

Annual Report
Independent Complaints and Grievance Scheme

July 2018 – June 2019

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INTRODUCTION

"The new Scheme represents a strong foundation from which to promote better behaviour and improve the culture of Parliament. We say a strong foundation as we believe that achieving positive change will require persistence, flexibility and the on-going evaluation of the impact of the measures outlined in this report"¹

ICGP delivery report, July 2018

This first Annual Report of the Independent Complaints and Grievance Scheme (ICGS) is part of the on-going evaluation of Parliament's new and ambitious approach to improving its workplace culture. In its first year of existence, the ICGS has been reviewed in depth by Alison Stanley², and considered as part of the reports by Dame Laura Cox QC³, Gemma White QC⁴ and Naomi Ellenbogen QC⁵. These reviews, and our experience of running it, have identified its flaws but also its opportunities to have a lasting impact on the working lives of the parliamentary community. Although conscious of the things that need to change, I am heartened by the positive comments that we have received from users of the Scheme. Being on the receiving end of unacceptable behaviour is corrosive and undermining, and if the work we have done has brought resolution for just one person, then all that work has been worthwhile.

This Annual Report provides an overview of what we have learnt, based on actual cases and contacts, and is intended to help those responsible for workplace culture across Parliament in their ongoing efforts to make things better. It is important to be careful in drawing hard and fast conclusions from the first-year experience of any new initiative, and we have had to be particularly careful to ensure that our reporting of usage and emerging themes could not be used to identify individuals. As the data grows, the risk of losing anonymity lessens and the value of the lessons we are able to learn increases. This first report should therefore be seen as a start, and the team are keen to receive your feedback on what else would be useful for it to collect and report upon.

A new bicameral team will shortly be completing the transition of the Scheme to business as usual and I wish them well. Finally, I am grateful to all those who have worked so hard and been so candid and patient as we have developed and introduced such ambitious changes to the way we relate to each other as members of the parliamentary community.

Lee Bridges

Senior Responsible Owner - ICGS

¹ [ICGP Delivery Report](#)

² [Alison Stanley 6 month review](#)

³ [Dame Laura Cox QC report](#)

⁴ [Gemma White QC report](#)

⁵ [Naomi Ellenbogen QC report](#)

IMPLEMENTATION OF THE ICGS

Implementing the ICGS involved breaking new ground in responding to a range of issues and challenges. The implementation was fast-paced with the need to adapt promptly to changing requirements, being mindful of the wide range of interests both within and outside Parliament. A particularly challenging element to implement was the requirement to provide an additional personal support facility in relation to sexual misconduct through trained Independent Sexual Violence Advisers. This differed significantly to the more advice focussed Bullying & Harassment Helpline. Maintaining confidentiality has been a key driver in developing processes and we are pleased this has proved to be effective.

This initiative commenced in July 2018, by covering the House of Commons, Parliamentary Digital Service (PDS) and third party passholders. House of Lords Administration staff came in scope in November 2018 with Members of the House of Lords and their staff in May 2019 being included in the Scheme (with some Lords specific changes to reflect differing standards arrangements).

It is through the active support of cross-party and cross-Parliament leadership and management that we have been able to achieve as much as we have, to date.

THE HELPLINES – USAGE AND STATISTICS

Limited management information has been collated from the start of the scheme, with [statistics](#) published on a quarterly basis. This information has been continually monitored to improve services over the first year.

As anticipated, both Helplines have been a source of information and support, as well as the mechanism for making complaints. Those making use of the Helplines have included people who have been complained about, managers and colleagues who want advice on supporting someone else, and representative bodies such as Trade Unions.

The Helplines reported that the majority of individuals who contacted them for the first time did not want to escalate to formal procedures immediately, but rather use it as an opportunity to talk about their experiences in a safe, confidential environment and to obtain information.

