

HOLOCAUST MEMORIAL BILL

MEMORIAL

Complaining of non-compliance with the Standing Orders of both Houses of Parliament

TO THE EXAMINERS OF PETITIONS FOR PRIVATE BILLS IN THE HOUSE OF COMMONS AND
THE EXAMINERS OF PETITIONS FOR PRIVATE BILLS IN THE HOUSE OF LORDS

THE MEMORIAL
of
THE THORNEY ISLAND SOCIETY AND
RESIDENTS OF WESTMINSTER

SHEWETH as follows:-

Introductory

1. A Bill (hereinafter referred to as “the Bill”) has been introduced into the House of Commons entitled “A Bill to make provision for expenditure by the Secretary of State and the removal of restrictions in respect of certain land for or in connection with the construction of a Holocaust Memorial and Learning Centre”.
2. The Bill was introduced by the Secretary of State for Levelling Up, Housing and Communities.
3. Your Memorialist The Thorney Island Society (“the Society”) is a local amenity society established in 1985. Its area of interest is ‘old’ Westminster (in the Society’s Constitution called “the old Westminster village”), an historic area which includes Victoria Tower Gardens and the Palace of Westminster. One of the Society’s purposes, as stated in its Constitution, is to “secure the preservation protection development and improvement of features of historic or public interest in the old Westminster village”. In pursuance of this purpose, the Society took an active part in the application for planning permission for the Holocaust Memorial and Learning Centre (“HMLC”) as a Rule 6 party and as an objector, providing witnesses and counsel at the Inquiry and assisting

other parties. Approximately 40% of the Society's members live in the old Westminster village and make use of its open spaces.

4. Your 16 Memorialists listed in the Schedule to this Memorial ("the Residents") are all residents in the area whose homes are only a few minutes' walk from the Victoria Tower Gardens and all of them are members of the Society. The Residents value the Victoria Tower Gardens as an open space, an important green space asset, and regularly use it for recreation. All the Residents also took an active part in the planning process for the HMLC as objectors on their own account.
5. In this Memorial "the Standing Orders" means the Standing Orders (Private Business) of both Houses of Parliament, and the several words and expressions to which meanings are assigned by the Bill have the same respective meanings except where the context otherwise requires. A reference to "HC SO" with a number is a reference to the Standing Order (Private Business) of the House of Commons with that number and a reference to "HL SO" with a number is a reference to the Standing Order of the House of Lords with that number.
6. Your Memorialists respectfully represent that the Standing Orders do apply to the Bill and have not been complied with in respect of the introduction of the Bill in the instances mentioned in this Memorial (amongst others). For the reasons mentioned in this Memorial, your Memorialists submit that the Bill affects their private interests and that it affects their private interests in a manner different from the private interests of others of the same category or class as your Memorialists.

Applicability of the Standing Orders

7. Your Memorialists respectfully submit that the Bill is subject to the Standing Orders and is therefore a hybrid bill, for the reasons set out below.

Hybridity: principles

8. Mr Speaker Hylton-Foster defined a hybrid bill as:

"a public bill which affects a particular private interest in a manner different from the private interest of other persons or bodies of the same category or class" [HC Deb (1962-63) 669, c 45, cited at Erskine May, Parliamentary Practice, paragraph 30.57.

9. In the same paragraph, Erskine May says that a bill has not been regarded as hybrid if all the persons or bodies affected by it, and no others, belong to a category or class germane to the subject-matter of the bill (referring to the Certificate of the Examiners from the Examiners relating to the Aircraft and Shipbuilding Industries Bill and Statement of Reasons therefor) and it is not the practice to treat as hybrid, bills dealing with matters of public policy whereby private rights over large areas or of a whole class are affected.

10. In Chapter 49 of Erskine May (Classification of bills as public, private or hybrid) under the heading “Bills brought in by the Government for local purposes, etc”, Paragraph 42.3 of Erskine May says the following and makes reference to a number of examples in the footnotes:

“A bill brought in by the Government (dealing with Crown property, or with national and other works in different localities, etc.) that affects private interests is introduced as a public bill. It is subsequently treated as a hybrid bill. A hybrid bill has been defined by the Speaker as ‘a public bill which affects a particular private interest in a manner different from the private interest of other persons of the same category or class’.

