

No.	Recommendation (and paragraph no.)	Implemented?
1	I strongly recommend that the Parliamentary implementation and administration ICGS team is properly resourced with sufficient capacity and capability to undertake the considerable remaining implementation work and contract management role for the Scheme at pace. (para 46)	Yes
2	Organisationally the implementation and administration of the ICGS team should sit outside of any HR department of either House. For implementation of the ICGS to 'be seen to be' a Parliamentary function and not HR-controlled and, given the House of Lords is now covered by the Scheme, I would recommend resourcing and positioning the ICGS team as a bicameral service managed outside of the HR function of either House. (para 49)	Yes
3	The tensions between the importance of confidentiality and data protection and the value of sharing the usage data within the organisation need to be addressed as a matter of priority. (para 51)	Yes
4	I strongly recommend that a retention policy position be agreed with the external suppliers to ensure adequate record keeping. (para 55)	Yes
5	I strongly recommend that a policy decision is made promptly by the ICGS team and, if necessary, agreed with the Boards of each House for the provision of anonymised data under the categories I list above to management teams and a plan to further increase the categories of data over a reasonable period of the next two years. (para 58)	Yes
6	I recommend that, building on current practice, there are regular informal reviews by the helpline contractors internally as to concerns and reactions of callers so as to inform improved advice and handling if required. The ICGS team and the helpline contractors should agree the content, channel and frequency of a light touch satisfaction survey of callers. (para 63)	Yes
7	I recommend that the experience of staff, the operation and impact of the service be fully assessed at the 18-month review of the extended one-year pilot of the ISMA service, together with the plans for the tender for a new three-year contract depending on the stage that has reached. (para 67)	N/A
8	I recommend that the initial assessment stage for the Bullying and Harassment Policy should be operated only as an eligibility check (as defined above), undertaken only by the helpline adviser, if and when the caller decides that they want to make a formal complaint. The initial assessment stage should not be an evaluation of whether there is ' <i>case to answer</i> ': this should be a question for the full investigation carried out by the independent investigator. This should also be considered for the equivalent stage of the Sexual Misconduct Policy. If implemented, the impact of this change should be assessed in the 18-month review. (para 74)	No
9	I would recommend that this ability to request a review remains in place and the impact and effectiveness also assessed in the 18-month review. (para 75)	N/A
10	I would recommend that these points above should be carefully considered in light of the Gemma White QC Inquiry and any recommendations made by her on this issue. (para 82)	Yes
Nos. 11-17: Given the factors set out above directly leading to slow and lengthy investigations, I recommend that the following related actions be taken to improve investigation pace, quality and consistency:		

11	Standards and process: The ICGS team to clearly communicate the required content, format and standards for the investigation reports to the independent investigators, including the requirements of anonymity as to the identity of the complainant and respondent or any identifying facts. Make compliance with this standard a contractual requirement. This should significantly reduce or extinguish the need for the quality assurance process. (para 91)	Yes
12	Standards and process: Review and streamline the process steps involved from the report of a complaint to one of the helplines, the engagement of a suitable investigator to completion of the investigation, minimising the need for ICGS team administration. Alongside review and, where possible, streamline the forms and documentation required. (para 91)	Yes
13	Timescales and communication: Building on the timescales set out in each of the two policies, set timescales for each step of the investigation from first contact of the investigator with the complainant after they have made a report to the helpline to delivery of the final investigation report. (para 91)	Ongoing
14	Timescales and communication: Set target timescales for overall completion of an investigation, dependent on relevant factors, for example the complexity of the case and the number of respondents and witnesses. This should be no more than a month for simple cases to no more than two months for more complex cases. A simple and binding mechanism should be put in place by the ICGS team for investigators to alert if there is an overrun, with a monitored plan for completion as soon as possible. These timescales will directly determine the size of the pool of experienced investigators required. (para 91)	Ongoing
15	Timescales and communication: Formalise the requirement on the investigator to keep the complainant and respondent regularly aware of progress on investigation, on at least a weekly basis or longer if agreed with the individuals. (para 91)	Yes
16	Experience and availability of investigators: Building on the experience of the first eight months of the Scheme, agree with the Commission of each House the specification in terms of experience, skillset and capability required from the independent investigators. This is needed to assess the provision available from the current independent investigators and would also be needed to widen the pool of suitable investigators available as envisaged in the House of Commons Commission proposals for non-recent and recent cases. (para 91)	Yes
17	Experience and availability of investigators: Undertake any renegotiation of contracts with the independent investigation contractors to ensure the required standards, timescales and pace of investigations as set out above and the required experience and skillsets. (para 91)	Yes

