

The All-Party Parliamentary Group Against Antisemitism and the Antisemitism Policy Trust - Memorandum of Understanding

1. Who Are We?

The Antisemitism Policy Trust:

The Antisemitism Policy Trust is a charity with the mission to: “educate and empower parliamentarians, policy makers and opinion formers to address antisemitism”.

To deliver its mission, it:

- Works with British parliamentarians, policy makers and opinion formers to address policy issues relating to antisemitism
- Provides the secretariat to the British All-Party Parliamentary Group Against Antisemitism
- Works internationally with parliamentarians and others to address antisemitism

Core to delivery of the mission, is relationship building across all parties, providing policy advice, providing support for scrutiny of public policy as well as arranging and delivering events in partnership with organisations inside and outside of the Jewish community. The Trust helps to ensure rule compliance for the APPG Against Antisemitism, provides logistical and educational content support for APPG events and visits and helps to manage the Group’s external communication including its reports. The Trust also works internationally on global policy issues, encouraging states to consider appropriate national infrastructure to address antisemitism and engaging with international institutions so that they are better equipped and prepared to address antisemitism.

The All-Party Parliamentary Group Against Antisemitism:

All-Party Parliamentary Groups (APPGs) are formed by members of both Houses of Parliament from across the political spectrum and meet to discuss issues of concern. They are voluntary and receive no parliamentary funding but do have access to parliamentary facilities. The groups have no formal place in the legislature.

The APPG Against Antisemitism’s official purpose is to “combat antisemitism and help develop and seek implementation of effective public policy to combat antisemitism”.

Financial declarations for the Group and details of its members are on the register of All-Party Groups and on the Antisemitism Policy Trust website.

2. Governance

The Antisemitism Policy Trust is governed by a board of trustees which meets on a quarterly basis and to which the staff are held accountable. The Trust has a three year strategic plan and annual work plans agreed in advance, usually at a meeting in December of each year.

The APPG Against Antisemitism is constituted under specific rules for APPGs, administered by the Office of the Parliamentary Commissioner for Standards, which relate to maintaining an entry on the parliamentary register, procedures for admitting members and

electing officers and regulations on the holding of meetings. External persons may only attend the AGM or any other meetings of the group at the discretion of the chair or in the case of the AGM, of attending parliamentarians. Nobody but parliamentarians can determine a work plan for the APPG.

The Trust has provided the secretariat to the APPG for more than 15 years, at the invitation of the APPG. The Trust and APPG together are required to adhere to the rules set out by parliament including registration and disclosure of donor information where relevant. Staff are employed by the Antisemitism Policy Trust, and not by the APPG.

3. Finance

The Antisemitism Policy Trust is financed by charitable donations. The trustees have financial oversight of the charity and agree an annual budget to underpin the three year strategic and annual work plan. The Trust prepares an annual return for the Charity Commission and annual accounts.

The All-Party Parliamentary Group does not have a bank account or any financial structures. It must abide by a set of specific and explicit rules regarding its meetings, transparency and financial record-keeping.

Specifically, any group receiving more than £12,500 from outside Parliament, in money or kind, in its reporting year must:

- Complete an income and expenditure statement, in accordance with specific requirements
- Arrange to have this approved at its AGM
 - Publish the approved statement on the website with 28 days of its approval and within four months of the end of the relevant reporting year
- Publish a closing income and expenditure statement, approved by the officers of the group, within four months of the end of parliament.

All funding and programming decisions for the Antisemitism Policy Trust are taken by its board and/or staff under direction from its board. Requests for the Trust to support APPG activities which have previously not been agreed as part of an annual work plan, will be discussed and agreed by the Trust Board on a case-by-case basis.

4. Programming: Work Plans, Events and Visits

The Antisemitism Policy Trust maintains a strategic plan which is reviewed and renewed on a three-year cycle and contains KPIs. An annual work plan is drafted to ensure timely delivery of the strategic plan

The APPG does not have a formal planning process. Parliamentarians are given update reports at the AGM, where they have a chance to input and suggest ideas, and by agreement with the chair, through e-bulletins sent on a regular basis.

Examples of work carried out by the Trust might include: party conference events, briefing events for policy stakeholders, lobbying work around legislation and speeches given by its staff.

Examples of work carried out by the APPG might include: meetings or briefings for MPs, visits overseas, Ministerial meetings, parliamentary inquiries or other activities.