No bill introduced by the Government and proceeded with as a hybrid bill can be cited as a precedent to show that a subsequent bill is of such a character that it ought to be treated as a public and not as a private bill.”.

11. In a section headed “What is a hybrid bill?” the Cabinet Office’s Guide to Making Legislation (2022) paragraph 41.1 says:

“41.1 A public bill which affects a particular private interest in a manner different from the private interests of other persons or bodies in the same category or class is called a hybrid bill and is subject to a special procedure which includes some of the steps applicable to private bills. This means that it generally takes far longer to complete its parliamentary process than an ordinary public bill, and the procedure is more complex. Such bills are best avoided, if at all possible.”.

12. Paragraph 41.2 of the Cabinet Office document then recites some recent examples of hybrid bills (all railway bills) and then paragraph 41.3 says:

“41.3 “Private interest” is wide enough to cover not only the interests of a purely private person or body (such as an individual or company) but also, for example, the interest a local authority has in the administration of its area. A bill may also be regarded as hybrid if it affects a named geographical area outside London (London is often viewed as a special case) and also affects private interests. A bill that singles out a particular person or body for favourable treatment is not normally regarded as hybrid so long as others in the same category or class are not thereby prejudiced. These are, however, only rough guides to hybridity. If there is a possibility of a bill being regarded as hybrid, it is essential for the matter to be checked with Parliamentary Counsel, who will consult the authorities of both Houses. The ultimate decision on whether a bill is hybrid lies with the House authorities.”.

13. In the underlined sentence in the above passage, your Memorialists consider that the reference to “outside London” can be disregarded in the case of the Bill. It is submitted that this reference is made in respect of Bills which deal with the whole of London, not areas within it. This view is supported by paragraph 42.4 of Erskine May and by precedent, for example the Crystal Palace

Bill [Session 2000-01] and the Festival of Britain (Supplementary Provisions) Act 1949, which is referred to later in this Memorial.

14. In a section headed "The nature of hybridity", *Craies on Legislation* [12th Ed. 2020] says at paragraph 5.4.17 "A useful rule of thumb for acquiring a general flavour for the kind of Bill likely to be hybrid is to consider whether the nature of the Bill is such that it is theoretically likely that there would be a class of person with sufficient private interest in the matters affected by the Bill to wish, and be entitled, to petition against the Bill in the event of their private interests not being properly safeguarded or compensated by the promoters of the Bill".

Bills brought in by the Government for local purposes, etc

15. Your Memorialists submit that the passage from paragraph 42.3 of Erskine May referred to in paragraph 10 above (and supported by the underlined passage in the extract from the Cabinet Office guidance set out in paragraph 12 above) presents the clearest indication that the Bill should be treated as a hybrid bill. Taking each element of the proposition contained in paragraph 42.3 in turn:
 - (a) the Bill has been brought in by the Government;
 - (b) the Bill deals with Crown property; and
 - (c) the Bill affects private interests.
16. Neither (a) nor (b) above can be disputed, so the issue at hand is whether the Bill affects private interests.
17. In paragraph 5.4 of their submissions, the Secretary of State alleges:

"In any event, as all the definitions of hybridity above contemplate, a bill is not hybrid simply because it impacts private (or local) interests. The key factor is whether, where such interests are impacted, a particular person (or body of persons) is impacted differently from other persons or bodies in the same class."
18. Your Memorialists disagree with the proposition made by the Secretary of State if it is intended (as seems to be the case) to mean that a Bill can never be hybrid unless the interests of persons or bodies are impacted differently from other persons or bodies in the same class. In particular, that "key factor" does not apply, in your Memorialists' submission, in the case of bills of the type contemplated in paragraph 42.3 of Erskine May. Your Memorialists submit that in the case where the Bill is of local application, the test is not whether private interests are affected differently from others, but whether they are affected at all.
19. The Secretary of State refers to a number of examples to support their proposition. But these are clearly different from the Bill. They include Bills which provided for the nationalisation of

industries, and which contained lists of specific companies who were to be treated in certain ways under them. Tellingly, the passage quoted from the Speaker's comments on the Education Reform Bill in paragraph 5.7 of the Secretary of State's submissions includes this (underlining for emphasis):

"I have to look at the terms of the Bill. Provided that the formula or description used in the Bill deals with a category or class which is relevant to the purposes of the Bill and the Bill does not expressly specify or single out an individual or corporation within the category for different treatment, the Bill is not hybrid."