18	I recommend that a clear description of the types of sanctions available for each user group (including MPs and Peers), with clear signposting to full detail, be included in the communication products that I recommend in section 5 below and updated promptly when needed. (para 95)	In part
19	In communicating the support services both in hard copy and on the intranet sites, their purpose and which group they are serving should be clearly set out. Rather than listing all the services, only those that are relevant for the particular group should be shown on communications targeted to that group, e.g. the intranet site for Members' staff. (para 101)	Yes
20	I would recommend that, at the 18-month review, the consistency of the policies and approach for handling complaints of bullying and harassment or sexual misconduct across the Parliamentary Community be examined. On the assumption that the strategic intent of having a coherent approach across Parliament still holds good, I would also recommend that the 18-month review indicates the necessary steps, if any, to realign processes and approach to the policies. (para 109)	N/A
Nos. 21-25: 112. From my review on the implementation of the Scheme to date and the conditions necessary for success, there are three elements of accountability that must be clearly stated and attributed to roles in the House. I set these out below, with my recommendations as to the level of seniority and/or leadership required:		
21	Nature of accountability: Accountability for driving the effective and pacy implementation, ongoing smooth-running operation, data collection and monitoring of the Scheme, for each group in the Parliamentary Community.	Yes
	Person or group accountable: On the basis that my recommendations on the ICGS team above being implemented, I recommend that the ICGS Programme Director (heading up the ICGS Team) has this accountability. (para 112)	
22	Nature of accountability: Accountability for ensuring the regular review of the operation and usage of the Scheme and the trends emerging, together with a substantive discussion of its effectiveness, impact on culture and the perception of users. For example: Is the Scheme having the impact it was intended to have in restoring the credibility and confidence of those working for or in Parliament that complaints of bullying and harassment or sexual misconduct are dealt with fairly and independently? Is such behaviour being seen to be dealt with by imposition of appropriate sanctions?	Yes
	Person or group accountable: I recommend that this accountability sits individually with the Clerk of the House of Commons and the Clerk of the Parliaments. In this they could be supported by members of their Executive Board, for instance the House of Commons Clerk Assistant responsible for policy matters, as mentioned above. The substantive discussions would be with the Boards/Commissions of each House. (para 112)	
23	Nature of accountability: Accountability for making any decisions on any changes needed to the policies or operation of the Scheme, based on the above quantitative and qualitative data and analysis.	Yes
	Person or group accountable: I recommend that this accountability sits with respective Commissions, Clerks and Leaders of each House, as relevant. (para 112)	

24	<p>Nature of accountability: Accountability for continuing to deliver on the strategic intention to have one coherent and consistent approach across Parliament, including resolution of issues where changes are proposed but not universally agreed by all groups.</p> <p>Person or group accountable: I recommend that the respective Clerks, in consultation with the Leaders and Shadow Leaders of each House, establish a formal bicameral group of MPs, Peers, House senior managers/leaders and trade unions and staff representatives. Given the key role of the independent Commissioners for Standards in each House in decision making and imposing sanctions, I would expect consultation with them would also be valuable. This bicameral group would be collectively tasked to share monitoring data and best practice, as well as discussing any issues being raised or changes being proposed.</p> <p>This bicameral group must have clear terms of reference and mandate to enable it to be an effective and binding mechanism for making joint decisions, which are recognised by each Commission or equivalent body. As some changes will be subject to the decision of either or both Houses, the active participation of and championing by the MPs or Peers on this group is essential. (para 112)</p>	In part
25	<p>Nature of accountability: [same as recommendation 24]</p> <p>Person or group accountable: [continued from recommendation 24] Alongside this bicameral group, I recommend that ensuring that the strategic intent remains strong be an ongoing role for the House of Commons Commission and the House of Lords Commission. (para 112)</p>	Yes
26	<p>Given its value in cultural and behavioural change, I recommend that the <i>Valuing Everyone</i> training should be mandatory for all House, Members' and Peers' staff and contractors, to be completed within one year from the date of this Report, including holding training sessions at regional centres for constituency office staff to make them more accessible. In any event, I recommend actively monitoring the run rate for bookings and attendance to ensure that the target audience has been covered within a reasonable time and to identify any gaps to relevant team managers and senior management. (para 124)</p>	In part
27	<p>I would therefore recommend that the training for line managers is reviewed to assess whether it adequately covers this aspect of the concerns and needs of line managers [uncertainty, disempowerment and lack of clarity as to role when a member of their team is involved in an investigation]. (para 125)</p>	No
28	<p>Building on the commitment they have already made to changing the culture for the better, I recommend that both Houses take this opportunity to make a decision that all MPs and Peers attend the <i>Valuing Everyone</i> training. This mandating of themselves to do so will send a clear and powerful message to the whole Parliamentary community and externally that they are committed to changing the culture for the better. This is about MPs and Peers valuing the Parliamentary community and everyone being part of that same community, so taking responsibility to improving the culture, participating in this key training to help everyone to understand how to work together better, whether on the Parliamentary estate, in constituency offices or elsewhere. (para 128)</p>	In part