Volume of calls

The Bullying and Harassment Helpline is supporting significantly higher volumes of callers than was originally anticipated. Before the launch of the Scheme, it was envisaged that there would be around 200 calls per year, based on statistics from similar organisations. In fact, there have been 704 contacts in the first 12 months. Many of the calls have been complex, with some callers providing a large amount of unsolicited information. This has resulted in a higher volume of work and a more varied level of contact than expected at the start of the contract.

Statistics

The ICGS Helplines have been operating for a year and we have been provided with statistics on the number of contacts, the number of unique callers, limited information on the location of where incidents have taken place and the number of investigations started, concluded and resulting outcomes.

The ICGS team publishes quarterly statistics on the contacts made to the Helplines and the number of investigations started in the relevant quarter. These are available on [Parliament's website](#). Concern over identifying individuals recedes as more data is collected and future reports will therefore be able to provide more granular information. However, maintaining confidentiality is an over-riding factor.

As well as the quarterly statistical publications, it is also intended to provide more detailed analysis at the half-year mark (the first being April 2020), detailing themes and trends as well as an overview of Helpline data. The next Annual Report will be published in October 2020.

From 6 November 2018, House of Lords Administration staff were able to access the ICGS and, from 1 May 2019, complaints against members of the House of Lords or their staff were also included in the scheme. The data for the first year of operation of the scheme come with significant caveats. For example, House of Lords' staff joined the scheme five months into the reporting year and House of

Lords' Members and Members' staff are only captured in the data for the final month covered by this Report. The statistics therefore do not reflect a consistent user group across the period, but rather an increase in the members of the parliamentary community able to use the ICGS.

The following data is from 19 July 2018 – 30 June 2019

Table 1

Unique contacts/calls made to ISMA and the Bullying and Harassment Helpline

| Total number of contacts/calls and unique callers to the Helplines | Independent Sexual Misconduct Advisory Service (ISMA) | Bullying and Harassment Helpline |
|---|--|---|
| Contacts/calls | 79 | 704 |
| Unique (individual) callers | 52 | 233 |

Table 2

Unique callers by user group to the ISMA and the Bullying and Harassment Helplines

| | |
|--|------------|
| Staff of the House of Commons, House of Lords (from November 2018 onwards) and the Parliamentary Digital Service | 125 |
| MPs staff (including interns) | 60 |
| Undisclosed | 54 |
| Others (contractors, visitors etc.) | 31 |
| MPs | 8 |
| Members of the House of Lords (from May 2019 onwards) | 5 or fewer |
| Staff of Members of the House of Lords (from May 2019 onwards) | 5 or fewer |

ISMA Helpline

Sexual misconduct cannot always be identified as a single event. It may include various different actions over a period of time. It may not be explicit or obvious but may be a continual pattern of inappropriate behaviour. Thirty-seven callers cited sexualised bullying and harassment as to the reason for contacting the Helpline.

Bullying and Harassment Helpline

The majority of individuals calling the Helpline cited bullying or bullying and harassment as the main incident. A very small number stated harassment only as the main incident.

Demographics

A substantial number of callers to both Helplines were unwilling to share their personal information. Some wanted to keep their anonymity and some thought that the Helplines might not be independent. The Helplines have confirmed that this unwillingness to give personal information is consistent with other organisations for whom they provide services. The Helplines do not require this information to help callers.

Location of incidents

The location of where a bullying or harassment incident took place is recorded for unique calls and only when it is mentioned by the caller. Where this has been mentioned, most cases have occurred on the parliamentary estate. This may reflect where the majority of incidents occur, given the fact that the majority of the parliamentary community work on the Parliamentary Estate. People using the helplines have commented on seeing posters on the Estate and information in the toilets and this visibility is proving to be a positive way of promoting greater engagement with the scheme within the Parliamentary Estate.