20. The proviso underlined above is not satisfied in the case of the Bill – the Bill does not use any formula or description to deal with any category or class. It simply lifts a restriction over an area of land. The fact that the proviso is not satisfied in the case of the Bill means that the test of whether people or bodies are treated differently from others in the same class is not relevant.
21. If your Memorialists are correct in saying that all that needs to be shown is that private interests are affected by the Bill, then the next question is whether any such interests are so affected.
22. The Secretary of State contends (paragraph 5.17) that "the rights [by which it is assumed they mean interests] protected by sections 8(1) and (8) of the 1900 Act for members of the public to use Victoria Tower Gardens as a public garden cannot, by any reasonable interpretation, be described as 'private rights' [private interests] – they are much too general in nature for that". Your Memorialists disagree with that proposition for the following reasons.
23. First, your Memorialists refer to the passage from the Cabinet Office guidance set out in paragraph 12 above, where it says "Private interest" is wide enough to cover not only the interests of a purely private person or body (such as an individual or company) but also, for example, the interest a local authority has in the administration of its area. Also, the Secretary of State appears to concede (and the precedents bear it out) that "private interests" can include local interests (see paragraphs 5.2 to 5.4 of the submissions made on behalf of the Secretary of State).
24. Dealing first with local authorities, both Westminster City Council and the Greater London Authority have interests in the administration of the parts of their respective areas which are affected by the Bill. Not least, both are planning authorities, but they also have other more general important functions relevant to the Bill which relate to the health and well-being of their residents – including the Residents. These interests are unquestionably affected by the Bill because of the proposed removal of the restriction on the use of Victoria Tower Gardens. In your Memorialists' submission, this point alone is enough to demonstrate that the Bill should be treated as a hybrid bill.
25. Secondly, the Society also has private interests that are affected by the Bill. In support of this contention, they refer back to the passage in *Craies* which is set out in paragraph 14 above and,

using the words from that passage, submit that the nature of the Bill is such that it is more than theoretically likely that the Society falls within a class of person with sufficient private interest in the matters affected by the Bill to wish, and be entitled, to petition against the Bill in the event of their private interests not being properly safeguarded or compensated by the promoters of the Bill.

26. The words above have been underlined because, in their submission, the Society would be entitled to petition against this Bill if it were to proceed as a hybrid bill. This is because the class of person in which it falls is the class of society, association or other body representing amenity or recreational (among other) interests mentioned in HC SO 95(2) [HL SO 117(2)]. Had Parliament not considered that the interests of an amenity society could be a “private interest” (in this case in the category of “local interest”) then it would not have made those standing orders. Because of those standing orders, amenity societies and other organisations have petitioned against numerous private and hybrid Bills which deal with specific public open spaces, in order to protect their local interests.
27. Finally, in support of their submissions in relation to this point, your Memorialists refer to the examples that are cited in the footnotes to paragraph 42.3 of Erskine May. In particular, reference is made to the Festival of Britain (Supplementary Provisions) Bill 1948–49, which was treated as a hybrid Bill. That Bill is comparable to the Bill in that it authorised the carrying out of activities in a public park in London (Battersea Park) and suspended the rights of the public to use it as a public open space. It is important to note that the Festival of Britain Bill did not provide for the compulsory acquisition of any person or body’s interests or otherwise specifically interfere with any person’s property rights other than those of the persons to whom functions were given under the Bill (London County Council, the Port of London Authority and the Minister). And most importantly, it does not appear that the Festival of Britain Bill treated the private interests of any particular body differently from any other body in any class, yet the Bill was considered to be hybrid. The simple point is that in cases of local application, the test is whether private interests are affected, and they clearly are in the case of the Bill.

Public Policy

28. Without prejudice to your Memorialists’ contention above that the Bill is hybrid because it is a bill brought in by the Government dealing with Crown property that affects private interests, your Memorialists make the following submissions in response to the assertion made in paragraphs 5.20 and 5.21 of the Secretary of State’s submissions that the Bill implements public policy where a whole class is affected, and therefore should not be treated as hybrid.
29. The first question to be addressed under this heading is whether the Bill implements public policy at all. If it does not, then in your Memorialists’ submission, it must be treated as hybrid.