29	I also recommend that the decision set a time period for completion, namely that all MPs and Peers do so within one year from either the date of my report or from the date of their election or appointment (whichever is later). (para 129)	In part
30	I would recommend that the Good Employer Standard needs to be implemented by the end of this calendar year. (para 134)	No
31	I would recommend that on a regular basis (at least annually) the independent contractors take part in promotional events both on the Parliamentary Estate and regionally to raise awareness and visibility of their services. (para 145)	In part
Nos. 32-39: My recommendations to address awareness, understanding and communications are set out below.		
32	It is essential that the purpose and importance of the ICGS and its associated policies and procedures are not lost within wider cultural workstreams or the outcome of forthcoming independent inquiries. So, a separate intranet page for the ICGS should be set up for each user group, with a link from the homepage. For the House of Commons this should be separated from the Cox Inquiry Action Hub. In the House of Lords, care must be taken not to lose the current prominence of the ICGS when there are communications about the forthcoming report from the Naomi Ellenbogen QC inquiry. (para 158)	In part
33	The place of the ICGS within wider actions being taken on leadership, management and culture should be clearly explained across the Parliamentary community. When core communication messages about changing culture in Parliament are further developed, and responses to recommendations of Dame Laura Cox, the Gemma White QC and Naomi Ellenbogen QC inquiries are made, the impact (if any) of these on the ICGS should be explained but not confused with the Scheme and its operation. (para 159)	Yes
34	To address the current low level of understanding of the policy and processes, implement a fresh 'user group' and 'user journey' approach to their communication, to provide clear information and to replace current signposting to the Delivery Report. (para 160)	In part
Nos. 35 – 37: As part of this fresh communication approach, working with the ICGS Team, a new set of communication products should be developed, comprising of:		
35	Refreshed communication content on the helplines to ensure that the messaging is clear that they are available to provide advice and support, separate and in addition to them being the route to report inappropriate behaviour. This could include consideration as to whether the "Bullying and Harassment Reporting Service" should be renamed to remove the emphasis on reporting. (para 161)	Yes
36	Publication of streamlined and practical separate documents for each of the existing Bullying & Harassment and Sexual Misconduct Policies by separating out policy from procedure. When information is not strictly policy or procedure but is helpful, it should be set out in new accompanying FAQs. This opportunity should be used to clarify some of the terms that have caused confusion and concern to date such as "decision-making body" and where differing terminology is used in the policies referring to the same step or activity risking confusion. (para 161)	No