Table 3

Location of incidents reported to the ISMA Helpline and the Bullying and Harassment Helpline

| *Location (where provided by caller) | Number of incidents |
|---|----------------------------|
| Parliamentary Estate | 144 |
| Email/written | 22 |
| Constituency | 26 |
| Telephone | 16 |
| Elsewhere in the UK | 14 |
| Overseas | 5 or fewer |

*Callers do not have to provide the location of an incident when they call the Helplines. Therefore, the figures in Table 3 do not represent the total number of contacts/calls made (Table 1) or unique callers (Table 2).

INFORMATION FROM COMPLAINT INVESTIGATIONS

During the first year of the scheme, 34 individual complaints have been taken forward for independent investigation.

In many cases, complainants have brought allegations against more than one respondent, so this figure does not truly reflect the number of people who have been investigated under the scheme. A number of complaints did not meet the eligibility criteria of the scheme, which at the start of the Scheme, required that the alleged incidents must have taken place since June 2017 and that the individual making the complaint must have been a member of the parliamentary community at the time of bringing the complaint (with the exception of complaints under the House of Lords' Codes of Conduct).

From October 2019, the scheme was extended in the Commons to include former members of the parliamentary community and for complaints that occurred prior to June 2017.

The scheme allows for collective complaints, whereby a number of people can raise an individual complaint against the same respondent. The processes are in place for managing complaints of this nature, but none was progressed during the first year. One was opened, but the complainants chose to be witnesses to the lead complainant, rather than raising their own individual complaint.

Table 4

Complaints investigated by the Investigation Service – complaints referred by either ISMA or the Bullying and Harassment Helpline

| | |
|--|------------|
| Complaints Received from the Helpline (19 July 2018 to 30 June 2019) | 34 |
| Complaint withdrawn by the complainant before the initial assessment completed | 5 or fewer |
| Initial Assessment completed | 31 |
| Ineligible after initial assessment completed | 7 |
| Informal resolution agreed after the initial assessment | 5 or fewer |
| Full Assessment Completed | 17 |
| Not upheld after formal assessment completed | 10 |
| Upheld after formal assessment completed | 7 |

Reasons for complaints not being taken forward

In addition to the cases that were ineligible, a small number of cases were not completed because the complainants decided to withdraw from the process before the initial assessment was completed. In some cases, the complainant decided not to engage with the process after the initial contact.

Length of investigations

The length of investigations has varied from four months to ten months. The investigations have, at times, taken longer than we would wish. Some reasons for this include: the agreeing of interview notes with the relevant people; complainants and/or respondents submitting supplementary evidence—some of which has been extensive—at various stages of the investigations; ill-health; and the availability of respondents and witnesses, especially during recesses.

The Investigation Liaison Lead monitors progress of complaints and ensures that procedures are followed at all stages, but cannot and must not interfere with the independent investigation process.

It is clear that some of the cases are taking far too long to conclude and a number of changes will be implemented to speed up proceedings. These include the removal of the initial assessment stage as recommended by Alison Stanley in her six-month review of the ICGS; imposition of strict deadlines for complainants and respondents to confirm meeting notes/submit evidence; and closer monitoring of timescales. It is imperative that the independence of investigations is not compromised by efforts to speed up investigations, but the actions above can be implemented without affecting this independence.

Outcomes

When an ICGS investigation has been completed and the complaint has been upheld, the following procedures are followed/have been followed:

- In upheld complaints where the respondents are employed by the House of Commons, the Parliamentary Digital Service or the House of Lords, the relevant Decision-Making Bodies⁶ engaged with line managers on internal HR policies and procedures.
- One complaint was found to be vexatious against the respondent, and appropriate steps were taken through the management chain.

⁶ [Decision-Making Bodies](#)

LESSONS AND ISSUES IDENTIFIED FROM ICGS DATA ANALYSIS AND FEEDBACK

The following are examples of issues and lessons we have learned from feedback received from a range of stakeholders, including service users, Trade Unions (representing both Administration staff and MPs' staff) and the external providers.