30. Your Memorialists accept that it is government policy to support the implementation of the HMLC in Victoria Tower Gardens. However, the fact that a policy may be government policy does not, in your Memorialists' submission mean that it is public policy for the purposes of deciding whether a Bill is hybrid.
31. In your Memorialists' submission, the Bill has been drafted in in such a way that it might lead the reader to conclude that it implements or deals with public policy, when in reality it does not. Clause 1 would provide for the Secretary of State to incur expenditure in relation to the construction, use, maintenance, improvement or operation of a new national Holocaust Memorial and Learning Centre. There is no need for this provision. Government expenditure on this project could be authorised through the usual ways and means procedures in Parliament. Had the High Court not quashed the planning permission for the HMLC, it is inconceivable that a single purpose Bill would have been required to authorise expenditure on the HMLC. Clause 1 is only in the Bill, in your Memorialists' submission, to provide a hook on which to hang an argument that the Bill is a matter of public policy. Without it, the only substantive provision of the Bill would be clause 2, which lifts the restrictions on the use of Victoria Tower Gardens. In that form, your Memorialists submit that the Bill would amount, to an even greater extent than it already does, to a local measure, not a Bill dealing with public policy.
32. In your Memorialists' submission, the Bill is not concerned with public policy of the sort that are cited as examples in *Erskine May*. It is, in essence, a local measure, dealing with a local issue that has arisen because an important local Act prevents the government from implementing a manifesto commitment in a particular local area.
33. Even if the Bill were considered to be a matter of public policy, it does not follow that it "cannot be hybrid" as is suggested by the Secretary of State in paragraph 5.21 of their submissions.
34. First, your Memorialists submit that the public policy test does not "trump" the test relating to government bills brought in for local purposes, which requires an assessment of whether private interests are affected (see paragraphs 15 to 27 above).
35. Secondly, as the Secretary of State's submissions say in paragraph 5.19, the public policy test has a second limb to it – in general, it is not the practice to treat a bill implementing public policy as hybrid "whereby private rights over large areas or of a whole class are affected". Your Memorialists do not consider that private rights over large areas (for obvious reasons) or of a whole class are affected in this case. The private rights and interests that are affected in this case include the rights of your Memorialists and of others, particularly the local authorities. Your Memorialists again cite the example of the Festival of Britain (Supplementary Provisions) Bill 1948–49. If one assumes that Bill was considered to have implemented a matter of public policy, it was still treated as a hybrid Bill, presumably on the basis that it affected private interests in similar ways to those which are affected by the Bill.

Classes affected by the Bill

36. The following paragraphs are without prejudice to the submissions of your Memorialists set out above. They deal with what your Memorialists consider to be the separate test of whether your Memorialists have interests which are affected differently from the way the interests of others are affected in the same class. The Secretary of State appears to be saying that the only class (apart from the Secretary of State themselves) affected by the Bill is the general public (see paragraph 5.13 of the submissions).

The Society

37. The Society acknowledges that it is not named in the Bill or in the London County Council (Improvements) Act 1900 ("the 1900 Act"). However, it does allege that it is affected by the Bill in a different way from others in the same class as the Society, and that the class is a class which is germane to the subject matter of the Bill. The Society submits that the class in which it falls is the class of society, association or other body which is capable of representing amenity or recreational (among other) interests mentioned in HC SO 95(2) [HL SO 117(2)].
38. That Standing Order is mentioned specifically because it encapsulates a long-standing principle that as respects private and hybrid Bills, local amenity societies like the Society have traditionally been allowed standing when it comes to petitioning against such Bills. In the Society's respectful submission, this status cannot be disregarded when considering whether the Society's interests are affected by the Bill and defining the class within which it sits.
39. The class of societies described above is clearly germane to the subject matter of the Bill, because the effect of clause 2 of the Bill will be to disapply the restrictions imposed by the 1900 Act which require Victoria Tower Gardens to be laid out and maintained for use as a garden open to the public (section 8(1)) and require the Secretary of State to maintain the gardens so laid out (section 8(8)).
40. The Society's interests are affected by the Bill in a different way from other amenity societies in the same class simply because Victoria Tower Gardens is within the relatively small area in which it has an interest.