- Whilst Trust officials might offer views on APPG activity, only parliamentarians can determine the activities of the All-Party Parliamentary Group Against Antisemitism.
- In drawing up its annual work plan, the Trust will consider the objectives of the APPG. The APPG will be invited to comment on the Trusts annual work plan and strategic plans at the discretion of the Board chair.
- The annual work plan will identify whether particular activities are APPG activities, Trust activities or an activity which will be run jointly.
- Requests to support delivery of APPG activities which have previously not been agreed as part of the annual work plan, will be agreed by the Trust Board on a case-by-case basis
- If an APPG member has an idea for the Group which involves a cost, there should be no expectation of funding from the Trust but all ideas will be considered by the board.
- *The Secretary to the APPG Against Antisemitism is answerable to the APPG through its chair. To that end, reasonable requests by the chair for action to fulfil the aims of the APPG and that would not cost more to implement than the stated level of support for the APPG that the Trust provides, should be met so long as there is not a cost to the Trust for any activity falling outside of its aims. Activity falling within the Trusts aims might be funded but will require assessment on a case-by-case basis.
- APPG Activity funded from without the Trust to fulfil APPG aims should be administered by the secretary under the direction of the Group Chair subject to the cost of doing so not being greater than the stated level of support for the APPG from the Trust.

5. Publicity, Communications and Branding

The Antisemitism Policy Trust maintains its own brand identity, issues press releases and offers comment on matters relevant to its strategic plan or core purpose.

The APPG branding is set by parliament and there are strict rules to follow when printing publications, for website publicity and other matters. Parliamentarians by nature of their role are constantly in the public eye, asked for comment on a wide range of issues and are on occasion asked to give statements as a member of the APPG.

- MPs or Peers who are members of the group are of course entitled to give comment on any matter they see fit, although it is courteous to inform the chair first when doing so in the name of the group. The Trust has no say on when MPs comment or what they might say, although advice can and will be offered as appropriate. Parliamentarians cannot provide comment on behalf of the Trust.
- The Trust reserves the right to comment on matters of key relevance and interest without prior consultation with the APPG, although it is courteous and in some cases appropriate to do so. The Trust, including the secretary to the APPG, will not give comment on behalf of the group although may refer to the secretariat role where necessary or appropriate.
- When a matter of interest to both the Trust and APPG becomes public, the Trust will always publicise the potential for contacting MPs of the Group to give comment on its own press releases.
- Priority will be given to APPG press releases, which must always be signed off by the APPG chair, but where timing or circumstance prevents an APPG press release from being distributed a Trust release may go in its stead.
- The Trust will help maintain the APPG social media channels under the direction of the chair. Passwords are to be the property of the APPG chair and posts must relate to the work of the group or its members and must always be cross-party or balanced.
- The Trust maintains an APPG page on its website and this follows the relevant parliamentary rules. Events, publications and others materials linked through that page shall be branded as appropriate on a case-by-case basis but should, as far as is practicable, make clear which activities have been undertaken by the Trust and which by the APPG.
- The Trust does not decide which parliamentarians join the APPG and the secretariat arrangement does not signal the Trust's endorsement or agreement with any particular parliamentarian's position on any matter any more than membership of the APPG signals agreement with a position of the Trust.

The Antisemitism Policy Trust (**APT**) is invited to provide the secretariat to the APPG Against Antisemitism (**APPG**).

To this end, the APT:

- maintains the APPG's internet page on its website;
- hosts a full list of APPG members, officers and supporters in the same space;
- maintains a mailing list of members and in some cases their researchers to communicate details about the group, although such contact might also be made by the APPG chair; and
- maintains a database with contact details of group members.

The APT's position as secretariat is re-confirmed on an annual basis at APPG Annual General Meetings and at inaugural meetings following a general election.

For the duration of a period of secretariat support, the APT will handle personal data for the APPG.

The APPG has the right to withdraw its association with the APT by way of a meeting of the All-Party Parliamentary Group within the rules set out by the House of Commons Commissioner for Standards.

The parties acknowledge that for the purposes of UK data protection legislation, the APPG is the data controller and the APT is the data processor.

The following terms will apply with respect of the processing of personal data:

- 1) The APT will only act on the written instructions of the APPG (unless required by law to act without such instructions);
- 2) The APT will ensure that people processing the data are subject to a duty of confidence;
- 3) The APT will take appropriate measures to ensure the security of processing;
- 4) The APT will only engage sub-processors with the prior consent of the APPG and a written contract;
- 5) The APT will assist the APPG in providing subject access and allowing data subjects to exercise their rights under the GDPR;
- 6) The APT will assist the APPG in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- 7) The APT will delete all personal data as requested at the end of any relationship with the APPG; and
- 8) The APT will submit to audits and inspections, provide the APPG with whatever information it needs to ensure both parties are meeting their Article 28 GDPR obligations, and tell the APPG immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.

The table below sets out the details of the processing of personal data which the APT will carry out on behalf of the APPG:

Scope of the processing	In order to provide the secretariat to the APPG.
Duration of the processing	The personal data will only be processed for the duration of time for which work is carried out on behalf of the APPG.

Nature and purposes of the processing	The collection and processing of personal data on behalf of the APPG for the purposes of providing the secretariat.
Type of Personal Data	Parliamentarian's names, position, political party, email address, phone number and any other publically available information.
Categories of Data Subject	MPs, Peers, Parliamentary Researchers, group members.