Importance of the independence of the services

Callers to the Bullying and Harassment Helpline have valued the opportunity to discuss their concerns with the Helpline's trained staff, in a safe-space which is independent of Parliament. A small number of callers expressed concerns about the impartiality of the independent investigators. Concerns originated from callers becoming aware that their complaint was shared with the ICGS Investigation Liaison Lead and based on a couple of independent investigators' imprecise use of terminology. We have made it clear that it is important that the investigator continues to promote their independence throughout their dealings with complainants and respondents.

Trust and confidence

From early feedback, the Bullying and Harassment Helpline identified that callers were worried that certain individuals would be protected by the employer. The Helplines report that this perception has receded as the Scheme becomes more embedded. It is inevitable that some complainants have concerns or reservations, prior to escalating issues through the ICGS. Although a level of anxiety is to be expected, some individuals, particularly longer-serving employees, have expressed concerns about the retribution they believe they could face as a result of complaining about bullying and/or harassment. This has ranged from believing that the respondent would protect themselves at the expense of the complainant's reputation or employment, to knowing that related concerns have been ignored in the past. Independent investigators have noted that some staff have expressed a fear of victimisation or retribution and feeling unsupported by line management. Work pressure also means that individuals find it hard to take time from the working week to participate in the investigation process.

Eligibility

The Bullying and Harassment Helpline identified some issues discussed on the Helpline may be better suited to existing HR or informal options, as a result of issues related to management style, rather than being bullying or harassment.

Management activity

It has been noted by the independent investigators that many of the early cases were long-standing issues, where individuals were trying to re-investigate their concerns with the new scheme. How to address behaviour that falls outside of the Bullying and Harassment and Sexual Misconduct policies is being considered in the work on wider cultural change.

Support for those being complained about

Both Helplines have been contacted by and have provided advice to those about whom complaints have been made. The ICGS Team received requests from multiple stakeholders for improved communication of available support for those who have been complained about or believe that complaints have been made about them. Work has been ongoing to increase the support and communication of that support to people in this position, including through written communication and promotional activity.

The Helplines have confirmed that such support has been provided, when asked for. It is a priority for the ICGS team to ensure that more is known about the available support for not only complainants, but also respondents, witnesses, managers and others.

Process for reporting and improving communications

There was a need for greater publicity of the Independent Complaints and Grievance Scheme. As a result:

- Telephone contact cards were placed in toilets and rest areas on the Parliamentary Estate;
- The ISMA Service gives introductory presentations to staff teams;
- Regular information events have been held in the Portcullis House Atrium; and
- An interactive user guide for complainants was produced, with further guides to be available for respondents, witnesses and managers.

PERSPECTIVES ON PATTERNS OR TRENDS FROM THE HELPLINES AND THE INDEPENDENT INVESTIGATION SERVICES

The following patterns were obtained, following feedback from the 79 contacts to the ISMA Helpline and the 704 contacts to the Bullying and Harassment Helpline between 19 July 2018 and 30 June 2019.

Alcohol

According to feedback from the ISMA Helpline, there is a culture of drinking on the Parliamentary Estate, fostered by the ready availability and comparatively low cost of alcohol, and the extended opening hours of bars on the Parliamentary Estate. ISMA advise that it is well established, both through their experience and through research into this area, that drinking alcohol is often not the cause of the behaviour, but is often the excuse given.

The Bullying and Harassment Helpline has noted that, although alcohol and Parliamentary bars have been mentioned in conversations on the Helpline, this has been a minor factor.

Independent investigators involved with cases of bullying and harassment and of sexual misconduct have not identified any specific issues around alcohol.

Power relationships

Feedback from both Helplines indicate that the majority of cases have involved issues surrounding actual or perceived power imbalances.

The ISMA Helpline reported that more than half of callers were reluctant to report their case due to the fact that the person about whom they were complaining had friends or colleagues in senior positions. The callers were also worried about any negative impact that such a complaint might have on their career opportunities. Several callers described there being 'prolific offenders' who had not been reported to the Helpline or other procedures, for similar reasons.