The Residents

41. The Residents acknowledge that none of them (or any specified class of them) is named in the Bill or in the 1900 Act. However, they allege that they are affected by the Bill in a different way from others in the same class, and that the class is a class which is germane to the subject matter

of the Bill. The Society submits that the class in which it falls is the general public. The Secretary of State's submissions also appear to contend that if any class is affected by the Bill, then it is the general public (paragraph 5.13 of the submissions).

42. The class of the general public is germane to the subject matter of the Bill, because the effect of clause 2 of the Bill will be to disapply the restrictions imposed by the London County Council (Improvements) Act 1900 which require Victoria Tower Gardens to be laid out and maintained for use as a garden open to the public (section 8(1)) and require the Secretary of State to maintain the gardens so laid out (section 8(8)).
43. The Residents' interests are affected by the Bill in a different way from other members of the general public because they all live so closely to Victoria Tower Gardens and naturally make use of the gardens more frequently than the majority of members of the public at large.

The local authorities

44. Your Memorialists acknowledge that neither Westminster City Council nor the Greater London Authority is named in the Bill although Westminster City Council was mentioned in the 1900 Act. However, they do allege that those local authorities are affected by the Bill in a different way from others in the same class as those authorities, and that the class is a class which is germane to the subject matter of the Bill. Your Memorialists submit that the class in which the two local authorities fall is the class of local authorities generally and which are capable of being a local authority of any area the whole or any part of which is injuriously affected by a bill or any provisions thereof mentioned in HC SO 96 [HL SO 118].
45. That Standing Order is mentioned specifically because it encapsulates a long-standing principle that as respects private and hybrid Bills, local authorities have traditionally been allowed standing when it comes to petitioning against such Bills where their areas are affected. In your Memorialists' respectful submission, this status cannot be disregarded when considering whether the two local authorities' interests are affected by the Bill and defining the class within which it sits.
46. The class of local authorities described above is clearly germane to the subject matter of the Bill, because the effect of clause 2 of the Bill will be to disapply the restrictions imposed by the 1900 Act which require Victoria Tower Gardens to be laid out and maintained for use as a garden open to the public (section 8(1)) and require the Secretary of State to maintain the gardens so laid out (section 8(8)). The effect of the Bill is clearly relevant to the local authorities, who exercise important functions relating to planning and more widely to the well-being of their residents.
47. The two local authorities' interests are affected by the Bill in a different way from other local authorities in the same class because Victoria Gardens is within the area in which they exercise their functions.

48. In addition, both local authorities which had an interest in Victoria Tower Gardens at the time the 1900 Act was passed played a direct role in its implementation. Westminster City Council and the London County Council both contributed financially towards the creation of the Gardens and the London County Council promoted the private Bill which became the 1900 Act.

Compliance with Standing Orders

49. HC SO 4 [HL SO 4] ((Contents of Notice) requires that whenever an application is intended to be made to bring in a private bill a notice shall be published in newspapers as provided in Standing Order 10 (Publication of notice in newspapers), and that the notice so published shall contain a concise summary of the purposes of the bill, without detailed particulars and without any reference to provisions of an ancillary, subsidiary or consequential nature intended to give effect to any such purpose. Where a bill is not promoted by a local authority, as is the case with the Bill, the notice must be published, in a newspaper or newspapers circulating in the area of the (in this case) London borough in which the promoter's principal office is situated, once in each of two consecutive weeks with an interval of at least six clear days between publications, the second publication being not later than 11th December.

Your Memorialists respectfully submit that no such notice has been published in respect of the Bill even outside the time limits provided by Standing Order 10.

50. HC SO 4A [HL SO 4A] (copies of bill to be made available) requires that the promoters shall on and after 4th December make available for inspection, and for sale at a reasonable price, copies of the bill at an office in London and also where a bill is not promoted by a local authority, as is the case with the Bill, at an office in the (in this case) London borough in which the promoter's principal office is situated.

Your Memorialists respectfully submit that copies of the Bill were not so made available for inspection and for sale on 4th December, and that the Standing Order has therefore not been complied with. Further, your Memorialists allege that copies of the Bill are not so available for inspection and for sale at an office in the requisite London borough, as required by the Standing Order.

