benefit entitlement. As a result, we are unable to reverse this decision. We appreciate that any change to your pension benefits is unwelcome. If you would like free, independent and confidential

²¹ ['Public sector pensioners face cash clawback. FT adviser. 24 April 2018](#)

²² Nottinghamshire County Council, [LGPS GMP reconciliation exercise with HMRC](#), March 2018, para 18

pension advice about this matter, you can contact the Pensions Advisory Service (TPAS).

If I was overpaid because of incorrect GMP data, will I have to repay any money?

If we identified during the GMP rectification exercise that we overpaid you because we held incorrect GMP data for you, you will not need to repay any money.²³

The NHS and Teachers Schemes appear to have taken a similar approach.²⁴

The Scottish Public Pensions Agency has decided that in the schemes for which it is responsible, it will allow any overpayment to be converted to pension entitlement:

Q10: In 2008 the Scottish Government allowed affected LGPS, Police and Firefighter pensioners to retain their pensions at their current rate. Will the same be done for these GMP related overpayments?

A: As in 2008 Scottish Ministers strongly believe that affected pensioners should not be penalised for overpayments received in good faith, relating to a very complex issue where overpayments have been made through no fault of their own. Therefore going forward a similar approach will be taken for affected LGPS, Police and Firefighter pensioners which will allow the overpaid element of their pension to be converted to a pension entitlement from the scheme. A consultation of the regulations allowing this approach was held during 2018.²⁵

A decision on whether all overpayments would be written off would be taken when the reconciliation exercise was complete:

The full extent of any overpayments will not be known until a scheme has completed its reconciliation exercise. At that point the Accountable Officer for the scheme will decide what action is required taking into account all of the circumstances around why the overpayments have been made.²⁶

3.2 Experience in the private sector

Schemes in the private sector in which people have accrued GMP rights are also identifying overpayments due to the GMP reconciliation exercise. An article in *FT adviser* in March 2018 said that: "as many as 43,600 pensioners could have to give back up to £50,000 already received from their company pensions as schemes update their data. Former Pensions Minister, Sir Steve Webb said the problem had arisen "due to data from 30 or 40 years ago coming from an era where it was submitted manually, and keyed in by somebody else." According to the Pensions Administration Standards Association (PASA), 13 per cent of schemes in rectification were recouping the payments. Reasons for not recovering include the fact that people would not have known they

²³ Civil service pensions, [GMP FAQs](#);

²⁴ [Teachers' Pensions Annual Report 2017-18](#), July 2018., page 13; ; [NHS Pension Scheme annual report 2018](#), p35

²⁵ [SPPA, GMP reconciliation and the end of contracting-out](#)

²⁶ Ibid

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were being overpaid and would have spent the money.²⁷ PASA has produced [guidance to support GMP reconciliations](#).

²⁷ [Thousands face demands for pension cash back, FT adviser, 7 March 2018](#)

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