The Bullying and Harassment Helpline noted that power imbalances were relevant in the majority of cases, with those in senior positions tending to account for a higher percentage of those being complained about than those making a complaint.

GENERAL SCHEME ISSUES

Performance of services

There is regular and ongoing liaison between the ICGS contract manager and the external providers within formal contract meetings and in dealing with complaints and issues as they arise. Issues have largely been around administration and communication with people using the scheme. The providers have been responsive to feedback, which has led to service improvements.

Complaints and compliments

Queries or concerns regarding specific investigations are dealt with by the ICGS Investigation Liaison Lead. If the issues relate to the performance of the contract this is escalated to the ICGS Contract Manager. Issues raised have included;

- **Respondents not feeling supported through the process** - It has been identified that the strict confidentiality requirements of the process leaves respondents feeling that they cannot seek support from line management. We are seeking to address this by issuing a statement on confidentiality which clearly explains where help can be sought. The investigators will go through the statement with all parties involved in the investigation when they first meet them and will leave it with them in a signed copy of the interview notes.
- **Pace of investigation completion** – This has been raised by individuals, Trade Unions, Investigators and the Parliamentary Commissioner for Standards. In the early stages of the scheme, delays were attributed to the need for new process and documentation to be agreed. The ICGS team have taken feedback from investigators on forms and processes and improvements are being made. The forms have been streamlined where possible and, following the recommendations from the Alison Stanley Review work is under way to reduce the stages of the investigation by removing the Initial Assessment Stage. There are also now more formal requirements for providing regular updates to those who make a complaint and those who have been complained about. Requests for improved communication with those involved in investigations resulted in a requirement for investigators to contact participants, at least once every three weeks.
- **Confusing and contradictory information about independence of investigations** – Some complaints have been focussed on the lack of clarity from the investigators around the role of Parliament in the investigations. For example, some complainants have been told incorrectly that a report will go to HR for a decision or that the ICGS team will approve whether an investigation is to proceed. Some of the confusion comes from the misunderstanding surrounding of the role of the Investigation Liaison Lead in quality assuring reports. This is done to ensure that the polices have been applied correctly and that the report meets the standard required. The Investigation Liaison Lead has no input or influence over the assessment of the investigators. At the end of the process, once the investigator has completed their assessment, of

whether on the balance of probabilities the complaint is upheld or not upheld, the full report goes to the Decision-Making Body (DMB) which will consider whether to pursue action. For House staff this may mean taking action under internal HR policies and procedures. Confusion around the role of the DMB has contributed to concerns that HR are involved in the investigation process. We have sought to address this by feeding back to investigators promptly when learning of concerns. These points are also addressed more explicitly with investigators when they are allocated their first complaint.

We have also received positive feedback, from users of the scheme, including the following:

Bullying and Harassment Helpline

- *"Thank you for the conversation, I really appreciate it and feel much more confident regarding the incident and where I stand. Thank you for taking the time to help and support at a time when I was feeling frustrated".*
- *"I would like to express my sincere gratitude and thank you for the time taken supporting with my case. Particular thanks to (Advisor X) and (Advisor Y) for their support [...] at a time when I felt I had no options".*

ISMA service

- *"I would like to thank you for [your] support during a dark time, supporting me no matter what, in my [own] way and time. It was helpful having [her] on the estate to be able to encourage me throughout my ordeal. It enabled me to take one step at a time".*
- *"Your service is really needed".*

Investigation Service

- *"Thank you for your guidance and support during this matter. I appreciate it".*
- *"Thank you for meeting me yesterday, and for your kind and understanding manner throughout the meeting".*

We will continue to gain information from users and providers of the scheme and from all stakeholders to ensure that it continually improves.

TRAINING

The ICGS training “Valuing Everyone” is a core part of the ICGS and is key to achieving the following objective of the staff working group *“to help MPs, Members of the House of Lords and staff across the estate to understand and prevent harassment, including sexual harassment, bullying and discrimination.”*⁷

A procurement exercise for delivery of the training was carried out in December 2018 and Challenge Consultancy was appointed as our training partner.