51. HC SO 11 [HL SO 11] (Publication of notice in the Gazette) requires that not later than 11th December there shall be published once in the London Gazette a short notice stating:

- (a) the short title of the bill;
- (b) the time within which objection may be made by deposit of a petition in the office of the Clerk of the Parliaments or the Private Bill Office of the House of Commons and that information regarding the deposit of such petitions may be obtained from either of those offices or from the agents for the promoters;

- (c) The offices at which copies of the bill may be inspected and obtained mentioned in the full notice.

Your Memorialists respectfully submit that no such notice was published in the London Gazette even outside the time limits provided by Standing Order 11.

52. HC SO 13 [HL SO 13] (Notice to owners, etc.) requires that on or before 5th December in the case of a Bill whereby it is proposed to authorise the compulsory acquisition of land or of rights to use land, notice in writing of the proposal shall be given to the owner, lessee, and occupier of each parcel of land or house affected, in the form, as nearly as maybe, set forth in Appendix A to the Standing Orders unless, in the case of an owner or lessee, his identity cannot after reasonable inquiry be ascertained.

Your Memorialists respectfully allege that the effect of the Bill amounts to the compulsory acquisition of rights to use the land within the scope of clause 2 of the Bill. That land forms part of the Victoria Tower Gardens, which is used as a public park and owned by the Department of Culture Media & Sport in trust for the nation. The provisions that clause 2 of the Bill would remove the use of part of the land as that of a garden open to the public and restrict the use of most of the land. The effect of the Bill would be to enable the use of the land for the purposes of the HMLC, substantively an acquisition of rights. Your Memorialists submit that it is to be implied from the conduct of the Bill's introduction that notice has not been given, as required by Standing Order 13, in the manner required by HC SO 22 [HL SO 22] (mode of giving notice), and that the Secretary of State should be put to strict proof in this regard.

53. HC SO 38 [HL SO 38] (deposit of copies of bill in Vote Office and Private Bill Office) requires that printed copies of every bill for which a petition has been presented shall, on or before 27th November, be delivered at the Vote Office for the use of any Member of the House and in the Private Bill Office for the use of any agent who may apply for the same. It further requires that there shall be attached to every copy of a bill delivered under this Standing Order, deposited, delivered or sent under any of the Standing Orders following this Order, or made available for inspection and sale under Standing Order 4A (copies of bill to be made available), a printed memorandum describing the bill generally and subject to paragraph (3) of the Standing Order, every clause in the bill.

Your Memorialists respectfully submit that printed copies of the Bill were not delivered at the Vote Office and in the Private Bill Office on or before 27th November and that a printed memorandum describing the Bill generally, as required by the Standing Order, is not attached to every copy of the Bill.

54. HC SO 39 [HL SO 39] (deposit of copies of Bills at Treasury and other public departments, etc.) requires that on or before 4th December, printed copies of the bill, in the numbers required by Standing Order, shall be deposited at various Government Departments.

Your Memorialists respectfully submit that, as the bill was not printed until the day that it was introduced, Standing Order 39 cannot have been complied with.

55. Your Memorialists submit that the most serious consequence of the failure to comply with the Standing Orders mentioned in this Memorial is that those having an interest in the Bill, including the council tax payers in the City of Westminster, as well as your Memorialists, have not been alerted to the important provisions contained in the Bill, nor to the fact that they will have an opportunity of petitioning against the Bill in Parliament.

YOUR MEMORIALISTS therefore request that they may be heard by themselves, their Agents and witnesses in support of the allegations contained in this Memorial.

Sharpe Pritchard LLP

Agents for the Thorney Island Society and residents of Westminster

SCHEDULE

The Residents

	Name	Address
1.	Clare Annamalai	
2.	Mark Chambers	
3.	Jonathan Fry	
4.	Nina Grunfeld	
5.	Andrew Jones	
6.	Alan Leibowitz	
7.	Margaret Lister	
8.	Lucy Peck	
9.	Richard Pyatt	
10.	Eugene Searle	
11.	Nigel Stoughton	
12.	Karel Tripp	
13.	Barbara Waine	
14.	Barbara Weiss	
15.	Diana Wethered	
16.	Henry Wickham	

IN PARLIAMENT
SESSION 2022-23

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MEMORIAL

of

THE THORNEY ISLAND SOCIETY
AND
RESIDENTS OF WESTMINSTER

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