37	Publication of clear flowcharts from the perspective of each main user group showing the step-by-step process. As a bare minimum the 'user groups' should include the reporter/complainant, the respondent and the line manager of the respondent. (para 161)	In part
38	To both increase understanding and ease of availability, particularly when people are under stress, there should be prominent signposting to these new products, flowcharts, FAQs and helpline numbers in all relevant information, including staff handbooks, manager's guides and induction materials and available in hard copy for all those who do not have access to the intranet. (para 162)	In part
39	To address the issue of raising awareness amongst all the groups in the Parliamentary Community, ensure that all senior managers implement a communications plan to their group so that they are aware of and can easily access the helplines and the new products. The Communications team should implement a communications plan to ensure that constituency office staff are reached and regularly updated using all relevant channels including hard copy products. (para 163)	Yes
40	To the extent it is not already happening, I strongly recommend that senior leaders in both Houses communicate the importance of team leaders and line managers having open discussions with their teams on working together based on the Behaviour Code and, crucially, role model doing so. To be most effective, these are not one-off discussions but an ongoing dialogue. I recommend that these start immediately and be built upon in the subsequent rollout of the cultural change work/initiatives over the next year. Particular attention and focus should be paid to reaching constituency office staff to ensure the Behaviour Code gets embedded fully across the Parliamentary community. (para 174)	Yes
41	I would recommend therefore that the elements set out in paragraph 229 of the Cox Report are used as a checklist against which to assess action taken on my recommendations and the policy, procedure, communications and operation of the Scheme on an ongoing basis. (para 178)	Yes
42	I agree with the amendments relating to the definition of victimisation and recommend that these helpful additions are made and communicated as part of the new approach to Communications I recommend in section 5 of my Report. (para 179)	No
43	I recommend that an express reference to gendered bullying is inserted into both policies. I also recommend that the full wording on intersectionality in the sexual misconduct policy is also inserted into the Bullying & Harassment policy. These changes should be communicated as part of the new approach to Communications I recommend in section 5 of my Report, as well as the message that bullying and harassment or sexual misconduct can be affected by protected characteristics, including how those characteristics intersect with each other. (para 181)	No
44	I recommend that legal representation at hearings is not permitted, although complainants and respondents can of course choose to seek legal advice and support if they so wish. (para 184)	Yes

45	I would strongly recommend that more generally the duty of confidentiality is emphasised in ongoing communications and training on the Scheme and to all parties at each stage of the process. If it has not already been considered I recommend that an assessment is made of whether existing contractual provisions in employment across the Parliamentary Community, including between MPs and their staff, are sufficient for addressing any breaches of confidentiality under these policies. I recommend that the respective Commissioners and the appropriate Committees in each House review and consider the position on confidentiality in relation to MPs and Peers prior to the 18-month review. (para 191)	In part
46	Therefore, I would recommend that any relevant recommendations and responses to such recommendations [White and Ellenbogen], that have not been addressed by my review, are incorporated into the 18-month review. (para 195)	N/A
47	In line with the House of Lords' Committee for Privileges and Conduct recommendation on third party reporting, it should continue to be the position in the House of Commons that third parties cannot formally report behaviour under the ICGS policies and procedures. However, the role of the 'bystander' should continue to be distinguished from third party reporting by being explained, highlighted and valued both in the <i>Valuing Everyone</i> training and in other cultural change initiatives, including the strengthening of leadership and management capability and practice across the Parliamentary Community. Those witnessing inappropriate behaviour or noticing the effects of it can currently contact the helplines for advice and support and should be actively encouraged to do so. (para 203)	In Part
48	It would be best practice that the decision-making body should be made aware if there are a number of reports about the behaviour of the same person. To introduce such cluster reporting a number of policy decisions need to be made. In the first instance, in order to practically allow for cluster reporting, the relevant data needs to be being collected and stored by the requisite helplines. Furthermore, a threshold for each of Bullying and Harassment and Sexual Misconduct should be agreed at the most senior level; and a decision made on what further action can be taken once such threshold has been met. (para 209)	In part
49	In order to decide on these policy decisions, understanding how cluster reporting would operate fairly and effectively in practice would be essential. Once the ICGS, including the Sexual Misconduct Policy, has been effectively implemented, improved anonymised data and trends, together with qualitative feedback on an anonymised basis from the helplines will be available and there should be experience of complaints proceeding from investigation to decisions and sanctions. I recommend therefore that this issue is revisited when the ICGS has been in place for at least one year, with the resulting data and experience, and an appropriate bicameral working group be established to consider it. (para 210)	No

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The ICGS should not be extended to cover visitors to constituency offices at this stage. In its early stages of implementation, focus and resources should be dedicated to ensuring the Scheme works for the core Parliamentary community as a workplace complaints and grievance scheme. In evaluating the operation and impact of the Scheme at the 18-month Review, if there have been material changes in the circumstances, consideration could be given to this issue again. (para 217)

No