Shaping the content

Challenge Consultancy worked with the ICGS team and other stakeholders to scope and design training that all members of the parliamentary community would benefit from. Learning from those who had experienced bullying and harassment or sexual misconduct was a key factor in shaping the training. In conversations with many stakeholders across Parliament, Challenge Consultancy heard about a range of experiences. The gathering of stories and information enabled them to create bespoke learning content and materials that would resonate with the experiences of members of the parliamentary community. The training explores the themes of bullying, harassment and sexual misconduct in the context of the Behaviour Code for Parliament and addresses key objectives covering:

- Clarifying what constitutes unacceptable behaviour;
- Gaining understanding of the impact of inappropriate behaviour;
- Signposting the ICGS services and other areas of support; and
- Empowering people to challenge inappropriate behaviour.

The training is designed to help members of the parliamentary community to recognise behaviour that is not acceptable or appropriate and to give them the tools to question such behaviour.

The training also highlights the different ICGS Helpline services and available support. Each person is provided with a course booklet that contains a mini directory of information and contacts for each service and highlights other sources for more detailed policies and procedures.

⁷ [Valuing Everyone training](#)

Rollout of training

A programme of training has been rolled out on a phased basis to different members of the parliamentary community (with flexibility in timings and delivery locations), following successful pilots that started in February 2019. The decision to make the training mandatory for staff of both Houses created a concerted momentum and demonstrated genuine commitment.

Table 5 - Training completed by 30 June 2019

| Participant | Completed | Percentage |
|---|------------------|------------------------|
| House of Commons staff | 594 | 22% |
| House of Lords Staff | 161 | 25% |
| Parliamentary digital service | 39 | 9% |
| MPs | 30 | 5% |
| MPs' Staff | 100 | 3% |
| Members of the House of Lords (training was not offered to Members of the House of Lords until July 2019) | 0 | 0% |
| Staff of Members of the House of Lords | 1 | Not known ⁸ |

⁸ The percentage of Lords Members' staff represented by the figure in the last line of the table cannot be calculated as no central record for the purposes of the ICGS is currently kept of the number of such staff.

Table 6 - Completion/intended completion as at 30 September 2019

| Participant | Completed | Booked | Total | Percentage completed |
|---|------------------|---------------|--------------|-----------------------------|
| House of Commons staff | 997 | 345 | 1342 | 40% |
| House of Lords staff | 254 | 73 | 327 | 40% |
| Parliamentary digital service | 134 | 165 | 299 | 31% |
| MPs | 99 | 18 | 117 | 15% |
| MPs' staff | 150 | 49 | 199 | 4% |
| Members of the House of Lords (training was not offered to Members of the House of Lords until July 2019) | 15 | 9 | 24 | 2% |
| Staff of Members of the House of Lords | 3 | 2 | 5 | Not known ⁹ |

FUTURE ACTIVITY INCLUDING SERVICE IMPROVEMENTS

Improving communications

A number of actions have been or are going to be implemented to improve communication about the scheme and facilities. These include:

- Updating the current ICGS Intranet information to promote the advice services and provide information about how investigations of complaints are managed, with a 'refreshed' site being planned for the Winter of 2019;
- In response to feedback a new gender neutral ISMA email address was introduced in October 2019.

Increasing trust and confidence

The new Bicameral Team will not sit within the Human Resources Department of either House or PDS. This should reduce concerns about confidentiality and independence.

The improvements outlined above for speeding up investigations and simplifying the process should also improve the experience of those involved in the Scheme.

⁹ The percentage of Lords Members' staff represented by the figure in the last line of the table cannot be calculated as no central record for the purposed of the ICGS is currently kept of the number of such staff.

Process improvement

Work is underway to improve process and documentation including:

- **One investigation process** – Combining the initial and formal assessment will reduce time and potential duplication of work, providing an earlier involvement of those who have had complaints made about them;
- **Reduce form filling** – Combining the complaint form and initial meeting note to confirm the specific complaint allegations;
- **ICGS and external investigator liaison** – Clarifying roles, responsibilities and stakeholder requirements and continue to develop effective communication to resolve issues collaboratively to efficiently and effectively deliver investigations promptly.

Focus resourcing to identified need

Resources are being refocused to areas of need; including:

Independent Services

- **Bullying & Harassment Helpline** – Increasing the contract provision in recognition of substantial higher usage of the service than anticipated;
- **ISMA** - Resources targeted to identified need for the operating hours of 9am-6pm Monday to Friday;
- **Investigation Services** – Sustaining and increasing the pool of high-quality external investigators for both the existing scheme and to accommodate the requirements of non-recent cases.

Embedding and Improving external service provision

The contracts for the Helpline services were initially for 12 months. These have been extended by 12 months. Procurement of service for the next two to three years will take place in early 2020. The specification for these services will be based on organisational requirements and feedback from the first 18 months of the ICGS operation.

Implementation of planned improvements, responding to new requirements, including those identified in the 18-month review, is dependent on the continued support of the parliamentary community. A considerable amount has been achieved in the first year of the scheme through this support and it is anticipated that with the establishment of the new bicameral team, activity will continue to support improvements in the culture and working environment within Parliament.

LOOKING FORWARD

Implementation of the Recommendations of Independent Inquiries

Three months after the ICGS was established, Dame Laura Cox's Report, "The bullying and harassment of House of Commons staff", was published.¹⁰ The Report highlighted the extent of alleged bullying, harassment and sexual misconduct that had occurred, for many years, in the House of Commons. The House of Commons Commission accepted all of Dame Laura's recommendations and the ICGS team worked with the House of Commons Commission to implement the second recommendation, that "those House employees with complaints involving historical allegations can access the new scheme". The House of Commons agreed in July 2019 to facilitate this change and also agreed that former members of the parliamentary community should be eligible to bring a formal complaint for investigation and adjudication under the ICGS scheme. The ICGS was extended to include non-recent cases of some former members of the parliamentary community in October 2019. The ICGS team is currently organising the recruitment of the additional expert independent investigators for non-recent and some current cases.

The changes in policy that allow for non-recent complaints and for complaints involving staff who have left Parliament since June 2017 to be considered under the ICGS do not currently apply to staff of the House of Lords Administration or to Members of the House of Lords or to their staff. However, the appropriate authorities in the House of Lords are actively considering whether and how to apply these changes, and how they would operate alongside existing provisions in the Codes of Conduct or the Staff Handbook for dealing with complaints that relate to events that took place before June 2017. The ICGS team is working closely with staff in the House of Lords to ensure the two Houses work together in disseminating the correct information and in planning for any changes to the current arrangements in the Lords.

In July 2019, Naomi Ellenbogen QC's report, "An independent inquiry into bullying and harassment in the House of Lords", was published.¹¹ The report examined the extent of bullying and harassment among staff and Members of the Lords, and some of the behaviours and culture of the House of Lords that need to change to ensure that all those working in the Lords are treated with dignity and respect. The report makes a number of recommendations, some of which relate to the ICGS, which are currently being taken forward by the House of Lords Administration, the ICGS team and the appropriate Member-led bodies.

A staff team, including members of the ICGS team, is progressing with its work on implementing Dame Laura's third recommendation, to consider ways in which the process for determining complaints of bullying, harassment or sexual misconduct will be an entirely independent process, in which Members of

¹⁰ [The bullying and harassment of House of Commons staff: Independent Inquiry Report](#), Dame Laura Cox DBS, 15 October 2018

¹¹ [An independent inquiry into bullying and harassment in the House of Lords](#), Naomi Ellenbogen QC, 10 July 2019

Parliament will play no part.¹² Different options are being worked through by the staff team.

¹² Same as above, page 5